



# CONSIDERATE POUCHERS

## The view from pouch users across Europe

Considerate Pouchers is a consumer advocacy group representing adult users of nicotine pouches across Europe. Many of our members, including this author, are former smokers who quit cigarettes thanks to these products. We welcome the opportunity to contribute the consumer perspective, which is too often absent from this debate.

### What this looks like from the consumer side

Divergent national rules mean that a legal product in one Member State is a criminal offence in another. France's 2025 ban on nicotine pouches is the clearest example: adults who switched away from cigarettes lost legal access overnight, while cigarettes remained on every shelf. Whatever direction this revision takes, it must protect legal adult access. It must not turn the most restrictive national approach into the European standard.

We caution against framing nicotine pouches primarily as a public health risk. The evidence points the other way. Sweden, the only Member State with wide availability of snus and nicotine pouches, has reached a daily smoking rate of 3.7 percent according to the latest report from the Swedish Council for Information on Alcohol and Other Drugs (CAN, Vanor och konsekvenser 2025), well below the WHO smoke-free threshold of 5 percent. Sweden also records roughly 41 percent lower cancer incidence and 44 percent fewer smoking-related deaths per capita than the EU average. It is smoke, not nicotine, that causes the overwhelming majority of smoking-related disease. Pouches contain no tobacco leaf and involve no combustion. Treating them like cigarettes ignores the risk continuum that the evaluation itself acknowledges exists.

### Regulation that works, regulation that backfires

We support bringing nicotine pouches into EU scope through proportionate, product-specific regulation, in particular a harmonised minimum purchase age of 18, enforced consistently across all Member States.

We oppose options that would restrict these products to the point of de facto prohibition, in particular blanket flavour bans and nicotine caps below 20 mg per pouch. Flavours are not a

youth lure. They are the reason adult smokers stay switched instead of returning to cigarettes. Caps set below the levels that satisfy adult smokers make the product useless as an alternative and push users back to cigarettes or to stronger unregulated products. Survey data and the Swedish experience both confirm this.

Prohibition does not eliminate demand, it relocates it. Where pouches are banned, consumers turn to unregulated cross-border and online markets with no age verification, no quality control and no labelling. A restrictive TPD3 would hand the market to illicit sellers while punishing the one Member State that actually achieved smoke-free status.

### **What we ask of the Commission**

The roughly one in four Europeans who still smoke deserve a regulated, dramatically less harmful alternative. The tobacco-free generation goal of Europe's Beating Cancer Plan is best served by helping smokers leave smoke behind, as Sweden has proven. We ask the Commission to assess, as a distinct policy option, a harm reduction framework: strict youth protection combined with legal adult access. We urge the impact assessment to model the consequences of restriction on smoking relapse rates and illicit trade, and to consult consumers directly, not only about them.

Contact:

Juan Rafael Taborcía

**Global Spokesperson of Considerate Pouchers**

[juan@consideratepouchers.org](mailto:juan@consideratepouchers.org) | +34622024435

