

# 2025 MHOA Conference

## Public Health Law Updates and What's Coming Down the Pike from the Tobacco Industry



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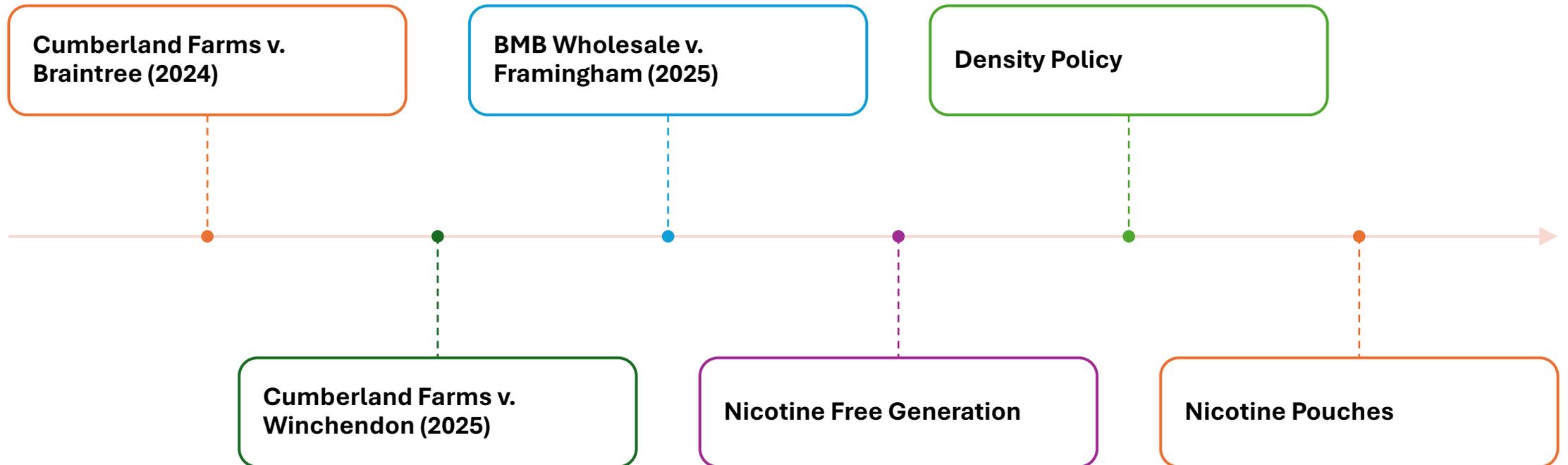


# Disclaimer

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- This information is provided for educational purposes only and should not be construed as legal advice.

# What Coming Down the Pike?



# Cumberland Farms v. Braintree

- In 2019, a Court told Cumberland Farms that the Board of Health had correctly determined that Jazz Black & Mild cigars are flavored.
- In 2022, CFI was fined \$1,000 for offering for sale a Jazz Black & Mild Cigars in Northbridge.
- In fiscal year 2024, DPH data shows that out of 199 inspections conducted in Cumberland stores, flavored tobacco products were offered for sale 56 times, or in 28.1% of inspections.



