

January 31, 2019

The Honorable Diana DeGette
Chairperson
The Oversight and Investigations Subcommittee
U.S. House of Representatives
2111 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Brett Guthrie
Ranking Member
The Oversight and Investigations Subcommittee
U.S. House of Representatives
2434 Rayburn House Office Building
Washington, D.C. 20515

Chairperson DeGette, Ranking Member Guthrie and Members of the Committee:

Thank you for creating an opportunity for the country's largest e-cigarette manufacturers to provide detailed explanations of their marketing practices—particularly toward youth—and the health impacts of their products. We encourage the committee to allow executives to provide thorough accounts of their past business practices. But more importantly, we encourage the committee to focus on the future of the tobacco industry.

We are acutely aware of the tactics tobacco companies used in the past to create a thriving market for their products while being fully aware of the health dangers posed by cigarettes. Companies that sell dangerous products need to minimize the potential risks of their products and must be held accountable for maintaining responsible business practices. For these reasons, we applaud the committee for taking action.

But policymakers and regulators must also consider the harm reduction potential of e-cigarettes, which are undeniably safer in composition than combustible cigarettes,ⁱ the deadliest consumer product on the market. It should be the goal of every policymaker and regulatory agency that has a vested interest in the health of our populace to bring on an era in which smoking-related illness are not the leading cause of preventable death in the United States.ⁱⁱ Doing this will require a three-pronged approach that addresses supply reduction, demand reduction and harm reduction.

When properly regulated, e-cigarettes can address two of these areas directly: reduction of demand for combustible products and reduction of the harms associated with combustible cigarettes.

Undoubtedly, youth use of e-cigarettes is cause for concern and continued investigation. However, this should not be the only measure of e-cigarettes' effect on population health. Based on the body of research as a whole, we urge the committee to consider that, although we cannot know the long-term effects of e-cigarettes, we know enough about the short- and medium-term effects to conclude that populations that continue to exhibit high smoking rates will benefit from the availability of e-cigarettes.

The FDA, policymakers and manufacturers all have a responsibility to maximize the health and welfare of our populace. This responsibility should not be limited to the health and welfare of youth, but must also consider what policies can benefit current adult smokers. With this in mind, we urge the committee to focus on what companies can do moving forward to ensure that less-risky products are available to replace combustible cigarettes while minimizing the potential for youth use and uptake.

Thank you for your time and consideration.

Respectfully submitted,

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ⁱ “Nicotine without smoke: tobacco harm reduction,” Royal College of Physicians Tobacco Advisory Group, 2016. <https://www.rcplondon.ac.uk/projects/outputs/nicotine-without-smoke-tobacco-harm-reduction-0>; “The Public Health Consequences of E-cigarettes,” National Academies of Science, Engineering and Medicine, January 2018. <http://nationalacademies.org/hmd/reports/2018/public-health-consequences-of-e-cigarettes.aspx>. The best available science indicates e-cigarettes are not likely to exceed 5 percent of the harm associated with combustible cigarettes, a conclusion supported by both Public Health England and recently the National Academies of Sciences, Engineering and Medicine.

ⁱⁱ Centers for Disease Control and Prevention, “CDC National Health Report Highlights,” U.S. Department of Health and Human Services, 2014, pp. 8. <https://www.cdc.gov/healthreport/previous/2014/publications/Compendium.pdf>. Smoking is the leading preventable cause of disease and death in the United States, responsible for about one in every five preventable deaths.