

NICOTINE POUCH INTELLIGENCE

Regulatory and scientific updates in the nicotine pouch industry. Assessing industry impact



NIC

REGULATORY INFLUENCES

This month's developments mark a decisive shift in how oral nicotine products are being perceived and scrutinised globally. A wave of new studies, media investigations and enforcement actions is reshaping the narrative around nicotine pouches highlighting youth uptake, adverse-event reporting, marketing practices and the regulatory vacuum in several major markets. As policymakers head into COP11 and national governments prepare their 2026 agendas, the evidence base driving these debates is expanding rapidly. For manufacturers, the signals are clear: regulatory expectations are rising fast.



Nicotine Strength Concerns

Experts are raising concern in the UK as sales of high-dose nicotine pouches surge. These products, sold in colourful tins and marketed as “tobacco-free”, contain nicotine levels as high as 97.5 mg far beyond typical nicotine gum. Teenagers report rapid “rushes”, nausea, fainting and frequent use in schools. While the sachets may represent a lower-harm option for smokers, the evidence for their quitting efficacy is weak. The primary worry now is uptake among never-smokers and adolescents whose developing brains are uniquely vulnerable to nicotine’s addictive effects. [Link](#)



Scottish Teen Warnings

A new qualitative UK study of 14-16 year-olds in Scotland finds widespread awareness of nicotine pouches, with many reporting use in school settings. Users describe these tobacco-free sachets as easy to hide and offering a “nicotine rush,” yet report adverse effects including gum pain, mouth/throat burning, nausea, sweating and fainting. Staff were largely unaware of their use. The products remain unregulated in the UK and are legally available to under-18s, prompting researchers to call for urgent regulatory action and enhanced public-health messaging. [Link](#)



Pouch Use Among Kids

The use of nicotine pouches among UK children is rising rapidly, with awareness in 11- to 17-year-olds climbing from 38 % to 43 % within a year. Brightly packaged, candy-like tins of fruity-flavoured sachets delivering 4-20 mg or more nicotine are popular in schools. Many teens carry them in class or sleep with them under their lip. Parents and experts express alarm: although pouches are likely less harmful than cigarettes, the high nicotine doses, youth-use and lack of marketing/age controls present major addiction and health risks. The forthcoming Tobacco and Vapes Bill would ban under-18 sales, regulate flavours and cap strengths.

[Link](#)



Nicotine Access Loophole

A recent article highlights a regulatory anomaly: while many consumer products like alcohol or Christmas crackers have age limits, there is currently no minimum age-of-sale for nicotine pouches in the UK. These oral sachets containing nicotine are often brightly packaged and have become accessible to children and teenagers, with experts warning that this legal gap allows youth uptake and addiction risk. Observers argue urgent reforms are needed such as instituting a legal age threshold, limiting flavours and restricting marketing to prevent young people from gaining easy access to high-dose nicotine products.[Link](#)



Advent Pouch Launch

Nicokick has introduced its first-ever nicotine-pouch “advent calendar” for adult consumers aged 21+, set to launch on 12 November 2025. Priced at US \$69.99, the limited-edition box includes 24 sealed cans, each from different established and emerging brands (e.g., ZYN, VELO, Sesh). Strengths range from 3 mg to 9 mg with flavours like mint, citrus, wintergreen and seasonal variants such as spiced cider and espresso martini. The initiative is described as a “transparent, seasonal way for adult nicotine users to explore a variety of pouches” and is positioned as part of their smoke-free innovation journey.[Link](#)



Youth View On Pouches

A UK qualitative study of 14-16-year-olds finds high awareness of nicotine pouches, easy access, and experimental use in schools. More established use was reported especially among older boys, who can use pouches discreetly during class. Pupils reported adverse effects such as gum pain, throat burning, nausea and fainting. School staff, by contrast, were largely unaware of the products and their prevalence. The report calls for stricter enforcement and regulation on age-of-sale, flavour, strength and packaging of nicotine pouches. [Link](#)



Snus v Pouches

The article compares Snus (traditional moist tobacco pouches) with modern tobacco-free Nicotine Pouches, highlighting key differences in composition, risk profile and regulatory treatment. Snus contains tobacco leaf and is extensively studied via decades of Swedish experience, showing substantially lower harm than smoking. By contrast, nicotine pouches contain no tobacco-leaf, only nicotine with flavourings, and while early evidence suggests similarly favourable outcomes, long-term data are lacking. Both sidestep combustion and reduce toxicant exposure, but youth-use, regulatory grey zones and unknown long-term effects remain significant concerns. [Link](#)



Unregulated Pouch Use

A UK study led by University of Stirling and Scottish Centre for Social Research finds that 14- to 16-year-olds in Scotland are experimenting widely with unregulated nicotine pouches, which can legally be sold to under-18s in the UK. Users report discrete use during school hours and adverse effects including gum pain, throat burning, nausea, sweating and fainting. School staff remain largely unaware of these products. The researchers stress that stronger regulation and improved public-health messaging are urgently required. [Link](#)



Illicit Pouch Sales

A shop in Crawley and its director were fined after trading-standards inspections revealed they sold unmarked, non-compliant nicotine pouches and unlawful nicotine-e-liquid to a 16-year-old. The offences followed repeated warnings and a previous seizure earlier in the year. During inspection on 19 March 2025, 126 packets lacking required UK labelling were confiscated. On 9 October 2025 the business and director pleaded guilty to offences including sale of age-restricted products and regulatory breaches, each fined £1,376. [Link](#)



WHO Flags Youth Pouch Use

World Health Organization (WHO) warns that the rapid expansion of e-cigarette and nicotine-pouch use among young people undermines decades of tobacco-control gains. According to its recent position paper, the industry is leveraging “harm-reduction” language while aggressively marketing nicotine pouches and e-cigarettes with bright packaging, flavours and influencer campaigns to adolescents. WHO highlights that more than 15 million children aged 13-15 now vape globally, are nine times likelier than adults to do so, and calls for alternative products to be regulated as strictly as conventional tobacco. [Link](#)

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Designing with Impact in mind

“What people want isn't always what they need. What they need should guide what we build”

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1



TikTok Normalises Pouch Use

This qualitative study analysed 132 TikTok videos to understand how oral nicotine pouches, particularly Zyn, are portrayed on the platform. Five themes emerged. ONPs were framed as a trendy lifestyle product (“the Zyn movement”), strongly associated with male identity (“boy heaven”), and celebrated for convenience and discreet use (“life doesn’t have to stop”). Users frequently minimised harms, presenting acute nicotine sickness and longer-term oral effects as trivial or humorous. Some videos promoted unproven “benefits,” such as cognitive enhancement. Overall, TikTok content overwhelmingly normalised and glamorised ONP use, embedding it within youth culture and reinforcing positive perceptions despite known risks of nicotine exposure in adolescence. The authors conclude that youth-focused policy, platform restrictions, and targeted prevention strategies are urgently needed. [Link](#)

