Good afternoon. My name is Tamatha Thomas-Haase and I am presenting comments on behalf of the North American Quitline Consortium (NAQC).

I would like to begin by thanking FDA for all of their efforts related to the Family Smoking Prevention and Tobacco Control Act and committing NAQC’s full support to making implementation of the Act successful. I believe it is also important to acknowledge the time and energy FDA has taken to reach out to the tobacco control and public health communities for its perspectives on an approach to regulation.

Today I will share NAQC’s views on FDA’s new authority to regulate tobacco products. In addition, NAQC will submit its complete and final comments to FDA in writing before September 29th in response to the call for comments.

There are four areas that NAQC hopes FDA will consider as it moves forward in working to reduce the horrendous toll of tobacco use on the health of Americans – a responsibility FDA shares with countless organizations across the country.

First, we urge FDA to include 800-QUIT-NOW, a toll-free number that links callers with their state quitlines, and www.smokefree.gov, a website that contains quitting information, on all label statements and warnings for tobacco products. In addition, NAQC recommends that the number and website should be required on all advertising including point-of-sale advertising. Such action will encourage tobacco users to think about quitting and link those who want to quit with effective no-cost services. We know that smokers who perceive greater smoking-related health hazards are more likely to consider quitting and to quit successfully. However, NAQC asks FDA to require more than the communication of risks and health hazards on the label, namely actionable health information on how to receive help with quitting.

Secondly, we hope that FDA takes full advantage of their broad authority around dissemination of information to educate consumers about effective cessation options. Such action will make tobacco users more aware of effective services that exist in their communities and will encourage them to use these services. The Family Smoking Prevention and Tobacco Act emphasizes the importance of communicating with consumers and disseminating information to them. No information is more important to tobacco users than information about effective ways to quit.
Thirdly, NAQC urges FDA to decrease the allowable level of nicotine in all tobacco products to a non-addictive level. Such action will give tobacco users the opportunity to make a true choice -- one not influenced by addiction -- about using tobacco products. Although FDA may not have authority to ban nicotine from tobacco products, the Act grants authority for developing standards for the reduction or elimination of certain constituents. We encourage FDA to explore ways in which the level of nicotine allowed in cigarettes could be decreased, perhaps in a stepwise approach over several years, from highly addictive levels to a standard sub-addictive level. There could be no better outcome in the exercise of the authority granted under the Act than to eliminate the addictive nature of tobacco products.

Lastly, over the next two years, NAQC encourages FDA to conduct the necessary research to put menthol-related controversies to rest. At the end of the study period, NAQC anticipates that FDA will have adequate evidence to eliminate the use of menthol as a flavor additive and as an ingredient in all tobacco products. Such action is likely to prevent youth from using menthol-flavored products as “starter products”, reduce the burden of tobacco related diseases in the African American community, and make it easier for tobacco users, especially African Americans and Hispanics, to quit.

The authorization of FDA to regulate tobacco products heralds an exciting new era for tobacco control and cessation. NAQC is confident that the four focus areas noted in these comments are consistent with FDA’s authority and if implemented would help achieve the Family Smoking Prevention and Tobacco Control Act’s goals to curb the significant adverse consequences of tobacco use. NAQC and its network of members across the U.S. and Canada stand ready to help FDA in these efforts.

Thank you, again, for the opportunity to provide input and share views on FDA’s new authority to regulate tobacco products.