



FEDERATION OF ALL INDIA FARMER ASSOCIATIONS

H.No. 26-3-274, 4thLine Devapuram, Ashok Nagar, Guntur Andhra Pradesh

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Date : June 14, 2022

Ms Stella Kyriakides

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

Dear Commissioner Kyriakides,

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

We are writing you concerning the upcoming review of the Tobacco Product Directive (TPD). As we understand, the EU Commission is planning a revision of the TPD. As a tobacco farmer association, we would like to highlight the importance of this dossier for members of European Commission.

Federation of All India Farmer Associations (FAIFA) is a non-profit organization representing the cause of millions of farmers of major crops across the States in India. FAIFA strives to project farmers' voice at regional, national and international level and work towards ensuring sustenance of stable livelihood of farmers. **One of the important issues that FAIFA is representing currently is the cause of millions of tobacco farmers in India due to misrepresentation of data by WHO.**

The impact of EU regulation does not stop at EU borders. Due to complex global value chains, enterprises in non-EU countries [like India] we feel the direct impact of legislative changes, although in some cases only at a later time than enterprises within the EU. Nonetheless, we believe it is our obligation to ask you to take our interests into consideration.

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 on entire tobacco farming community. While tobacco companies can mitigate the impact of new regulation and legislation, tobacco growers lack the resources and flexibility and therefore are more prone to negative effects. Farmers 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.



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Unintended consequences on our businesses must be avoided. For example, investments made by tobacco growers must be protected. They already face economic difficulties due to existing regulations or subsidy cuts that make the industry less profitable over time while switching to a different crops is not always a viable solution. Many tobacco growers are small, family-run farms who cannot profitably grow crops or other plants that require large acreages. Nor can their facilities, such as tobacco curing barns, simply be re-directed to other agricultural production uses.

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. 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.

Once again, we are reiterating that, Tobacco farming sector is always at loss in trying to understand why each time it is just tobacco crop and its farmers' are targeted by the WHO / EU Commission . In the past too, Tobacco farmers on numerous occasions, both in person and through representations have appealed/requested to all the concerned policy making august offices to kindly consider ground level realities and concerns of global tobacco farmers' in general and Indian farmers in particular to consider environmental conditions before authorizing horribly misconstrued policies and its regulations. Farmers' have already faced the brunt of pictorial health warning regulation (GHW), illegal/smuggled markets, which directly impacted the earnings of poor tobacco farmers in the World.

We therefore believe that it is critical that the impact that the TPD on farmers across the world is covered in the upcoming evaluation of the TPD2. Many times in the past, farmers and farmer organizations across the World have repeatedly suggested regarding imperative farmers' concerns, which has fallen to deaf ear. At least this time around, farming community is really hopeful that our livelihood concerns will be taken seriously and addressed properly.

Entire Tobacco farming community would be delighted, if the Honourable Commissioner Kyriakides considers the above mentioned farmers concerns during the TPD2 evaluation.

Thanking you,

Yours sincerely,

For Federation of All India Farmers' Association [FAIFA]

P S Murali Babu, General Secretary