

Dockets Management Staff (HFA-N-0128)

ID: LFG-2018-0016

Food and Drug Administration

5630 Fishers Lane, Room# 1061

Rockville, MD, 20852

Sent via: Mail

April 23rd, 2018

Re: FDA-2017-N-6189, Docket Number

Dear Food and Drug Administration,

I am submitting this comment in which is in regard and pertaining to Docket Number: FDA-2017-N-6189. It is to my understanding that the United States Food and Drug Administration is seeking to obtain information for consideration in developing a tobacco product standard to set the maximum nicotine level for cigarettes. Because tobacco related harms ultimately result from addiction to the nicotine in such products, causing repeated use and exposure to toxicants, the United States Food and Drug Administration is considering taking this action to reduce the level of nicotine in which products so that they are minimally addictive or nonaddictive, using the best available science to determine a level that is appropriate for the protection of the health of the general public.

The United States Food and Drug Administration is using the term “nonaddictive” in this document specifically in the context of a potentially nonaddictive cigarette. The United States Food and Drug Administration does acknowledge that the highly addictive potential of nicotine itself depending upon the route of delivery. Questions do remain with respect to the precise level of nicotine in cigarettes that might render them either minimally addictive or nonaddictive for specific members or segments of the population. The United States Food and Drug Administration does envision the potential circumstance where nicotine levels in cigarettes do not spur or sustain addiction for some portion of potential smokers. This could give addicted users the choice and ability to quit more easily, and it could help prevent experimenters, including but not limited to children and young adults, from initiating regular use and becoming regular smokers.

While I do appreciate the United States Food and Drug Administration for wanting to establish nicotine limits for cigarettes, in which does have the intent to make them less addictive to individuals that want to buy them, I am not so sure that this will solely be the best way to combat the dangerous effects of nicotine on the user, to individuals in the vicinity of the user or to the environment. I think that if the United States Food and Drug Administration set a maximum standard of nicotine, and if the federal agency taxed everything over the maximum limit, I believe that would accomplish more of the goals that the United States Food and Drug Administration wanted to accomplish. Individuals and entities listen whenever taxes are places on products that they want to buy or sell. Taxes can deter individuals from buying certain goods and it can impose challenges of entities, such as companies, from being able to create and sell products that they want to. So, I believe that the United States Food and Drug Administration working to help establish a maximum nicotine standard for cigarettes would be the first step towards helping to thwart addiction to nicotine products but I believe that the second step will

be to tax products in which do sell nicotine products, such as cigarettes, that are above the maximum nicotine standard in which the United States Food and Drug Administration will establish.


Respectfully,

Isaiah X. Smith¹

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