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## **1. About Considerate Pouchers**

**Considerate Pouchers is a global consumer-led initiative advocating for evidence-based harm reduction strategies in nicotine policy. Our mission is to defend the rights of adult consumers to access safer nicotine alternatives such as nicotine pouches, while promoting public health outcomes by reducing tobacco-related harm. We operate across the EU and beyond, engaging with policymakers, regulators, scientists, and consumers to ensure nicotine regulation is rooted in science, proportionality, and respect for consumers' choice.**

## **2. Executive Summary**

**We welcome the opportunity to respond to the European Commission's call for evidence on its forthcoming Cardiovascular Health Plan. However, we are concerned that the Commission is currently considering classifying all nicotine-containing products, including nicotine pouches, as cardiovascular risk factors, despite mounting evidence to the contrary.**

**Nicotine pouches are tobacco-free, smoke-free, and combustion-free. They do not expose users to the thousands of harmful chemicals found in cigarette smoke, including carbon monoxide and tar, the real culprits behind cardiovascular harm.**

**Evidence from clinical studies demonstrates that while nicotine can have temporary cardiovascular effects (such as increased heart rate), these effects are mild, reversible, and not associated with long-term cardiovascular disease in healthy users.**

**Sweden, the only country in the EU with widespread legal access to oral nicotine products, has one of the lowest cardiovascular disease rates in Europe. The Swedish experience confirms that harm reduction works. Instead of classifying nicotine pouches as a risk, the Commission should view them as part of the solution.**

### **3. The Cardiovascular Evidence on Nicotine Pouches**

**Contrary to popular belief, nicotine is not the main driver of smoking-related cardiovascular disease. According to *Benowitz & Burbank (2011)*, the combustion products of tobacco, not nicotine, are primarily responsible for adverse cardiovascular outcomes. Nicotine's effects are modest and comparable to everyday stimulants such as caffeine.**

**A comprehensive review by *Breland et al. (2021)* concludes that nicotine alone does not significantly contribute to atherosclerosis or increase the long-term risk of heart attack or stroke in the absence of combustion. The same conclusion is reached by *Benowitz (2010)*, who notes that nicotine replacement therapy (NRT) is widely prescribed even to people with cardiovascular conditions, with no significant adverse effects.**

**In one of the few direct studies on oral nicotine, *Moheimani et al. (2021)* found that nicotine administered through oral pouches resulted in only transient cardiovascular effects in healthy volunteers. There were no signs of increased vascular inflammation or arterial stiffness, key predictors of cardiovascular disease.**

**Moreover, *Middlekauff et al. (2011)* studied sympathetic nerve activity and found that nicotine from smokeless sources does not provoke the same harmful responses as inhaled nicotine combined with smoke.**

**Submission by Considerate Pouchers to the European Commission Call for Evidence:  
Cardiovascular Health Plan 2025**

**In summary:**

- **Nicotine pouches do not cause cardiovascular disease.**
- **They lack the combustion byproducts that cause systemic inflammation, endothelial dysfunction, and arterial damage.**
- **Scientific literature supports their safety relative to cigarettes and even e-cigarettes.**

**If the Commission truly aims to improve cardiovascular health, its policy must distinguish between products that burn and those that don't.**

## 4. Harm Reduction Works: Sweden's Cardiovascular Case

Sweden provides the most compelling real-world evidence for tobacco harm reduction.

Despite having one of the highest nicotine consumption rates in Europe, Sweden also enjoys:

- The **lowest** daily smoking rate in the EU (5.6%)
- **44% lower** overall cancer incidence compared to the EU average
- **44% lower** tobacco-related mortality
- The **lowest** lung cancer incidence in Europe: 17.8 per 100,000
- And crucially: **lower** rates of ischemic heart disease and stroke than neighboring countries

These outcomes are not coincidental. Sweden's pragmatic approach (providing legal, affordable, and flavored smoke-free alternatives like snus and nicotine pouches) has led to fewer smokers, and thus fewer cardiovascular deaths.

According to projections by the consumer health coalition Smoke-Free Sweden, if the rest of the EU followed Sweden's model, over 3.5 million premature deaths could be prevented in the next decade.

By contrast, countries that pursue bans or overregulation of nicotine pouches, such as Finland, have seen youth smoking increase, not decrease, as young people revert to cigarettes or illicit products.

The evidence is clear: Sweden proves that access to smoke-free alternatives saves lives, including from cardiovascular disease.

## **5. Policy Recommendations**

**We urge the European Commission to resist outdated approaches to nicotine. In the context of cardiovascular health, the goal should be risk reduction, not nicotine elimination.**

**We recommend:**

- 1. Do not classify nicotine pouches as cardiovascular risk factors. Doing so would conflate them with combustible tobacco, ignoring both science and common sense.**
- 2. Develop product-specific guidance. Smoking, vaping, and oral nicotine products are fundamentally different and should not be treated as a monolith.**
- 3. Protect adult access to smoke-free alternatives, including flavored pouches, which are essential for switching.**
- 4. Implement proportionate taxation policies to ensure pouches remain a more affordable alternative to smoking.**
- 5. Support public education campaigns to clarify the real risks and benefits of switching from smoking to pouches.**
- 6. Ensure regulatory transparency and scientific integrity. Stakeholders must be consulted meaningfully before conclusions are drawn, skipping a public consultation would be a serious scientific misstep.**

## 6. Conclusion

**The Commission's upcoming Cardiovascular Health Plan is an opportunity to promote genuinely life-saving interventions. But that opportunity will be squandered if science is ignored in favor of prohibitionism.**

**Nicotine pouches are not a problem. They are part of the solution.**

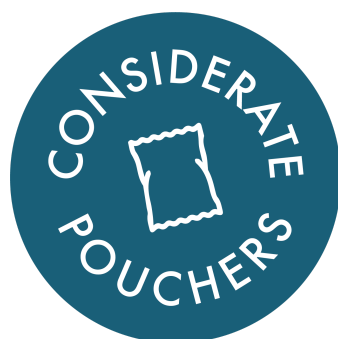
**Including them as risk factors in cardiovascular strategy would not only lack scientific merit, but also risk pushing smokers away from less harmful options and back toward the combustible products that truly endanger heart health.**

**We urge the Commission to base its conclusions on evidence, not assumptions, and to recognize the role of nicotine harm reduction in building a smoke-free, heart-healthy Europe.**

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