Ministry of Health, Welfare and Sport

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Subject Ratification Protocol to Eliminate Illicit Trade in Tobacco Products and update measurement TNCO

Our reference
1369203-178340-VGP

All correspondence addressed to the postal address quoting date and reference of this letter.

Dear Mr. Andriukaitis,

I hope this letter finds you well.

Further to our earlier contacts I would like to inform you on two recent developments on tobacco control in the Netherlands: the situation of ratification of the WHO Protocol to Eliminate Illicit Trade in Tobacco Products (hereafter: Protocol) and the results of research conducted by the Dutch National Institute for Public Health and the Environment (RIVM) on measurement methods for tar, nicotine and carbon monoxide yields of cigarettes. A summary of the alarming results you will find enclosed in the appendix to this letter.

First, I am happy to bring you the good news that the Netherlands will ratify the Protocol as soon as possible, including legislation in 2019.

Secondly, I would like to inform you about the results of the research by the RIVM. As you know the RIVM published the results of their research on tar, nicotine and carbon monoxide (TNCO) emissions measured by the Canadian Intense (CI) method. These results show that smokers inhale considerably more toxic substances in comparison with measurements following the ISO method. These differences of TNCO emissions between the ISO method and the Canadian Intense method are mainly caused by a high extent of filter ventilation.

In our meeting on the 23rd of April we talked about the possibility to explore an alternative method to measure TNCO levels in cigarettes. I was very pleased by your offer to explore solutions in an expert meeting in Brussels. This expert meeting took place on the 6th of June. Unfortunately, the meeting did not result in a proactive strategy to explore alternatives for the ISO-method on a short notice. One week after this meeting, the RIVM published the results of their research. In my opinion, these results are very alarming.

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In the Netherlands, about 20.000 people die every year as a result of smoking-related diseases. Therefore I want to do everything in my power to prevent young people start smoking and help smokers quit smoking. I will continue putting this issue on the agenda in meetings in Brussels, in the preparation of the Conference of Parties in Geneva this October and in meetings with my European colleagues. I would like to ask you, given the alarming results of the RIVM research, to concretize your following steps on short-notice in preparation of the evaluation of the Tobacco Productive Directive. In this way, we can explore which extra steps we can take together until the evaluation starts.

Yours sincerely,

Paul Blokhuis
State Secretary for Health, Welfare and Sport

Appendix A:

The Canadian Intense method for determining tar, nicotine, and carbon monoxide contents in cigarette smoke produces at least twice as high levels of toxic emissions as the ISO method

As commissioned by, and in collaboration with, the Office for Risk Assessment and Research of the Netherlands Food and Consumer Product Safety Authority, the Dutch National Institute for Public Health and the Environment (RIVM) and the department of Pharmacology and Toxicology of Maastricht University are conducting research into the emission of toxic substances in cigarette smoke.

The data in the table below are taken from the manuscript titled "The influence of cigarette filter ventilation on aldehyde yields in cigarette mainstream smoke of 11 Dutch brands using four different machine testing protocols", which will shortly be submitted for publication in a scientific journal. The table shows that the average tar, nicotine, and carbon monoxide (TNCO) contents as measured by the Canadian Intense (CI) method are at least twice as high as the contents measured by the ISO method, which is the current standard by-law. Smoking parameters of the more intense CI method are closer to human smoking behavior. The largest difference in TNCO contents between the two methods arises for cigarettes with the lowest TNCO yields in the ISO method. These cigarettes have more filter ventilation holes, which are taped over in the CI method – similar to smokers blocking these holes with their fingers and lips during smoking.

Table 1: TNCO contents, as provided by manufacturers, measured by the ISO method vs. TNCO contents measured by the RIVM by means of the CI method. According to the tobacco product directive (2014/40/EU) cigarette smoke is permitted to contain a maximum of 10 mg/cigarette of tar, 1 mg/cigarette of nicotine, and 10 mg/cigarette of carbon monoxide.

Brand	Tar (mg/cigarette)			Nicotine (mg/cigarette)			CO (mg/cigarette)		
	ISO	CI	CI/ISO ratio*	ISO	CI	CI/ISO ratio*	ISO	CI	CI/ISO ratio*
1.	1	17	17	0.1	1.2	12	2	27	14
2.	4	23	6	0.4	1.5	4	5	24	5
3.	8	20	3	0.6	1.7	3	9	26	3
4.	10	34	3	0.8	2.0	3	10	26	3
5.	10	34	3	0.8	2.0	3	10	28	3
6.	10	37	4	0.8	2.1	3	10	29	3
7.	10	29	3	0.9	1.8	2	10	25	2
8.	10	30	3	0.8	2.0	3	10	28	3
9.	10	29	3	0.8	1.9	2	10	25	3
10.	10	39	4	0.8	1.9	2	10	24	2
11.	10	34	3	0.8	1.7	2	10	29	3

** The CI / ISO ratio shows how many times the emission level measured by the CI method is higher than the level measured by the ISO method.*