<table>
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<tr>
<th>INFORMATION SHEET ABOUT MEETING/CONTACTS WITH THE TOBACCO INDUSTRY</th>
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<td><strong>Date</strong> of the meeting:</td>
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<td><strong>Time and duration</strong> of the meeting:</td>
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<td><strong>Place</strong> of the meeting:</td>
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<td><strong>Participants</strong> in the meeting:</td>
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<tr>
<td>● Lena Widefjäll, assistant to Carl Schlyter (MEP - Greens/EFA)</td>
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<td>● Cecilia Kindstrand Isaksson, EU Director Swedish Match plus two of their staff</td>
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<td>● Christofer Fjellner (MEP - EPP)</td>
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<td>● Christian Engström (MEP - Greens/EFA)</td>
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<td>● Cecilia Wikström (MEP - ALDE)</td>
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<td>● Some other assistants to Swedish MEPs</td>
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<td><strong>Short minutes</strong> of the meeting:</td>
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Chronology: Swedish snus, the revision of the Tobacco Products Directive and the resignation of Commissioner Dalli

Background

1. In the EU, the placing on the market of tobacco for oral use, except those intended to be smoked or chewed, is prohibited. The prohibition was introduced by Tobacco Products Directive 92/41/EEC amending Directive 89/622/EEC. Since snus is neither smoked nor chewed, it is banned. The Swedish tradition of using snus dates back to the early 1800s.

2. Sweden was granted a permanent exemption to the ban upon joining the EU in 1995.

3. Swedish snus is the only tobacco product to be traditionally traded and consumed in solely one member state, and nowhere else in the EU. This anomaly persists because current EU regulation is based on an outdated distinction between various types of oral tobacco, and not at all on product quality standards, scientific data and/or risk assessment.

4. The European Court of Justice in 2004 found the 2001 ban to be justified based on the meagre scientific research available at that time (before 2001). The extensive science that has emerged since 2001 no longer justifies a prohibition and is a violation of the principle of proportionality.

The review process

5. The European Commission has for some years now been working on revising the current Tobacco Products Directive. During the course of this process, Swedish Match has, together with other stakeholders, actively engaged all the means offered by official revision channels. Swedish Match has:
   a. Submitted to the public consultation organized by DG SANCO in December 2010. DG SANCO found the public consultation to show support for the continuation of the ban on snus, when in fact the outcome was the opposite;
   b. Submitted a scientifically supported report to the stakeholder consultation with industry, highlighting that current science does not support a ban. The submission also addressed the distortive effects of the ban on the internal market, and the negative consequences on a wide variety of economic actors, within and beyond the borders of Sweden;
   c. Engaged with various European Commission services to explain the current scientific evidence on snus, as well as to outline the distortive effects of today’s legal regime.

How is this related to the resignation of Commissioner Dalli?

6. Unfortunately, it is the view of Swedish Match that DG SANCO has, throughout the revision process, systematically and willfully ignored all the facts related to the ban on Swedish snus. On several occasions, even prior to the initiation of formal external consultations, DG SANCO publicly stated that the ban will remain, on the basis that "there is no evidence that Swedish snus is less harmful than cigarettes." Considering that the EU’s own scientific expertise (SCENIHR) came to the opposite conclusion in 2008, this raises serious concerns about whether or not the revision adheres to evidence-based policy making.

Swedish Match contracts external consultants to advise us on communications, and support our understanding of the political environment. We have signed the EU's code of conduct for lobbying and the company is registered in the EU’s transparency register. Our engagement activities are focused on providing legislators with a thorough understanding of how various legislative options affect our core business. Given the above circumstances Swedish Match
asked a Maltese EU lawyer and acquaintance whether there was a possibility for her to hand over a three-pager lining out the essence of the snus case to Commissioner Dalli. Simply put, we were concerned that the Commissioner was not even aware of our case – which we believe is very strong and in our favor.

