



1050 17th Street, N.W.
Suite 1150
Washington, DC 20036
202.525.5717

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Aug. 10, 2017

**Dr. Scott Gottlieb, Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993**

Re: Expanded federal campaign to discourage use of e-cigarettes

Commissioner Gottlieb,

Earlier this week, the Food and Drug Administration announced it would expand its public-education efforts to discourage use of e-cigarettes and related vapor products.¹ This campaign is in direct conflict with your recently stated intention to embrace a harm reduction approach to tobacco control.²

Federally sponsored campaigns intended to discourage use of e-cigs and smokeless tobacco are likely to do more harm than good. They are unlikely to discourage nonsmokers from using these products.³ They are much more likely to give smokers and state and local officials the mistaken idea that e-cigs and smokeless products are just as dangerous as traditional combustible cigarettes.

I therefore urge immediate suspension of the implementation of this anti-e-cigarette campaign.¹ Current federal anti-e-cig and anti-smokeless campaigns and webpages should be taken offline until they can be redirected toward smoking prevention, with e-cig and smokeless products either not mentioned, or described as less addictive and far less harmful than cigarettes.

I know these conclusions are opposite what you are hearing from FDA and Centers for Disease Control and Prevention leadership. The problem, as I perceive it, is that a combination of perceptions—not science—currently drive federal tobacco control policy. One factor is a commitment to a tobacco-free-society that is interpreted as ruling out any consideration of the use of any nonpharmaceutical nicotine product for public health benefit. Another is the perception that the harmful nature of nicotine is so self-evident that any scientific evidence that conflicts with this belief can be summarily dismissed. Thus, the major barrier to official endorsement of tobacco harm reduction (THR) is not lack of scientific evidence. It is the unwillingness of federal officials to consider evidence that adding a THR component to

tobacco control programming could secure personal and public health benefits not likely reachable by any other means.

A sampling of the evidence that favors endorsing e-cigs and related vapor products for THR is as follows:

We have known since at least the 1970s that smokers smoke for the nicotine, but die from the tar.⁴ All of the 480,000 tobacco-related deaths per year in the United States are due to a single tobacco product – the cigarette.⁵ Deaths from all other tobacco-related products are so few and far between and so hard to separate from background data that they are neither counted nor estimated by CDC on a regular basis. We know that e-cigs and related vapor products and the smokeless tobacco products widely available on the American market are less addictive than cigarettes⁶ and pose far less risk.⁷

We also know that e-cigs do not attract teens to cigarettes and nicotine addiction. In fact, a strong case can be made that e-cigs play a leading role in diverting current teen smokers, as well as teens likely to initiate smoking, away from cigarettes. This is based on the CDC data that shows the dramatic increase in e-cig use by teens in recent years has been associated with record reductions in smoking and no increase in the overall percentage of teens using any tobacco-related product.⁸

The studies commonly quoted to suggest that e-cigs attract teens to smoking⁹⁻¹¹ show no such thing. They are limited to experimentation and occasional social use. They show that teens inclined to experiment with tobacco-related products are more likely to try cigarettes than teens not inclined to such experimentation. They ignore the fact that 60 percent of e-cig use by teens is with zero-nicotine e-cig products.¹² We also now know that the dramatic recent reductions in adult cigarette use, previously attributed to the federal "TIPS from Former Smokers" campaign, were really due to smokers switching to e-cigs.³ The federal campaign contributed nothing to these reductions.

Sincerely,

Joel L. Nitzkin, MD
Senior Fellow for Tobacco Policy
R Street Institute

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