

## Environment and Public Health Institute – EPHI

The proposed measure in the Netherlands is counterproductive if the ambition is to protect public health. The scientific justification given by the Dutch government for this ban fails to recognize or acknowledge, scientific conclusions or consumer demand for less risky alternatives to cigarettes.

Public health authorities in several European countries have acknowledged that nicotine pouches are less risky than cigarettes. The most recent report (2022) of the UK Committee on Toxicity, found that, as an alternative, *“the use of oral nicotine pouches, as recommended by the manufacturer [...] is likely to be associated with a reduction in overall risk of adverse health effects”*. Similarly, the German federal agency for risk assessment (BfR) stated in its (2022) health assessment of nicotine pouches that *“... nicotine pouches could represent a reduction in health risks”*.

Sweden, the cultural home of nicotine pouches, has the lowest rate of tobacco-related diseases and the lowest rate of tobacco-related deaths in the EU (Ramström, 2020). Sweden also has the lowest male lung cancer incidence (WHO 2022). On top of this, EU men are three times more likely to die from tobacco-related lip and oral cavity cancer than Swedish men (Ramström, 2020). It's proven that the Swedish model saves lives.

Sweden has also made good progress in appropriately regulating the products. Oral nicotine pouches are regulated in Sweden since August 2022. The regulation stipulates everything from excise to marketing and more, which has enabled responsible and controlled consumption. The use of oral nicotine pouches is a key factor in why Sweden has the EU's lowest smoking prevalence of 5,6 %. Almost fulfilling one of the main goals (5 % smoking prevalence) in the EU Commission 'Europe's Beating Cancer Plan' – 18 years ahead of plan. At the same time, smoking prevalence is around 20 percent or almost 3 million Dutch citizens. If the Dutch government decides to go through with its plan to ban oral nicotine pouches, the goal of reaching a 5 % smoking prevalence will be very difficult to obtain in the Netherlands. We, therefore, urge the Dutch government to take the Swedish model into account.

## **EPHI - Environment and Public Health Institute**

We are a Stockholm-based Think Tank analyzing and evaluating European and Swedish environment and public health policy. We believe that serious threats to our environment and health are best tackled thru innovation and entrepreneurship. We promote science-based policy rather than policy-based science for a more effective and efficient environment and health policy.

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