7. The events that led to the resignation of Commissioner Dalli are as follows, according to the chronology of events known to Swedish Match:

**Chronology**

**20 October 2011** – A Maltese entrepreneur contacted the European Smokeless Tobacco Council (ESTOC), the trade association to which Swedish Match belongs, at the e-mail address of the Chairman (chairman@estoc.com). He requested information about where to buy snus in Sweden. ESTOC’s Secretary-General, who has access to the email account in the absence of the chairman, replied that ESTOC could not be of assistance with this particular request. The Maltese entrepreneur replied that he desired a meeting with ESTOC regardless of this fact, as he wanted to “learn more about snus”.

**21 October 2011** – The Maltese Entrepreneur arrived in Stockholm and met ESTOC’s Secretary-General who in turn asked one Swedish Match employee to join the meeting, as the former person is not a product specialist. They had a general discussion about snus, the snus ban and the relevant science. During the meeting, the Maltese entrepreneur expressed support for the idea of lifting the ban on snus. At this meeting, he also claimed to be a personal acquaintance of Commissioner John Dalli, demonstrating this by placing a telephone call to somebody he claimed was Commissioner Dalli. After the meeting Secretary-General sent the Maltese entrepreneur scientific information on snus. There was no mention of potential consultancy services or any other type of contractual engagement.

**11 November 2011** – An employee of Swedish Match telephoned a Maltese acquaintance who is also an expert on EU law and the internal market. He found that this person was knowledgeable about the snus issue, the European Court of Justice case on snus, and was familiar with the political climate in Malta. They agreed that this person would act as a consultant to Swedish Match with the aim to eventually ensure that Commissioner Dalli had access to publicly available literature that would facilitate an understanding of the legal, scientific and internal market issues relevant to Swedish snus. The fee agreed for these services was 5 000 EUR, which was judged by Swedish Match to be fair remuneration for the anticipated number of hours to be spent by the consultant on these services.

**12 December 2011** – Two employees of Swedish Match visited Malta, with the purpose of educating the consultant about the details of the snus issue. The consultant suggested that she should seek a meeting alone with Commissioner Dalli and on the basis of that meeting determine what future assistance, if any, she could provide.

**6 January 2012** – The Malta-based consultant informed Swedish Match that a meeting between herself and Commissioner Dalli had taken place. At this meeting, she reported, Commissioner Dalli was informed about the following topics:

- A description of science
- The consumer perspective
- Competition, internal market and non-discrimination
- Taxation considerations

The consultant informed Swedish Match that Commissioner Dalli had mentioned that he was willing to take unpopular decisions, as long as there was a strong scientific foundation. Commissioner Dalli also reportedly stated that he was willing to receive more scientific information regarding snus, in particular statistics and literature published by the WHO. At this meeting, the Maltese entrepreneur who had approached ESTOC in late 2011 was also reported to be present, although it is unclear to Swedish Match who had invited him.
Swedish Match and the Malta-based consultant agreed that it would be sensible to arrange a second meeting between the consultant and Commissioner Dalli, where further scientific materials regarding the health effects of snus (including WHO data) could be handed over. (See further the material provided to Commissioner Dalli in annex I) The consultant said she believed that Commissioner Dalli had taken an interest in the core of the discussion, i.e. the lack of scientific evidence to support of the current ban on snus.

10 February 2012 - The consultant called Swedish Match, reporting that a second meeting with Commissioner Dalli had taken place. The consultant stated that this meeting had ended in an "odd" way. She then indicated that a personal meeting between herself and Swedish Match was crucial in order to discuss in full the outcome of the meeting she had just participated in.

13 February 2012 – The Swedish Match employee travelled to Malta and met the consultant, who reported the following:

- Both Commissioner Dalli and the Maltese entrepreneur had participated in the second meeting on the 10 February.
- Commissioner Dalli was well informed about the snus issue, its health consequences, and he clearly expressed that the ban on snus was absurd.
- Commissioner Dalli had revealed that he had the will, the arguments and the Commission's support to lift the ban on snus. But that would mean that Commissioner Dalli's political career would be over.
- Commissioner Dalli then left the meeting, and the Maltese entrepreneur took over, telling the consultant that Commissioner Dalli wanted compensation for lifting the ban.