2



Veteran Pouch Use Trends

The study titled “Prevalence & Characteristics of E-Cigarette and Nicotine Pouch Use Among United States Military Veteran Smokers” evaluated 93 veteran smokers (primarily male, average age >50) through a cross-sectional survey. It found that 44% reported dual use of cigarettes plus alternative nicotine products (ANPs) including e-cigarettes and nicotine pouches. Among ANP users, over half used both e-cigarettes and pouches; pouches alone were used by 7%. Users commonly reported ANPs to be as addictive as traditional cigarettes. Dual users were less likely to have made past-year quit attempts and more often smoked about 0.5 packs daily. The authors note that convenience and cost were key motivations for ANP use, and they call for larger epidemiological and experimental studies to better understand these usage patterns in veteran populations. [Link](#)

3



Emerging Nicotine Health Risks

This comprehensive review evaluates the health risks of e-cigarettes, heated tobacco products (HTPs), and tobacco-free nicotine pouches (“white snus”). Evidence shows e-cigarettes are consistently associated with asthma, wheeze, COPD, and acute lung injury, with supporting mechanistic data demonstrating inflammation, oxidative stress and DNA damage. Limited but concerning evidence links e-cigarettes to cardiovascular disease, diabetes, cancer-related biomarkers and adverse pregnancy outcomes. Early HTP studies suggest similar respiratory and metabolic risks. For nicotine pouches, evidence is almost entirely absent, but given their high nicotine delivery, the authors conclude it is plausible they increase risks of diabetes, pregnancy complications and other nicotine-related effects. The review emphasises the urgent need for robust longitudinal studies to inform regulation. [Link](#)

4



Price, Tax, Substitution Dynamics

This study provides the first US evidence on how oral nicotine pouch (ONP) sales respond to prices and to taxes on cigarettes and e-cigarettes. Using 35 months of Nielsen state-level sales data, the authors find that ONP demand is price-responsive in convenience stores a 10% price increase is associated with a 2.3% fall in sales suggesting ONP taxes could reduce use. Crucially, higher cigarette taxes strongly increased ONP sales, indicating ONPs act as economic substitutes for cigarettes and may draw smokers toward lower-risk products when cigarette prices rise. By contrast, e-cigarette taxes showed no meaningful effect on ONP sales. The authors conclude that ONP taxation should account for harm-reduction potential, and that coordinated tax systems are essential to avoid unintended shifts across nicotine products. [Link](#)

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5

Pharmacist Attitudes Switzerland

This Swiss national cross-sectional survey examined community pharmacists' attitudes toward smoking-cessation interventions and alternative nicotine delivery systems (ANDS). The findings reveal that while most pharmacists view traditional smoking-cessation tools as important, fewer express confidence or readiness in recommending ORAL nicotine pouches and other ANDS. Key barriers include limited knowledge of regulatory status, concerns about youth uptake, and uncertainty over efficacy and safety profiles. Pharmacists indicated a strong desire for clearer guidelines, training and evidence to integrate these newer formats into cessation practice. The authors conclude that pharmacists represent an underutilised resource in expanding harm-reduction pathways but need support to fulfil this role. [Link](#)



6

Biomarkers & Pouch Use

In this study of exclusive users of oral nicotine pouches (ONPs), researchers measured biomarkers of exposure (BoE) and potential harm (BoPH) to assess health-impact profiles compared to combustible cigarette smokers. They found ONP users had significantly lower levels of specific tobacco-related toxicant biomarkers (e.g., TSNAs) than cigarette smokers, suggesting reduced exposure. However, some BoPH indicators such as oxidative stress and inflammation markers remained elevated, though generally lower than in smokers. The authors conclude that while ONPs may offer reduced-exposure potential, they are not devoid of risk and call for long-term studies to define clinical harm, particularly for dual users. [Link](#)



7

Teens Normalising Pouch Use

This UK qualitative study explores 14–16-year-olds' awareness, access and use of nicotine pouches, revealing widespread familiarity and growing experimentation. Pupils especially older boys described pouches as easy to obtain through peers, older siblings and certain retailers, with social-media selling also common. Young people valued pouches for their discreet use in school and the strong “nicotine rush,” often perceiving them as less harmful than vaping because they affect “gums, not lungs.” However, many reported adverse effects, including gum pain, nausea, sweating, rapid heartbeat and fainting, sometimes linked to high-strength products. School staff were largely unaware of pouch use among pupils. The authors conclude that rising youth uptake, misconceptions of reduced harm and frequent side-effects underline the need for regulation, monitoring and targeted public-health messaging. [Link](#)



8

Pouch Appeal in Pakistan

This qualitative study of 113 adolescents (aged 10-16) in Pakistan explored perceptions of the nicotine pouch brand Velo. Researchers identified four key themes: exposure (regular visibility at point-of-sale, online and via peers), accessibility (participants perceived minimal resistance from vendors), appeal (described as stylish, modern, discreet and candy-like), and harm perceptions (some viewed the pouches as less harmful than cigarettes due to lack of warnings, while others recognised risks of addiction, vomiting and headaches). The authors conclude that product design, packaging and marketing create adolescent appeal, underscoring the need for tighter age restrictions, point-of-sale regulation and clearer health warnings. [Link](#)

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Pouch Promotion Channels

A recent study published in Tobacco Control analysed promotion tactics of nicotine pouches via music festivals, exclusive concerts and reward programmes. It found that brand-sponsored events and influencer collaborations provide direct access to younger adult audiences, while reward-programme mechanics drive product trial and sustained usage. Discreet pouch formats combined with lifestyle marketing blur the line between tobacco-control frameworks and general consumer goods. The authors conclude that the promotional environment is rapidly evolving, and urge regulators to revisit age-of-sale enforcement, event-sponsorship transparency, and digital-marketing controls to mitigate youth uptake risk. [Link](#)

Across the growing body of reporting and research in the first half of Nov 2025, a clear and consistent set of themes is emerging each carrying significant regulatory implications for nicotine-pouch manufacturers. Youth uptake is the dominant concern across all jurisdictions. Multiple UK studies, as well as international qualitative work, show teenagers easily accessing pouches, often using them discreetly in classrooms, and experiencing acute side-effects such as nausea, fainting, gum pain and throat irritation. Media reports amplify this pattern, highlighting pouches with high nicotine strengths, confectionary-style packaging, and the absence of coherent age-of-sale laws. These findings are now shaping the public narrative: nicotine pouches are perceived less as harm-reduction tools and more as unregulated youth-oriented products. Policymakers will inevitably respond.

A parallel theme is marketing and lifestyle positioning. Investigations into event sponsorships, influencer-driven promotion and reward programmes show that pouches are being integrated into music festivals, youth-culture spaces and digital ecosystems. This blurring of tobacco-control boundaries will likely prompt regulators to extend advertising and promotion prohibitions currently applied to cigarettes and e-cigarettes. Expect future rules mandating full sponsorship transparency, restrictions on cultural-event partnerships, and potentially the classification of reward schemes as inducements subject to prohibition.

