



OUR REF. SHC 9538

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SUBJECT : ADVISORY REPORT OF THE SUPERIOR HEALTH COUNCIL OF BELGIUM :  
NEW TOBACCO PRODUCTS: HEATED TOBACCO PRODUCTS

Dear Sir, Dear Madam,

The Superior Health Council (SHC) of Belgium is an independent scientific advisory body that is part of the FPS Public Health, Food Chain Safety and Environment. It has become aware of letters sent by the *American Chamber of Commerce* to the Public Health Ministers of several countries (Poland, Moldova). The SHC, which is quoted in these letters, wishes to respond to this as well as to clarify and convey the full message of its advisory report.

- The SHC wishes to reiterate that abstention from all forms of tobacco consumption is a public health priority and that the current legislation must contribute to this.
- The new tobacco products are, as their name implies, tobacco-based products and must therefore meet the regulatory requirements for tobacco products. According to the legislation currently in force, these are:
  - a ban on advertising,
  - a ban on sales to minors under 18 years of age,
  - a ban on smoking in enclosed areas accessible to the public,
  - notification of new tobacco products and devices to the authorities,
  - regulation of ingredients, labelling, product presentation, and distance selling.

Belgium has restrictive legislation on tobacco products and any advertising and/or claims according to which these products “promote public health”, as quoted in the AMCHAM letter, are prohibited in Belgium. This is supported by the SHC.

- The new "**heated tobacco products**" including IQOS are complex systems containing nicotine and additives. Tobacco is heated and not burnt. The heating range for tobacco is also very wide for the different devices and this influences the emissions and the number and quantity of toxic substances contained in the vapors.
- Among the substances found in the aerosols are nicotine and various harmful and potentially harmful compounds. Emission and exposure levels (except for nicotine) are significantly lower than for conventional cigarettes. However, it is not insignificant for a whole range of harmful products generated by conventional cigarettes. Besides these compounds, which are similar to those found for



conventional cigarettes, other compounds that are specific to these new tobacco products have also been detected. The FDA has identified as many as 80, of which 4 are potentially carcinogenic.

- Further toxicological studies should be promoted.
- In clinical studies, following a switch from conventional cigarettes to heated tobacco products (IQOS or GLO), significant decreases in biomarker levels of exposure to harmful and potentially harmful constituents have been observed, although they are not considered to be totally safe. Favourable changes have also been noted in several biomarkers with biological impact, suggesting that there is potential for a decreased risk of disease if smokers switch from conventional cigarettes to heated tobacco products.

However, the observed asymptotic dose-response relationship implies that even if the intensity of exposure to heated tobacco products does not exceed 5% of the exposure to tobacco smoke, the risk of these devices is far from negligible.

- Because of their attractive, trendy look, such products appeal to smokers as well as ex-smokers and non-smokers. At this stage, it is difficult to assess the risk of these products acting as a gateway to mainstream smoking for non-smokers and young people. Independent longitudinal studies are needed to do so.

The role of heated tobacco products as a means of smoking cessation is currently under discussion and requires further investigation. Their addictive potential is comparable to that of conventional cigarettes.

- Finally, in the context of the trend for smoking cessation, the SHC agrees that all means available are useful in achieving this objective. All systems currently on the market that are less toxic should therefore be considered. Heated tobacco products appear to have a more favorable toxicity profile than conventional tobacco products. However, they cannot be regarded as risk-free. Considering the short- and long-term uncertainties of heated tobacco products, the toxic effects of dual use (conventional cigarettes and heated tobacco products) and taking into account approved tools for smoking cessation (nicotine substitutes, etc.), the SHC considers that the consumption of these products should not be encouraged by measures which make them more attractive than conventional tobacco products, such as lower taxes, better accessibility of the products for potential consumers, or tolerance regarding advertising. The current regulations for cigarettes should therefore also apply to heated tobacco products.



## Superior Health Council

The advisory report "New tobacco products: heated tobacco products" (SHC 9538) is available in French, Dutch and English on the SHC website.

<https://www.health.belgium.be/fr/conseil-superieur-de-la-sante?keyword=9538>

<https://www.health.belgium.be/nl/hoge-gezondheidsraad?keyword=9538>

[https://www.health.belgium.be/en/report-9538-New\\_tobacco\\_products](https://www.health.belgium.be/en/report-9538-New_tobacco_products)

A handwritten signature in black ink, appearing to be 'Jean Nève', written over a horizontal line.

Chairman of Superior Health Council  
Prof Jean Nève