

## Response to the Dutch public inquiry about banning tobacco free nicotine pouches

Smoking cigarettes cause almost 8 million people's premature death on earth per year as per WHO. Snus and tobacco free nicotine pouches has zero deaths recorded. Sweden has the lowest prevalence of smoking in EU with (2022) the WHO target for a smoke free nation of maximum 5% daily smokers within reach. Sweden has also the lowest rates of lung cancer, oral cancer, cardiovascular diseases in the EU as well as other smoking caused cancer forms. The reason is mainly because Swedes have replaced deadly cigarettes for snus (with tobacco) and/or tobacco free nicotine pouches. This scientific and very much epidemiological fact is internationally known as "The Swedish Experience".

Now the Dutch government wants to ban the latter, but continue to allow lethal cigarettes and thus robbing those who smoke in the Netherlands, and those who used to smoke but who have successfully managed to quit smoking by greatly reducing harm thanks to nicotine pouches. This is an irrational decision that will seriously damage the chance to have smoking rates reduced in The Netherlands. The public health consequences of a ban on nicotine pouches would be similar to that of banning nicotine replacement products such as nicotine patches, nicotine gum but keeping deadly cigarettes or banning methadone which has helped thousands of heavy narcotics users quit such use by using scientifically much lower risk products.

We encourage the Dutch government to review and act on the science, instead of trying to ban a product that scientifically has been quantified as being 99,78% less harmful than smoking cigarettes i.e. representing 0,22% of the risk of smoking cigarettes. In layman terms this means that for every smoker who quit smoking there has to be 454 new nicotine pouch users in order to have a relative risk status quo (100% risk divided by 0,22% = 454 persons). The scientific relative risk of various nicotine products as compared to smoking cigarettes can be found here (Murkett et al 2020):

<https://f1000research.com/articles/9-1225>

The ultra-low risk of nicotine pouches has also been confirmed by the German state scientific institute BfR here:

[https://www.openagrar.de/receive/openagrar\\_mods\\_00076668](https://www.openagrar.de/receive/openagrar_mods_00076668)

BfR recommends that nicotine pouches are regulated, not banned. Sweden has since 1 August 2022 introduced a new law that regulates tobacco free nicotine pouches e.g. by introducing a 18 year limit for purchase of such products and a limitation forbidding retailers and manufacturers to market such products for anyone suspected of being under the age of 25. The summary in English of the successful new Swedish law on tobacco free nicotine products can be read here. The law regulates age limits, marketing limits, packaging, warning text, product notification of sales and much more. The Swedish law is the result of a comprehensive two year state inquiry and could easily be copied by the Dutch government for these tobacco free nicotine pouch products. The tax on the nicotine content is 200 SEK (18 Euro) per kilo of product including all contents such as water, plant fibers, flavors and the nicotine in itself. Swedish snus (with tobacco) has scientifically been proven to have a extremely low risk as compared to smoking, see The Swedish Experience above and have a tax rate of

508 SEK (46 euro per kilo). Thus, the Swedish government has acknowledged that nicotine pouches has an even lower risk than Swedish snus containing tobacco.

<https://www.folkhalsomyndigheten.se/the-public-health-agency-of-sweden/living-conditions-and-lifestyle/andtg/rules/tobacco-free-nicotine-products/>

Is the Dutch government aware of the scientific fact that nicotine is not the cause of cancers? It is the gases of combustion in smoked tobacco along with tar in cigarettes that causes death, sickness's and suffering. I refer to e.g. the United States Food and Drug Administration's (FDA) home page:

***"What Makes Tobacco Use Harmful?"***

***Nicotine is what keeps people using tobacco products. However, it's the thousands of chemicals contained in tobacco and tobacco smoke that make tobacco use so deadly. Some of these chemicals, known to cause lung damage, are also found in some e-cigarette aerosols.***

***This toxic mix of chemicals—not nicotine—cause the serious health effects among those who use tobacco products, including fatal lung diseases, like chronic obstructive pulmonary disease (COPD) and cancer.***

***Tobacco products containing nicotine pose different levels of health risk to adult users. Combustible products, or products that burn tobacco, are the most harmful. An example of a combustible product is cigarettes, which deliver more than 7,000 chemicals<sup>1</sup> along with nicotine that makes it hard to quit."***

The quote is from: <https://www.fda.gov/tobacco-products/health-effects-tobacco-use/nicotine-why-tobacco-products-are-addictive>

It seems that the admirable goal of trying to get Dutch smokers (and smokers in other EU nations) to quit smoking will be a total failure if the Dutch government continue to allow deadly cigarettes and instead ban vastly safer nicotine products such as tobacco free nicotine pouches that has rendered Sweden almost becoming the first smoke free country in the world as per WHO definition, very much thanks to snus and its mother cousin tobacco free nicotine pouches. Daily smoking among young adults 16-26 year old is presently down to 3% as per the EU Eurobarometer and in Norway the rate of daily smokers among young adults is now down to 1% according to the Norwegian National Statistics Agency. In short, smoking among young adults has almost been eradicated thanks to the availability of snus and nicotine pouches and scientifically proving that snus and nicotine pouches are not a gateway in to smoking, but the complete opposite i.e. a gate way out of smoking.

The Dutch government should not take a decision about nicotine pouches without first consulting the overwhelming scientific and epidemiological facts on how Sweden became the first smokefree (almost) country in the world.

The Dutch police propaganda against tobacco free nicotine pouches lacks science totally. First of all they call it "snus" although it does not contain tobacco at all and secondly, they claim organized crime use nicotine pouches to lure youth into crime by "bribing them with nicotine pouches". Surely such matter should address organized crime, not the product as such being 99,8 % safer than smoking. If not, the Dutch government should consider banning other drugs like alcohol, cigarettes, cannabis, or hard cash because all of these could be used as bribes to innocent young persons. It is however not the fault of these products or money in itself, that is the cause of people becoming organized criminals, it is instead how criminals are allowed to be criminals in the first place.

As for other scientific and intelligent submissions to this Dutch enquiry, I fully support the testimonials of Professor Brad Rodu of the University of Kentucky, the European Tobacco Harm Reduction Advocates (ETHRA), INNCO, Doctor Charles Gardner, The World Vaper's Alliance, The Swedish Snus Users Association

Yours sincerely

Bengt Wiberg

Tobacco harm reduction advocate and expert

Sweden

Yours sincerely