



To,

Shri, Jagat Prakash Nadda
Hon'ble Union Health Minister
(Min of health & Fam Welfare)
348-A, Nirman Bhavan, Maulana Azad Road,
New Delhi - 110011"

Date-25-09-24

Dear Sir,

SUBJECT: REPRESENTATION FOR URGENT ADDITION OF NICOTINE POUCHES IN THE LIST OF VAPE AND HNB TOBACCO SO IT FALLS UNDER THE AMBIT OF COMPREHENSIVE BAN OF E CIGARETTES AS OUTLINED IN PROHIBITION OF ELECTRONIC CIGARETTES (PECA) ACT OF 2019

We (Shram) are a self-help group with large number of doctors and professionals, working in the field of health and education since many years unstintingly building awareness campaigns against tobacco and alcohol. Objectives of Shram dictate us that we assist Govt in arriving at judicious decisions on all policy matters relating to the health of citizens. It is under this capacity we are writing you this letter.

Tobacco control has been a flagship program of Govt. of India as per the National Tobacco Control Program and the Union Health Ministry has undertaken lot of measures to fight the menace of tobacco including the new and fancy categories of tobacco like introduction of PECA Act of 2019, Comprehensive banning e-cigarettes and heat-not-burn products. The World Health Organization has indicated that smokeless tobacco and vaping contributes to a significant morbidity in the developing world including India.

We want to express our deep apprehensions about the introduction of a new category of nicotine products, specifically Nicotine Pouches, that are being marketed by international tobacco companies as a "reduced risk" alternative to tobacco products. These products are tobacco-free but filled with nicotine, sweeteners, and flavors, and they are placed between the lip and gum for absorption through the oral mucosa. Our concern stems from the following facts as enumerated below.

Targeting Youth and Young Adults

Nicotine pouches are being aggressively marketed towards young people using flavours such as black cherry, apple mint, berry, and coffee, and are available in varying nicotine strengths (2mg to 20mg). This wide range of appealing flavours and discreet usage options make them especially attractive to youth.



connect@shram.co.in



www.shram.co.in



[@shramindia](https://twitter.com/shramindia)

Much like with e-cigarettes, social media platforms such as TikTok and Instagram are being used to promote these products to a younger audience. The introduction of these pouches as a “gateway” to nicotine addiction, particularly among non-smokers and non-vapers, is deeply concerning. Evidence from various global markets demonstrates that these products can easily lead to nicotine dependency, with serious long-term consequences for brain development and behaviour, particularly in adolescents.

Marketing Tactics of International Tobacco Companies

The tactics being employed by tobacco companies to push nicotine pouches in India mirror those used to market other harmful products like e-cigarettes and heated tobacco products globally. Flavoured nicotine pouches are being promoted through digital ads, influencer marketing, and television commercials in limited markets. These companies often promote nicotine pouches as a means to maintain nicotine consumption where smoking or vaping is not possible, undermining any claims of these products being cessation tools.

It is also worth noting that international companies are capitalizing on loopholes in regulatory frameworks to market nicotine pouches under the guise of “Nicotine Replacement Therapy (NRT)” products. This is an insidious attempt to gain approval for mass marketing while bypassing public health scrutiny. In countries like Canada, this strategy has already been exposed, and public health experts are sounding the alarm about the dangers these products pose to a new generation.

Health Risks and Global Concerns

Numerous health experts and organizations, including the World Health Organization (WHO), have expressed concerns about the adverse health effects of nicotine pouches. Though positioned as a “safer alternative,” these pouches can still contain harmful substances such as tobacco-specific nitrosamines, which are linked to DNA damage and cancer. Side effects commonly reported include gum and mouth irritation, nausea, hiccups, and heightened nicotine addiction.

Nicotine exposure in adolescents can lead to cognitive impairments, attention problems, and addiction. A report by the American Lung Association highlights that nicotine usage before full brain development (which occurs in the mid-to-late 20s) can have significant adverse effects on memory, learning, and behaviour. In the U.S., the FDA has issued numerous warnings to retailers for selling these products to underage consumers, underscoring the risks they pose to public health.

Countries such as Russia, Belgium, the Netherlands, Argentina, and Singapore have already taken decisive steps to ban nicotine pouches. These actions are based on growing evidence of the health risks associated with these products, especially in young populations. For instance, Russia banned nicotine pouches in 2020 due to high nicotine content and usage by minors. In Belgium, the government cited the addictive nature of these products and their potential to serve as a gateway to smoking as key reasons for prohibition.

The Indian Context

India, with the world's largest smokeless tobacco consumer base, already faces an immense public health burden due to tobacco-related diseases. As the WHO report highlights, smokeless tobacco use is associated with a wide range of cancers and cardiovascular diseases. Introducing nicotine pouches into this environment would exacerbate the already severe public health crisis, particularly among youth. These products, marketed under the guise of tobacco cessation aids, are nothing more than addictive substances aimed at hooking the next generation of consumers.

The Ministry of Health and Family Welfare's Tobacco Control Division (TCD) has already raised concerns about the misuse of nicotine products like gums and patches, warning that such products can be used for addiction rather than cessation. There is no justification for allowing nicotine pouches in India, especially when a variety of safer NRT products such as gums, lozenges, and patches are already available.

Our Appeal

In light of the above concerns, I respectfully urge you to consider the following Suggestions.

1. **Complete Ban on Nicotine Pouches:** Following the lead of countries like Russia, Belgium, and the Netherlands, India should impose a total ban on the production, import, sale, and marketing of nicotine pouches. Allowing these products to proliferate would create a new public health burden, particularly for our youth.
2. **Prohibit Pharma Route for Nicotine Pouches:** The government should prevent international companies from exploiting the pharmaceutical approval route to introduce nicotine pouches as cessation aids. Their real motive is clear: to capture new consumers, particularly the youth, for long-term nicotine addiction.
3. **Strengthen Monitoring and Enforcement:** Ensure that any nicotine-related products marketed in India, including those already approved as cessation aids, are subject to stringent monitoring and regulation to prevent misuse.

The Government of India has made tremendous strides in protecting public health by banning e-cigarettes and heated tobacco products in 2019. It is now time to extend that protection by banning nicotine pouches before they can take root in the Indian market. The evidence is clear: these products pose a significant risk to public health, particularly for our children and young people.

We trust that the government will take the necessary steps to safeguard the health of the nation by prohibiting the introduction and sale of nicotine pouches in India. We look forward to your prompt action to protect public health.

Yours sincerely,



Dr Mukul bajpai
Founder SHRAM

Copy To

1-Smt Punna Salila Srivastava, IAS
Officer on Special Duty - Ministry of Health & Family Welfare
"158-A, Nirman Bhavan, Maulana Azad Road,
New Delhi - 110011"
secyhfw@nic.in

2- Smt V.HeKali Zhimomi, IAS
Additional Secretary - Ministry of Health & Family Welfare
254-Wing A / 6th Floor Chandra Lok Building,
New Delhi -110001
zhimomiv@ias.nic.in

Note - This letter has been drafted and edited by our editorial team and has approval of members of
Shram