After the consultant had related the above background to the Swedish Match employee, the Maltese entrepreneur joined the meeting. The Swedish Match employee stated that he understood that something had gone wrong, and that he was there only to hear what had taken place as he had no authority to make any decisions. The Maltese entrepreneur reiterated the information provided to Swedish Match by the Consultant. The Entrepreneur also went into more detail concerning price (the asking price was € 60 million) and conditions for the payment – according to the Maltese entrepreneur, the CEO of Swedish Match was to bring a down payment of € 10 million to Commissioner Dalli at a predetermined location anywhere in the world, at which point further information on how the directive should be changed would be explained.

13 February 2012 - The Swedish Match employee informed his superior who in turn reported it to the General Legal Counsel of Swedish Match.

18 February 2012 - The Maltese entrepreneur contacted ESTOC again, on the chairman’s email, saying he had something “interesting to talk to you about”. This e-mail ended up with the Secretary General of ESTOC. At this point in time, the Secretary General had not been informed of the remarkable offer advanced by the same individual to Swedish Match.

21 February 2012 - Swedish Match informed the consultant that she must firmly convey that Swedish Match declined the offer made in Malta.

24 February 2012 - Swedish Match informed the Swedish Government about the offer and was asked to keep the government updated on any further developments.

7 March 2012- Secretary General of ESTOC participated in an industry stakeholder meeting organized by Commissioner Dalli and DG SANCO. Commissioner Dalli expressed interest in the science related to Swedish snus and requested data in this regard. In response to this request, the Secretary General of ESTOC sent Commissioner Dalli a letter, attached in annex II.
8 March 2012 - The Maltese entrepreneur contacted the Secretary General of ESTOC again by e-mail, and proposed that he would provide services including the arrangement of a meeting with Commissioner Dalli.

16 March 2012 - The Secretary General responded to the email of the entrepreneur and asked what kind of services he could provide. He was also asked to attach an estimation of cost for the suggested services. When Patrik Hildingsson (Vice President Public Affairs, Swedish Match and Chairman of ESTOC) learnt that the Maltese entrepreneur was in a dialogue with the Secretary General a few days later, he informed her about the offer that had been made to Swedish Match.

29 March 2012 - The Maltese entrepreneur contacted ESTOC by phone and offered to fix a high level meeting (my boss with your boss). During this call, the entrepreneur claimed he could guarantee that the upcoming tobacco proposal would include a removal of the snus ban. After this high level meeting, a first installment of a substantial payment would be required.

Swedish Match informed the Swedish Government that a second approach had been made.

April – Swedish Match collected all materials, documents, emails etc. related to the above in consultation with the Legal Counsel of Swedish Match.

Mid-May 2012 - Swedish Match submitted the facts set forth above to the Commission and the Commission immediately handed over this information to OLAF.

OLAF immediately commenced its investigation, based on the information provided to the Commission by Swedish Match. During the course of the investigation Swedish Match employees and the Secretary General of ESTOC have been questioned about the events described above and have disclosed all information at their disposal to OLAF.
Annex 1 – Swedish Match documents handed over to Commissioner Dalli

What is Swedish snus?

Swedish snus is a smoke free tobacco product enjoyed mainly in Scandinavia and North America. It comes either loose or in small packets (like small teabags) and is placed between the upper lip and gum.

Snus is selling more and more, to a large degree at the expense of cigarette smoking. Several studies report that Swedish snus is a commonly used smoking cessation aid.

Apart from Swedish snus, it exists a large number of different smoke free tobacco products in the EU. It is very difficult to find reliable figures concerning the size of the smoke free tobacco market, as the products remain for the most part unregulated. About 30 million people in the EU have tested smokeless tobacco products, and it is consumed in the majority of the European countries. Products among others are dry snuff, nasal snuff and chewing tobacco.

The levels of tobacco toxins vary substantially between the different products. According to all research available, Swedish snus is among the products that contain the lowest levels of tobacco related toxic components.

Of the above mentioned smoke free products, Swedish snus is the only one that is not allowed in the EU (with the exception of Sweden). All the other products are largely left outside current European regulation despite the fact that they are legally sold in the EU.

Why is Swedish snus treated differently?

In the 1980’s a snus like product was introduced in the UK and Ireland. After intensive debate snus was banned in Ireland with the arguments that is caused cancer and was aimed at young people. The EU found that the ban of snus in one member state posed a threat to the internal market. Only by banning snus in the whole EU could one say that the market was harmonized.