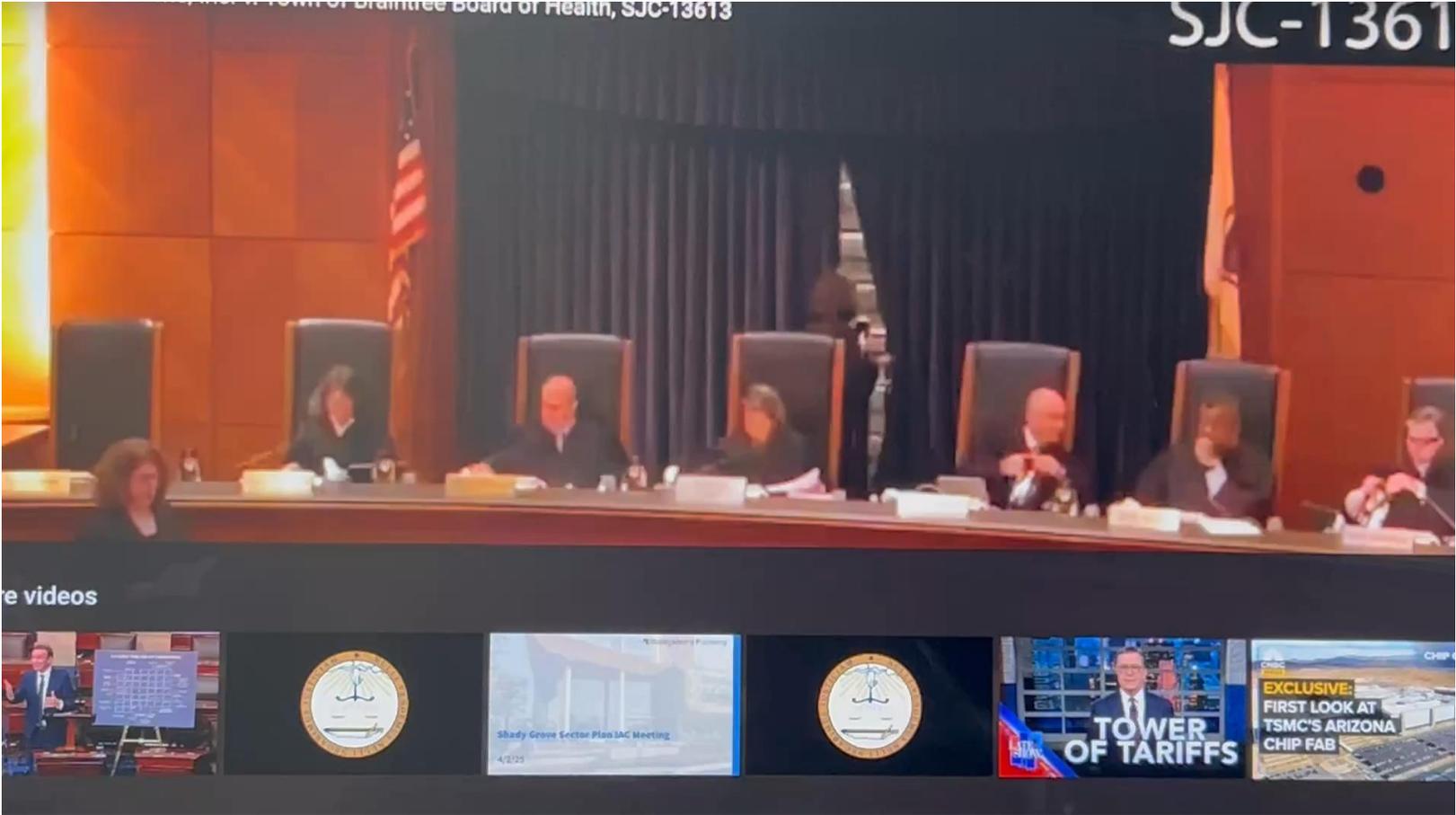
# Cumberland Farms v. Braintree



## Cumberland Farms' Claims:

- We know that Jazz Black & Mild is a flavored product and that it was on the display shelf behind the clerk, but that does not mean we were offering it for sale to anyone.
- The Braintree Board of Health does not have authority to issue fines, even though 105 CMR 655.00 says the opposite.

# SJC's Response to Cumberland Farms



# Cumberland Farms v. Braintree

## The Supreme Judicial Court's response

- **Video of Argument:**

- The Court was not interested in hearing the Cumberland Farm's new definition of "offer to sell."
- "Each board of health may enforce 105 CMR 665.000 . . . at law or in equity in the same manner that local rules and regulations are enforced."
- "long-standing history of local regulation of tobacco products"
- "Local communities have a lengthy history of regulating tobacco products to curb the well-known, adverse health effects of tobacco use."

# BMB Wholesale v. Framingham



The Framingham Board of Health does not know how to conduct a smell test. We do, says BMB Wholesale of Salem, NH.



July 16, 2025

### NOTICE TO TOBACCO PERMIT HOLDERS

At their meeting on July 15, 2025, the City of Framingham Board of Health assessed the following tobacco/nicotine delivery products and determined that they are "flavored tobacco products" under the definition outlined in Massachusetts General Law Chapter 270, Section 28, 105 CMR 665.000 Minimum Standards for Retail Sale of Tobacco and Electronic Nicotine Delivery Systems, and "An Act to Modernize Tobacco Control". These products are prohibited from being sold in retail establishments that are not licensed smoking bars. The list of nicotine delivery products determined to have flavor include:

#### VAPE

- CRAVE MAX 2500
- NU CLEAR 2500
- SPACE ULTRA CLEAR
- CRAVE CLEAR BC7000
- CRAVE MEGA CLEAR 5500
- BRIXZ CLEAR UNFLAVORED
- OXBAR 35K

#### NICOTINE POUCH

- BRIXZYN WHITE
- BRIXZYN FRESH
- BRIXZYN CLEAR
- CRAVE CHILL

You are hereby notified the following:

1. These products must not be sold in Framingham after September 1<sup>st</sup>, 2025;
2. You must confirm by email that you have complied with this notice;
3. Failure to comply will result in a fine of \$1000 per 105 CMR 665.045 (A)(1);
4. Additional enforcement action including fines, permit suspension, or permit revocation, if necessary

The items listed is not final. Additional items may be added as determined by the Framingham Board of Health.

If you have any questions, please contact Parivallal Thillaigovindan [pthillaigovindan@framinghamma.gov](mailto:pthillaigovindan@framinghamma.gov)

Sincerely,

Parivallal Thillaigovindan  
Tobacco Control Program Manager  
Framingham Public Health Department  
188 Concord St Room 102  
Framingham MA 01702

BMB  
Wholesale v.  
Framingham

# BMB Wholesale v. Framingham

## COUNT I

(Declaratory Relief under G.L. c. 231A)

*(against all Defendants)*

34. Plaintiff repeats and incorporates by reference the allegations contained in the preceding Paragraphs of this Complaint.

35. Defendants did not implement the standards required by state laws and regulations at the Board Meeting, including G.L. c. 270, § 28 and 105 CMR 665.000, which comprehensively regulate the sale of flavored tobacco products in Massachusetts.

36. Instead, they imposed a standard under which unflavored products were deemed flavored solely because they did not smell like tobacco.

