

Date:
15 October 2004

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EU Commission
Attn. Commissioner D. Byrne

Dear Sir,

Swedish Match welcomes the Commission's initiative on "Enabling Good Health for All: A reflection process for a new EU Health Strategy". As indicated in the reflection process document, not all European citizens today enjoy the same level of health. As stated in the document and in the speech given by Commissioner Byrne in the EPC workshop of July 17.2004 titled "Good health for all", Sweden is the best example of good health with the lowest mortality rate, lowest lung cancer incidence rate and the longest life expectancy.

In view of the Swedish example cited by Commissioner Byrne and the health risks identified by him in relation to cigarette smoking it is important to consider the fact that Sweden has a very different tobacco consumption pattern compared with the rest of the European Union. Sweden has allowed the sale of the smokeless tobacco product snus and throughout the 20th century a significant part of the male tobacco users have used snus rather than cigarettes. We believe that this, coupled with effective anti-smoking policies have resulted in the lowest incidence of male smoking in the European Union. Snus is recognized in the scientific community as being much less hazardous than cigarettes.

The Swedish experience shows that there are less harmful tobacco products than cigarettes and that given a choice significant numbers of tobacco consumers will opt for these safer alternatives thus reducing tobacco related illness. The Swedish experience is not only relevant to adult tobacco users but also to young people. For instance the prevalence of daily smoking among 15 year old boys is reported to be 5.7 % in Sweden which is by far the lowest in the European Union and much lower than reported figures from its neighboring countries Finland (22.1 %) and Denmark (13.7%).

Swedish Match invites the Commission to adopt a new strategy on tobacco control which would better protect citizens from hazardous effects of tobacco consumption by allowing the consumers to chose less hazardous products rather than restrict such choice through a ban on snus and certain other smokeless tobacco products. Such policy could be coupled with a regulatory regime on smokeless products setting maximum levels of certain hazardous

Swedish Match AB (publ)

Postal address: Visiting address:
SE-118 85 Stockholm
Sweden

Phone: Rosenlundsgatan 36
+46 8 658 02 00
Registered Office: Stockholm

Fax:
Legal: +46 8 668 6232

constituents where Swedish Match's voluntary standard Gothiatek® may serve as an inspiration. For more information about the Gothiatek® standard see www.gothiatek.com. For the purposes of this consultation on "Good Health for All" Swedish Match limits itself to this submission while remaining at the disposal of the Commission for providing the most recent scientific and statistical evidence on the above.

Yours sincerely,

Bo Aulin
Senior Vice President
Secretary and General Counsel
Swedish Match AB

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