



**Standard for Tobacco and Tobacco Products – Smokeless Tobacco Products**

ICS 65.160

*Price group B*  
© SON 2018

**Approved by SON Governing Council**



**STANDARDS ORGANISATION OF NIGERIA**

**Lagos Operational Office**

Plot 13/14 Victoria Arobieke Street,  
Off Admiralty Way,  
Lekki Peninsula Scheme 1,  
Lekki, Lagos, Nigeria.

**Head Office**

No. 52, Lome Street,  
Wuse Zone 7, Wuse  
Abuja, Nigeria

**NO COPYING WITHOUT SON PERMISSION EXCEPT AS PERMITTED BY COPYRIGHT LAW**

## Technical Committee on Tobacco and Tobacco Products

S/NO	NAME	ORGANIZATION REPRESENTED
1	PROF. R.I IDOWU (Chairman)	UNIVERSITY OF ABUJA
2	MALAU M. TOMA	FEDERAL MINISTRY OF HEALTH
3	ABRAHAM E. AGBONS	FEDERAL MINISTRY OF HEALTH
4	HAROUNA LY	PHILIP MORRIS LIMITED
5	IBRAHIM FADIPE	PHILIP MORRIS LIMITED
6	ABIMBOLA NIBSON-NIBORO	PHILIP MORRIS LIMITED
7	DIANA OKORO	PHILIP MORRIS LIMITED
8	ODIRI EREWA-MEGGISON	BRITISH AMERICAN TOBACCO
9	SEYI ASHADE	BRITISH AMERICAN TOBACCO
10	ADENIYI AJANE	BRITISH AMERICAN TOBACCO
11	CHIAGO AKPATA	BRITISH AMERICAN TOBACCO
12	NANCYNWANZE	BRITISH AMERICAN TOBACCO
13	YESIM EMIR	JTI
14	ADEOLA AKINNIBOSUN	JTI
15	UNOMA ASOMUGHA	NAFDAC
16	APOSU LINUS	ICCON
17	LATIFU SALAMI	ITC
18	ALAWODE IBUKUN	ITC
19	AHMAD ISIYA	ITC
20	BARRISTER NWACHUKWU	HAPPINESS FOR CHILDREN FOUNDATION
21	SONIA NWAODO	HAPPINESS FOR CHILDREN FOUNDATION
22	CHRISTOPHER GODSWILL	HAPPINESS FOR CHILDREN FOUNDATION
23	DANIEL IFEAMAH	HAPPINESS FOR CHILDREN FOUNDATION
24	UGO NWOFOR	HAPPINESS FOR CHILDREN FOUNDATION
25	OGENYI AMANDA	HAPPINESS FOR CHILDREN FOUNDATION
26	ANIObI CHINELOR	HAPPINESS FOR CHILDREN FOUNDATION
27	BOLANLE ASIMOLOWO	HAPPINESS FOR CHILDREN FOUNDATION
28	THOMAS LINDEGAARD	SCANDANAVIAN TOBACCO GROUP
29	ONDAJE IJAGWU	CONSUMER PROTECTION COUNCIL
30	KELECHI KEN OKO	CONSUMER PROTECTION COUNCIL
31	PHILIP JAKPOR	ENVIRONMENTAL RIGHTS ACTION
32	HILDA OCHEFU	CAMPAIGN FOR TOBACCO-FREE KIDS
33	MICHEAL OLANIYAN	CAMPAIGN FOR TOBACCO-FREE KIDS
34	CHIBUOKE NWOKORIE	CAMPAIGN FOR TOBACCO-FREE KIDS
35	SEGUN AJAYI-KADIR	MANUFACTURERS ASSOCIATION OF NIGERIA
36	JULIUS MBA	GREG JANE INT'L LTD
37	TOCHUKWU NWEKE	GREG JANE INT'L LTD