37. Defendants exceeded their statutory authority and acted arbitrarily and capriciously by failing to follow required procedures and by issuing the Notice.

38. The Notice and the order contemplated therein are both procedurally defective and preempted by state laws and regulations that impose a standard contrary to the standard followed by the Board.

39. Absent a declaration from this Court, Plaintiff is losing and will continue to lose significant sales to retail establishments within Framingham and stands to suffer reputational harm.

# BMB Wholesale v. Framingham

Based on all the evidence before me, I cannot conclude that BMB has shown by any standard of proof a likelihood of success on the merits or that it will suffer irreparable harm, particularly when weighed against the extraordinary relief sought by the injunction.

The Court is cognizant of the public policy favoring that the Board conduct an orderly and fair process of decision-making and in enforcement of the law. The Court is equally cognizant of the public policy favoring the safety of children from exposure to flavored tobacco products.<sup>2</sup>

## **ORDER**

For the foregoing reasons, Plaintiff's Motion for Preliminary Injunction is **DENIED**.

SO ORDERED,



Emily A. Karstetter  
Justice of the Superior Court

DATE: October 8, 2025

# BMB Wholesale v. Framingham



**Where did BMB  
Wholesale go?**

BMB  
Wholesale v.  
Framingham -  
How to  
Determine  
Whether  
Products Are  
Flavored

- Determining what nicotine products are flavored.
  - Start with manufacturers' letters, but don't stop there.
  - Board member or health agents designated by the board conducts a smell test.
  - Does the product smell like anything other than tobacco?
  - Expertise not required.
- 



## CITY OF FRAMINGHAM

Public Health Department



Public Health  
Prevent. Promote. Protect.

508) 532-5470  
health@framinghamma.gov  
www.framinghamma.gov

188 Concord Street  
Room 102  
Framingham, MA 01702

July 16, 2025

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BMB  
Wholesale v.  
Framingham -  
Are  
Manufacturers'  
letters always  
accurate?

BMB  
Wholesale v.  
Framingham -  
Are  
Manufacturers'  
letters always  
accurate?

**Compliance Letter**  
(From: FLYCLOUDS TECHNOLOGY LIMITED)

We FLYCLOUDS TECHNOLOGY LIMITED is a professional vaping products manufacturer in China, were authorized to produce vaping products under 'Brixz' Brand legally.

According to the relevant vaping products laws of the state of Massachusetts, (Quoted from the relevant law, 270 Mass. General Laws § 28(2019), available at [http://www.mass.gov/info-details/mass-general-laws-c270-ss-28.](http://www.mass.gov/info-details/mass-general-laws-c270-ss-28) ) *Prohibits the sale of all flavored nicotine vaping liquids. Nicotine vapor products with a distinguishable taste or aroma, other than the aroma of tobacco may not be sold effective June 1 , 2020.*

Therefore, we produced Brixz 9000 disposable vape and Brixz 3.0 disposable vape for Massachusetts customers accordingly, which are not flavored, complies with the existing law in Massachusetts. It's legal for all of our wholesale and retail customers to sell in Massachusetts.

Below are the detailed information of our Brixz 9000 and Brixz 3.0,

Item	Description	Packing Details	Nicotine mg/mL
Brixz 9000	Brixz 9000 17.5ml disposable vape -Clear 3%	5pcs/display box 200pcs/ CTN	30mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Clear 5%	5pcs/display box 200pcs/ CTN	35mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape - Ultra Clear 3%	5pcs/display box 200pcs/ CTN	30mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Ultra Clear 5%	5pcs/display box 200pcs/ CTN	35mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape - Smooth Clear 3%	5pcs/display box 200pcs/ CTN	30mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape - Smooth Clear 5%	5pcs/display box 200pcs/ CTN	35mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Classic Clear 3%	5pcs/display box 200pcs/ CTN	30mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape - Classic Clear 5%	5pcs/display box 200pcs/ CTN	35mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Fresh Cubano 3%	5pcs/display box 200pcs/ CTN	30mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Fresh Cubano 5%	5pcs/display box 200pcs/ CTN	35mg/ml
Brixz 9000	Brixz 9000 17.5ml disposable vape -Azure Tobacco 3%	5pcs/display box 200pcs/ CTN	30mg/ml



BMB  
Wholesale v.  
Framingham -  
Are  
Manufacturers'  
letters always  
accurate?

SHENZHEN SAM'S TECHNOLOGY CO., LTD  
ADDRESS: ZHONGXIN RD, SHAIJING AREA, BAO'AN DISTRICT, SHENZHEN,  
CHINA

Date: November 1, 2024  
Subject: Letter of Certification  
Attention: Retailers in the Commonwealth of Massachusetts

To whom it may concern,

Shenzhen Sam's Technology manufactures Crave Nicotine Pouches. Shenzhen Sam's Technology certifies that **Crave Chill, Clear, Naked, Smooth, Chill Limited, Clear Limited, Smooth Limited and Naked Limited in 6mg and 9mg** products are not flavored tobacco products defined by 105 CMR 665,005 and are certified accordingly pursuant to 105 CMR 665.010(E).

Shenzhen Sam's Technology Co., LTD is represented by Feel Good Industry LLC in the United States.