In 1992 EU adopted legislation that prohibits tobacco for oral use, except those intended to be smoked or chewed. As Swedish snus is neither smoked nor chewed it is prohibited. However, the ban did not cover traditional oral tobacco (snus was not considered traditional even though it has been consumed in Northern Europe for over 200 years). In other words, the new legislation banned Swedish traditional snus, but allowed other unregulated products that are more harmful.

Since 1992 significant amount of scientific research has been conducted on the health risks posed by snus and oral smokeless tobacco products. It is clear that the health risks vary considerably between the different products. It is also clear that Swedish snus is considered being among the least harmful products. There is today no evidence for the opinion that it is a risk factor for cancer. There is no confirmation of the view that snus is a particularly attractive product for young people.
Conclusion

If the current scientific evidence were available at the time of the adoption of the Tobacco Directive it is most likely the ban on snus would be annulled for breach of the requirement to give reasons and breach of the principles of non discrimination, proportionality, and free movement of goods.

- The current EU ban on Swedish snus on the internal market lacks a justified reasoning and is both discriminatory and disproportionate.
- The current EU ban on Swedish snus is a violation of the free trade principle and distorts the function of the internal market.
- The ban on snus denies adult European smokers access to a traditional and viable non-combustible tobacco alternative that is scientifically well-documented.
- All smokeless tobacco products should be subject to a consistent and non-competitive product regulation based on product quality and consumer protection.
Swedish Snus and Health

Snus is the most scientifically analyzed smoke free tobacco product and it is considered to be among the least harmful. Several international and national organizations have published research and reports on Swedish snus. This is what they say:

The World Health Organisation (WHO):

Cigarette smoke is the most hazardous form of nicotine intake and medicinal nicotine is the least hazardous. Among the smokeless tobacco products on the market, products with low levels of nitrosamines, such as Swedish snus, are considerably less hazardous than cigarettes, while the risks associated with some products used in Africa and Asia approach those of smoking. 1

European Commission’s Scientific Committee on Emerging and Newly-Identified Health Risks2:

- Swedish snus use may help some smokers quit cigarette smoking
- Swedish snus has the potential to reduce harm related to the use of tobacco products
- Swedish snus use is not a risk factor for oral cancer
- Swedish snus use poses significantly fewer and less severe, health risks than cigarette use
- Swedish snus is less harmful than other smokeless tobacco products currently legal in the EU.
- The availability of snus has had a positive impact on public health in Sweden.
- Swedish snus use among youth and adult users is not a significant predictor of future smoking

Royal College of Physicians, United Kingdom

- Swedish smokeless (snus) products appear to be associated with the lowest potential for harm to health
- In relation to cigarette smoking, the hazard profile of the lower risk smokeless products is very favourable
- Smokeless tobacco is 10-1,000 times less hazardous to health than smoking, depending on the product.
- Available low-harm smokeless products have been shown to be an acceptable substitute for cigarettes to many smokers, while ‘gateway’ progression from smokeless to smoking is relatively uncommon. 3
- Swedish data provide proof of concept that substitution of smokeless for smoked tobacco can be effective as a harm reduction strategy 4

3 Harm reduction in nicotine addiction, Report by the Tobacco Advisory Group of the Royal College of Physicians, October 2007
4 Ending tobacco smoking in Britain Radical strategies for prevention and harm reduction in nicotine addiction, British Royal College of Physicians, 2008
International Pancreatic Cancer Case-Control Consortium (Panc4)

- No association of smokeless tobacco and pancreatic cancer was found.

National Board of Health and Welfare, Sweden

Overall risk for death, disease and impaired quality of life:

- Daily smoking
  - Strongly to very strongly elevated risk
- Abuse of alcohol
  - Strongly elevated risk
- Unhealthy eating habits
  - Strongly elevated risk
- Insufficient physical activity
  - Strongly elevated risk
- Daily snus use
  - Slightly to moderately increased risk

For every snus user who takes up smoking there are four smokers who switch to snus when they give up smoking. These results indicate that the net effects of the changed tobacco habits are positive in public health terms, since smoking is so much more dangerous to health than snus.