38	GREG OKAFOR	GREG JANE INT'L LTD
39	SUNIL MENON	GREG JANE INT'L LTD
40	BENOIT N	GREG JANE INT'L LTD
41	LOUIS NJOKU	LOUREN NIG. LTD
42	HASSAN ADEYEMI	BLACK HORSE TOBACCO
43	FARES SAIDI	BLACK HORSE TOBACCO
44	HASSAN ZEIN	GONGONI DISTRIBUTION NIGERIA LIMITED
45	BOSUN ALONGE	BAZE UNIVERSITY
46	JEFF MWANGEMI	LEAF TOBACCO & COMMODOTIES NIG.LTD
47	LORETTA ANNIE-OKAFOR	LEAF TOBACCO & COMMODOTIES NIG.LTD
48	SATUMARI HAUWA A	INSTITUTE OF CHARTERED CHEMIST
49	OLUWUYI CHRISTOPHER	FEDERAL MINISTRY OF AGRIC & RURAL DEVELOPMENT
50	BERNARD UKATTAH	FEDERAL MINISTRY OF AGRIC & RURAL DEVELOPMENT
51	BAFANG IDI SULE	FEDERAL PRODUCE INSPECTION SERVICE
52	UMARU KAWU	STANDARDS ORGANISATION OF NIGERIA
53	CHINYERE EGWUONWU	STANDARDS ORGANISATION OF NIGERIA
54	OKUNOLA OMOLARA	STANDARDS ORGANISATION OF NIGERIA
55	BARTH UGWU	STANDARDS ORGANISATION OF NIGERIA
56	CHARLES NWAGBARA	STANDARDS ORGANISATION OF NIGERIA
57	ELSIE OFILI	STANDARDS ORGANISATION OF NIGERIA
58	AMINA ABBA HALIRU (TECHNICAL SECRETARY)	STANDARDS ORGANISATION OF NIGERIA

CAMPAIGN FOR TOBACCO PREVENTION REFERENCE ONLY

## Foreword

The Technical Committee on Standards for Tobacco and Tobacco products elaborated the standard for Smokeless Tobacco Products.

The need to provide adequate information to the public on the risk associated with consumption of tobacco products necessitated the elaboration of this standard. The standard will promote fairness amongst manufacturers, importers, distributors and marketers of the products and to safe guard the health of the consumer.

This Standard incorporates relevant provisions of the Nigerian Tobacco Control Act, 2015 and some of the relevant decisions reached at the WHO Framework Convention on Tobacco Control (FCTC).

In elaborating this standard, references made to relevant National and International Standards and information obtained from the Nigerian Tobacco Control Act, 2015, WHO FCTC, manufacturers and other stakeholders are hereby acknowledged.

CAMPAIGN FOR TOBACCO FREE KIDS REFERENCED ONLY

## 1. Scope

This Nigerian Industrial Standard covers the quality and safety requirements, reference sampling and test methods for Smokeless Tobacco products imported, distributed, manufactured for local sale or marketed in Nigeria. It does not include tobacco heat-not-burn products.

## 2. Normative references

The following documents, in whole or in part, are normatively referenced in this document and are indispensable for its application. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies.

NIS ISO 15152 – Tobacco - Determination of the content of total alkaloids as nicotine – Continuous-flow analysis method

NIS ISO 17025 - General requirements for the competence of testing and calibration laboratories

NIS ISO 6488 - Tobacco and tobacco products - Determination of water content - Karl Fischer method

NIS ISO 16632 - Tobacco and tobacco products -- Determination of water content -- Gas-chromatographic method

NIS ISO 15517 – Tobacco - Determination of nitrate content – Continuous-flow analysis method

Coresta recommended method No 69 - Determination of pH in Smokeless Tobacco Products

Health Canada Method T-310 - Determination of Whole Tobacco pH

Coresta recommended method No 72 – Smokeless Tobacco Products – Determination of Tobacco Specific Nitrosamines in Smokeless Tobacco Products by Liquid Chromatography - Tandem Mass Spectrometry

Health Canada Method T-309 - Determination of Nitrosamines in Whole Tobacco

Health Canada Method T-307 - Determination of Benzo[A]Pyrene in Whole Tobacco

CAC/RCP 1,1969, Rev. 4, 2003, 3<sup>rd</sup> Edition - Recommended International Code of practice General Principles of food Hygiene

CORESTA recommended method No 71 – Smokeless Tobacco Products – Sampling

### **3. Terms and Definitions**

For the purpose of this Nigerian Industrial Standard, the following shall apply:

#### **3.1**

##### **Additives**

Any substance, except for tobacco leaf and other natural or unprocessed tobacco plant parts, used in the manufacture or preparation of smokeless tobacco products and has a specific function in the finished product.

