

FSFW sees new report as undermining progress needed to end smoking

ISLAMABAD: The Foundation for a Smoke-Free World (FSFW) has expressed reservations over the omissions in the Report of the 10th Meeting of WHO Study Group on Tobacco Product Regulation (TobReg).

In an analysis addressed to the Executive Board of the World Health Organization (WHO), which will consider the report in its 148th session currently underway, FSFW says the highly influential document will critically undermine progress needed to end smoking because of its failure to highlight the potential benefits of tobacco harm reduction—an approach which could save 3 million lives annually by 2060.

FSFW analysis maintains the TobReg study group, mandated to advise WHO about evidence-based interventions that can enable Member States to fill the regulatory gaps on tobacco control, should have ensured that its 10th meeting also deliberated on issues related to the regulation of new and emerging tobacco products, including Electronic Nicotine Delivery Systems (ENDS) and Heated Tobacco Products (HTPs). “Yet, the report indicates that any discussions on this topic were incomplete and their evidence base wanting.”

FSFW noted significant oversights in the report—deficiencies that are troubling given the potential for TobReg to influence regulatory narratives ahead of the Ninth Conference of the Parties (COP9) to the WHO FCTC. However, the three critical oversights relate to harm reduction, evidence base, and product differentiation.

The report has failed to explicitly address the benefits of harm reduction as a strategy to achieve a decline in death and disease caused by combustible cigarettes. It has painted Harm Reduction Products (HRPs) as a threat to tobacco control, and by narrowly focusing on demand and supply issues, has missed offering a balanced assessment of the potential of HRPs to reduce smoking rates as demonstrated in countries such as the UK, Japan, Sweden, and South Korea.

Secondly, the report does not provide adequate references and is not accompanied by an impeccable evidence base. Its recommendations are based on information contained in documents that are either not referenced or are still in preparation, and as such, lack transparency. “Many of the report’s statements are contradicted by other sources including those used by FDA and Cochrane reviews in their assessments of heated tobacco products and e-cigarettes.... The study group’s report can hardly be characterized as providing helpful guidance if the scientific basis of their recommendations is not provided.”

Thirdly, the report did not differentiate between emerging and novel products such as ENDS, Electronic Non-Nicotine Delivery Systems (ENNDS), and HTPs. This distinction is important because the risks and benefits of each product can greatly vary. Its recommendations primarily focus on HTPs. “Indeed, clear recommendations for e-cigarettes and other products are difficult to glean from the report,” the statement maintains.

While encouraging focus on evidence-based measures, the report cautions against being distracted by the promotion of novel tobacco products. FSFW sees this recommendation as promoting the status quo in tobacco control despite the fact that existing tobacco control approaches are yet to yield the desired reduction in smoking rates. “Its vague allusion to novel products also disregards the almost 100 million people who use such products across at least 40 countries,” the analysis points out, terming this omission as a missed opportunity to promote health via innovation in this space.

Another recommendation talks about ensuring that the public is well-informed about the risks associated with HRPs. FSFW argued that just as it is critical to inform the public about the risks of using a certain product, it is equally important to share information about positive outcomes associated with it. “In the case of HRPs, TobReg assesses the negative consequences of adoption but fails to consider the potential benefits among smokers,” the analysis states. Moreover, the report has also failed to address public misconceptions about the relative risk of nicotine, HRPs, and combustible cigarettes.

In another recommendation, the report underlines the need to rely on independent data and research, and to critically analyze and interpret tobacco industry-funded data. In this context, FSFW believes TobReg needs to consider strategies that enhance public access to research funded by the tobacco industry as such research is routinely used by regulatory bodies like the USFDA because of its scientific merit and potential utility.

The FSFW statement sees TobReg’s treatment of HRPs as marking a departure from emerging consensus regarding the promise of these products. “The recommendations imply that HRPs threaten health, undermine tobacco control policy, and provide no benefits to combustible users. This stance, if absorbed by governments, will reinforce use of combustible products and ultimately subvert efforts to curb deaths caused by smoking,” it concludes.