Scientific evidence is also beginning to crystallise. Biomarker data indicate substantially reduced toxicant exposure relative to cigarettes, but not zero risk with certain inflammation markers remaining elevated. This “lower but not negligible” profile will shape regulatory rhetoric, driving calls for product standards rather than outright bans. Conversely, long-term uncertainty will support precautionary frameworks, especially where youth uptake is visible.

Regulators are also increasingly focused on product design: high nicotine strengths, flavours, and the “candy-tin aesthetic” repeatedly appear as risk factors. Expect imminent moves to cap nicotine levels, enforce plain or standardised packaging, restrict flavours, and require on-pack health warnings equivalent to or modelled on those used for e-cigarettes. Age-of-sale harmonisation to 18+ across the UK and EU appears inevitable, alongside digital-age verification for online sales.

Enforcement trends show another predictable trajectory. Seizures of illicit pouches, prosecutions for selling to minors and cross-border inconsistencies are all rising. Manufacturers should anticipate tighter import controls, registration requirements, and traceability obligations similar to TPD/TPD2 schemes. In effect, the regulatory environment is converging towards a fully codified category, with expectations aligning to those applied to established nicotine products. Manufacturers who invest early in compliance, scientific substantiation and responsible marketing will be best positioned as this regulation solidifies.

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NICOTINE POUCH INTELLIGENCE

Regulatory and scientific updates in the nicotine pouch industry. Assessing industry impact

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This month's intelligence briefing highlights a critical turning point for the nicotine pouch sector. A wave new scientific studies, media coverage, and policy signals is reshaping how regulators view ONPs; simultaneously as rising youth risk and high-potential harm-reduction tools, particularly those in disadvantaged groups. The next phase of regulatory evolution will be shaped not only by evidence but by industry behaviour. This edition outlines the emerging landscape and what responsible companies must do now to protect the category's future.



1

Reality of Access

A new survey by Haypp, summarised via Talking Retail, reveals a major mismatch between perception and reality around youth access to nicotine pouches. While two-thirds of UK adults believe minors find it easier to buy pouches online, most under-18 purchasers actually obtained them from physical stores 56% from corner shops and 17% from supermarkets.

That means roughly 73% got pouches from brick-and-mortar outlets, versus only 21% buying online when underage. This disconnect underscores that high-street retail remains the leading access point for minors, challenging assumptions that online sales pose the greatest under-age risk.

[Link](#)



2

Imperial Pouch Relaunch

Imperial Brands has launched a new nicotine-pouch brand, ZONE, in the UK marking its formal entry into the mainstream smokeless-nicotine category.

Positioned within the core 9–12 mg segment which currently constitutes ~43.4% of the UK pouch market ZONE aims to capture increasing demand for discreet, on-the-go nicotine alternatives.

According to Imperial, the nicotine pouch category in the UK is predicted to grow by 234% over the next five years making ZONE a strategic commercial opportunity for both retailers and the company's next-generation product portfolio.

[Link](#)



3

Velo Drives Growth

PJ Carroll & Co, the Irish subsidiary of British American Tobacco, reported dramatic growth in its Velo nicotine pouch business. Sales surged from 6 million pouches in 2023 to 29 million in 2024, driving a 442% increase in revenue and giving Velo a 45.9% share of Ireland's nicotine-pouch market. This strong performance offset declining cigarette sales and contributed to an 11% rise in overall net revenues for the company. However, despite the surge in next-generation product growth, pre-tax profits still fell by 8%, reflecting wider pressures in the combustible tobacco segment.

[Link](#)



4

Nicotine Pouch Risks

Unilad summarises evidence on health risks associated with Zyn and other nicotine pouches stressing that while these products avoid tobacco combustion, they are not harmless. Reported side-effects include nausea, gum soreness and ulcers, gastrointestinal discomfort, and oral irritation among users. Nicotine itself remains addictive, can raise heart rate and constrict blood vessels, and may contribute to cardiovascular strain.

Given limited long-term data, health experts caution that pouches should not be treated as "risk-free," especially by non-smokers, young people or those with underlying health conditions. [Link](#)



7

UK Rejects Restrictions

A new Talking Retail poll shows most UK adults oppose Ireland-style restrictions on nicotine pouches and prefer a regulated, not prohibitionist, framework. Only a small minority support an outright ban, while 44% favour proportionate regulation that keeps products available for adults. The survey also found growing public recognition of nicotine pouches as lower-risk alternatives, with around 30% believing stop-smoking services should be able to recommend them. Overall, the results indicate that UK consumers favour harm-reduction policies over the more restrictive approach recently introduced in Ireland. [Link](#)



8

Retailer Success Essentials

Retail expert Markus Lindblad outlines how retailers can maximise nicotine-pouch sales by focusing on customer needs rather than overwhelming brand variety. He emphasises three key drivers of purchasing decisions: flavour, price and nicotine strength. Staff training is essential so teams can explain strengths, guide smokers transitioning from cigarettes, and clarify that pouches differ from tobacco-containing snus, which remains illegal in the UK. Lindblad argues that as customer awareness grows, informed advice and curated product ranges will be central to helping retailers capture the rapidly expanding nicotine-pouch category. [Link](#)



5

UBC Study Warning

A UBC Okanagan study, reported by Castanet, warns that TikTok is making nicotine pouches such as Zyn appear trendy and risk-free to young people. Researcher Dr Laura Struik analysed 250 TikTok videos, which collectively attracted over 16 million likes, more than 114,000 comments and almost two million shares. Videos typically present pouches as easy, discreet and socially desirable, framing one brand as empowering and exclusive. Struik cautions that prolonged use may cause oral cancer and heart problems, calling the products "nicotine addiction starters," not cessation tools, particularly among adolescent users. [Link](#)



6

Luxembourg Pouch Ban

Luxembourg's recently adopted Bill 8333 sets an extremely low maximum nicotine limit of 0.048 mg per pouch, prompting industry, public-health experts and some politicians to argue that the measure functions as a de-facto ban rather than a regulation. Lawmakers insist the intent is consumer protection, but critics note that no commercially available pouch can meet such a threshold, effectively removing the category from the market. Concerns have also been raised that users may turn to neighbouring countries or illicit sources, undermining oversight, tax revenue, and harm-reduction opportunities. [Link](#)



9

Youth Uptake Rising

Nicotine pouches are reportedly "flying off the shelves" across the UK and worryingly, an increasing share of buyers are teenagers. The podcast notes growing youth uptake, often via social or peer influence, raising alarm among public-health advocates about early-age nicotine exposure. Although pouches are touted as discreet, tobacco-free alternatives, their rising popularity among minors underlines a regulatory blind spot and suggests the trend could undermine broader harm-reduction efforts. [Link](#)