#### **3.2**

##### **Brand**

A name, term, design, symbol or any feature that identifies any product of one manufacturer/distributor of good or service as distinct from those of other manufacturers/distributors.

#### **3.3**

##### **Constituents**

Substances that occur naturally in tobacco leaf.

#### **3.4**

##### **Content**

Comprises of ingredients and constituents

#### **3.5**

##### **Country of origin**

Name of the country where Smokeless Tobacco products are manufactured.

#### **3.6**

##### **Chewing Tobacco**

Chewing tobacco is a category of oral Smokeless Tobacco products that are to be chewed during normal use. There are different forms of chewing tobacco that range from Scandinavian chewing tobacco, Loose leaf chewing tobacco, Twist / roll chewing tobacco and Plug chewing tobacco.

#### **3.7**

##### **Dry Snuff**

A dry oral Smokeless Tobacco product (moisture content typically less than 10%), that is manufactured from fire-cured fermented tobacco. The tobacco is ground into a powder and other flavor ingredients added.

#### **3.8**

##### **Destination**

Name of the country where Smokeless Tobacco product is sold.

### 3.9

#### **Ingredients**

Include tobacco, components, including materials used to manufacture those components, additives, processing aids, residual substances found in tobacco (following storage and processing), and substances that are known to migrate into the product (contaminants are not part of ingredients).

### 3.10

#### **Ingredient function**

The function of tobacco ingredients and non-tobacco ingredients for product categories where those are in use, used in the Smokeless Tobacco product.

### 3.11

#### **Moist Snuff**

A moist oral Smokeless Tobacco product made from cut or ground air- and fire-cured tobaccos and other ingredients. Moist Snuff is commonly manufactured using a controlled fermentation process. The product is typically placed between the gum and the lower lip in the oral cavity.

### 3.12

#### **Nasal Snuff**

A dry nasal Smokeless Tobacco product made from ground/pulverized mainly air- and flue-cured tobaccos. During manufacture, the tobacco is mixed with a casing solution and allowed to ferment or age for several weeks before being finally mixed with other ingredients. The product is inhaled through the nose.

### 3.13

#### **Population**

Aggregated batch of sale units of the Smokeless Tobacco products in retail outlets in a given geographical area, at any time in a given period.

### 3.14

#### **Smokeless Tobacco products (STP)**

Tobacco products that do not require combustion or production of tobacco aerosol (smoke) by other means, at the time of use. Examples include but are not limited to snus, chewing tobacco, moist and dry snuff and nasal snuff.

### 3.15

#### **Snus**

A moist to semi-moist oral Smokeless Tobacco product, traditionally produced and used in Sweden, which is made from finely ground, mainly air-cured, tobaccos and other ingredients. The product is placed between the gum and the upper lip in the oral cavity.

### 3.16

#### **Tobacco**

Leaves from the tobacco plant and other natural processed or unprocessed parts of the tobacco plant, including expanded and reconstituted tobacco

### 3.17

#### **Tobacco blend**

A mixture of leaves from different types of tobacco and other tobacco-based components plus any associated humectants and flavorings required for a particular product or brand specification.

### 3.18

#### **Total alkaloids**

These are the naturally occurring 'family' of organic substances containing basic nitrogen atoms. Nicotine belongs to this 'family'. The total alkaloid as nicotine is determined in accordance with NIS ISO 15152.

## **4. General Requirements**

4.1 Every manufacturer, distributor or importer of Smokeless Tobacco Products shall submit to Standards Organisation of Nigeria (SON) by 31<sup>st</sup> of December of each year under reference, the information required by this Standard as print or in electronic form.

4.2 The submission shall contain, in addition to the information required by this Standard, the following information:

a) The name, registered street address and telephone number of the manufacturer, distributor, importer or marketer on whose behalf the submission is made;

b) The street address of the manufacturer's principal place of business in Nigeria;

c) The street address of the place of business where the Smokeless Tobacco product that is the subject of the report was manufactured;

d) The date of the report;

e) The period covered by the report;

f) The Product Information Form described in the Appendix A for each marketed Smokeless Tobacco products brand, as per the quality requirements, test procedures and analytical methods established by this standard.

g) Residual Agrochemical level in the tobacco leaf used in the production of the tobacco product. See format in Appendix B.

