



Association for the Treatment of  
Tobacco Use and Dependence

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May 25, 2011

Center for Tobacco Products  
Food and Drug Administration  
Attn: Document Control Center  
9200 Corporate Boulevard  
Rockville, MD 20850

Re: FDA 05-2010 Menthol Request

The Board of Directors of the Association for the Treatment of Tobacco Use and Dependence (ATTUD) commends the Tobacco Products Scientific Advisory Committee (TPSAC) for its report to the FDA on the use of menthol in cigarettes. TPSAC recommended the FDA remove menthol cigarettes from the marketplace based on evidence that it will significantly benefit public health in the United States<sup>1</sup>.

ATTUD is an international organization of over 400 providers dedicated to the promotion of and increased access to evidence-based tobacco treatment. As such, our members have great concern over the harmful impact of tobacco use on individuals and populations, particularly those at increased risk for the persistent use of tobacco products.

Many disparities persist in our country related to tobacco use, initiation and access to treatment. Our organization is committed to advocating for effective treatment of tobacco use and dependence in all persons, including those most vulnerable to devastating health effects caused by their addiction to tobacco products.

Based on their rigorous evaluative process to determine the risk and benefit to the public health (Equipose), ATTUD agrees with the following findings of the TPSAC:

1. Removal of menthol cigarettes from the marketplace would benefit public health in the United States.
2. The evidence is sufficient to conclude that a relationship is more likely than not that the availability of menthol cigarettes increases experimentation and regular smoking. (Above Equipose)
3. The evidence is sufficient to conclude that a relationship is more likely than not that the availability of menthol cigarettes results in lower likelihood of smoking cessation success in African Americans, compared to smoking non-menthol cigarettes. (Above Equipose)
4. The evidence is sufficient to conclude that a relationship is as likely as not that the availability of menthol cigarettes results in lower likelihood of smoking cessation success in other racial/ethnic groups (At Equipose)

5. The evidence is sufficient to conclude that it is more likely than not that the availability of menthol cigarettes increases the likelihood of experimentation and regular smoking beyond the anticipated prevalence if such cigarettes were not available, in the general population and particularly in African Americans. The evidence is sufficient to conclude that it is more likely than not there is a causal relationship between the availability of menthol cigarettes and regular smoking among youth. (Above Equipoise)
6. The evidence is sufficient to conclude that it is more likely than not that menthol cigarette marketing increases prevalence of smoking beyond anticipated prevalence if such cigarettes were not available for the whole population, and for youth and African Americans. (Above Equipoise)

Recent population based data demonstrate that approximately one third of all smokers, or 19.2 million persons age 12 and above, and 80%, or 15.4 million African American smokers smoke menthol cigarettes. Consistent with what we know about other flavorings, around half, or 1.1 million adolescents start smoking using menthol cigarettes<sup>2</sup>.

Despite these high numbers of current menthol smokers, a recent survey found that 39% of all and 46% of African American menthol smokers reported they would quit smoking if menthol were eliminated. As tobacco treatment advocates, having a strong network of providers trained in evidenced based approaches to tobacco cessation and in the use of FDA approved medications can save hundreds of thousands of lives by eliminating menthol<sup>3</sup>.

In the interest of the health and safety of our nation's youth, reducing both the disease and economic burdens of tobacco use on individuals, vulnerable populations, the health care system and our economy, and the prevention of needless death and disability we strongly support the TPSAC recommendation that the FDA remove menthol cigarettes from the marketplace.

Respectfully,



John R Hughes, MD  
President, ATTUD

1. Benowitz NL, Samet JM. The Threat of Menthol Cigarettes to U.S. Public Health. *N Engl J Med*. May 4 2011.
2. Rock VJ, Davis SP, Thorne SL, Asman KJ, Caraballo RS. Menthol cigarette use among racial and ethnic groups in the United States, 2004-2008. *Nicotine Tob Res*. Dec 2010;12 Suppl 2:S117-124.
3. Winickoff J, McMillen R, Vallone D, et al. US Attitudes About Banning Menthol in Cigarettes: Results From a Nationally Representative Survey. *Am J Public Health*. May 12 2011.