

ENGLISH TRANSLATION – Bengt Wiberg's letter to four ministers in the Swedish Government in December 2019

Attention:

Ibrahim Baylan - Minister of Commerce, industry and innovation

Anna Hallberg - Minister for Foreign Trade and Minister responsible for Nordic issues

Hans Dahlgren - EU Minister

Ann Linde - Minister for Foreign Affairs

Copy: Government registrars and diary

Ref: Case in EU: 2019-0478 NL

The Dutch government proposal can negatively affect Swedish industry and the health of millions of Europeans. The Swedish government may be able to prevent this by responding to the EU request for a new law in the Netherlands.

The social democrats party led Swedish government could possibly prevent the above by honestly answering the voluntary referral statement invited to answer by the Dutch government via the EU Commission. The deadline for the respective EU countries to submit a written opinion is December 31, 2019. The government received the invitation earlier this fall, via the EU Commission and has thus had at least two months to answer the EU Commission on this important question.

The Dutch government's invitation to respond to their bill which means that, in addition to total bans on cigarettes and E-cigarettes in all public places, outdoor cafés, etc., the Dutch government has included snus, tobacco-free snus and all other smokeless products. In Sweden, the Parliament decided on December 11, 2018 to ban the former to be used in public places such as outdoor restaurants, bus stops, outside schools etc. However, the Swedish Government made sense when exempting snus from this ban and should therefore take this opportunity and inform the Dutch the government on Sweden's decision 2018 and why snus was exempted from the ban on snus use in certain public places. There is no "passive snus use" and the product therefore does not disturb anyone else. However, the government's failure to act in this matter could be detrimental to the fact that Sweden has by far the lowest proportion of smokers in the EU and by far the lowest proportion of tobacco mortality, and all tobacco-caused diseases, in the EU. This is mostly because Swedes use snus instead of smoking. Research, see Appendix 1-2, shows that as many as 86-87% of Swedish snus are former smokers who stopped smoking for good. The large scientific study included about 66,000 Swedes who were followed up during the period 2003-2011.

Now the government has the opportunity to give its position on this to the rest of the EU and the Netherlands in particular. If the Dutch bill goes through, unmatched by the Swedish government, other EU governments are likely to conclude that snus is as dangerous as smoking when the Swedish government has not commented on the Dutch proposal, despite being officially invited to submit the government's comments already during the fall of 2019. Swedish so-called "Simple jobs" in the industry

will then suffer as the demand for less harmful smoke-free products, such as Swedish snus or tobacco-free snus, can be severely affected. The impact on Europe's public health, for every 100 million daily smokers, who obviously cannot cope with smoking, is extremely worrying. Approximately 780,000 die prematurely from smoking-caused diseases in the EU annually. Nobody has proven dead from snus. Snus is not a health product but must be considered in relation to the danger of smoking. For the person who cannot quit smoking without substitutes, Swedish snus or tobacco-free snus can be an excellent tool to quit smoking. In the EU, there is no ban on tobacco-free snus manufactured by Swedish companies and sold to EU countries.

We snus users therefore recommend that the government submit a referral statement to the Dutch government before the deadline of December 31, 2019. Please explain that Sweden already implements a smoking ban in public places and why it is both pointless, ineffective and bad for public health to set equal signs between snus, including tobacco-free snus, and cigarettes. More info on the Dutch bill here, you can download the Dutch proposal also in Swedish. Also attach this in Swedish in this mail, see appendix in Word.

The government's lack of clarity on the issue of snus

At the same time, the Swedish government can clarify facts about snus and the EU for the 17% of Swedish voters' men and women who use snus and the approximately 100 million daily smokers in the EU who, due to the EU snus ban, does not have access to significantly less harmful Swedish snus. A clarification regarding the ministers Baylan and Linde, expressed in the media, misconceptions regarding Swedish snus also deserves to be expressed. However, this need not be done at all in the reply to the Netherlands. More a thinker to think about for the government. Parliamentary parties The Moderates, Liberals, Christian Democrats, Center Party and Sweden Democrats have all openly declared their support for Swedish snus as being less harmful than cigarettes. The Social Democrats, the Environment Party and the Left Party have not been as clear about how to s have not been as clear on how to approach snus in relation to smoking.⁸⁵

As far as the clarification of social democratic ministers on the EU snus issue is concerned, this should be longed for by Sweden's snus using i.e. 1.2 million eligible voters.

Here are the misunderstandings (expressed in the media):

Interview by Business **Minister Ibrahim Baylan** by CEO Gnter Mrder September 6, 2019: <https://youtu.be/jur9c2Hxm4w> . Business Question and Minister Baylan's answer starts at 44:00 minutes into the video.