4.3 The submission as described above shall be accompanied by a certificate issued by a laboratory accredited under ISO 17025 responsible for the testing.



**4.3.1** The certificate shall be dated and signed by the appropriate technical authority responsible for the laboratory analysis.

**4.4** Without prejudice to the requirements of this standard, all smokeless tobacco products released for sale in Nigeria shall comply with specific requirements in clause 6.1.

**4.5** Products which do not comply with the provisions of this Standard shall not continue to be sold and marketed.

**4.6** Tobacco companies shall take all reasonable precautions to ensure that all tobacco used in the manufacture of Smokeless Tobacco products together with the premises and products themselves are free from infestation & contamination during various stages of storage, processing, manufacturing and distribution of the finished product.

**4.7** All the parameters described in the Product Information Form (Appendix A) shall be submitted to SON by the 31st December of each year.

## **5. Ingredients**

**5.1** Smokeless Tobacco Product producers shall not use tobacco ingredients at levels which, based on available scientific evidence, render the Smokeless Tobacco Product more harmful to health than the Smokeless Tobacco Product would be without such tobacco ingredients.

**5.2** Any person engaged in the production of Smokeless Tobacco Product using tobacco ingredients at levels which, based on available scientific evidence, render the Smokeless Tobacco Product more harmful to health than the Smokeless Tobacco Product would be without such tobacco ingredients as referred to in 5.1 shall be liable to administrative actions in accordance with applicable provisions of law.

**5.3** Every manufacturer and importer of Smokeless Tobacco Products in Nigeria shall submit to the SON by 31<sup>st</sup> of December of each year under reference all the relevant information regarding the types of ingredients used during manufacturing process by product type and by brand, with the exact levels of non-commercial sensitive ingredients by weight in milligrams and percentage of weight of the Smokeless Tobacco Products.

**5.4** A reporting threshold shall be set for individual flavourings used at quantities below 0.1% of the total smokeless tobacco unit weight, such that the said ingredients may be grouped and identified as "flavourings" on this list.

The report of the ingredients shall include the following requirements:

a) The common name of the ingredient;

b) The chemical abstract services (CAS) registry number of the substance; Flavour and Extracts Manufacturers assessment number (FEMA) and The Council of Europe (CoE) number (as available)

c) The function of the ingredient;

d) The Maximum Use Level (MUL) by weight (mg) and by percentage (%) in any brand sold in the market during the reporting period.

Adopt same principle of reporting as cigarette

## 6. Quality requirements

### 6.1 Specific requirement

In addition to general requirements specified in clause 4, Smokeless Tobacco Products shall comply with the specification given in Table 1.

**Table 1:  
Specific Requirements for Smokeless Tobacco Products**

Parameter	Specification	Test Method
Tobacco Nicotine Content (%) (max)	4.0	NIS ISO 15152
Tobacco Moisture Content (% by Dry weight) (max)	Moist Snus= 52 Dry Snuff= 15 Chewing tobacco=15 Snuff= 35 Nasal snuff- 15	NIS ISO 6488 NIS ISO 16632
Tobacco Nitrate Content (% by Dry weight) (max)	3	NIS ISO 15517
pH Range	4 – 11	CRM 69 T - 310
Tobacco Specific Nitrosamines (TSNA) (dry weight basis) (max)	10 ppm	CRM 72
Nitrosodimethylamine NDMA (dry weight basis) (max)	0.01 ppm	T - 309
Benzo(a)pyrene) B(a)P (dry weight basis) (max)	0.02 ppm	T - 307

## 6.2 Contaminants

### 6.2.1 Chemical Contaminants

#### 6.2.1.1 Mycotoxins

All Smokeless Tobacco Products shall comply with the following limits for Mycotoxins in Table 2

**Table 2**  
**Requirement for mycotoxins in Smokeless Tobacco Products**

Mycotoxins (wet weight basis)	Limit	Test Method
Total Aflatoxin (max)	0.01 ppm	AOAC
Ochratoxin A (max)	0.05 ppm	AOAC

#### 6.2.1.2 Pesticide Residue

The product shall comply with the maximum residue limits (MRLS) for pesticide established by appropriate authority.

