

Ms Stella Kyriakides  
Member of the European Commission  
European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels  
Belgium

Brussels, XX.XX.XXXX

**Subject: TPD Evaluation and impact on small and medium sized tobacco growers**

Dear Commissioner Kyriakides,

We are writing you concerning the upcoming review of the Tobacco Product Directive (TPD). According to the Europe's Beating Cancer Plan implementation roadmap, the evaluation of the TPD will take place in 2022 with the aim to present a Commission proposal by 2024. As the Association of European Tobacco Growers, we would like to highlight the importance of this dossier for our members.

**[Paragraph on Background of Association/sender]**

Tobacco farmers are naturally sensitive to external effects. Firstly, tobacco growing becomes increasingly vulnerable due to the effects of extreme weathers resulting from climate change. Secondly, legislation related to our products are continuously tightened, which has direct effect of our farmers, which are predominantly small business (thus falling into the category of SMEs).

Tobacco growers are not only the first, but also the elementary part of the tobacco production chain. This is why we are interested in the upcoming revision of the TPD. Therefore, we were surprised that despite our role in the production chain, not only farmers but SMEs in general (with the exception of importers and exporters), were not consulted in the Commissions preparations of the TPD2 Application Report that was published in May 2021. Neither small tobacco growers, processors, cigar and cigarillo manufacturers, nor retailers were consulted, leaving a significant portion of affected (small and medium) businesses without a voice.

Tobacco growers play an important role in their local communities, providing direct and indirect employment in rural regions. Where farming is the primary economic activity, the entire rural economy, may depend on the profitability of the sector. Additionally, throughout rural areas, farming places an important role in environmental and cultural services.

We therefor believe that it is critical that the impact that the TPD will have on our SMEs is covered in the upcoming evaluation of the TPD2.

SMEs are affected by legislative changes in a distinct manner. This is why it must be ensured that new regulation presented through the TPD review is properly analyzed and targeted to the needs of small enterprises. Unintended consequences on our businesses must be avoided.

The Commission has stated in its Communication on Better Regulation 2021 that the "SME test" aims to analyze potential impacts on SMEs by assessing the costs and benefits. At the forefront of this

consideration is the "think small" principle. This is particularly important for our members. Therefore, we would like to emphasize the importance of involving the EU SME Envoy Vazil Hudák in the evaluation process to ensure that the concerns of SMEs are adequately addressed.

Dear Commissioner Kyriakides we would be delighted if this point would be considered during the ongoing process.

Best regards,

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