



Universal

UNIVERSAL LEAF TOBACCO COMPANY, INC.

7 April 2026

President Ursula von Der Leyen
President of the European Commission
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Re: Evaluation of the EU Tobacco Control Framework

Dear President von Der Leyen,

I am writing on behalf of Universal Leaf Tobacco, Inc. regarding the European Commission's recent evaluation report of the EU tobacco control framework. Universal supports evidence-based regulation and recognizes the importance of the Commission's public health objectives. However, we are concerned that the evaluation does not sufficiently account for the practical effects of current and future regulatory changes on the lawful agricultural and commercial ecosystem that underpins the European tobacco and nicotine market. In particular, the evaluation gives too little attention to the impact on farmers and farming communities, grower organizations, tobacco processors, and rural economies, as well as the role that illicit trade already plays in undermining them.

Concern for European Farmers and Rural Communities

We believe the evaluation gives too little attention to the broader agricultural and rural ecosystem that supports the legal tobacco supply chain across Europe and beyond. For many farming communities, particularly in Bulgaria, Greece, Italy, Spain, Croatia, Poland, and Hungary, tobacco remains a significant source of income, seasonal employment, export activity, and economic stability. Changes to the legal market can have ripple effects that extend well beyond manufacturers and retailers, impacting growers, processors, logistics providers, and rural households that are already under immense economic pressure.

We further believe that any major regulatory shift should be evaluated not only through a public health lens, but also through rural economic resilience and European competitiveness lenses—particularly where policy changes may accelerate contraction in legal demand without a clear transition framework for affected producers and communities. It is important to recognize that further restrictions are likely to distort the agricultural supply chain to the benefit of growers outside of the European Union.

In this context, it is notable that the Commission's evaluation report does not appear to contain a sufficiently visible assessment of the potential consequences of legislative initiatives on rural communities, growers, agricultural livelihoods and supply chains, territorial cohesion, and community resilience. This is despite the clear institutional expectation that such "rural-proofing" should be fully considered and have stronger cross-sectoral application across EU policy making, as stipulated in the *Better Regulation* guidelines and explicitly called for by the Polish Council Presidency in 2025.



Universal

UNIVERSAL LEAF TOBACCO COMPANY, INC.

Illicit Trade and Loss of Market Control

We also remain concerned that the evaluation does not give sufficient weight to the relationship between regulatory pressure and illicit trade. The Commission's own materials acknowledge challenges relating to traceability, enforcement, cross-border sales, and market oversight. Those concerns should not be treated as secondary. When regulation outpaces enforceability, demand can shift away from the regulated market and into illicit or unregulated channels, where transparency, tax compliance, product oversight, and age controls are weaker or absent. These challenges are particularly acute in eastern border Member States, as recently highlighted in the Commission's Pact for the Eastern Border Regions (COMM 2026/82). Regrettably, this does not appear to have been considered as part of this evaluation.

This shift harms more than governments and enforcement authorities. It also harms the lawful agricultural and commercial ecosystem—including farmers, grower organizations, leaf merchants, and other mid-chain participants—by weakening the legal market on which they depend.

Call for a More Complete Policy Assessment

For these reasons, we believe that any future revision of the EU tobacco-control framework should be supported by a more complete and balanced assessment of:

- the impact on European agricultural producers and rural employment through a dedicated rural-proofing impact assessment;
- the harm to European agricultural competitiveness;
- the risk of displacing legal commerce into illicit channels;
- the feasibility of enforcement across Member States; and
- the long-term consequences for a transparent, regulated supply chain.

Universal remains committed to constructive engagement as this process moves forward, and, as Europe's largest processor of leaf tobacco, we respectfully request a meeting to discuss further. We would welcome this opportunity to contribute to a fuller discussion of the agricultural, rural, and supply-chain implications of future policy choices.

Yours sincerely,

Jonathan Wertheimer
Regional Director, Europe
Universal Leaf Tobacco, Inc.



Universal

UNIVERSAL LEAF TOBACCO COMPANY, INC.

CC: Commissioner Christophe Hansen

CC: Commissioner Olivér Várhelyi