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Dear Madam/Sir,

I am a professor of medicine and hold an endowed chair in tobacco harm reduction research at the University of Louisville in the United States. I am responding to the Dutch government's consultation on legislation to ban nicotine pouches. I was the senior author of the first medical journal publication about nicotine pouches (1), and I feel qualified to make the following comments.

If the Dutch government bans nicotine pouches, this will inevitably perpetuate high mortality rates among Dutch smokers. To illustrate my statement, I compared mortality rates for lung cancer, the sentinel disease of smoking, among men and women in The Netherlands and in Sweden, where vastly safer smoke-free options such as snus and nicotine pouches are widely available and consumed. I derived estimates for the year 2020 from the World Health Organization's International Agency for Research on Cancer mortality database (2). The rates for the two countries are completely comparable because IARC provides individual country rates that are calculated using a standardized population age structure (3). All the rates in the following paragraph are reported as deaths per 100,000 among men or women age 40+ years.

The lung cancer mortality rate (LCMR) among men in the Netherlands is 92, which is twice as high as the rate for Swedish men (45.1). Similarly, the LCMR among women in the Netherlands is 72, which is 60% higher than the rate for Swedish women (45).

In short, a Dutch government ban on nicotine pouches would deny Dutch smokers vastly safer cigarette substitutes, thereby needlessly increasing their risk for premature smoking-attributable diseases and deaths.

Sincerely,

Brad Rodu
Professor
University of Louisville

References

1. Plurphanswat N, Hughes JR, Fagerström K, Rodu B. Initial Information on a Novel Nicotine Product. *Am J Addict.* 2020 Jul;29(4):279-286. doi: 10.1111/ajad.13020. Epub 2020 Mar 16. PMID: 32176374. <https://pubmed.ncbi.nlm.nih.gov/32176374/> Cancer Today, IARC, WHO

2. Cancer Today Website. International Agency for Research on Cancer, World Health Organization. <https://gco.iarc.fr/today/home>
3. Cancer Today Website, Help. International Agency for Research on Cancer, World Health Organization. <https://gco.iarc.fr/today/help>