



## Call for Evidence – Revision of EU Rules on Tobacco Products and Tobacco Advertising

ASH Finland strongly welcomes the European Commission's initiative to revise the Tobacco Products Directive (TPD) and the Tobacco Advertising Directive (TAD). We support a comprehensive strengthening of EU tobacco and nicotine legislation to better protect public health and achieve a tobacco-free generation by 2040. Revision is necessary, as current regulations have not kept pace with new nicotine products, digital marketing practices, and rapidly evolving markets.

**The primary objective of the revision must be the protection of children and young people from nicotine addiction.** Most nicotine use begins in adolescence or early adulthood. Nicotine pouches, e-cigarettes, and other novel nicotine products often include features that appeal to young people, such as flavours, attractive packaging design, discreet use, and social media marketing, all of which lower the threshold for experimentation.

**The revised TPD should cover all nicotine-containing products regardless of product type, including nicotine pouches, heated tobacco products, synthetic nicotine products, and future emerging products.** The current notification system should be replaced with a pre-market authorization system that assesses products' addictiveness, appeal to young people, environmental impacts, and risks of regulatory circumvention.

**The revision of the TAD should address digital marketing** by prohibiting all direct and indirect promotion of tobacco and nicotine products, including influencer marketing, sponsorship, social media content, livestreaming, and brand stretching.

**Regulation of flavours and product design should also be strengthened.** The ban on characterizing flavours should apply to all nicotine products. In addition, standardized packaging, stronger health warnings, and restrictions on product design are key measures to reduce product attractiveness, particularly among young people.

**The EU should also strengthen the implementation of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) and increase its awareness among Member States.** Policymaking must remain independent from tobacco and nicotine industry influence.

**Finland aims to eliminate the use of tobacco and nicotine products, reflecting a long-term public health strategy focused on protecting children and young people.** Experience shows that strong national measures can reduce use, but also that national regulation is limited when marketing and supply chains operate across borders.

The rapid spread of nicotine pouches across Europe highlights the need for EU-level harmonization to reduce regulatory fragmentation, prevent circumvention, and ensure a high level of health protection. **Strong EU-level regulation is essential to achieving a tobacco-free and nicotine-free generation in Europe. At the same time, Member States should retain the ability to adopt stricter national measures where necessary.**

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*ASH Finland (Action on Smoking and Health) is a national public health organization and tobacco policy expert established in 1989. Our goal is a tobacco- and nicotine-free Finland.*

## Research evidence and references:

- 1. Nicotine is a highly addictive and toxic substance that adversely affects the human body.**  
*Münzel, T., Crea, F., Rajagopalan, S., Lüscher, T. (2025). Nicotine and the cardiovascular system: unmasking a global public health threat. European Heart Journal 2025 Dec 18;47(15): 1764-1781.*
- 2. Nicotine is particularly harmful to children and adolescents.**  
*England, L. J., Aagaard, K, Bloch M. et al. (2017). Developmental toxicity of nicotine: A transdisciplinary synthesis and implications for emerging tobacco products. Neurosci Biobehav Rev 2017, 72: 176–89.*
- 3. As brain development continues into early adulthood, disruptions to this process can impair attention, learning, and memory, and increase the risk of anxiety and depression. Nicotine exposure may also have long-lasting adverse effects on brain development.**  
*Leslie, F.M.. (2020). Unique, long-term effects of nicotine on adolescent brain. Pharmacol Biochem Behav. 2020 Jul 30, 197: 173010.*
- 4. Children and young people are especially vulnerable to nicotine addiction and the adverse health effects of nicotine exposure.**  
*Mahajan. S.D., Homish, G.G., Quisenberry A. ( 2021). Multifactorial Etiology of Adolescent Nicotine Addiction: A Review of the Neurobiology of Nicotine Addiction and Its Implications for Smoking Cessation Pharmacotherapy. Front. Public Health 2021, 9: 664748.*
- 5. The products are deliberately designed, marketed, and distributed to maximize youth appeal, uptake, dependence, and use.**  
*Maddox, R., Freeman, B., Pisinger, C., Banks, E. (2026). Availability, appeal, and addictiveness by design: Tobacco and nicotine industry deliberate targeting of youth. PLoS Med 23(5): e1005133.*
- 6. Youth nicotine and tobacco use in Finland has shifted structurally in recent years, with nicotine pouches and e-cigarettes emerging as key products. Use is significantly more common among students in vocational education compared to upper secondary school students, and poly-use of multiple nicotine products has increased.**  
*Ollila, H., Ruokolainen, O. (2025). Use and acquisition of tobacco and nicotine products among youth between 2017 and 2025. Data Brief 36/2025. Finnish Institute for Health and Welfare, Helsinki.*
- 7. Nicotine pouches are the most widely used nicotine products among young people in Finland.**  
*Ollila, H., Ruokolainen, O. (2025). Use and acquisition of tobacco and nicotine products among youth between 2017 and 2025. Data Brief 36/2025. Finnish Institute for Health and Welfare, Helsinki.*
- 8. Novel nicotine products may also act as a gateway to cigarette smoking.**  
*Golder, S., Hartwell, G., Barnett, L.M. et al. (2025). Vaping and harm in young people: umbrella review. Tob Control. 2025 Aug 19:tc-2024-059219.*
- 9. Nicotine addiction is associated with an increased risk of later alcohol and drug use.**  
*U.S. Department of Health and Human Services. The Health Consequences of Smoking: 50 Years of Progress. A Report of the Surgeon General. (2014). Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2014.*
- 10. Flavourings mask the bitter taste of nicotine. In addition, menthol may increase nicotine absorption in the body and thereby contribute to the development of nicotine dependence.**  
*DeVito, E.E., Krishnan-Sarin, S. (2018). E-cigarettes: Impact of E-liquid Components and Device Characteristics on Nicotine Exposure. Curr Neuropharmacol 2018, 16: 438-459.*

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