For more information:

Massachusetts has banned the sale of any flavored tobacco product or tobacco product enhancer in any traditional retail establishment, online or through any other means to any consumer in the commonwealth. The marketing or advertising of such a sale is also prohibited. 270 MASS. GEN LAWS § 28 (2019), *available at* <https://www.mass.gov/info/details/mass-general-laws-c270-ss-28>.

Accordingly,

- Prohibits the sale of all flavored nicotine vaping liquids. Nicotine vapor products with a distinguishable taste or aroma, other than the aroma of tobacco may not be sold effective June 1, 2020. We will advise you of any developments.

Please keep a copy of this Certification Letter for your records as a recently enacted Massachusetts regulation requires.

# Cumberland Farms v. Winchendon

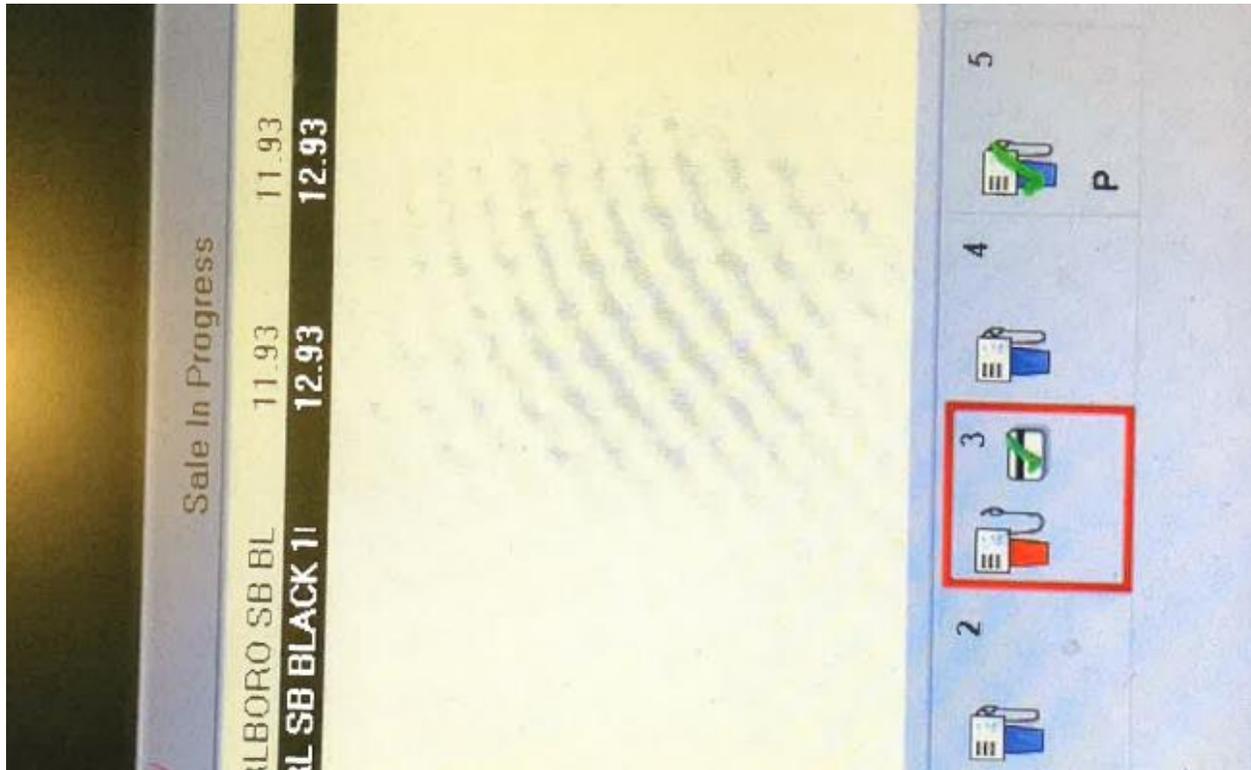
- Cumberland Farms says the \$1.00 off is not a coupon, as defined by 105 CMR 655.00, and thus, is not prohibited.



Coupon means any card, paper, note, form, statement, ticket or other communication distributed for commercial or promotional purposes to be later surrendered by the bearer so as to receive an article, service or accommodation without charge or at a discount price.



# Cumberland Farms v. Winchendon



- The same product costs different amounts depending on whether the packaging listed the discount.
- Is the discount listed on the product a coupon?

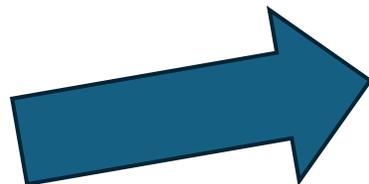
# Cumberland Farms v. Winchendon – State vs. Local Policy

## 665.025: Prohibition on Coupons and Other Discounts

No person shall accept or redeem, offer to accept or redeem, or cause or hire any person to accept or redeem or offer to accept or redeem any coupon that provides any tobacco product without charge or for less than the listed or non-discounted price. No retail establishment that is not a retail tobacco store or smoking bar, or any other establishment shall distribute or cause to be distributed a free sample of a tobacco product.

