

## Public submission from Considerate Pouchers to the Latvian Government

### About Considerate Pouchers

Considerate Pouchers is a global advocacy group of like-minded nicotine pouch users passionate about ensuring that our safer nicotine product of choice is not banned or overregulated. We collaborate with other organisations that are aligned with a comprehensive approach to ending smoking. Considerate Pouchers is an independent platform set to represent pouchers around the world part of and supported by the Snus & Nicotine Pouch Users Alliance.

More information can be found on [www.consideratepouchers.org](http://www.consideratepouchers.org)

### About this consultation and why Considerate Pouchers is responding to it

The [amendment proposal](#) to the [Law on the circulation of tobacco products, herbal smoking products, electronic smoking devices and their liquids](#) bans nontobacco nicotine pouches and limits their nicotine concentration to 4 milligrams per gram.

These restrictions will mean the end of nicotine pouches as a safer alternative to tobacco, condemn their users to smoking or the black market, and heavily damage public health. Through this response we explain why these proposals are a step backwards on the road to a smoke-free Latvia and how the Latvian government can improve public health by promoting the use of nicotine pouches and other reduced-risk nicotine products for smoking cessation.

### Considerate Pouchers' comments to the Latvian Government:

Nicotine pouches are a smoke-free product that helps people stay away from smoking. They are made of non-woven materials and manufactured from fibres. Inside, the main ingredients are microcrystalline cellulose, pharmaceutical grade nicotine, binders, water and flavourings. They can come in a variety of flavours, nicotine strengths, sizes and packaging options, and they are used by placing them under the lip typically for between 30 minutes and an hour, where nicotine is absorbed through the oral mucosa.

[Research](#) has shown that nicotine pouches are the least harmful nicotine alternative to smoking, since their risk to health is similar to that of products used in conventional nicotine replacement therapy, such as nicotine patches or nicotine gum. At the same time, nicotine pouches can quickly deliver a high amount of nicotine to the user, to a similar extent as other smokeless products according to a [study](#).

These two characteristics make nicotine pouches a great tool for smoking cessation. They allow smokers to intake a similar amount of nicotine as with cigarettes, but with a much-reduced harm. This is possible because nicotine is relatively harmless, while the health damage from cigarettes comes from the [over 70 cancer-causing chemicals present in tobacco](#).

Yet, for nicotine pouches to be an effective and attractive alternative product for smokers looking to quit, nicotine concentrations and flavours play a key role.

Each smoker is a different case and needs a particular nicotine concentration for nicotine pouches to work for him as an alternative to smoking, so – keeping in mind that nicotine is virtually harmless – having as many nicotine concentration options as possible in the market maximizes the likelihood of a smoker switching and improves public health. The proposed restriction does not only limit the options of smokers to switch, it also makes it almost impossible for them to do so and for users to keep consuming nicotine pouches instead of smoking. The proposed 4 milligrams per gram limit is too low for nicotine pouches to work as a smoking cessation aid. Most users use higher concentrations and would be excluded.

Most nicotine pouches weigh between 0.3 and 1 grams, with the most common weight being around 0.5 grams. In the European Union Member States that have regulated nicotine pouches, their nicotine concentration limits vary between 12 and 20 milligrams per pouch. This is, nicotine concentration limits across the EU for the medium pouch vary between 24 and 40 milligrams per gram: between 6 and 10 times more than what has been proposed in Latvia.

Such a low nicotine concentration limit will discourage smokers to try nicotine pouches to stop smoking and will make nicotine pouches insufficient for current users. Current users will try to obtain pouches with higher nicotine concentrations in the black market or go back to smoking, and public health will suffer.

Similarly, flavours play an important role when it comes to nicotine pouches working as an alternative to smoking. They are attractive for smokers looking for safer alternatives and can be an incentive to switch. They help users forget the flavour of tobacco and stay away from smoking.

Banning flavoured nicotine pouches will discourage smokers to try them and will force current users to obtain their products from the black market, where products do not pass safety and quality checks, do not pay taxes and are not kept away from minors. If current users cannot find them in the black market and are forced to use tobacco flavoured pouches, they are more likely to go back to smoking. Either way, public health will be damaged.

We therefore urge the Latvian Government to not implement the proposed flavours and nicotine concentration restrictions to protect public health and the life of all Latvian current and former smokers.