National Institute for Alcohol and Drug Research (SIRUS), Norway

- Smoking declines as snus increases
- Snus the most common method to quit smoking
- Use of snus is associated with an increased probability of being a former smoker
- Snus is associated with an increased probability of a positive outcome of a quit-smoking attempt compared to NRTs
- Snus is a solitary method of quitting that might appear convenient for those who reject NRTs

The above conclusions are supported by independent epidemiological studies, some 200 scientific papers and by public health statistics from Sweden - data for Swedish men shows:

- Europe’s highest per capita consumption of smokeless tobacco (snus).
- By far the lowest cigarette consumption in Europe.
- By far the lowest lung cancer mortality in Europe.
- Lowest percentage of smoking-related deaths among developed countries.
- Lowest oral cancer mortality rate in Europe.
- The Swedish females constitute the “control group”. Their smoking rate and cancer incidence is on a European average for females.

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1. Bertuccio et al. 2011
4. National Institute for Alcohol and Drug Research (SIRUS), Norway, 2009
Swedish snus and the internal market

Swedish snus is a smoke free tobacco product enjoyed mainly in Scandinavia and North America.

Even though it exists a large number of different smoke free tobacco products (all unregulated), snus is the only product that is banned in the EU (with the exception of Sweden). This means that any EU country is allowed to market their smoke free products in Sweden, while snus can't be sold anywhere but in Sweden.

According to research, snus is among the tobacco products with the lowest levels of tobacco related toxic components and it is the least harmful of tested products.

In the EU similar situations must not be treated differently (the principle of non-discrimination). If two products are alike they must be dealt with in the same way. The ban on snus is a breach of this principle as snus is forbidden, while all other similar products, such as chewing tobacco, are permitted.

Measures taken to protect public health can't go beyond what is necessary to achieve this objective (the principle of proportionality). A ban on snus does not protect health, as more harmful chewing tobacco is sold legally in the EU. A restriction on one product will not be proportionate unless same restrictions apply on similar products from other countries. All EU countries can sell tobacco products and cigarettes in Sweden, while the least harmful product, snus, is forbidden in all EU countries.

If there is supposed to be an internal market and free movement of goods, all obstacles to trade must be removed. Persons in different countries must be able to make choices and enjoy the benefits of that market. The ban on snus is not justified by health arguments. Sweden is supposed to keep its door open for all unregulated tobacco products. This is a clear breach of the principle of free movement of goods.

Conclusion

The ban on snus is a breach of the principles of non-discrimination, proportionality and free movement of goods.

All smokeless products available in the EU should be regulated and fulfill certain requirements. Consumers have the right to know what is in the products they buy, and they have the right to make their own choice.
Annex 2 - Letter sent from ESTOC to Commissioner Dalli 2012 03 14

Mr J. Dalli
Commissioner
B-1049 Brussels

Brussels, 14 March 2012

Dear Commissioner Dalli,

First of all, I thank you for the opportunity to meet with you and your colleagues on 7 March. I appreciate the opportunity to convey our message directly to you, Mr Commissioner.

It is often stated that traditional smoke free tobacco is harmful to health without mentioning the risks in relative terms. The WHO Study Group on Tobacco Product Regulation states:

“Among the smokeless tobacco products on the market, products with low levels of nitrosamines, such as Swedish snus, are considerably less hazardous than cigarettes, while the risks associated with some products used in Africa and Asia approach those of smoking.”

The most important determinants of health risks among individual users of a certain product consumed orally are the chemical properties of that product. This explains why ESTOC’s members adhere voluntarily to a strict product regulation that sets maximum permissible levels of constituents in finished products - including nitrosamines (TSNAs), which are considered by many to be among the most controversial compounds found in tobacco.

Today the EU is discriminating against traditional Swedish snus-like products since they are denied access to the internal market by a complete ban, while other traditional smokeless tobacco products remain available. The ban is not proportionate and lacks justified reasoning. One of the consequences of this is a distortion of the internal market, most evidently for the Baltic Sea area, including the Åland islands.