The question was: "Sweden has by far the lowest proportion of smokers and tobacco mortality in the whole EU. Mostly thanks to our snus use instead of smoking cigarettes. Why is the government not working to allow snus in the EU? "

Minister Ibrahim Baylan replied:

"There has been a very strong opposition from the Commission and also a number of member states, and this has sometimes been so powerful that you have been worried that you will at all be able to both manufacture and sell snus as we do in Sweden. That has been a double ... but also a concern that, if this issue becomes a key issue, then it may not be the end result that you can sell snus throughout the

European Union ... but it may even be that we get restrictions on how we do this at home and we really wanted to make sure you don't do that. "

Former Minister of Commerce Ann Linde received a question from the Gothenburg Post (Göteborgsposten) in January 2018:

The Göteborgsposten reporter Camilla Hagen asks why the government has not defended snus in the EU.

Ann Linde replied: "If you now push this issue further, despite this massive opposition, you will then need to renegotiate the Tobacco Directive. And then we can't be sure to keep our exception. I refuse to participate and risk anything that could jeopardize Swedes' right to use snus."

<https://www.gp.se/nyheter/sverige/ny-r%C3%A4tteg%C3%A5ng-om-det-svenska-snuset-1.5095173>

What are the facts?

Sweden's right to sell snus is enshrined in the EU Accession Treaty and therefore cannot be changed unless all EU member states, including Sweden vote for it. This should never happen. In Sweden, snus makes up 17% of the electorate and snus has been used for over 200 years and is thus by far the oldest harm reduction product (compared to smoking) in the world. Abroad, the Swedish epidemiological wonder is referred to as Sweden in principle ceasing to smoke as "The Swedish Experience". On October 22, 2019, the US Federal Authority (Federal and Drug Administration) decided to grant Swedish snus, as the first product in FDA history, the approval as a "modified risk tobacco product" and an approval to market these current eight Swedish snus products as being less harmful than smoking.

Ibrahim Baylan's comment in the interview with the Entrepreneurs regarding the fact that it is not allowed to manufacture snus in countries other than Sweden is also incorrect. Snus may be manufactured in all EU countries but may not be sold in EU countries other than Sweden. Snus has been manufactured for many years, including in Denmark by AG Snus, V2 Tobacco and Ministry of Snus and sold in Sweden. Tobacco-free snus (so-called All White products or nicotine pouches) and chew bags can be sold in the EU. The use of snus in any EU country is not prohibited. The only prohibition is to sell snus containing snus tobacco to consumers in EU countries other than Sweden.

End note

Snus should not be a political issue at all. It is rather a public health issue. We in Sweden should be proud to have the lowest proportion of smokers in the entire EU (and probably the western world) as well as the lowest tobacco mortality and prevalence of tobacco-caused diseases. In September 2017, the world's largest so-called meta-data study, comprising 26 years of published scientific research, concluded that Swedish snus does not increase the relative risk of any disease at all when using snus compared to non-snus. This has also been cited in the Medical Journal (Läkartidningen), see below. The meta-data study (The Global Burden of Disease Study) was published in the scientific journal The Lancet in September 2017. Link to the Medical Journal (Läkartidningen) here: <http://www.lakartidningen.se/Klinik-och-vetenskap/Klinisk-oversikt/2018/10/Skademinimering-ar-ett-omdiskuterat-alternativ-for-dem-som-inte-kan-sluta-roka/>

Role of snus in initiation of smoking

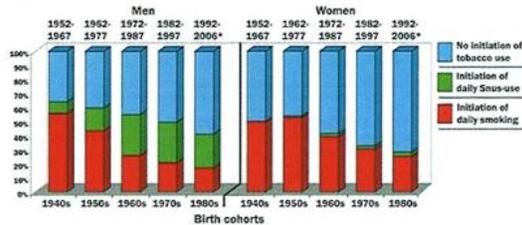
One of six boys and some few girls are 'Snus-starters', i.e. they have started daily tobacco use by initiating snus use. How does that influence the probability for initiation of smoking?

The rate of initiation of smoking is much lower among Snus-starters than among those who have not started using snus, both for boys and girls. This suggests that starting with snus use can hamper initiation of smoking rather than serve as a gateway to smoking. A small fraction of Snus-starters take up smoking, but most of them, 63%, do later quit smoking completely and 24% quit snus use as well and become totally tobacco-free.

Another question on how snus influences initiation of smoking deals with whether increasing snus use adds to previous tobacco use in the population or replaces part of it. This question has been addressed by large population studies that have analysed the development in Sweden during the last 50 years.

Rate of initiation of daily smoking		
	Non-snus-starters	Snus-starters
Boys	46%	18%
Girls	40%	8%

Patterns of initiation at different time spans.
As reflected by the birth cohort that dominated initiation in each time span.



These data for consecutive birth-cohorts show that patterns of initiation have changed substantially during the later half of the last century. The green segments of the bars, representing initiation of snus use, show striking increases from

decade to decade, particularly among males, while the corresponding red segments, representing initiation of smoking, show sharp decreases. The blue segments, representing non-initiation of tobacco use, show that the increase of snus use has been associated with a distinct increase of the fraction of those who abstain from initiation of any tobacco use. These data demonstrate that an increasing initiation of snus use is well compatible with a decreasing total recruitment to tobacco use, and suggest that the increasing number of Snus-starters are mainly drawn from presumptive smokers.

