



Public submission from the World Vapers' Alliance to the Finnish Government

About the World Vapers' Alliance

The World Vapers' Alliance (WVA) amplifies the voices of vapers worldwide and empowers them to make a difference in their communities. Our members are vapers associations and individual vapers from all over the world. More information can be found on www.worldvapersalliance.com

About this consultation and why the World Vapers' Alliance is responding to it

The Finnish Government's [amendment proposal](#) to the [Tobacco Act](#) jeopardises smoking cessation efforts in Finland by restricting access to safer nicotine alternatives such as nicotine pouches and snus. It aims to impose restrictions on the sale of nicotine pouches, such as banning some flavoured products, limiting their nicotine concentration and introducing plain packaging. The amendment also aims to reduce the amount of snus importable as a passenger in Finland to half its current level.

The World Vapers' Alliance participates in this consultation to provide scientific evidence and comments on the proposed restrictions and their potential impact on public health to the Finnish Government.

How to read this document:

We respond to the main regulatory changes presented in the amendment proposal separately.

Banning flavoured nicotine pouches: The proposed amendment plans to ban the sale of alcohol and cannabis-flavoured nicotine pouches, as well as flavours that are 'likely to appeal to children and young people', including candy, dessert, fruit and berry flavours.

WVA's response:

The targeted flavours are not intended to attract children and young people to nicotine consumption but to satisfy the needs and tastes of adult users. They provide an incentive for smokers looking for safer nicotine alternatives to try nicotine pouches and help them quit smoking for good by allowing them to forget the taste of tobacco.

In general, it has been demonstrated that flavours play a central role in smoking cessation. In the case of vaping, Dr Colin [Mendelsohn \(2017\)](#) summarised their role as follows: *"Flavours are an important part of the appeal of vaping for adult smokers and make the products attractive as an alternative to smoking, just as flavours are also used to enhance the appeal of nicotine gum."*

Researchers from the Yale School of Public Health [Friedman & Xu \(2020\)](#) proved this idea and associated the use of vaping flavours with a 230% increase in the odds of adult smoking cessation. These findings can easily be extended to nicotine pouches, as they work in a similar way to e-cigarettes as a smoking cessation tool.

As a consequence, their prohibition will prevent thousands of smokers from switching and would push a share of users back to smoking. Similarly, we can expect a significant proportion of users to try to obtain flavoured nicotine pouches on the black market. Evidence from surveys and vaping flavour bans across the globe (such as in [Canada](#), [San Francisco](#), [Massachusetts](#) or [Estonia](#)) has shown that they rather push vapers back to smoking or to the black market. Again, there is no reason to think that a flavour ban will work differently in the case of pouches.

It is estimated that between 80% and 90% of nicotine pouches sold on the market contain flavourings. Their prohibition would effectively end the legal nicotine pouches market in Finland. In summary, the unintended negative consequences of the flavour ban will make it a public health disaster. We therefore urge the Finnish government to reconsider its approach and reject banning flavoured nicotine pouches.

Limiting nicotine concentration: the amendment proposal aims to establish a limit of 20 milligrams of nicotine per gram of product.

WVA's response:

Regardless of their nicotine concentration, nicotine pouches are the least harmful alternative to smoking, as [Azzopardi, Liu & Murphy \(2022\)](#) proved, with a risk profile similar to that of conventional nicotine replacement therapies (such as nicotine gums or nicotine patches). They work as a smoking cessation tool because they can deliver a high amount of nicotine with very

limited risks, as [Lunell et al. \(2020\)](#) demonstrated: *“The two higher doses of ZYN (6 and 8 mg) deliver nicotine as quickly and to a similar extent as existing smokeless products, with no significant adverse effects.”*

These two characteristics make nicotine pouches a great smoking cessation aid with great potential to save lives and improve public health. Yet, setting a nicotine concentration limit could prevent those smokers who need high levels of nicotine from switching.

Nicotine is relatively harmless and it is an important factor in whether smokers are able to switch. Each user needs a different concentration for nicotine pouches to be a good replacement for tobacco, with most of them using concentrations above 4 milligrams per gram. While the proposed 20 milligrams per gram limit may be ok for most users, it may also prevent others from switching, so we encourage the Finnish government to consider the implications of this measure and evaluate its impact on smokers and users.

Requiring health warnings in the product's packaging and harmonising their appearance (plain packaging): the amendment proposal aims to introduce mandatory health warnings in the packaging of nicotine pouches and implement plain packaging.

WVA's response:

While it is important to make users aware of the risks of nicotine pouches, it is vital that their risk is presented in relation to that of cigarettes. Nicotine pouches are not just a nicotine product, they are a product to consume nicotine in a less harmful way and to quit smoking and should be promoted as such. We, therefore, urge the Finnish government to allow information on the packaging of the products relative to their low health risks in comparison with smoking and their use as a smoking cessation tool.

Halving the amount of snus importable as a passenger into Finland: the amendment proposal aims to limit the imports of snus as passengers to 500 grams per calendar day instead of the previous 1000 grams.

WVA's response: Snus is a smokeless, moist powder tobacco pouch that is far less harmful than smoking and helps smokers quit. Thanks to its large-scale adoption by smokers in Sweden, Sweden is on the verge of becoming the first smoke-free country in the world by reaching a 5% smoking rate.

The sale of snus is banned throughout the European Union with the exception of Sweden, although imports as passengers are allowed up to a certain level. Instead of making it even more difficult for smokers to access them, the Finnish government should move in the opposite direction and allow smokers to use them within their means to quit smoking. We therefore urge them not to halve the allowed import limit for passengers.

WVA's conclusion remarks:

Nicotine pouches have been proven to be substantially less harmful than smoking and great tool to quit smoking, with flavours playing a vital role in the process. Therefore, we urge the Finnish Government to consider all the evidence and establish the necessary measures to keep nicotine pouches (including all flavours) available for adult smokers.

A comprehensive review of the literature can be found in our Vaping and Harm Reduction Fact Sheet here: <https://worldvapersalliance.com/harm-reduction-vaping-fact-sheet/>

For any questions or comments, please contact the submitter of the response.