10

Discreet Use Rising

In Britain, online discussion about nicotine pouches has soared more than 600% over the past two years, reflecting a shift to discreet, smoke-free nicotine use. Pouches small, tobacco-free sachets placed under the lip are increasingly common among adults, used from offices to football terraces. Swedish firm Empicure recently introduced its new rapid-delivery system Seratek® in the UK, claiming around 80% of nicotine is released within five minutes. The trend underscores a broader move toward convenience-led nicotine consumption and growing market momentum for pouches. [Link](#)

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11

BAT Pouch Surge

British American Tobacco (BAT) is forecast to benefit from strong growth in the U.S. oral-nicotine pouch market, with analysts suggesting volumes could almost double by 2028 if current usage patterns hold. Demand for modern oral products such as BAT's Velo and Velo Plus continues to rise as U.S. cigarette sales decline, giving the company a clearer route to revenue diversification. Analysts note that BAT's U.S. strategy positions pouches as a major future growth pillar, with expanding distribution and consumer adoption supporting expectations of sustained volume and market-share gains over the next several years. [Link](#)



12

Zyn MRTTP Review

The U.S. Food and Drug Administration (FDA) will convene an expert panel on 22 January 2026 to review whether 20 pouch variants of ZYN marketed by Swedish Match USA (a unit of Philip Morris International) can be legally labelled as "lower-risk" alternatives to cigarettes. The proposed claim asserts that switching from cigarettes to ZYN reduces risks of mouth cancer, heart disease, lung cancer, stroke, emphysema and chronic bronchitis. The panel will assess available scientific evidence, likely consumer perceptions, and potential public-health impacts before the FDA issues a final decision. [Link](#)



13

Kennedy Under Pressure

The article describes how Robert F. Kennedy Jr. the public face of Make America Healthy Again (MAHA) struggled to respond coherently when criticised over inconsistencies between his rhetoric and actions. Amid rising scrutiny, the piece argues that Kennedy's lofty health-reform promises ring hollow in the absence of concrete delivery, and that his tendency to demand from others what he fails to practise undermines his credibility. Critics say this erodes public trust in both Kennedy and the MAHA movement's broader agenda. [Link](#)



14

COP11 Exposes Tensions

COP11 highlighted escalating global concern over emerging nicotine products, with Parties calling for tighter regulation of alternatives. Delegates endorsed stronger domestic funding for tobacco-control programmes and urged governments to consider measures such as generational bans and stricter marketing restrictions. Proposals to hold the industry financially liable for environmental and health harms gained traction. The meeting ultimately exposed widening tension between public-health ambition and industry influence, setting the stage for COP12. [Link](#)

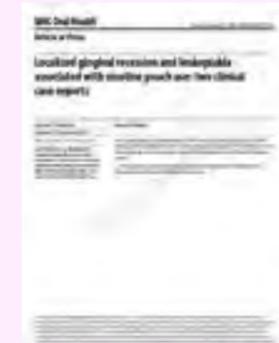
SCIENTIFIC UPDATES



1

Colour Cues Shape Perception

This AI-guided analysis examined colour schemes on packaging for seven leading U.S. oral nicotine pouch brands, using 59 top-selling flavour and strength variants. The study found that all brands consistently used colour to signal flavour profiles: blue for peppermint or mint, green for wintergreen, and warm tones such as red and yellow for cinnamon or citrus. Several brands including On!, Zeo, Zyn and Rogue also used colour gradients to indicate nicotine strength, with lighter tones for lower doses and darker tones for higher concentrations. Others, such as Sesh, Velo and Zone, kept uniform designs regardless of strength. The authors conclude that colour is intentionally deployed to communicate product attributes, shaping consumer perceptions and potentially influencing appeal. [Link](#)



2

Nicotine pouches harm gingiva

The article presents two case reports linking nicotine pouch use to localized oral pathology. Both young, otherwise healthy men developed gingival recession and in one case leukoplakia precisely at the sites where pouches were habitually placed. Clinical examinations, periodontal charting and radiographs ruled out alternative causes such as aggressive brushing, occlusal trauma or generalized periodontal disease. The authors suggest that repeated chemical and mechanical irritation from pouches may drive mucosal and gingival damage. Leukoplakia raises concern for potential premalignant change, though one patient declined biopsy. The paper emphasizes that clinicians should routinely ask about nicotine pouch use, recommend cessation, perform thorough oral examinations, and biopsy suspicious lesions to exclude dysplasia or malignancy [Link](#)

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3



Switching motivations

This study explored factors influencing low-income adults who smoke daily to switch from combustible cigarettes to either e-cigarettes or oral nicotine pouches. Through thematic analysis of 26 interviews, researchers found that key facilitators of switching included the convenience of using alternative nicotine delivery systems in both public and private settings, their ability to effectively relieve nicotine cravings, and participants’ belief that these products are less harmful than cigarettes. Barriers included slower or weaker nicotine delivery, preference for the sensory and ritual aspects of smoking, and limited knowledge or misconceptions about nicotine pouches compared with e-cigarettes. Overall, participants reported reduced cigarette use when using ANDS, but highlighted the need for clearer information particularly on the safety of nicotine pouches. [Link](#)

4



Influencer Disclosures Increase

This study investigated how paid partnership disclosures in TikTok influencer videos promoting oral nicotine pouches (ONPs) affect young adult users. Ninety-six ONP-using participants (ages 18–23) viewed a simulated 2-minute TikTok either with or without a paid-partnership label. Heart rate was monitored and participants completed pre/post self-report measures. Those who viewed the disclosed video showed significantly greater cognitive resource allocation (higher heart rate) than those viewing the non-disclosed version. They also reported larger increases in craving, perceived harm reduction, and intentions to use ONPs. The findings suggest that disclosures heighten attention and persuasive impact. The authors recommend exploring influencer-driven counter-messaging that uses disclosures to better communicate potential ONP risks to young adults. [Link](#)

Summary and Brief Impact Analysis

The emerging landscape around nicotine pouches is being shaped by two converging forces: real-world market behaviour and an expanding body of scientific research. Recent reporting shows that youth access and normalisation are now at the centre of public and regulatory concern. Surveys indicate that while the public believes under-18s acquire pouches online, most actually obtain them from physical retailers with weak age-verification. Meanwhile, social-media platforms have recast pouches especially ZYN as lifestyle accessories celebrated by influencers, with TikTok content driving uptake among adolescents who perceive the products as low-risk despite reporting acute side-effects such as gum pain, nausea and fainting. Media narratives portraying pouches as addictive, harmful to oral tissue and increasingly popular with teenagers amplify political pressure for intervention.