### **L. Free Distribution, Coupon Redemption and Discount Pricing:** No retailer or person shall:

1. Distribute or cause to be distributed, any free samples of tobacco products, as defined herein.
2. Accept or redeem, offer to accept, or redeem, or cause or hire any person to accept or redeem or offer to accept or redeem any coupon that provides any tobacco product, as defined herein, without charge or for less than the listed or non-discounted price; and
3. Sell a tobacco product, as defined herein, **through any discount** (e.g., "buy-two-get-one-free") if the sale reduces the price of a pack to less than the listed or non-discounted price.



# How to Use a Nicotine Pouch “discreet and convenient design”

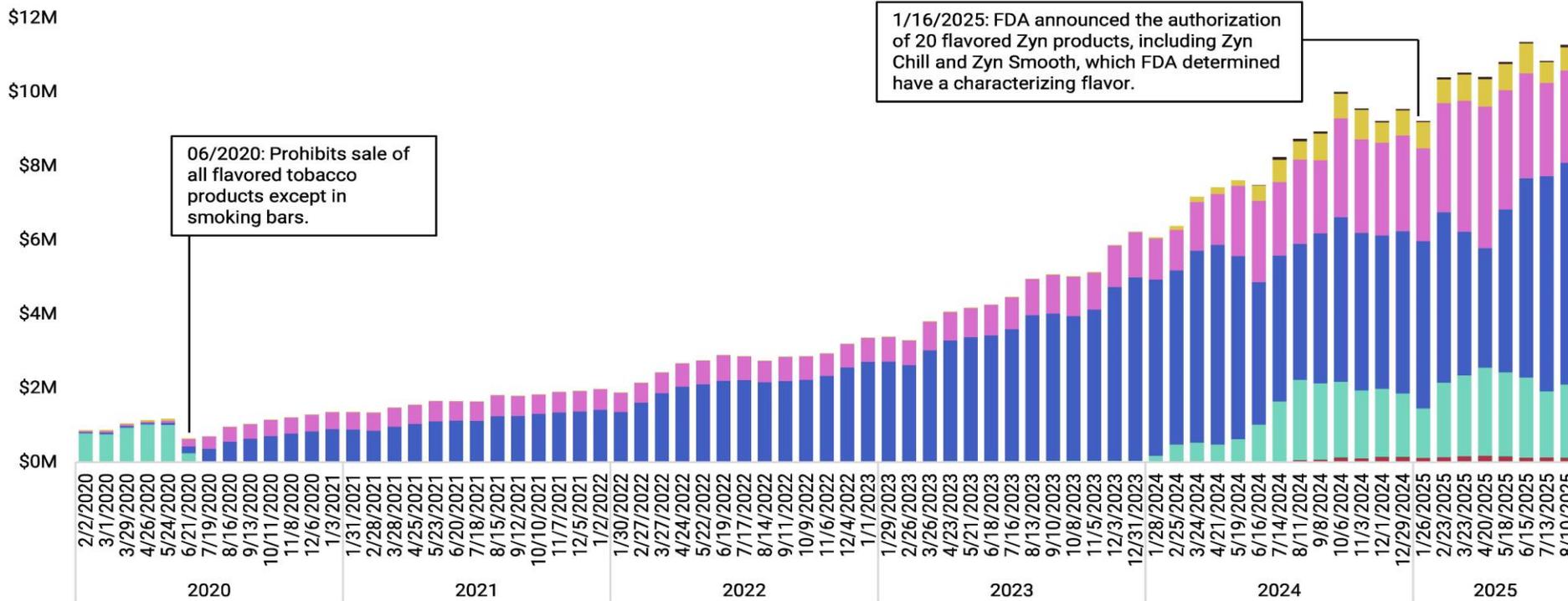


# How Popular Are They?

- From 2016 to 2023 sales increased from 6 million to 334 million. (CDC)
- From 2019 to 2023 current use among MA high students tripled. (1% to 3.2%)
  - Can be used discreetly in school.
  - No smoke or vaper.
  - Small.
  - Containers look like they contain mints or gum.
  - Can be used anywhere.
- 2<sup>nd</sup> most popular tobacco/nicotine product used by youth in 2024.
  - 480,000 middle and high school students using nationwide.
- The only commercial nicotine product in MA not subject to any excise tax.

**Figure 3. Total Nicotine Pouch Dollar Sales, by Flavor, Massachusetts**

Tobacco Menthol Mint Clear/Other Cooling\*\* Original/Smooth\*\* All Other Flavors\*\* Unknown



\*Sales data do not reflect sales from vape shops or online retailers; dates represent end of 4-week periods.  
 \*\*Clear/Other Cooling includes products with flavor names such as clear, clear ice or unflavored, which likely contain non-menthol synthetic cooling agents (e.g., Zyn Chill, Oeo Clear). Original/Smooth includes products with flavor names such as smooth or original which likely contain artificial sweeteners (e.g. Zyn Smooth, On! Original, Zyn Original). All Other Flavors category includes fruit, clove/spice, chocolate, alcoholic drink (such as wine, cognac or other cocktails), candy/desserts/other sweets or some other flavor.

