

NICOTINE POUCHES IN GERMANY IN 2025:

*Where adult consumer preferences
and regulation collide.*



PHILIP MORRIS
INTERNATIONAL



Summary

Country context

Since they do not contain tobacco, nicotine pouches are not covered by the German Tobacco Products Act.

However, due to their oral use and presence of nicotine some state courts have classified them as food. This has led to restrictions on their sale. As a result, the sale of nicotine pouches are effectively banned in Germany.

Across Europe however, nicotine pouches are regulated in many other Member States, including the Czech Republic, Slovak Republic, Denmark, Hungary and Poland. All countries have maximum nicotine limits and age restrictions.

Despite this, in Germany:

Around

1.5million users

use nicotine pouches regularly, making Germany one of Europe's largest markets for nicotine pouches.¹

¹ https://m.bfr-meal-studie.de/cm/429/09_ne_dicke_lippe_riskieren.pdf

PMI commissioned Ipsos, a leading market research agency, to build knowledge on accessibility of adult consumers to nicotine pouches in Germany. The fieldwork was conducted in July-August 2025.

Nicotine pouch survey

1256

mystery shop visits,
across **24** cities,
covering **all regions**

Germany's Federal Institute for Risk Assessment (BfR):

The BfR is Germany's Federal Institute for Risk Assessment, focusing on food safety, product safety, and consumer health protection. The BfR conducted a thorough scientific review and evaluation of nicotine pouches.

It concluded that

“Keeping this model of risk minimisation in mind, switching from cigarettes to nicotine pouches could represent a reduction in health risks for a person who smokes. However, measures should be taken to avoid that use of nicotine pouches leads to a higher nicotine intake compared with other products on the market”.

The BfR also concluded that nicotine pouches
**should not contain more than
16.6 mg of nicotine per pouch.**

FINDINGS

Nicotine pouches are widely available across Germany despite a sales ban.

15.8% of stores visited had nicotine pouches on offer.

55.9% of the products on offer exceeded 16.6 mg nicotine.

13.6% of the nicotine pouch cans sampled were counterfeit. For comparison, counterfeit cigarettes account for only **0.8%** of the cigarette market.²

80.9% of stores offering nicotine pouches did not have them in open display, but stored under the counter.

Counterfeit *pouches*

Example of counterfeit ZYN
nicotine pouches found in Europe



²Data or information relating to counterfeit cigarette incidence is as of 2025 based on: https://www.zigarettverband.de/wp-content/uploads/D_Karte_2Q-2025.pdf

AREA 1 (which includes HAMBURG)

Nicotine pouches are available in **11.3%** of stores and **33.3%** of sampled nicotine pouches were counterfeit.

Compared with **0.7%** of cigarette counterfeit incidence in the same area.

AREA 2 (which includes COLOGNE)

Nicotine pouches are available in **11.6%** of stores and **17.9%** of sampled nicotine pouches were counterfeit.

Compared with **2.2%** of cigarette counterfeit incidence in the same area.

AREA 3A (which includes FRANKFURT)

Nicotine pouches are available in **16.1%** of stores and **8.8%** of sampled nicotine pouches were counterfeit.

Compared with **0.6%** cigarette counterfeit incidence in the same area.

AREA 3B (which includes STUTTGART)

Nicotine pouches are available in **9.2%** of stores and **23.3%** of sampled nicotine pouches were counterfeit.

Compared with **0.4%** of cigarette counterfeit incidence in the same area.

The southern cities of Munich, Augsburg and Nuremberg have the lowest incidence of counterfeit nicotine pouches with an average of **8.0%** counterfeit incidence for these areas.

AREA 5 (BERLIN)

Nicotine pouches are available in **20.2%** of stores and **13.6%** of sampled nicotine pouches were counterfeit.

Compared with **3.1%** cigarette counterfeit incidence in the same area.

AREA 7 (which includes LEIPZIG)

Nicotine pouches are available in **22.9%** of stores and **10%** of sampled nicotine pouches were counterfeit.