Alongside this, commercial growth has been explosive. Companies like BAT, Imperial and Emplicure are expanding aggressively, with sales multiplying year-on-year and new technologies promising faster nicotine delivery. This rapid mainstreaming signals to regulators that pouches are no longer niche but an established pillar of the nicotine market. Responses vary widely: Luxembourg has enacted what amounts to a de-facto ban through ultra-low nicotine limits, while UK public opinion leans toward regulated access rather than prohibition. In the US, the FDA is evaluating modified-risk claims for ZYN, an indication of a more evidence-driven path that still scrutinises youth appeal.

New scientific studies are strengthening regulators’ foundations. Research on packaging reveals that colour schemes communicate flavour and nicotine strength, potentially misleading consumers and increasing youth appeal an invitation for standardised labelling rules. Clinical case reports document localised gingival recession and leukoplakia at habitual pouch-placement sites, motivating calls for warnings and usage guidance. Behavioural trials demonstrate that pouches help low-income smokers reduce cigarette use, highlighting their role in tackling health inequality. Yet experiments also show that influencer content even with “paid partnership” disclosures intensifies craving and perceived harm reduction among young adults, reinforcing the case for strict digital-marketing controls.

Together, these developments point toward regulatory frameworks that preserve adult harm-reduction potential while tightening rules on youth access, marketing, packaging and post-market surveillance. The industry’s response especially its willingness to self-police and invest in independent science will determine whether proportionate regulation prevails or restrictive models gain ground.

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**COP11, the Future of Tobacco
Harm Reduction:**
**the Strategic Imperative for Responsible Nicotine
Industry Ahead of COP12**

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WHITEPAPER

Working towards COP12

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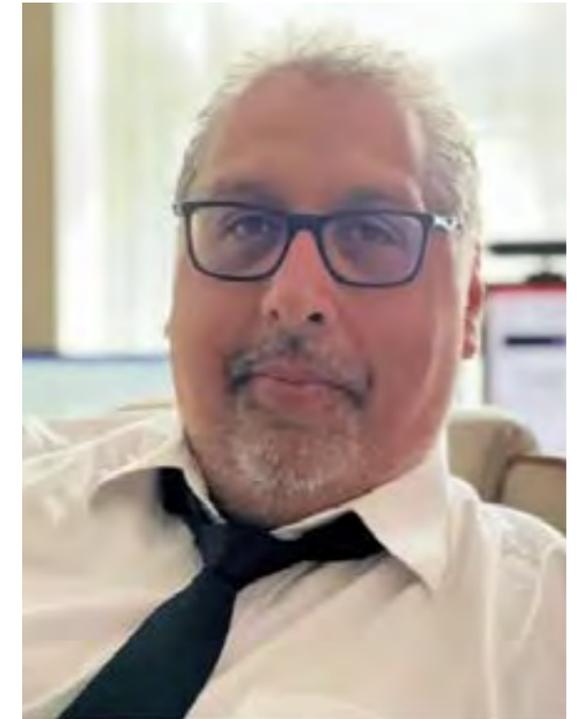
WHITEPAPER

“ Regulatory legitimacy is not a hurdle. It’s how we build public trust ”

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#01 WELCOME!



The outcome of COP11 marked a decisive turning point for the global nicotine landscape. While Parties advanced long-overdue commitments on environmental stewardship and industry liability, they left unresolved the most urgent question facing millions of adult smokers worldwide: what role should reduced-risk nicotine products play in the future of tobacco control? Instead of embracing differentiated, science-based regulation, COP11 revealed a widening gulf between emerging harm-reduction evidence and policymaking shaped by precaution, politics, and deep mistrust of industry intent.

“Harm Reduction will only be trusted globally when the Industry proves it can put public health above short-term commercial gain”

This month’s white paper examines not only what happened at COP11, but what must now happen next. The threat of sweeping restrictions, or outright bans on alternative nicotine products could easily rise to the top of the COP12 agenda unless industry, scientists, advocates, and regulators collectively shift the conversation. For the reduced-risk category to survive and mature, the industry must do far more than defend itself. It must reform itself.

We argue for a new strategic posture: responsible self-governance, evidence-generation on a scale the sector has never achieved, transparent collaboration, and a unified commitment to eliminating irresponsible marketing and poor-quality products. Harm reduction cannot succeed without credibility and credibility can not exist without accountability.

Dr Nived Chaudhary
Director NexCentra Consulting Ltd.

#02

Executive Summary

COP11 exposed a hard truth: the global tobacco-control community remains deeply sceptical of safer nicotine alternatives, largely due to mistrust of industry intentions and the absence of credible, unified, independently verifiable data. Despite the unquestionable public-health potential of reduced-risk products (RRPs), Parties at COP11 declined to recognise tobacco harm reduction (THR), deferred decisions on novel nicotine products, and reinforced a policy environment in which precaution can quickly morph into prohibition.

This white paper argues that the future of THR will not be shaped inside COP rooms alone but through what the industry does between now and COP12. The sector must demonstrate maturity, responsibility, scientific credibility, and alignment with global public-health goals. The current approach is failing; to succeed, we need a fundamental strategic reset. The priority is clear: industry must systematically build trust, demonstrate responsible conduct, generate shared high-quality evidence, and proactively shape the harm-reduction narrative before COP12 convenes. If we do not act, the global movement to restrict or ban nicotine alternatives including nicotine pouches will accelerate.

#03

What COP11 Delivered

COP11's formal outcomes were heavily skewed toward environmental and liability considerations. Delegates endorsed expanded interpretation of Article 18 on environmental harms, calling for stronger controls on product waste and lifecycle impacts. They supported legal pathways to hold the tobacco industry financially responsible for health and environmental damage, and they reaffirmed the need for sustainable domestic financing for national tobacco-control measures. These decisions will have far-reaching consequences, as they encourage gov-

ernments to pursue tax-based and legal strategies targeting industry accountability. Yet what stood out more sharply were the omissions. Despite widespread global use of nicotine pouches, e-cigarettes and heated tobacco products, COP11 avoided meaningful discussion on their risk-profile, regulatory positioning or potential contribution to reducing smoking-related mortality. The conference did not recognise tobacco harm reduction as a legitimate pillar of public health policy. It did not establish a process to evaluate real-world evidence or to

differentiate between combustible cigarettes and vastly less harmful alternatives. Instead, new nicotine products were often treated implicitly as part of the same problem, not part of the solution.

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The result is an increasingly divided global landscape. Some Parties, especially in Europe, Oceania and parts of Africa, gravitate toward extreme precaution, viewing any nicotine-containing product as inherently harmful. Others such as the UK, Sweden, Norway and New Zealand emphasise harm reduction as a pragmatic approach grounded in evidence. COP11 amplified this divide, and unless stakeholders intervene strategically, COP12 could lean toward positions that marginalise harm-reduction completely.

The Risk at COP12

If harm reduction advocates remain passive, COP12 could normalise restrictive or prohibition-driven frameworks for novel nicotine products. Countries facing youth-use panics or strong NGO pressure may introduce proposals to ban certain product categories, restrict nicotine strengths, eliminate flavours or prohibit marketing even if these measures undermine adult smokers' access to safer alternatives. In the absence of structured evidence evaluation, precaution will dominate by default.