**Trends of Nicotine Pouch Dollar Sales by Flavor from 1/29/2023 to 8/10/2025**

**Total nicotine pouch dollar sales increased from \$3.4 million to \$11.3 million (+232.5%).**

Tobacco-flavored nicotine pouch dollar sales increased from \$0 to \$119.7 thousand; dollar share increased from 0.0% to 1.1%.

Menthol-flavored nicotine pouch dollar sales increased from \$0.4 thousand to \$12.7 thousand (+2,905.4%); dollar share increased from 0.0% to 0.1%.

Mint-flavored nicotine pouch dollar sales increased from \$26.9 thousand to \$2.0 million (+7,212.6%); dollar share increased from 0.8% to 17.4%.

Clear/other cooling-flavored nicotine pouch dollar sales increased from \$2.7 million to \$6.0 million (+122.8%); dollar share decreased from 79.3% to 53.1%.

Original/Smooth nicotine pouch dollar sales increased from \$667.0 thousand to \$2.5 million (+273.9%); dollar share increased from 19.7% to 22.1%.

All other-flavored nicotine pouch dollar sales increased from \$7.3 thousand to \$625.6 thousand (+8,458.6%); dollar share increased from 0.2% to 5.5%.

# Nicotine Strength Varies

- Low strength: 2 - 4 mg.
  - For beginners.
  - “Particularly beneficial for those who are experimenting with nicotine for the first time.”
  - <https://alppouch.com/>
- Medium strength: 6 – 8 mg.
  - For those with moderate nicotine tolerance.
- High Strength: 10 – 14 mg.
  - For those with high nicotine tolerance providing a “robust experience.”
- Extra High Strength: 16 – 20 mg.
  - For those with very high nicotine tolerance.
- Loon NYXX – Bad Bull: 28 mg.
  - Some higher.

# Health Effects of Pouches

- Youth use of nicotine in any form is unsafe.
  - Disrupts the formation of brain circuits.
  - Intensifies symptoms of depression and anxiety.
- Stomach problems
- Gum problems
- Cardiovascular issues
- Long term neurological effects?
- Presence of carcinogenic TSNAs in pouches

# Marketing Strategies

- It's a harm reduction product.
  - No evidence that it helps quit smoking/vaping.
  - Not an FDA approved cessation device.
  - FDA authorized 3 mg. and 6 mg. Zyn products with explicit statement that:
    - “The authorization does not allow the company to make reduced risk claims about the products.”
- Zynfluencers
  - Tucker Carlson
  - “Then you feel the power rising from your central nervous system, then going outward through all the nerve endings down to the tips of your fingers. And then up here, it just starts crackling the synapses.”
  - “Zyn is a lifesaving medical product that enhances male vitality and mental acuity.”

