Mr. Christophe Hansen

Commissioner Agriculture and Food

Ms. Roxana Mizatu

Executive Vice President Social Rights and Skills, Quality Jobs and Preparedness

Mr. Olivier Varhelyi

Commissioner Health and Animal Welfare

SUBJECT: Evaluation of the EU Tobacco Control Framework

Dear Commissioners,

UNITAB Europe, the European Tobacco Growers Association and FETRATAB, the European Tobacco Processors Association, are writing in relation to the European Commission's recent evaluation report of the EU tobacco control framework (SWD(2026) 111 final). UNITAB and FETRATAB fully support evidence-based policymaking and recognizes the Commission's public health objectives, however, we are concerned that the evaluation does not sufficiently reflect the practical implications of existing and prospective regulatory measures on the lawful agricultural and commercial system underpinning the European tobacco and nicotine market. Moreover, in the Evaluation Report Commission is ignoring the concerns of the European farmers and other crucial economic, and social stakeholders. More specifically, the evaluation appears to give limited consideration to the consequences for farmers and rural communities, grower organizations, tobacco processing companies, and regional economies, as well as to the extent to which illicit trade already undermines these actors.

We therefore encourage you to ensure that these implications are taken into account in the future, in particular in the impact assessment and possible legislative proposal.

Implications for Farmers and Rural Communities

In our assessment, the evaluation gives inadequate weight to the broader agricultural and rural ecosystem that sustains the legal tobacco supply chain in Europe and beyond. In several Member States, including Bulgaria, Greece, Italy, Spain, Croatia, Poland, and Hungary, tobacco cultivation continues to represent a vital source of income, seasonal employment, exports, and economic stability for rural areas.

Changes affecting the legal market therefore risk triggering cascading effects well beyond manufacturers and retailers, directly impacting growers, processors, logistics operators, and rural households that are already facing significant economic pressure.

The Commission is ignoring its own agricultural and rural strategies

The CAP should support farmers and their livelihoods, while also improving productivity. But its aim and implementation programs being ignored by this TPD revision.

"Rural proofing" is a core element of its Better Regulation framework. It represents a structured process to identify, assess, and mitigate the territorial impacts of EU policies on rural areas, ensuring that legislation supports balanced development and rural viability. It takes places via:

- **Impact assessments** to determine territorial impacts (urban vs rural), regional disparities, and effects of specific sectors (such as agriculture)
- **Territorial tools**, which often feature analysis from the European Observation Network for Territorial Development and Cohesion
- **Consultation processes**, which involve stakeholders including farmers, rural authorities, and Member State input via Council working groups
- **Policy adjustment** if rural impacts are identified, which could include derogations, targeted funding/support measures, and regulatory flexibility.

None of this has been done!!

These omissions constitute a material analytical gap, which risks limiting the robustness of the evidence base for future policy decisions and exposing agricultural value chains to unintended shocks.

Introducing additional regulatory burdensome on this basis would further strain already vulnerable farming systems and contradict objectives on competitiveness, resilience, strategic autonomy and rural development, repeated political priorities in Council conclusions and Commission's intentions. UNITAB and FETRATAB further consider that any substantial regulatory change should be examined not only from a public-health perspective, but also through the lenses of rural economic resilience and European competitiveness. This is particularly relevant where policy choices risk accelerating a contraction in legal demand in the absence of a clear and credible transition framework for affected producers and communities. Moreover, further restrictions may have the unintended effect of distorting agricultural supply chains in favor of producers located outside the European Union.

Against this background, it is notable that the Commission's evaluation does not appear to include a sufficiently visible assessment of the potential impact of the current Tobacco Products directive on rural communities, agricultural livelihoods, supply chains, territorial cohesion, and local resilience. This is despite the explicit expectation that such “rural-proofing” considerations should be systematically integrated into EU policymaking, as set out in the Better Regulation guidelines and reaffirmed by the Polish Council Presidency in 2025. We therefore call the Commission to carefully revise the Evaluation Report including a comprehensive analysis and assessment of the impacts on agricultural value chains.

Council conclusions – issued by the 27 Member States as their voice in Brussels-based deliberations - on the Long-Term Vision for the EU’s Rural Areas, as well as on a Farmer Focused post 2027-CAP, endorse the Rural Action Plan and Rural Pact and call for action to keep rural areas populated and viable.

These conclusions stress the essential role of agriculture in creating employment, innovation and diversified incomes in rural economies. This is particularly important given the location of many tobacco growing operations in disadvantaged regions and the potential abrupt regulatory shocks that revisions to the TPD can create. Yet this is ignored.

Illicit Trade and Weakening of the Legal Market

We are also concerned that the evaluation does not adequately reflect the link between regulatory pressure and the expansion of illicit trade. The Commission’s own documentation acknowledges ongoing challenges related to traceability, enforcement, cross-border sales, and effective market oversight. These issues warrant greater attention.

Experience across multiple jurisdictions shows that excessive restrictions do not remove demand but instead push it into illegal channels, often supplied from outside the EU, to the detriment of compliant European operators.

As the first actors in the value chain, processors and growers are directly exposed to these shifts. Reduced legal demand means lower leaf purchases, contract cuts, and income instability for farmers, with wider spill-over effects including potential losses in processing and logistics jobs, as well as harm to rural employment and investment.

Where regulatory requirements advance more rapidly than enforcement capacities, consumption risks being diverted from regulated markets into illicit or unregulated channels, where transparency, tax compliance, product oversight, and age-control mechanisms are weaker or absent altogether. These risks are particularly pronounced in eastern border Member States, as recently highlighted in the Commission’s Pact for the Eastern Border Regions (COM 2026/82), yet they do not appear to have been fully taken into account in the evaluation.

Such developments affect not only public authorities and enforcement bodies, but also the lawful agricultural and commercial ecosystem—including farmers, grower organizations, processors, and other mid-chain actors—whose viability depends on stable and transparent legal markets.

The Commission is ignoring agriculture’s support of transformation in the sector

As manufacturers are shifting the production to innovative products, leaf growers are supporting the transformation of the sector as this also provides a vision for the future and long-term sustainability of the thousands of SMEs involved across EU Member States in the cultivation of tobacco. Tobacco growers often operate diversified farms and are also food producers, strongly relying on regulatory stability to plan cropping patterns, long-term contracts, while supporting innovation and succession. In regions where tobacco cultivation and processing form a core part of the local economy and alternative opportunities are limited, stability and innovative processes directly supports rural employment and cohesion. This exemplifies successful and sustainable just transition, enabling agricultural goals to be met.

Need for a More Comprehensive Assessment

For these reasons, UNITAB and FETRATAB believe that any future revision of the EU tobacco control framework should be supported by a more complete and balanced assessment addressing:

- the effects on European agricultural producers and rural employment, including through a dedicated rural-proofing impact assessment;
- the implications for European agricultural competitiveness;
- the risk of diverting lawful economic activity into illicit channels;
- the practical enforceability of regulatory measures across Member States; and
- the long-term sustainability of a transparent and well-regulated supply chain.

UNITAB and FETRATAB remain fully committed to constructive engagement as this process evolves and would welcome the opportunity to discuss these matters further. The Associations believe that such an exchange would allow you to contribute to a more informed consideration of the agricultural, rural, and supply-chain implications of future policy decisions.

In this respect, in view of the upcoming “wide consultation process”, we call on the Commission to carry out dedicated and structured consultations to ensure that farmers’ and processors views are adequately reflected in the decision-making process, given the significance of this matter for thousands of workers across the EU.

Yours sincerely,

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