

**Comments of Anne DiGiulio – As Prepared for Delivery**  
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**For Listening Sessions: FDA’s Recently Proposed Tobacco Product Standards**  
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Hello, my name is Anne DiGiulio and I’m the National Director of Lung Health Policy with the American Lung Association.

Today I’m asking the Food and Drug Administration (FDA) to finalized two proposed rules. The first to end the sale of menthol cigarettes and the second to end the sale of flavored cigars. I am asking that both rules be finalized by the end of 2022.

The science is clear: menthol in cigarettes make it easier for individuals to start using the products and become addicted; and makes it harder for people, especially Black Americans, to quit. The tobacco industry has long targeted Black Americans and other vulnerable populations, causing significant health disparities.

Evidence shows Menthol cigarettes increase addiction and reduce smoking cessation, particularly among Black smokers. Conversely, data strongly suggests that finalizing this proposed rule and ending the sale of menthol cigarettes will result in significant numbers of menthol smokers quitting smoking. Research from Canada, which ended the sale of menthol cigarettes in 2017, has found an increase in quit attempts and cessation among menthol smokers. We anticipate a similar result in the United States, especially among the Black community, which use menthol cigarettes at a disproportionately high rate.

Please remove all menthol cigarettes from the marketplace, including those that have received modified risk or exposure orders/authorizations. It is important that this regulation is comprehensive and not exclude any product.

As for flavored cigars, I urge you to remove all flavored cigars from the marketplace, regardless of the type of cigar, its cost, or other factor. If any loopholes are created, the industry will find a way to exploit them. Additionally, I encourage FDA to extend this proposed rule to include prohibiting the sale of flavored hookah/waterpipes and pipe tobacco too.

Research shows flavored cigars are popular among youth, playing a critical role in attracting new tobacco users and increase the likelihood of long-term addiction. Additionally, research shows that no matter what the tobacco product, flavors appeal to youth and young adults.

All cigars expose smokers to hazardous levels of disease-causing toxins and addictive levels of nicotine. Even if so-called premium cigars have different use patterns, they do not sufficiently reduce the health risks to users to justify permitting the use of flavors.

Both of these policy changes, ending the sale of menthol cigarettes and flavored cigars, have the possibility to encourage more people to quit tobacco products, the best thing that a tobacco user can do for their health. And it is important to note, that these smokers want to quit for good, not switch to another harmful tobacco products.

As a result, it is vital that these people are guided towards the seven FDA -approved cessation medications and proven, effective counseling. This is the most effective way to overcome the addiction

to nicotine. By using and building upon the existing cessation infrastructure, through quitlines, cessation coverage through insurance, we have the capacity to help these individuals quit for good. Additionally it is important to continue to research to find new safe and proven effective medications, that will gain FDA approval, to help smokers quit for good, especially for the youth population.

I encourage FDA to finalize both these rules by the end of 2022, to follow the science for the protection of the public health.

Thank you.