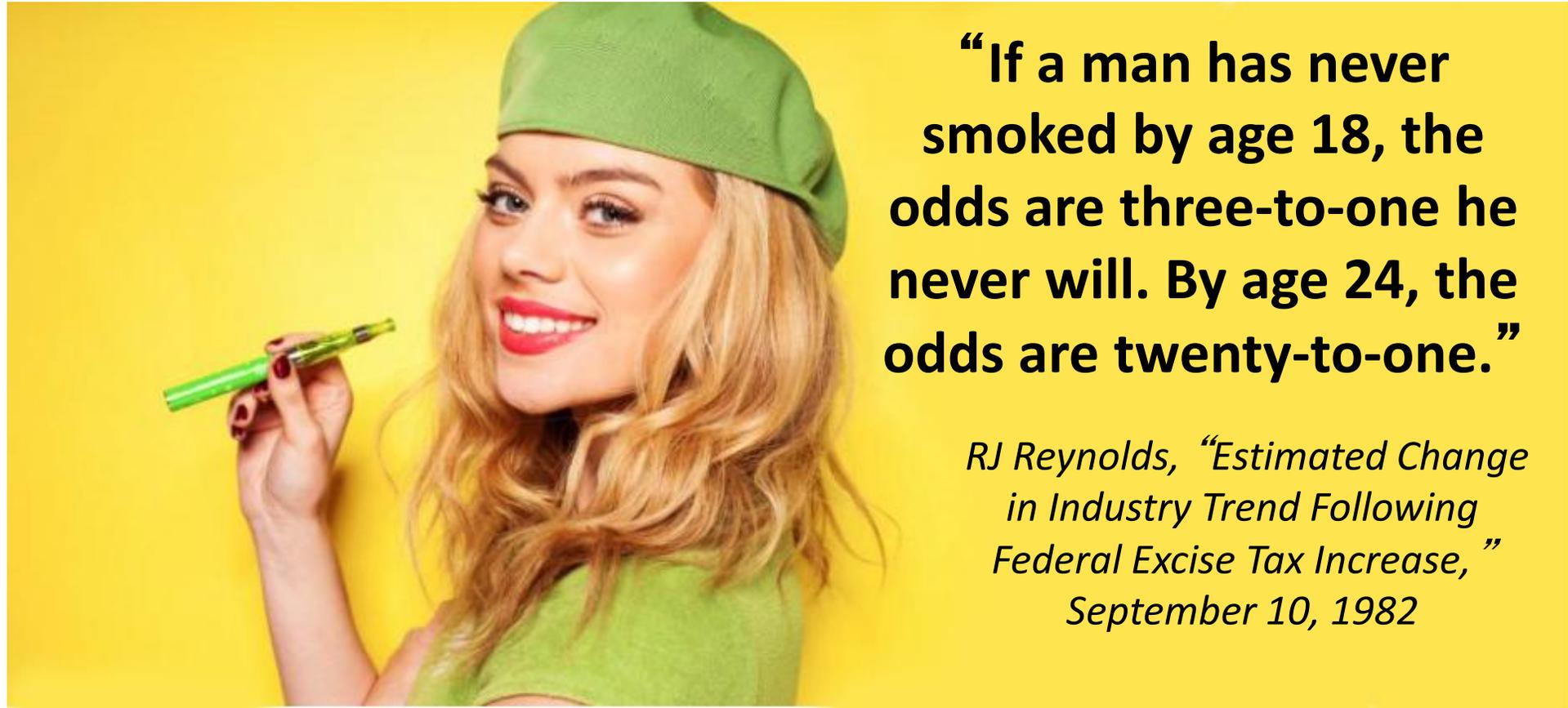


# Is Zyn the New Juul?

## A Cautionary Tale

- Philip Morris International (MPI) bought Swedish Match for \$16 billion in 2022.
- PMI sales are at record highs.
- Sales fueled by sale of Zyn.
- In 2024 shipments of Zyn rose 644 million cans, up by more than half from 2023.
- PMI cannot keep up with the demand.
- Expanding a factory in Kentucky.
- Building a new factory in Colorado for \$600 million.
- PMI pledged to make two-thirds of its income from products like Zyn by 2030.
- ALTRIA bought Juul for \$12.8 million.
  - Within 4 years it was nearly bankrupt by lawsuits blaming it for targeting youth.

# A Nicotine-Free Generation



**“If a man has never smoked by age 18, the odds are three-to-one he never will. By age 24, the odds are twenty-to-one.”**

*RJ Reynolds, “Estimated Change in Industry Trend Following Federal Excise Tax Increase,”  
September 10, 1982*



NFG allows retailers to sell to anyone who was 21 years of age or older on an effective date. For everyone else, now and in the future, retailers will never be allowed to sell nicotine products to them.

Brookline MA, US	Nov-20	Sep-21	2000
Stoneham MA, US	Mar-24	Jan-25	2004
Wakefield MA, US	Mar-24	Jan-25	2004
Melrose MA, US	Apr-24	Jan-25	2004
Winchester MA, US	May-24	Jan-25	2004
Malden MA, US	May-24	Jan-25	2004
Reading MA, US	June-24	Jan-25	2004
Concord MA, US	Oct-24	Jan-25	2004
Manchester MA, US	Oct-24	Apr-25	2004
Chelsea MA, US	Dec-24	Jan-25	2004
Belchertown MA, US	Dec-24	Jan-25	2004
Needham MA, US	Dec-24	Jan-25	2004
Pelham	Jan-25	Jan 9-25	2004
Newton MA, US	Jan-25	Mar-25	3-2004
Somerville MA, US	March-25	May-25	2005
Hopkinton MA, US	May-25	Jan-25	2005
Conway MA, US	May-25	May-25	5-12-2004
South Hadley MA, US	Oct-25	Nov-25	2005
Dover MA, US	Nov-25	Jan-26	2005

# Nicotine-Free Generation

## A Nicotine-Free Generation Policy Guide for Massachusetts Cities and Towns

Co-authored by staff from:  
Massachusetts Association of Health Boards,  
Massachusetts Health Officers' Association,  
Massachusetts Municipal Association, and  
The Public Health Advocacy Institute at Northeastern University School of Law



January 2025

This information is provided for educational purposes only and is not to be construed as legal advice. For legal advice, please contact your municipal attorney.

# Department of Public Health (DPH)



## 2024 Sales Regulation

### SAMPLE REGULATION RESTRICTING THE SALE OF TOBACCO AND VAPE PRODUCTS

#### CHECKLIST FOR POLICY DECISIONS (circle decisions):

- |  |       |     |
|--|-------|-----|
| 1. No permit renewal if outstanding fines exist (§E.6)           | YES   | NO  |
| 2. No permit renewal if three sales to persons under 21 (§ E 7)  | YES   | NO  |
| 3. No sales to the following persons:                            |       |     |
| Any person under the age of 21; OR                               | YES   | NO  |
| Any person born on or after January 1, 2004.                     | YES   | NO  |
| 4. Cap and/or reduce number of permits (§E.8)                    | YES   | NO  |
| Simple Cap ( )   Reducing Cap ( )   Dual Cap ( )                 |       |     |
| 5. No new permits within 500 feet of a school (§E.11.a)          | YES   | NO  |
| 6. No new permits within (---) feet of an existing               |       |     |
| 500 ( )   1,000 ( )   2,000 ( )                                  |       |     |
| 7. Ban Smoking Bars (§F)   |       |     |
| 8. Include minimum cigar package size/price (§H)                 |       |     |
| 9. Oral Nicotine Pouches (§G)                                    |       |     |
| 10. Ban blunt wraps (§K)   |       |     |
| 11. Ban free distribution of tobacco products (§L.1)             |       |     |
| 12. Ban redemption of coupons (§L.2)                             |       |     |
| 13. Ban Self-Service Displays (§N)                               |       |     |
| Exception for Adult-Only Retail Tobacco Store                    |       |     |
| 14. Ban tobacco product sales in educational institu             |       |     |
| 15. Fining Structure System (§T)                                 |       |     |
| Separate State and Local ( )   Unified Fining                    |       |     |
| 16. Tolling periods for local violations (§S)                    | YES   | NO  |
| State level at 36 months ( )   Over 36 months ( )                |       |     |
| 17. Suspension Periods (§T)                                      | YES   | NO  |
| 18. Choose Suspension Periods (§T)                               |       |     |
| First Violation: 1 to 7 days (mandatory for first underage sale) | ( )   |     |
| Second Violation: up to 7 days                                   | ( )   |     |
| Third or More Violations: up to 30 days                          | ( )   |     |
| 19. "Shall" vs. "May" language for suspensions (§T)              | SHALL | MAY |