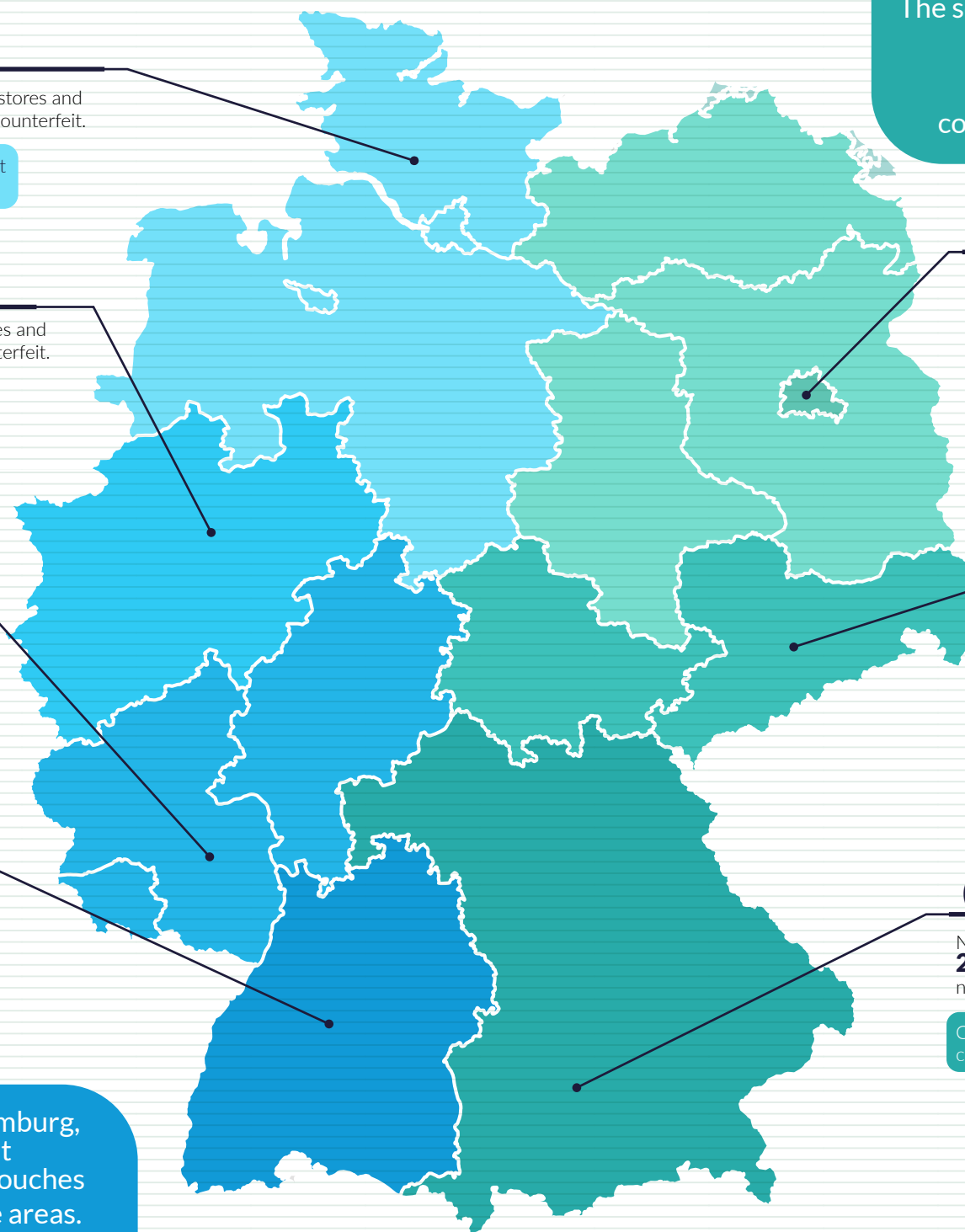
Compared with **0.6%** of cigarette counterfeit incidence in the same area.

