

Dear members of the WHO Independent High-level Commission on NCDs,

the responsible parties for implementing the FCTC (tobacco control) seem to have lost sight of some of the laudable initial purpose as stated in Article 1:

*(d) “tobacco control” means a range of supply, demand and **harm reduction** strategies that aim to **improve the health of a population** by eliminating or reducing their consumption of tobacco products and exposure to tobacco smoke;*

- None of the strategies presented even mention “harm reduction”.
-
- There is no evaluation of the success of currently implemented measures concerning the “health of a population”.
-
- For this the main factor (long term) should be prevalence of tobacco related diseases in this population.
-
- A second factor (short term) is the smoking prevalence in the population, which will allow an extrapolation for the development of the main factor.
-
- Instead all the parties of the FCTC only present the so-called “Tobacco Control Scale” as a supposed measure of success. But this “scale” doesn’t factor any of these measures of “the health of a population”. Is this important goal really irrelevant?
-

No consideration is given to the scientific facts that there are alternatives to smoking that are far less harmful. E.g. vaping ecigs (derogatorily called ENDS) and processed smokeless tobaccos like Swedish snus. In fact they are rather summarily dismissed and called to be arbitrarily banned.

There has been no serious evaluation of the success of the current strategies and the influence of other factors regarding the actual health of populations.

The strategies haven’t been changed or evaluated in years. All they call for is increasing taxes and prohibiting anything with nicotine (except for pharma products) as far as possible.

This shows the symptoms of another NCD: Compulsive gambling!

The gambler insists on sticking to his preconceived strategy even if it doesn’t produce the expected results. He ignores all alternatives, attempts to reason, and the negative effects (losses) this strategy might have produced and continues compulsively.

It is urgent that the participants of the FCTC step back from this unhealthy obsessive mind set and reconsider the original intent of the FCTC they signed.

Kind regards,

Norbert Schmidt
Member of the board
Independent German consumers organisation
Interessengemeinschaft E-Dampfen e.V.



<https://ig-ed.org>