



Response to Public Consultation on the Proposed €0.20/ml Excise Tax on E-Liquids in Croatia

We strongly oppose the proposal to introduce an excise tax of €0.20/ml on e-liquids in Croatia. Such a measure would undermine public health goals by making safer alternatives to smoking less accessible, pushing consumers back to smoking, and disproportionately harming those with the lowest incomes. Furthermore, the consultation period of only seven days is woefully inadequate and violates principles of democratic participation and transparency.

Higher Vaping Taxes Increase Smoking Rates

A growing body of peer-reviewed scientific literature shows that higher taxes on vaping products reduce their use at the price of increasing cigarette smoking, particularly among youth and low-income individuals, harming public health overall.

- A 2022 study published in *Health Economics* found that higher e-cigarette taxes reduce vaping but significantly increase youth smoking, leading to an overall decline in adolescent health outcomes: <https://pubmed.ncbi.nlm.nih.gov/35852452/>
- A 2013 study published in *New England Journal of Medicine* study showed that policies increasing e-cigarette retail prices, such as imposing a tax on e-cigarettes, could lead to substitution to cigarettes, highlighting the importance of maintaining affordability for these products: <https://pubmed.ncbi.nlm.nih.gov/24935898/>
- A 2021 paper published in *Preventive Medicine* concluded that e-cigarette taxes increase smoking rates: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7880200/>
- A 2021 working paper published at *NBER* reinforced these findings by demonstrating that higher e-cigarette taxes increase cigarette sales, warning that the substitution effect from vapes to cigarettes may considerably undercut or even outweigh any public health gains from reducing vaping: <https://www.nber.org/papers/w29216>

Vaping Is a 95% Less Harmful Alternative

According to Public Health England and the UK Office for Health Improvement and Disparities, [vaping is at least 95% less harmful than smoking](#). E-liquids do not contain tar or the thousands of toxic chemicals found in cigarettes, making them a vital harm reduction



tool. Policies that increase the cost of vaping disincentivize smokers from switching and place unnecessary barriers in the way of public health progress.

In addition to being less harmful, vaping is also **more effective than traditional nicotine replacement therapies** in helping smokers quit. One [major review of studies](#) found that vaping products with nicotine help more people successfully stop smoking compared to nicotine patches or gum. This has been confirmed by [clinical trials](#) showing that smokers who use vaping devices—especially when supported with behavioural help—are **twice as likely to quit** as those using other cessation methods.

Punishing these products with high taxes would make it harder for smokers to access one of the most effective tools to quit, ultimately doing more harm than good to public health.

Successful EU Models: Sweden, Greece, and Czech Republic

While Croatia considers raising taxes on vaping, several EU countries are [successfully reducing smoking rates](#) by supporting the use of less harmful alternatives like vaping and nicotine pouches as part of their public health strategies.

Sweden is leading the way and is on track to become the first EU country to reach the “smoke-free” target, with smoking rates already below 5%. This success is largely due to its pragmatic approach to tobacco harm reduction. Sweden promotes safer alternatives and applies a risk-based tax system that keeps these products more affordable than cigarettes, encouraging smokers to switch.

Greece has included harm reduction in its national health strategy, recognising that vaping can play a positive role in reducing smoking-related illnesses. Instead of penalising users of safer alternatives, the Greek approach focuses on education and support for smokers who want to quit.

The Czech Republic has also taken a forward-looking stance. The government has supported a differentiated approach to nicotine regulation and has opposed excessive EU-level restrictions on vaping products. This balanced model encourages switching without discouraging adult smokers from accessing safer options.

These countries show that a smarter, evidence-based strategy focused on harm reduction—rather than punishment—can achieve better health outcomes and lower smoking rates. Croatia should follow their example, not reverse the progress made.

Unfair Burden on Low-Income Populations



Excise taxes on vaping products are regressive, meaning they disproportionately affect those with lower incomes—who are also the most likely to smoke. Making safer alternatives more expensive creates a barrier for people who want to quit but can't afford more costly options. Instead of helping the most vulnerable quit smoking, this tax would make it harder for them to access the tools they need.

Lower-income smokers rely on affordable options to switch. Increasing the price of vaping products through taxation will entrench **health inequalities** and make it more difficult for those most at risk to improve their health. During a cost-of-living crisis, this is especially harmful.

Rather than penalising people trying to make healthier choices, policies should support them by keeping safer alternatives accessible and affordable—especially for those who need them most.

An Inadequate Public Consultation

The decision to open a seven-day public consultation on such a significant policy change is deeply concerning. Stakeholders—especially civil society organisations, consumer groups, and public health experts—require adequate time to analyse, respond to, and engage with government proposals. Rushing this process undermines **transparency, inclusiveness, and democratic legitimacy**.

Conclusion

We urge the Croatian government to:

- **Reject the proposed excise tax** on e-liquids;
- **Extend the consultation period** to at least 30 days;
- **Adopt a risk-proportionate tax framework**, ensuring that less harmful alternatives like vaping are always substantially more affordable than cigarettes;
- **Follow the example of countries like Sweden, Greece, and the Czech Republic**, which are achieving real progress in reducing smoking through evidence-based, harm-reduction-oriented policies.

Croatia has the opportunity to modernize its approach to public health by empowering smokers to make healthier choices—not punishing them for trying.



More information: <https://worldvapersalliance.com/harm-reduction-vaping-fact-sheet/>