The greatest danger is not formal treaty language, but the drift of political sentiment. The FCTC is often influenced by narratives rather than balanced evidence. When NGOs frame oral nicotine pouches as "**Big Tobacco's new vector**," and when industry actors reinforce this narrative by behaving irresponsibly through lifestyle-driven marketing, influencer partnerships, or non-compliant products it becomes far easier for Parties to view the entire category as a threat to public health.

This means that what happens *within the industry* matters as much as what happens in the negotiating rooms. The behaviour of a few reckless actors can endanger the entire category. Responsible companies will suffer if irresponsible ones are allowed to define the narrative. COP12 will be shaped not only by public-health lobbying, but by the industry's collective ability to demonstrate legitimacy, maturity and alignment with public-health principles.

#04 A New Vision

Industry Responsibility as the Foundation of Credibility

If the industry wishes to influence policy, it must first earn the right to participate. That means the era of passive defensiveness must end. The industry needs a visible transformation in how it behaves, how it communicates and how it polices its own members.

A responsible industry does not wait for regulators to impose rules; it sets higher standards voluntarily. It does not tolerate irresponsible marketing. It does not use youth-oriented channels, lifestyle branding or influencer promotions that trivialise nicotine. It positions nicotine pouches explicitly as harm-reduction tools, not as fashion accessories. It transparently discloses ingredients, manufacturing standards and scientific evidence.

Most critically, it openly calls out bad actors. It does not defend them in the name of “unity” or “commercial freedom.” The category will only survive if those who undermine public trust face real reputational and commercial consequences. Self-policing must become a core pillar of industry identity.

Such a shift changes everything. Public-health organisations may not agree with the existence of nicotine alternatives, but they cannot easily dismiss an industry that demonstrates genuine commitment to reducing harm, protecting youth, and generating robust evidence.

One of the most significant failures leading into COP11 was the scarcity of large-scale, independent real-world evidence

on nicotine pouches. A handful of companies have carried the scientific burden for the entire category, while many others invest heavily in trade shows, branding and event sponsorships instead of data generation. This imbalance is no longer sustainable.

If the category is to survive, science must become the industry’s shared infrastructure. Small and medium-sized companies cannot individually finance multi-year toxicology, consumer behaviour, PK/PD or longitudinal cessation studies. But collectively, through pre-competitive coalitions, they can. Cooperative research consortia exist in many industries pharmaceuticals, biotech, fertilisers, even automotive safety. The nicotine industry can and should adopt the same model.

Funds currently spent on elaborate trade booths could instead support multi-centre research programmes that examine cessation rates, dual-use dynamics, youth patterns, environmental impacts and comparative risk relative to cigarettes. Evidence should be independently managed, peer-reviewed and made publicly available.

A research-driven coalition would allow the industry to present unified, credible science at COP12, something that was painfully lacking at COP11. It would also counter arguments that harm-reduction claims lack evidence a narrative that prohibitionist NGOs wield effectively.

How the Industry Must Reframe Its Narrative

The framing of nicotine alternatives as lifestyle products has been a strategic mistake. Every influencer partnership, every “cool factor” ad, every brand promoting pouches as a youth-friendly convenience has given critics ammunition. To reshape the narrative before COP12, the industry must embrace a harm-reduction identity unequivocally.

This means clear, consistent communication anchored in three principles: adult smokers are the intended users; the primary purpose is risk reduction; and the category does not position itself as entertainment, fashion or social identity. Policymakers respond to products framed around public health, not personal expression. The more the industry aligns its messaging with cessation, switching and health-risk minimisation, the harder it becomes for critics to portray the category as a threat.

Meaningful engagement with the FCTC must move beyond the outdated dichotomy of “industry vs public health.” To influence COP12, harm-reduction advocates need to build broad alliances academics, clinicians, environmental scientists, cessation experts, consumer groups, and supportive governments. The goal is not to insert industry voices into COP directly, but to ensure that the harm-reduction narrative is represented by credible, independent actors who cannot be dismissed as industry proxies.

This requires proactive diplomacy. Researchers need funding to attend inter-sessional meetings. Governments that support harm reduction need coordinated briefs, evidence packages and

environmental analyses. COP delegations must be approached early, not weeks before the conference. Side-events, scientific panels and civil-society forums should be organised months in advance.

A unified scientific coalition, combined with credible public-health allies, can change the tone of COP12 even within the constraints of the often misinterpreted constraints of Article 5.3.

Environmental harm is one of the few areas where COP11 achieved consensus. This creates both a risk and an opportunity. If the industry ignores environmental concerns, critics will weaponise Article 18 to argue that new nicotine products are ecological threats, regardless of their lower health risk. But if the industry demonstrates leadership through reductions in plastic packaging, recycling programmes, and credible lifecycle analysis it can reposition alternatives as part of the environmental solution, not the problem.

A strong environmental record also helps dissociate the industry from legacy cigarette waste, which remains one of the world’s largest sources of plastic pollution. Emphasising the difference between filter-free pouches and plastic-laden cigarettes is a powerful narrative, particularly for Parties sensitive to environmental impact.

Looking Ahead: What Success at COP12 Looks Like

Success does not mean the COP suddenly embraces tobacco harm reduction. It means the conversation becomes balanced. It means parties recognize that combustible cigarettes remain the primary driver of disease and death, and that alternatives have a potential role in reducing that burden.

Most importantly, it means the industry arrives at COP12 with credibility: evidence generated collectively, behaviors aligned with public expectations, marketing standards that protect youth, environmental responsibility demonstrated in practice, and a coalition of independent experts capable of shifting the narrative.

#05 Regulatory Influences

The Haypp survey summarised by Talking Retail shows a stark mismatch between public perception and reality. Two-thirds of UK adults think minors mainly access pouches online, yet most under-18 users who admitted buying pouches actually got them from brick-and-mortar convenience stores and supermarkets, with only a minority buying online. Other reporting notes that there is still no legal age limit in the UK (though it is planned), and that high-street stores pose a “triple risk” of under-age sales compared with responsible online retailers using robust age-checks.

In parallel, several pieces highlight how youth are experiencing and framing pouches. A UBC Okanagan study of TikTok content found that nicotine pouches particularly ZYN, are overwhelmingly portrayed as fun, aspirational lifestyle accessories rather than cessation tools; only a small fraction of videos mention harms, while prolonged use may contribute to gum recession, caries, oral cancer and cardiovascular burden. UK school-based research echoes this: pupils report acute adverse effects (gum pain, burning,

nausea, sweating, fainting) but still perceive pouches as “better than smoking or vaping” because they avoid lung damage.

Unilad’s health explainer reinforces this risk narrative for the general public, emphasising that pouches are addictive, can drive cardiovascular strain and cause local oral side-effects, and should not be treated as harmless especially for non-smokers and young people. The Observer’s Daily Sensemaker adds a popular-media overlay, describing pouches “flying off the shelves” across the UK and increasingly being purchased by teenagers.