Swedish snus is arguably the most scientifically analysed smoke free tobacco product. Several international and national organizations have published research and reports on smokeless tobacco with a focus on Swedish snus including its impact on a number of health outcomes. I have taken the liberty of putting together a brief selection below (additional references in annex):

The World Health Organization (WHO)1:

“The conclusion that people who use only smokeless tobacco products have lower overall risks for disease and premature mortality than cigarette smokers can be reached with a high degree of confidence.”

European Commission’s SCENIHR2:

- Snus use is not a risk factor for oral cancer. (pg 113 & 120)
- The Swedish data “do not lend much support to the theory that smokeless tobacco (i.e. Swedish snus) is a gateway to future smoking. In the USA, the interpretation of two studies is divergent…” (pg 105)

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• “Availability of snus and the way in which it has been used may have been beneficial to public health since the harm to health caused by any use of snus as a gateway into smoking may have been more than outweighed numerically by the numbers quitting smoking for snus” (pg 116)
• Observational data from Sweden indicate that “snus has been used more often than pharmaceutical nicotine products by some men as an aid to stop smoking” (pg 110)
• Overall, snus use poses substantially lower health risks than cigarette smoking (pgs 114/115)
• SCENIHR’s conclusions included that “…for those who substitute smoking by STPs the benefits outweigh the risks” (pg 118)

Let me draw your attention to two supporting scientific quotes that SCENIHR also picks up on:

• “The risk of adverse effects associated with snus use is lower than that associated with smoking, overall by an estimated 90%.”
• “The results show that … there is consensus that LN-SLT (Low-nitrosamine smokeless tobacco) products are less hazardous than conventional cigarette smoking by a wide margin. …between 5% and 10% of the risk of smoking.”

In order to meet your objective to reduce the health burden of tobacco products, all smoke-free tobacco products sold in the EU market should be regulated in a consistent manner based on consumer safety. To maintain the ban on Swedish snus is to the detriment of the functioning of the internal market. It also denies the European tobacco user, a viable choice to smoking.

Twenty years after the first ban on Swedish snus was introduced in the EU and 15 years after Sweden joined the EU, Swedish snus has still not been assessed on its own merits, despite the abundance of scientific reports citing the favourable risk profile of Swedish snus use compared to other, currently available, tobacco products.

I trust that you will assess Swedish snus based on the merits of the product itself. Please do not hesitate in contacting me should you require further information.

I remain yours sincerely,

Inge Delfosse
Secretary General, ESTOC

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European Commission’s Monitoring Centre for Drugs and Drug Addiction

- The major disadvantages of PN products are that, like other smoking cessation aids (bupropion, varenicline), most smokers who use it do not succeed in quitting.
- Literature reviews of the health effects of SLT (Broadstock, 2007; Royal College of Physicin, 2007: SCENIHR, 2008) have concluded that some forms of SLT such as Swedish snus, which is low in nitrosamines, are significantly less harmful than smoking cigarettes.
- Mandated standards for toxins, such as tobacco-specific nitrosamines, in SLT should be less problematic to implement because the feasibility of this strategy has already been demonstrated. (Osterdahl et al., 2004; Stepanov et al., 2006) and, on Swedish experience, it is likely to minimise oral cancer risk.
- The Swedish experience suggests that LNSLT may be more likely to achieve this goal than current forms of PN as more smokers in Sweden have switched to LNSLT than PN (Foulds et al., 2008; Ramström, 2000). This could change if regulators allowed more attractive forms of PN to be developed and marketed to smokers. In EU countries other than Sweden, consideration could be given to relaxing the sales ban on non-smoked, non-chewed oral tobacco products.

PN: pharmaceutical nicotine, SLT: Smokeless tobacco, LNSLT: Low-nitrosamine smokeless tobacco

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5 European Monitoring Centre for Drugs and Drug Addiction Monograph, Harm reduction: evidence, impacts and challenges, 2010
6 Harm reduction in nicotine addiction, Report by the Tobacco Advisory Group of the Royal College of Physicians, October 2007
7 Smoking tobacco smoking as British Cancer strategy for prevention and harm reduction in nicotine addiction, British Royal College of Physicians, 2006
8 Bertuccio et al, 2011
"For every snus user who takes up smoking there are four smokers who switch to snus when they give up smoking. These results indicate that the net effects of the changed tobacco habits are positive in public health terms, since smoking is so much more dangerous to health than snus."  

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