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Thank you for allowing my testimony. My name is Dr. Paul Racicot, and I am a native New Englander with 40 years of experience in treating people battling addiction. I have been certified in the field of Smoking Cessation, help manage six convenient care centers in Vermont, and have co-founded the Concord Hospital Recovery Clinic in Gilford, New Hampshire. This clinic takes a holistic approach to treating people struggling with addiction, relying both on counseling services and medication treatment.

I am extremely concerned about municipal governments enacting restrictions on nicotine pouches, particularly efforts to limit their sale to adult only establishments. I understand that these are well-intentioned efforts designed to limit youth access to nicotine products, but as a practical matter, their biggest impact will be to hurt people already struggling with addiction.

By confining nicotine pouches to adult only establishments, the government will be making it substantially more difficult for adults to access these products while having a minimal impact on youth usage rates. Massachusetts and federal laws already prohibit the sale of tobacco and nicotine products to young people under the age of 21, and this policy has helped lead to youth tobacco usage plummeting in this country over the past five years.

The National Youth Tobacco Survey released last fall found that youth usage of any tobacco product was at its lowest rate since the survey began twenty-five years ago, and that only 1.8% of youth reported using nicotine pouches. At the same time, we know that an estimated 11.6% of American adults continue to smoke, and these adults can benefit from switching to a smoke-free alternative like nicotine pouches.

At our clinics, we treat many patients working to overcome a variety of addictions such as narcotics, alcohol, and nicotine. Of those with nicotine addictions, the vast majority are struggling to quit smoking cigarettes. This is especially problematic because health experts including the FDA have recognized that nicotine and tobacco products exist on a “continuum of risk” with some products – cigarettes in particular – posing significantly greater risks than others.

While nicotine is highly addictive, it is not the primary driver of the cancer, heart disease, and pulmonary ailments that plague smokers. It is the toxic chemicals inhaled via cigarette smoke that do the real damage. Therefore, it is in the best interests of smokers to move them toward smoke-free products like nicotine pouches that pose substantially fewer risks to their health.

The FDA has reached the same conclusion. The agency recently authorized the marketing of ZYN nicotine pouches, concluding that “due to substantially lower amounts of harmful constituents than cigarettes” these nicotine pouches “pose lower risk of cancer and other serious health conditions.”

While some advocates argue for treating smokers solely through the use of tobacco cessation products like nicotine gum, patches, or lozenges, my experience has been that these methods have a terribly low rate of success. Even prescription medications like Chantix work in less than 10% of people who use them, and carry side effects that can include psychosis and suicidal ideation. In my experience, helping

people overcome addictions requires a tailored approach that frequently involves moving them to lower risk products like nicotine pouches.

What is particularly troublesome about shifting the sales of nicotine pouches to adult only establishments is that traditional cigarettes will remain available at convenience stores and gas stations. Someone struggling to quit smoking would have easy access to deadly cigarettes but require a special trip to buy nicotine pouches that are demonstrably better for their health.

In addition, these policies would be directing nicotine pouch users to adult only vape shops that frequently sell marijuana paraphernalia. Many of my patients struggle with dual addictions and pushing them toward stores that sell marijuana supplies would be needlessly cruel, and could open the door for other relapses.

I appreciate that some policymakers may want to limit the availability of nicotine pouches to young people, but limiting their sale to adult only establishments is the wrong approach for public health. In authorizing ZYN nicotine pouches, the FDA concluded that these products "have the potential to provide a benefit to adults who smoke cigarettes... that its sufficient to outweigh the risks of the products, including to youth."

When it comes to public health, our efforts should be focused on helping adult smokers to quit. This proposed policy would only make that work more difficult, and for that reason, I would urge you to oppose it.

Sincerely,  
Paul F. Racicot MD