Role of snus in cessation of smoking

The vast majority of all those who have initiated daily smoking have done so without previous experience of snus use. But in this category there are substantial proportions, 35% among males, 8% among females, who have later taken up daily snus use. Population studies have charted the subsequent development of tobacco use patterns in this category.

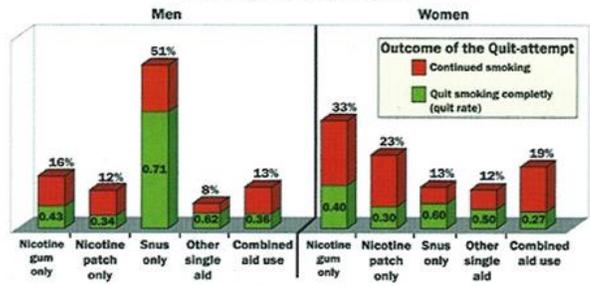
Current tobacco use status among 'Ever daily smokers'					
		Quit daily smoking	Daily smoking no snus use	Daily snus use no smoking	Daily dual use
With uptake of snus use	Males	87%	3%	44%	9%
	Females	86%	4%	41%	7%
Without uptake of snus use	Males	60%	36%	N.A.	N.A.
	Females	60%	38%	N.A.	N.A.

A very high proportion, 87%, of male smokers who take up snus use quit daily smoking. Equal figures for women as well. Some of these smokers switch to snus-use-only, and almost as many, 32%, do eventually quit snus use as well and become free from any tobacco use. A small fraction will be dual users. They have lower cigarette consumption than remaining pure smokers and would therefore have decreased rather than increased their health risk. The low level of dual use suggests that dual use is mainly a transient stage serving as a stepping-stone to a non-smoking or an entirely tobacco-free endpoint.

The high quit rate among smokers with uptake of snus use should be compared with the quit rate among smokers without uptake of snus use. In that group the quit rate is much lower and the fraction of remaining daily smokers is around 10 times higher than among those with uptake of snus use.

These observations raise the question on the effectiveness of snus as a self-help cessation aid compared to approved NRT products for cessation.

Percentages of "Self-help quit-attempts" made with different aids and Outcome of the quit-attempt



This chart presents data regarding self-help quit attempts with use of different self-administered cessation aids and outcome of these attempts. The height of each bar illustrates the percentage of quit attempts that were made with the aid(s) in question as indicated numerically at the top of each bar. The segments of each bar represent outcome with the aid in question — failure (red) or success (green). The numerical data in the green segments indicate the proportion of successful quit attempts for each cessation aid.

Among men, snus is the most commonly used product, while among women nicotine gum or patch is more common. The successfulness figures show that use of snus as cessation aid yields higher success rates than any of the other alternatives —both for men and women.

The combination of high usage and high successfulness means that, among men, snus has been the most effective product for self-help smoking cessation. The size of each green segment corresponds to the quantity of successful quit attempts in the category in question. It can be calculated that among men 'Snus only' was used in 64% of the successful quit attempts, while nicotine gum was used in 12% and the patch in 7%.

Conclusions

- 50 years of increasing initiation of snus use in Sweden has been accompanied by decreasing initiation of smoking and increasing proportion of non-initiation of tobacco use.
- Snus use is not a gateway to smoking – instead it hampers initiation of smoking.
- Among smokers with uptake of daily snus use quit rates are much higher than among smokers without uptake of snus.
- Dual use of snus and cigarettes is rather uncommon and appears to be a transient stage, a stepping-stone towards smoke free or tobacco-free life.
- Snus as self-help aid for smoking cessation yields higher success rates than nicotine gum or patch.
- Among men the combination of high successfulness in individuals and the large extent of use has resulted in higher number of quitters with snus than quitters with nicotine gum/patch.
- Snus favours public health both by decreasing initiation of smoking and by increasing cessation of smoking.

If the Swedish government has already answered the EU on the Dutch bill, I would like a copy of this in accordance with the principle of publicity.

Yours Sincerely

Bengt Wiberg

Bengt Wiberg is a snus health innovator and tobacco harm reduction advocate and former municipal finance manager for education administration in Lidingö County. Bengt has invented a now patent approved and unique packaging innovation that has received a global award with the motivation that it can help people all over the world to quit smoking and "definitely the biggest snus innovation since the invention of the portion snus". Bengt is also one of the two founders of the #EUforsnus campaign with several thousand members from about 100 countries including all countries in the EU. The members are adult men and women who almost all stopped smoking with the help of snus. Bengt's company, B-O Wiberg Solutions AB, is a small family business on Lidingö that does not manufacture or sell snus products. The company is engaged in innovation of the portion bags themselves.