



ECMA

EUROPEAN CIGAR MANUFACTURERS ASSOCIATION

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Mrs S. Brustad
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Eindhoven, 29 February 2008
Re.: EFTA notification 2007/9029/N

Your excellency,

I am writing to you on behalf of the European Cigar Manufacturers Association (ECMA). ECMA is the trade association of cigar manufacturers in the Member States of the European Union. ECMA members together account for over 90% of the cigars produced in the European Union. ECMA herewith would like to respond to EFTA notification 2007/9029/N, containing draft amendments to the Norwegian Tobacco Act. The main objective of the proposal is to introduce a ban on the visual display of tobacco products and smoking accessories at points of sale, with the exception of tobacconist shops. As we are of the opinion that the proposal creates barriers to the cigar exports from the European Union to Norway, we herewith would like to draw you attention to the following.

Cigar production, distribution and consumption

Cigars are being produced and sold in an enormous variety of models, sizes, brands, types of packaging and prices. The variety of products causes that cigars are generally produced in small production runs (batch production). With a total number of 6.6 billion cigars being consumed within the European Union in the year 2006, cigar consumption represents barely 0,8% of the total consumption of tobacco products (cigarettes, smoking tobacco and cigars) in the European Union. In Norway the situation is broadly similar: in 2005 some 22 million cigars were sold, to be compared with 2.365 million cigarettes and 1.117 tonnes of smoking tobacco. The cigar smoker generally is a male adult of mature age: the majority of cigar smokers are over 35 years of age. The Special Eurobarometer report "Smoking and the environment: actions and attitudes" dated November 2003 concluded that far more men smoked cigars than did women (2.2% to 0.2%), as did somewhat older individuals (1.9% of 40-54 year-olds smoked cigars or a pipe).



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ECMA comments on the proposal

ECMA recognises and appreciates the reasons to limit the exposure of tobacco products in the retail environment, and opposes minors to start smoking. The chief aim of the proposal is “to reduce the prevalence of smoking and use of smokeless tobacco among children and young people”. However, although the global profile of cigar smokers is the male, adult smoker, enjoying one or two of his cigars a day during a moment of rest or when relaxing, the proposal would also create barriers to the trade in cigars.

We believe that the retail mechanism should allow for communication of factual information to the consumer about the product, such as the selection of products available for purchase in the store and the price of such products. Due to its small sales volumes, the cigar sector would otherwise be disproportionately disadvantaged.

ECMA believes that customers should have access to product information, and that the communication of one pack of each product sold in the outlet and their prices would be a far better way for retailers to comply with the intention of the proposal than an outright ban on the visual display of tobacco products and smoking accessories.

We therefore would like to recommend you to amend the proposal in such a way, that the permanent visual display of one pack facing of each product sold at the point of sale remains to be allowed.

Yours sincerely,

Marcel Crijnen,
Secretary General.