Taken together, these pieces harden a predictable regulatory storyline: youth appeal, under-age retail access, social-media-driven normalisation, and misperceptions of risk. If the industry doesn’t address this head-on, regulators will.

On the commercial side, the data show a category in hyper-growth. In Ireland, PJ Carroll (BAT) reports Velo sales rising from 6 million to 29 million pouches in a single year, with the brand securing almost 46% market share.

Imperial Brands has formally entered the UK pouch market with ZONE, targeted squarely at the mainstream 9–12 mg strength band that already accounts for about 43% of the UK market. ZONE launches with five flavours, a slim can format and an RRP around £6.50, in a category Imperial expects to grow 234% over the next five years; annual UK pouch sales are already about £182m with some 350,000 users.

Emplicure’s GlobeNewswire release reports a >600% increase in British online discussions about pouches over two years and introduces Seratek®, a technology claiming to release ~80% of nicotine within five minutes. In financial commentary, Seeking Alpha suggests British American Tobacco could see a “boom” in US oral nicotine pouch volumes over the next few years, positioning modern oral as a key growth driver as cigarette volumes stagnate.

This wave of launches and growth data sends a simple signal to policymakers: pouches are no longer niche; they are becoming a core pillar of the nicotine market, backed by major multinationals and aggressive innovation.

Luxembourg’s Bill 8333 is the clearest example of a “shock therapy” response. The law pulls nicotine pouches under strict tobacco-style controls, banning advertising, limiting sales to adults, mandating warnings and most controversially capping nicotine content at 0.048 mg per

pouch/gram and banning additives like CBD and caffeine. Multiple observers describe this as a de-facto ban, since the limit is far below commercially viable doses; one critic notes it is equivalent to the nicotine naturally present in two aubergines.

By contrast, recent UK polling reported via Talking Retail and related outlets paints a more nuanced public mood. Over 44% of surveyed adults think pouches should be regulated rather than banned; fewer than 10% support an outright ban, and around 30% believe stop-smoking services should actively recommend pouches alongside vapes. A small majority favour reasonable nicotine strength caps analogous to vape rules.

The message to policymakers is that voters largely support harm-reduction framing and proportionate controls, not copy-and-paste bans.

In the US, the regulatory story is moving through a more formal evidence pathway. Reuters reports that the FDA will convene an expert panel in January 2026 to assess whether ZYN pouches can be marketed with modified-risk claims that switching from cigarettes reduces the risk of oral cancer, heart disease, lung disease and other conditions. If granted, these claims would effectively embed a form of tobacco harm reduction for pouches into US federal regulation, but the review process will also invite scrutiny of long-term safety and youth impacts.

Overlaying all this is a political optics story. The RFK Jr “MAHA Warrior” piece portrays the US health secretary using ZYN while preaching strict health responsibility, framing pouch use as hypocritical and underscoring their perception as a

vice” product rather than a clinical tool. Such narratives can push politicians and agencies to demonstrate how “tough” they are willing to be.

The overall direction of travel looks like this: some jurisdictions will emulate Luxembourg’s near-ban model; others, under public and scientific pressure, will gravitate toward regulated harm-reduction frameworks. The industry’s behaviour will heavily influence which of those models gains momentum.

Markus Lindblad’s guide to selling pouches, written from a retailer’s perspective, implicitly illustrates what better practice could look like. He argues that success depends less on flooding shelves with brands and more on understanding consumer needs around price, flavour and nicotine strength. Staff should be trained to help adult customers select appropriate strengths, set expectations about the experience, and clearly distinguish nicotine pouches from banned tobacco snus.

This sits uncomfortably alongside evidence that many minors are purchasing pouches in convenience stores and that some brands and social media creators are marketing them as playful lifestyle products. Regulators reading these stories will see a ready-made case for mandatory staff training, ID-checking obligations, stricter in-store placement, and perhaps even licensing requirements for retailers who sell pouches.

Simultaneously, consumer-facing narratives are bifurcating. Trade press and corporate communications emphasize discreetness, flavour variety, and on-the-go convenience for adult smokers looking to avoid smoke or vapour.

Public-health and mainstream media emphasise youth experimentation, unknown long-term risks, and acute adverse effects in teens. How regulators resolve this tension will depend in large part on whether the industry visibly behaves like a harm-reduction partner or a fast-moving FMCG category chasing volume at any cost.

In the immediate future, it is reasonable to expect several regulatory trends:

- * Closure of legal loopholes around youth access, with age-of-sale laws for pouches aligned to cigarettes and vapes, and strong enforcement expectations at convenience stores rather than a narrow focus on online.

- * Increasing scrutiny of marketing and social-media content, particularly influencer-driven material that glamorises pouches or blurs the line between adult harm reduction and youth lifestyle branding.

- * Greater emphasis on pack warnings, ingredient disclosure and potentially nicotine strength caps, styled more like the UK public would accept and less like Luxembourg’s de-facto ban, but clearly moving away from today’s lightly regulated environment in many markets.

- * In markets like the US, a dual track of heightened safety scrutiny and potential formal recognition of reduced risk via modified-risk orders for specific products.

For the industry, the implications are blunt. First, it must treat youth access as an existential risk, not a communications problem. That means embracing and visibly enforcing robust age-verification at retail, supporting mystery-shopper programmes and calling out retailers and brands that ignore youth-protection norms.

The Haypp survey paradox public fear of online sales versus reality in corner shops should be used to drive better in-store standards, not to deflect blame.

In short, the news items in H2 Nov 2025, which are likely to have regulatory influence, describe the nicotine pouch category very much at an inflection point. Youth access and sensational health narratives are converging with rapid commercial growth and regulatory experimentation. Whether the immediate future brings measured, harm-reduction-oriented regulation or a cascade of Luxembourg-style clampdowns will depend heavily on what the industry does and how it behaves in the next 12-24 months.

#06 Scientific Influences

The emerging scientific literature on oral nicotine pouches (ONPs) is beginning to shape clearer expectations for policymakers around the world. Although the category remains relatively young, an accelerating body of evidence is offering regulators new signals about product safety, behavioural effects, consumer perceptions, and the populations most likely to benefit from, or be harmed by, these products.

Four recent studies examining colour-coding in packaging, clinical oral-health outcomes, switching behaviour among low-income (LI) smokers, and the influence of influencer-driven TikTok marketing present a coherent picture of where regulatory frameworks are likely to go next. Together, these papers sketch a future in which nicotine pouches will face tighter, more nuanced regulation, but also demonstrate immense harm-reduction potential if the industry and policymakers align around product stewardship, targeted messaging, and protection of vulnerable groups.

One clear regulatory trend emerging from the packaging-colour analysis study is a growing focus on consumer signalling and implied claims.

