



10 February 2020

Therapeutic Goods Administration

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To Whom it may concern,

The Thoracic Society of Australia and New Zealand (TSANZ) is a health promotion charity whose mission is to lead, support and enable all health workers and researchers who aim to prevent, cure and relieve disability caused by lung disease. TSANZ is the only Peak Body in Australia that represents all health professionals working in all fields of respiratory health.

TSANZ has a membership base of more than 1700 individual members from a wide range of health and research disciplines. TSANZ is a leading provider of evidence-based guidelines for the treatment of respiratory disease in Australia and New Zealand, undertakes a large amount of professional education and training, is responsible for significant research administration, and coordinates an accredited respiratory laboratory program.

TSANZ support Cancer Council Australia, the National Heart Foundation of Australia, and the Australian Council on Smoking and Health in their stance against the application to amend Schedule 7 of the Poisons Standard to exempt "tobacco prepared and packed for heating". TSANZ draws attention to the following statements from their submission:

- There is no evidence of heated tobacco products (HTPs) conferring a public health benefit; there is, however, a significant risk of harm.
- The exemption for tobacco prepared and packed for smoking is an historical anomaly; it is not a reference point against which proposals to amend the scheduling of nicotine should be assessed.
- While TGA-approved nicotine replacement therapy (NRT) products are aids for smoking cessation, nicotine in tobacco products confers no health benefit. There is no evidence to support the use of HTPs as a smoking cessation aid.
- Evidence on secondhand emissions on HTP suggests that users and bystanders are exposed to measurable levels of particulate matter and harmful constituents.
- The World Health Organization (WHO) considers all forms of tobacco are harmful, including HTPs.
- The proposal to exempt HTPs from the Poisons Standard is inconsistent with the FCTC and *poses a threat to public health* by:
 - o the absence of reliable evidence of health benefits from HTPs for adult smokers; and
 - o ignoring the need to *protect* the majority of Australians, including children and non-smokers, from the harms that would result from the widespread availability of HTPs.



Thus, due to the dangers and risks to lung health associated with heated tobacco products, TSANZ cannot support this application going forward.

We appreciate your time and consideration regarding this matter and hope to continue the conversation regarding this issue with you in the future.

Yours faithfully,

