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Response to request by the World Health Organization for submission of comments on a proposed Framework Convention on Tobacco Control for public hearings at the Geneva International Conference Center (CICG), 12 - 13 October 2000.

I INTRODUCTION
The Zimbabwe Tobacco Association was formed in 1928 to represent the interests of growers of flue-cured tobacco in Zimbabwe. The ZTA’s main objectives are to promote and develop the flue-cured tobacco industry in Zimbabwe and to protect and further the interests of all producers in a responsible and transparent manner that takes account of the environment and the communities in the districts where tobacco is grown.

The ZTA represents a tobacco grower membership of some 1 400 large-scale commercial tobacco growers and, through our small-scale farming scheme, more than 4 000 small-scale commercial growers.

Funding of the Association is through membership subscriptions although revenue is also generated from the ZTA’s investments.

The ZTA welcomes the call by the World Health Organization to make submissions of comments on its draft Framework Convention on Tobacco Control, to be considered at the WHO’s public hearings to be held in Geneva on 12 - 13 October 2000. This call is a significant development as it marks a departure from the previous WHO hardline stance where it sought to exclude the tobacco industry from the drafting process of the FCTC.
Tobacco growers around the world, through the International Tobacco Growers Association of which the ZTA is a member, have always maintained that the wide and far-reaching nature of the FCTC demanded that it be developed in a transparent, inclusive manner that reflected the views and contributions of all stakeholders.

The ZTA hopes that the call for submissions and the public hearings themselves are not mere public posturing to give the appearance of fairness and that consideration will be given to the special circumstances and concerns raised by those who may be negatively affected by a too-restrictive and prescriptive Convention.

We make our submission as follows:

II POSITION ON THE FRAMEWORK CONVENTION ON TOBACCO CONTROL

The Zimbabwe Tobacco Association is mindful of and appreciates the concerns raised by health professionals regarding tobacco use. It has always been part of ZTA's philosophy to operate responsibly and we support initiatives that, within reason, seek to regulate the use of tobacco, whilst respecting the freedom of choice of informed adults who opt to smoke.

We support initiatives to regulate smoking by young people. We agree that smoking may be harmful to pregnant women and the unborn child. We agree that the tobacco industry must be involved in widespread awareness initiatives to increase knowledge of the risks of tobacco use. We would support reasonable regulatory frameworks for tobacco and tobacco products, in so far as they target the preservation of the health of the individual without impinging on other fundamental freedoms and rights of either individual adults or body corporates.
In other words ZTA's position supports a treaty that attacks specific health concerns arising out of tobacco use. Such a treaty would focus its attention on the accessibility of tobacco and tobacco products to specific target groups, seeking to restrict that accessibility. The ZTA maintains that tobacco use is and should remain a matter for informed adult choice.

For this reason, we are concerned at the wide and far-reaching prescriptive nature of the proposed Framework Convention on Tobacco Control. This, we contend, may be designed to satisfy an earlier stated objective of the Working Group “to put an end to tobacco use in any form”. The ZTA finds this disturbing as it suggests by implication that the WHO has set for itself the crusading task of drawing up a global tobacco prohibition accord, to be legally imposed upon governments. The WHO must respect the legal rights of tobacco growers to produce tobacco, which is not an illicit drug.

III THE IMPACT OF A GLOBAL TOBACCO BAN ON ZIMBABWEAN TOBACCO WORKERS
The direct implications of the FCTC on the tobacco industry in our country have been well articulated by the Government of the Republic of Zimbabwe in related fora.

The bulk of ordinary working people in Zimbabwe are employed in the agricultural sector. Statistics from the Agricultural Labour Bureau put this figure at some 350 000 people, a figure which often fluctuates and can be as high as 500 000 in a good season. Of these agricultural employees, one-third are engaged in tobacco farming, or 116 667 using the conservative figure of 350 000 workers.
Conservative extrapolation of the data based on an assumption of one worker supporting an average household of five people indicates the total population supported by tobacco workers at around 584 000 people. This figure excludes the families of the individual farmers themselves and should be seen in the context of a national population in Zimbabwe of just over 12 million, half of whom are under the age of 15.

The proposed FCTC puts the livelihoods of all these people at risk.

At an economic level, this year's tobacco crop is set to earn the country exports revenue of Z$25.4 billion (US$507.5 million) comprising some 30% of the national total, a significant amount which again strongly illustrates the strategic importance of this crop to Zimbabwe's economy. Much of this revenue is then used in the country to sustain the commercial, industrial and banking sectors, and to support the maintenance of schooling, housing and many other social services including health. Tobacco growers also produce 82% of Zimbabwe's horticulture, one of the faster-growing export earners in Zimbabwe which has been touted as an alternative to tobacco. Tobacco utilizes only 3% of our nation's arable land. Tobacco is grown on poorer sandy-loam or sandy soils and requires a four or five year rotation with maize grown immediately after tobacco to utilize residual fertilizer and then Rhodes grass lays. Maize stalks and harvested grass sustain significant cattle. Therefore Zimbabwe's tobacco farms are significant producers of food for our nation which takes pride in feeding itself.

It follows, therefore, that the proposed tobacco control treaty is a threat not only to the tobacco industry but to the whole nation. The ZTA is concerned that the proposed FCTC has been put on a fast-track passage system with little attention to its serious negative impact on whole nations. We submit that more thorough research be undertaken on the impacts and needs of tobacco-led economies. Even where the WHO and the World Bank have indicated some support for
“transition assistance” for affected farmers, such indication of support is
couched in vague, non-specific terms that suggest a preoccupation with
merely wishing to pacify critics and give the impression that the issue was
being addressed. The ZTA would like the WHO to come up with a detailed
Diversification Fund to support its suggestion for a switch to alternative crops.
Such a Diversification Fund must take into account the conditions mentioned
above and must guarantee tobacco growers against future losses.

Note must be taken of the advice of the Food and Agriculture Organisation
representative to ECOSOC 2000 (New York, 24 July 2000), where he
suggested:

“We need to remember that the conditions of farmers in many
developing countries are very different from those in high income
countries where farmers, even though they are also adversely affected
by the contraction of markets, certainly have more opportunities to
move into alternative activities.”

IV CONCLUSION

In welcoming the opportunity to submit our views on the proposed Framework
Convention on Tobacco Control, the Zimbabwe Tobacco Association
reiterates its support for an all-inclusive approach to deal with the health
dangers of tobacco use. To show good faith the WHO should include in the
Inter-governmental Negotiating Body, representatives from tobacco
dependent producing countries like Malawi and Zimbabwe.

Only through unified action can reasonable regulatory measures be
practicable. If growers had been involved in the process right from the
beginning and their views sought, much ground could have been covered. It
is therefore important at this stage to consider seriously the issue of constant
dialogue and collaboration with all interested stakeholders. The ZTA believes
there is room for all to play a significant constructive role that makes them
part of an international solution to an issue of global concern.

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The FCTC in its final form must pay careful attention to the social, cultural, political and economic needs and special circumstances of those countries, particularly in the developing world, that are highly dependent on tobacco.

28 August 2000