

D-0408-172-MV – 1 April 2008

***HOTREC reply to the
Impact assessment consultation on
An EU smoke-free initiative***

**Stakeholders consultative meeting organised by Unit C6, DG SANCO
Brussels, 19 March 2008**

HOTREC¹ thanks DG SANCO for the invitation to attend the “*consultation meeting with EU experts, civil society and social partners on an impact assessment on smoke-free environments*” held on 19 March 2007.

At that meeting, DG SANCO invited the participants to reply by 7 April 2008 to the questions prepared by RAND Europe, in the context of the Commission’s impact assessment on the “forthcoming initiative on smoke-free environments”.

Question 3 asked stakeholders to “*rank the five possible policy options (to the extent possible) in terms of their effects on various parameters*”, such as the exposure to environmental tobacco smoke (ETS) in workplaces and in public places, the prevalence of active smoking, mortality, morbidity, disability from ETS, etc., in order to measure social (health), economic and environmental impacts.

Question 4 asked stakeholders to “*quantify (to the extent possible) the effects of the five policy options on the main inputs to the model*” such as the overall exposure to ETS or the workers exposure to ETS in indoor workplaces and offices, including bars and restaurants.

HOTREC considers that it is simply impossible to reply to these questions in a meaningful manner. We have not been used, so far, by the European Commission to reply to “guess scenarios”. How can stakeholders realistically assess the potential health, social or economic impact over the time of the given policy options, without actually knowing their precise content? How can they make an “educated guess” on the health, social or economic effects in 27 Member States of possible EU measures not yet presented? **In addition, and even more importantly, who has the tools to quantify ETS exposure, as requested?**

¹ HOTREC represents the hotel, restaurant and café industry at European level. It counts 1.6 million businesses, with 92% of them being micro enterprises employing less than 10 people. The micro and small enterprises (having less than 50 employees) in the hospitality industry representing 99% of businesses make up some 62% of value added. The industry provides some 9 million jobs in the EU alone. HOTREC brings together 40 National Associations representing the interest of the industry in 25 different European countries.

HOTREC can only reiterate the position expressed in its reply to the Green Paper “*Towards a Europe free from tobacco smoke: Policy options at EU level*” (COM (2007) 27 final): **in view of the recent multi-fold developments in all EU countries relating to the smoking/non-smoking issue – which are acknowledged by the Green Paper itself - any intervention at EU level is not only superfluous but would also interfere in an inappropriate manner with national legislation and/or with voluntary initiatives taken at national level.**

Since years, the member associations of HOTREC have been sharing the concerns of the European and national authorities in relation to the health damages caused by active and passive smoking, with regard to both its employees and its customers. However, they consider that smoking rules should closely reflect the attitude and demands of society vis-à-vis smoking and evolve in parallel with these, depending on national circumstances, different cultures and perceptions.

Therefore, HOTREC invites once again the European Commission to opt for the policy option “status quo”. Such a policy, consisting of a mix of national legislation supported by European Community programmes and campaigns has so far proven to be effective in relation to the gradual development of appropriate smoking rules, best tailored to the needs and attitudes of society vis-à-vis smoking in the different EU Member States.

*

* *