AREA 4 (which includes MUNICH)

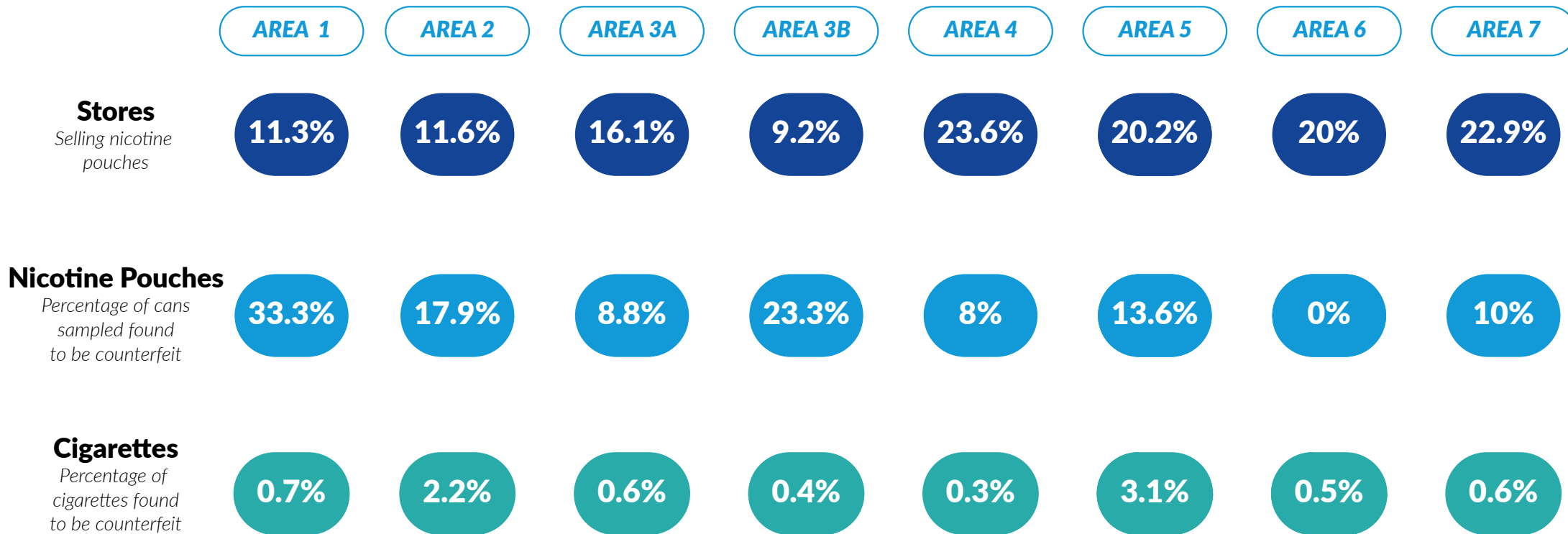
Nicotine pouches are available in **23.6%** of stores and **8%** of sampled nicotine pouches were counterfeit.

Compared with **0.3%** of cigarette counterfeit incidence in the same area.

The northern cities of Bremen, Hamburg, Hannover and Kiel have the highest incidence of counterfeit nicotine pouches with an average of **33.3%** for these areas.



Key Findings³



Nicotine pouches widely available with very concerning levels of counterfeit products found.

³Areas 1 to 7 correspond to Nielsen sales areas 1 to 7 commonly used in Germany for reporting on FMCG goods.

Nicotine pouches should be regulated, not banned.

Nicotine pouches are already widely available in Germany's retail network as well as in neighboring countries. Regulators should acknowledge this reality and regulate products to ensure proper safeguards to protect adult smokers, nicotine users and the legitimate market players.

Why Regulation Is Needed

To ensure consumer safety and high quality products, regulatory measures should include product notification, health warnings, adequate taxation, and licensing and other supply chain protection controls.

These measures are essential to:

- *Protect minors from accessing nicotine pouches*
- *Ensure consistent product quality to protect adult consumers*
- *Support legitimate retailers and manufacturers*
- *Counter illicit products*

Key measures enabled by regulation:



Prohibit sales to minors

with enhanced youth access prevention measures.



Product quality & safety standards

specific for oral products.



Nicotine limit:

up to

16.6 mg

per pouch following the German BfR guidance



Characterizing flavor restrictions:

no candy and child appealing flavors, but allowing, at least, tobacco, mint and menthol.



Packaging:

no can or packaging design appealing to minors .



Pre-market notification:

to demonstrate compliance with laws and standards; and allow unregistered products to be confiscated.



Taxation:

to bring an additional layer of control and enforcement in addition to revenue generation.



PHILIP MORRIS
INTERNATIONAL