



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 consumers to access safer nicotine alternatives such as nicotine pouches, while also promoting public health outcomes by reducing tobacco-related harm. We work across the EU, MENA, and beyond, engaging directly with policymakers, regulators, scientists, and consumers.

Introduction

We welcome the opportunity to respond to Morocco's public inquiry EP-61-2025 concerning proposed draft standards for tobacco, vaping, and nicotine pouch products. It is clear that Morocco is engaging with a complex regulatory landscape at a pivotal moment. We commend the effort to develop a structured approach to regulating new nicotine technologies. However, we caution that overregulation or prohibitionist policies risk undermining public health goals.

Our submission highlights the importance of proportionate, risk-based regulation of nicotine alternatives, particularly nicotine pouches, which represent the safest known delivery method for nicotine today.

1. The Role of Nicotine Pouches in Harm Reduction

Nicotine pouches are tobacco-free products designed to deliver nicotine through oral absorption. Unlike cigarettes, they contain no tobacco, require no combustion, and produce no smoke or aerosol. [According to Public Health England](#), nicotine itself, while addictive, is not the primary cause of smoking-related diseases such as cancer, cardiovascular, or respiratory illness.

Systematic reviews from the medical research NGO Cochrane confirm that alternative nicotine delivery systems, including pouches, can be effective in helping smokers quit. These products offer [a scalable and practical path to reduce smoking-related harm](#).

Sweden provides the best-known case study. By embracing low-risk products like snus and nicotine pouches, [Sweden has achieved](#) the lowest smoking rate and smoking-related mortality in the EU despite having one of the highest nicotine consumption rates.

2. Comments on Specific Standards in the Public Inquiry

- **PNM ISO 20768 (Vaping Machines and Puff Regimes):** We support the development of standardized methods to evaluate emissions from vaping products. However, it is essential that these standards reflect realistic usage patterns. Overly aggressive puff regimes can lead to artificially elevated toxin levels.
- **PNM ISO 21109 / PNM EN 17957 (Nicotine Pouches Testing):** We recommend Morocco ensure these standards evaluate pouches based on toxicological risk, not on their nicotine content alone. Nicotine delivery should be measured in terms of bioavailability and safety. [Flavors, a crucial element for adult smokers switching, should be permitted unless clearly proven to pose harm.](#)
- **PNM EN 16156 (Cigarette Ignition Propensity):** We support standards that reduce fire risks from combustible products. However, such safety measures should not be used to justify restrictions on non-combustible alternatives.
- **PNM ISO 4906 / PNM ISO/FDIS 13110 (Tobacco Fill Power / Moisture Content):** While these technical measures are important for traditional tobacco regulation, they should not be transposed onto novel, smoke-free nicotine products like pouches.

3. Avoiding Policy Pitfalls: Lessons from Elsewhere

Several countries have attempted to overregulate nicotine alternatives, only to see counterproductive results:

- **Finland:** In 2023, Finland banned flavored nicotine pouches. Youth smoking subsequently increased by 33% among 14-18 year olds, [especially among boys](#).
- **New Zealand:** Introduced a generational nicotine ban, only to repeal it due to enforcement concerns and illicit market growth.
- **Malaysia:** Announced restrictions but paused implementation following public outcry and public health experts' concerns about pushing users toward cigarettes.

Such examples show that well-intentioned but heavy-handed regulation often backfires. Adult demand does not disappear with bans—it shifts to illegal or unregulated markets.

Submission by Considerate Pouchers to the Moroccan Public Inquiry on Tobacco and Nicotine Products (EP-61-2025-DC-11.08.2025-CN-083)

4. Recommendations

We respectfully urge Moroccan authorities to consider the following:

1. **Risk-Proportionate Regulation:** Regulate based on actual harm, not on nicotine presence alone.
2. **Preserve Adult Access:** Ensure that adult consumers can access nicotine pouches, especially flavored varieties, which are crucial for helping smokers switch.
3. **Reject Prohibitionist Models:** Avoid generational bans or restrictions based solely on age cohort. These create unequal rights and fuel black markets.
4. **Educate, Don't Criminalize:** Invest in public education about safer alternatives rather than focusing solely on enforcement.
5. **Protect Innovation:** Allow room for continued innovation in harm reduction technologies.

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Conclusion

Morocco has the opportunity to be a leader in pragmatic tobacco harm reduction. By adopting proportionate standards, preserving adult choice, and learning from global successes like Sweden, the country can save lives without criminalizing consumers or fueling illicit trade.

We would welcome the opportunity to engage further with Moroccan regulators to provide scientific insight and share best practices from other regions.

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