**D. No Tobacco Sales to Persons [under Twenty-One (21) Years Old] OR [Born on or after January 1, 2004.]**

1. No person shall sell or provide a tobacco product to a person [under twenty-one (21) years old] or [born on or after January 1, 2004].

**YELLOW** highlighted sections are language copied from the latest state law and DPH regulation.

**GREEN** highlighted sections are uniquely local policy decisions (most are on the above checklist) to be made by the Board of Health.

**NO COLOR** indicates that language has been previously adopted by Boards of Health.

# Nicotine-Free Generation

## Nicotine-Free Generation (NFG) Overview

### What is Nicotine:

The term nicotine includes all tobacco and synthetically derived nicotine products such as vapes or e-cigarettes, cigarettes, cigars, chew, and pouches.

### The Problem:

Nicotine containing tobacco products remain the single greatest cause of addiction and death in Massachusetts with over 9,000 deaths each year,<sup>I</sup> more than three times the number of deaths from the state's opioid crisis. Tobacco kills one-half of its users,<sup>II</sup> accounting for 1 out of every 5 deaths in the US.<sup>III</sup> Despite decades of control efforts, the tobacco industry continually innovates new products and nicotine delivery methods, undermining regulation and targeting susceptible young adult populations.

### Nicotine-Free Generation:

Nicotine-Free Generation (NFG) proposes a definitive, streamlined approach to tobacco control. NFG policy prohibits the sale of nicotine products to anyone born after a chosen date (e.g. January 1, 2004). Those born before this date, who currently use nicotine, may be sold products indefinitely. The policy prevents sales to the next generation, phasing out sales slowly over time.

### NFG:

- **Respects the rights of users:** Those who already use nicotine products can continue to be sold nicotine indefinitely. NFG doesn't shame or stigmatize users.
- **Considers retailer needs:** NFG is gradual, providing retailers time to adjust their business model so it does not depend on selling a deadly, addictive product—the market declines only marginally each year.
- **Is socially reinforcing:** Over time, teens and young adults will be further removed in age from those who can be sold nicotine, decreasing early nicotine initiation that sparks lifelong addiction.
- **Accounts for personal rights and freedoms:** The Massachusetts Supreme Court unanimously upheld the policy in Brookline.<sup>IV</sup> Like asbestos or lead paint, selling tobacco is not a constitutional right. The purchase, use, or possession of tobacco is never criminalized.
- **Provides a smooth transition:** NFG avoids black market sales, as current dependent users are never cut off from legal nicotine access. Additionally, NFG curtails future demand by preventing the next generation from becoming addicted.
- **Comes at the right time and place:** NFG policy is spreading quickly and has already been adopted by seven Massachusetts towns. MA has led the country in spearheading nicotine policies such as flavor restrictions and minimum sales age of 21. Many places are meaningfully considering NFG, including other jurisdictions in the US and the countries of UK, EU, Malaysia, Singapore, Ireland, Denmark, France, Spain, and Canada.
- **Opposed strongly by Big Tobacco:** Will reduce sales, and improve public health.

# Opposition



1411 K Street N.W.  
Suite 900  
Washington, D.C. 20005  
202-525-5717

*Free Markets. Real Solutions.*  
[www.rstreet.org](http://www.rstreet.org)

Testimony from:

Jeffrey S. Smith, Senior Fellow, Integrated Harm Reduction, R Street Institute

R Street Testimony in Opposition of the Needham Board of Health Regulations Restricting the Sale of Reduced Risk Nicotine Products.

December 13<sup>th</sup>, 2024

Needham, Massachusetts - Board of Health

Director McDonald and members of the board,

My name is Jeff Smith, and I am a senior fellow on the Integrated Harm Reduction team at the R Street Institute. The R Street Institute is a nonprofit, nonpartisan public policy research organization. Our mission is to engage in policy research and outreach to promote free markets and limited, effective government in many areas. Our efforts to promote tobacco harm reduction are why we are particularly interested in this proposed regulation before the Needham Board of Health.

# Eventually ...

- You are starting a process that prohibit all sales in the future.
- NFG slowly phases in a complete ban.



# QUESTIONS?



Cheryl Sbarra, Esq., Mass Association of Health Boards

Lisa Stevens-Goodnight, Esq. Mass Municipal Association

Christopher Banthin, Esq., Public Health Advocacy Institute