

EU Nicotine Pouch Compliance Checklist

A practical pre-launch & sourcing checklist for EU/UK B2B resellers and distributors · 2026 edition

This checklist covers the documentation, labeling, notification and gating steps most EU/UK resellers must complete before importing and selling tobacco-free nicotine pouches. Rules differ by Member State and change over time. Treat this as a working checklist, not legal advice — always confirm specifics with local counsel or a certified compliance agent.

1. Is your product in scope?

- Confirm how the product is classified in your target country: as a 'novel tobacco product' under the TPD, a 'nicotine product', or a separately regulated category.
- Tobacco-free nicotine pouches are NOT cigars/cigarettes; they fall under TPD Article 20 (novel tobacco products) where Member States apply it, but several countries use national nicotine-product laws instead.
- Herbal / zero-nicotine pouches are usually outside nicotine regulation but may be caught by general product safety, food-contact or cosmetics rules depending on claims.

Classification drives every later step. Get this wrong and the rest of the checklist will not protect you.

2. EU-CEG / national notification

- Submit a notification via the EU Common Entry Gate (EU-CEG) for each Member State where you will sell.
- Notify at least 6 months before the product is placed on the market (TPD Article 20(2)).
- Include: product type, ingredients (with quantities), emissions (where applicable), toxicology data, and labelling.
- Keep your notification reference and submission date on file for customs and enforcement queries.

Each country is a separate notification. Selling in DE, FR and SE means three submissions, not one.

3. Labelling & packaging requirements

- Combined health warning covering the required % of the two largest surfaces (TPD Article 20(3)(c)).
- Ingredient list and quantities, and nicotine content expressed in mg/g.
- Net weight / number of pouches, batch number, and minimum durability / expiry.
- Manufacturer or importer name, address and contact details.
- Child-resistant and tamper-evident packaging (required in most Member States).
- Local-language labelling where the Member State mandates it.

4. Nicotine limits & flavour restrictions

- Check the maximum nicotine concentration allowed per pouch / per gram in each market — thresholds are not harmonised across the EU.
- Several Member States restrict or ban characterising flavours (e.g. certain mint/menthol-style or sweet profiles). Verify the current list per country.
- Some markets require flavour descriptors to be 'non-attractive' and limit colourants or additives.

Flavour and strength rules move fast. Re-check 30 days before each new country launch.

5. Age verification & retail gating

- Enforce 18+ verification at point of sale and on any e-commerce flow.
- Do not target non-smokers / under-18s in advertising; keep B2B messaging to verified business buyers.

- Keep records of age-gating and buyer-verification steps for due diligence.

6. Traceability & security features

- Apply unique identifiers / serialisation where the market requires track-and-trace for tobacco-related products.
- Maintain batch-level records linking production, shipment and destination for recall readiness.

7. Country snapshot (verify before launch)

Rules below are directional and frequently updated — confirm each with local counsel:

- Germany (DE): notifiable via EU-CEG; strict packaging/labelling and flavour scrutiny; 18+ enforced.
- France (FR): national nicotine-product framework; flavour and online-sales rules apply — verify current status.
- Sweden (SE): large pouch market; specific labelling and nicotine-strength expectations.
- Netherlands (NL) / Belgium (BE): flavour restrictions and retail limits — verify before import.
- Poland (PL) / Spain (ES): growing markets with EU-CEG notification and standard TPD-aligned labelling.

This is not exhaustive. The UK (post-Brexit) runs its own notification scheme via MHRA — do not assume EU submissions cover GB.

8. Documentation PouLux provides with every shipment

- TPD / national compliance statement for the notified SKUs.
- Certificate of Analysis (CoA) and batch test report.
- Material Safety Data Sheet (MSDS) where applicable.
- Full ingredient declaration and nicotine-content declaration.
- Support with EU-CEG submission references and labelling artwork sign-off.
- DDP documentation so customs duties are handled upstream, not at your door.

9. Pre-launch tick sheet

☐	Product classification confirmed per target country
☐	EU-CEG (or national) notification submitted, 6+ months lead time
☐	Health warning + ingredient/nicotine labelling applied
☐	Child-resistant & tamper-evident packaging in place
☐	Flavour & strength limits checked for each market
☐	18+ age gating live on all sales channels
☐	Batch traceability & recall process documented
☐	Local-language labeling where mandated
☐	PouLux compliance pack received and filed
☐	Local counsel sign-off obtained

Need the compliant SKUs, the documentation pack, or a DDP quote? PouLux is a compliance-first wholesale supply desk for nicotine pouches, herbal pouches and pod hardware. Contact: poulux.com · WhatsApp +86 133 6749 4665.

Disclaimer: This document is general information prepared by PouLux for reseller education. It is not legal, tax or regulatory advice. Laws differ by jurisdiction and change frequently — always obtain qualified local advice before importing or selling nicotine products.