#### 6.2.3 Metallic Contaminants

Smokeless Tobacco Products shall comply with the following limits for metallic contaminants stated below:

**Table 3**  
**Requirement for Metallic Contaminants in Smokeless Tobacco Products**

Metallic Contaminants	Limit	Test Method
Lead (Pb) (max)	2.0ppm	Electrothermal AAS
Cadmium (Cd) (max)	1.0 ppm	ICP- MS
Arsenic (As) (max)	0.5 ppm	Electrothermal AAS
Mercury (Hg) (max)	0.04 ppm	ICP-MS/ ICP-OES

## 7. Hygiene

It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1 – 1969, Rev. 4-2003).

## 8. Packaging and Labelling

### 8.1 Packaging

Smokeless Tobacco Products shall be packed in a suitable food grade container that will prevent contamination to the tobacco product and shall contain a minimum of 30 grams.

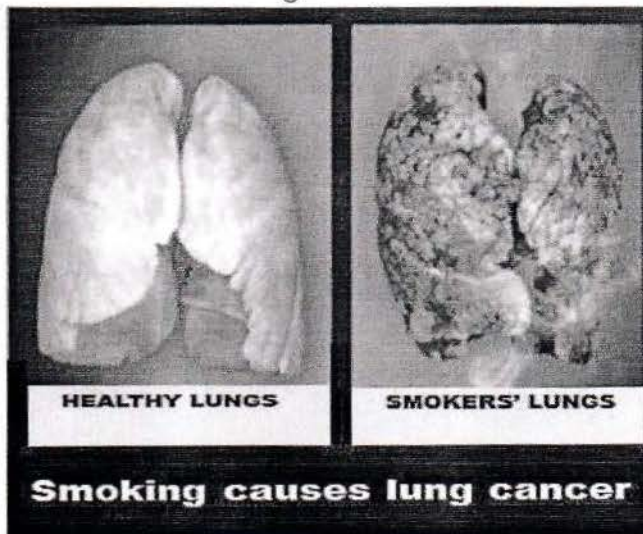
## 8.2 Labelling

The following particulars shall be legibly marked on one side of each packet:

- i. Name of product/Brand name
- ii. Quantity of Tobacco or Smokeless Tobacco products in the packet
- iii. Name and Location Address of Manufacturer and or Distributor
- iv. Date of manufacture and Expiry Date
- v. Country of origin
- vi. Batch number
- vii. 18+ Sign
- viii. "Do not litter sign"
- ix. Storage condition

## 8.3 Warning

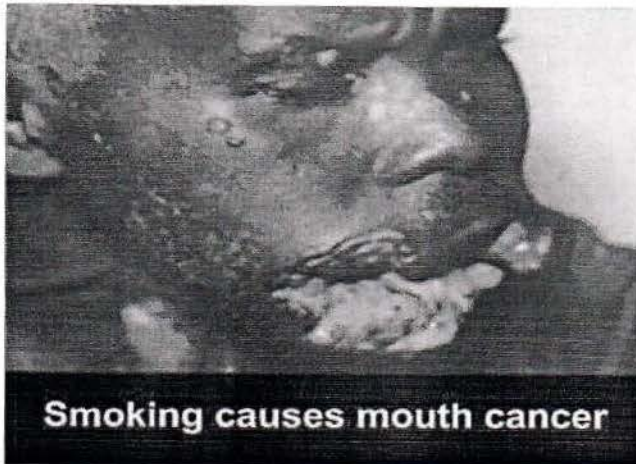
There are different types of packaging for Smokeless Tobacco Products. Each type of packaging shall be marked with the pictorial and text health warning in rotation which shall be no more than 24 months each, with no longer than 150 days from the date new warning and message take effect to replace the warning and message from a previous period as follows:



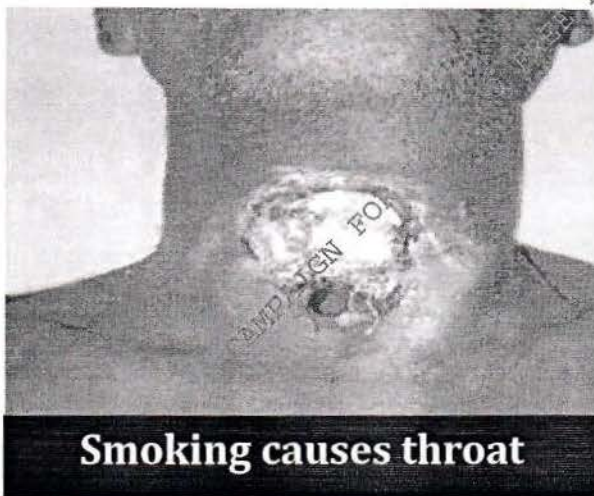
A: First rotation

CAMPAIGN FOR TOBACCO FREE KIDS REFERENCE ONLY

**B: Second rotation**



**C. Third rotation**



KIDS REFERENCE ONLY

**8.3.1** The text of the health warning on the packaging shall be printed in black ink on a white background within a black border of 1mm thickness minimum (exclusive of the space).

**8.3.2** The text of the health warning on a carton shall be printed in black within a black border of 1mm thickness.

**8.3.3** The health warning, excluding the borders shall occupy 50% minimum of the total area of one side of the carton and shall be printed on the lower part of each panel.

**8.3.4** The health warning, excluding the borders shall occupy a minimum of 50% of the total area of the front and back panels of each packet/container of Smokeless Tobacco products and shall be printed on the lower part of each panel, (primary & secondary packaging).

**8.3.5** The wording of the prescribed health warnings shall be printed using the HELVETICA fonts and, in a size, reasonable to fit the warning into the prescribed area.

## **9. Sampling and Testing**

### **9.1 Sampling**

**9.1.1** All products covered by the provisions of this standard shall be sampled and tested in laboratories accredited to the ISO 17025 standard, which describes the general requirements for the competence of calibration and testing laboratories.

**9.1.2** The Smokeless Tobacco Products shall be sampled according to the Coresta standard for the sampling of Smokeless Tobacco Products (CRM 71).

### **9.2 Analysis**

The samples taken in accordance with 9.1 shall be analyzed for compliance with the requirements of this standard.

## **10. Criteria for Conformity**

**10.1** A population shall be deemed to comply with the specification if after inspection and analysis of all the samples taken according to CRM 71, the number of non-conforming inspection samples did not exceed the acceptance number given in table 4 relative to the appropriate inspection sample size.

**Table 4**  
**Criteria for Conformity**

<b>Inspection Sample Size</b>	<b>Acceptance Number</b>
1-5	0
6-8	1
9-13	2
14-20	3
21-32	5
33-50	7
51-80	10

**Note:** Any failure beyond 10 is not acceptable

## Appendix A

### A: PRODUCT INFORMATION – SMOKELESS TOBACCO PRODUCTS

1- GENERAL PRODUCT INFORMATION	
1.1 Brand name	
1.2 Type of packaging	
1.3 Country of Origin	
1.4 Destination	

2 - TOBACCO CHEMISTRY	TEST METHOD
2.1 Nicotine (Total Alkaloids)	
2.2 Moisture	
2.3 Nitrates	
2.4 pH	
2.5 Tobacco Specific Nitrosamines	
2.6 Benzo(a)pyrene	

## APPENDIX B:

### B: INFORMATION ON RESIDUAL AGROCHEMICAL LEVEL IN THE TOBACCO LEAF

Substances	Common Name	Detected Level (µg/g)
Aldrin	Aldrin	
Trans-chlordane	Chlordane	
p,p'-DDE		
o,p' & p,p'- DDT	DDT	
dieldrin	dieldrin	
α-endosulfan	endosulfan	
HCB	Hexachlorobenzene	
α-HCH or α-BHC	HCH or BHC	
β-HCH or β-BHC	HCH or BHC	
γ-HCH or γ-BHC	gamma-HCH (Lindane) or gamma-BHC	
δ-HCH or δ-BHC	HCH or BHC	

heptachlor	heptachlor	
Heptachlor epoxide	-	
o,p' -TDE or o,p' -DDD		
p,p'-TDE or p,p'-DDD	TDE	
o,p' -DDE	-	

CAMPAIGN FOR TOBACCO FREE KIDS REFERENCE ONLY



## **Bibliography**

NIS ISO 10185 – Tobacco & Tobacco Products – Vocabulary.

CAMPAIGN FOR TOBACCO FREE KIDS REFERENCE ONLY