The study shows that colour is being used, consistently across brands, to denote both flavour and nicotine strength. This matters because regulators increasingly view packaging as a vector for implied risk communication particularly where flavours like “ice,” “citrus,” or “berry” are associated with youth appeal. The study highlights that some brands use darker colours to indicate higher nicotine concentrations, while others maintain uniform designs across strengths, raising concerns about consumer confusion.

Policymakers may interpret such inconsistency as grounds for standardisation. Global regulators have long used packaging controls colour restrictions, standardised labelling, display rules in tobacco control, and now have evidence to justify extending similar constraints to ONPs. A foreseeable next step is the introduction of guidelines that standardise how nicotine strength is displayed, restrict flavour-associated colour palettes, or require large, colour-independent markers to reduce misinterpretation. In other words, packaging-design practices once seen as benign branding choices may soon fall under strict regulatory oversight.

If the packaging study suggests a regulatory trend toward standardisation, the clinical case-report paper from BMC Oral Health underscores a second trajectory: greater scrutiny of product-specific health risks, especially where the evidence suggests site-specific harm. Although two case studies cannot establish causation, the anatomical precision lesions and recession occurring exactly at habitual pouch-placement sites provides regulators with plausible biological pathways to justify stronger consumer warnings or usage guidance. Importantly, the presence of leukoplakia in one case, despite lacking biopsy confirmation, signals to regulators that ONPs cannot be assumed risk-free, even if they are substantially less harmful than smoking. As ONP uptake grows, this kind of clinical evidence will likely motivate regulators to require targeted oral-health warnings, such as placement-rotation advice, guidance on maximum daily usage, or warnings about mucosal irritation. We may also see calls for mandatory post-market surveillance studies to monitor oral pathology incidence at population scale, mirroring pharmacovigilance frameworks already used for nicotine-replacement therapies. This increased attention to oral health is likely to push ONPs toward a harm-reduction regulatory model that recognises reduced respiratory and carcinogenic risk relative to cigarettes, but emphasises localised oral-tissue effects that must be transparently communicated and minimised.

While packaging and pathology shape product-specific regulatory thinking, the randomized trial examining facilitators and barriers to switching among low-income smokers introduces a much broader, more societally consequential dynamic: health inequality.

The study demonstrates that low-income adults, among the populations most harmed by combustible tobacco, find both e-cigarettes and nicotine pouches helpful in reducing cigarette consumption. Participants cited convenience, satisfaction of cravings, and a belief in reduced harm as key facilitators. These are exactly the behavioural mechanisms policymakers want to encourage among high-risk populations. Yet the study also identifies persistent barriers: delayed nicotine delivery compared to cigarettes, preference for the sensory experience of smoking, and misinformation about pouches. These findings act as a gift, rather than a critique, for harm-reduction policy because they expose precisely where education, product innovation, and clinical guidance can change outcomes.

For regulators, this study will strengthen the argument already influential in places like the UK and New Zealand that safer nicotine products may be necessary tools for addressing entrenched health inequalities. Low-income smokers have higher smoking prevalence, higher disease burden, and lower cessation success using traditional methods. ONPs, being discreet, affordable, and combustion-free, have a unique potential to shift behaviour in groups that traditional cessation strategies fail to reach. Regulators concerned with equity may use these data to justify differentiated policy frameworks, where access to ONPs is protected while marketing is constrained. For the industry, this evidence creates both opportunity and responsibility. Companies can leverage the equity narrative to advocate for proportionate regulation but must do so credibly, ensuring responsible marketing, affordable pricing, and the framing of ONPs as harm reduction

tools rather than lifestyle accessories. If regulators perceive the industry as exploiting disadvantaged populations, the equity argument will be lost. If, however, the sector demonstrates sincere alignment with public health goals, it can transform the narrative: from “industry interference” to “industry-supported harm-reduction for vulnerable groups.”

The fourth study, examining the effect of TikTok influencer videos with or without “paid-partnership” disclosures, shows the regulatory direction of travel for digital marketing and social-media influence. The study’s most striking finding is that paid-partnership disclosures increased cognitive attention, cravings, perceived harm reduction, and behavioural intentions to use ONPs among young adults. This reverses a long-standing assumption that disclosures reduce persuasive impact. Regulators will interpret this as evidence that influencer-driven ONP content particularly content that appears transparent or authentic is a potent driver of youth engagement and uptake. This study is likely to accelerate the push for bans or severe restrictions on influencer marketing, algorithmic amplification, and branded or semi-branded ONP content on platforms like TikTok, Instagram, and YouTube. Regulators may begin treating digital ONP promotion similarly to alcohol: heavily controlled, monitored for audience age-mix, and prohibited when youth exposure cannot be reliably limited.

To shape this trajectory constructively, the nicotine-pouch industry must evolve its behaviour. Regulators will expect clearer commitment to responsible marketing: no lifestyle messaging, no influencer partnerships with youth reach, no ambiguous flavour language, and no

colour palettes designed to insinuate sweetness or novelty. They will also expect the industry to demonstrate that it is not merely passively avoiding harm but **actively policing its own sector**. This means publicly calling out irresponsible actors, adopting voluntary codes of conduct, and supporting cross-company coalitions that fund high-quality, independent scientific studies. The studies above reveal that regulators are increasingly seeking evidence that the industry contributes to public health rather than undermines it. An industry that funds clinical research, invests in oral-health safety science, shares data transparently, and channels marketing away from youth-oriented spaces will not only protect its social licence to operate but will influence the shape of proportionate, evidence-based regulation.

Global regulators appear poised to adopt frameworks that differentiate ONPs from cigarettes but impose guardrails around packaging, marketing, product standards, consumer warnings, and post-market surveillance. The industry can either resist these inevitable shifts or help design them. The scientific evidence now emerging gives companies a roadmap: emphasise harm reduction, align with equity priorities, transform marketing practices, invest in science, and collaborate across the sector. The regulators are watching and the industry has a narrowing window to show that it can be part of the public-health solution rather than the next public-health problem.

The Role of Regulatory Foresight

For nicotine pouch manufacturers, regulatory foresight is no longer optional, it is a strategic imperative. In an era of heightened scrutiny, the ability to anticipate regulatory trajectories, public health expectations, and scientific developments is critical to ensuring long-term viability. Aligned Innovation a philosophy grounded in scientific integrity, regulatory coherence, consumer trust, and environmental responsibility can only be achieved when foresight is embedded into every stage of product development and positioning.

Reports like this serve as more than just information, they are tools for strategic alignment. They enable manufacturers to identify early signals, assess potential compliance gaps, and implement corrective measures before policy mandates force reactive overhauls. By engaging with emerging evidence, companies not only de-risk their portfolios but actively shape the regulatory and scientific narratives around the category.

The logo for NIC (Nicotine Pouch Intelligence) consists of the letters 'NIC' in a bold, sans-serif font, with a stylized blue and white wave graphic behind the letters.

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