July 15, 2022

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852

Re: Docket No. FDA-2021-N-1349 for “Tobacco Product Standard for Menthol in Cigarettes”

The American Association for Respiratory Care (AARC) appreciates the opportunity to submit comments in strong support of the proposed product standard prohibiting menthol as a characterizing flavor in cigarettes, which will reduce youth smoking, save lives, and advance health equity. The proposed rule will have an enormous public health impact in the short and long term.

The AARC is a national professional organization with a membership of 40,000 respiratory therapists who specialize in providing pulmonary diagnostics and treatment for patients who suffer from respiratory conditions like chronic obstructive pulmonary disease (COPD), asthma, pneumonia, lung trauma and other respiratory-related diagnoses. Respiratory therapists are educated and trained in all aspects of pulmonary medicine and are acutely aware of the devastating impact of tobacco use on public health.

**Prohibiting menthol cigarettes will increase smoking cessation and save lives.** Smoking remains the leading cause of preventable disease and death in the United States.1 Prohibiting menthol cigarettes, which are more difficult to quit than non-menthol cigarettes, will reduce this burden by increasing smoking cessation.2 As described in the rule, modeling studies have estimated that 324,000 to 654,000 smoking attributable deaths would be avoided by the year 2060 if menthol cigarettes were no longer available in the United States.3 Tobacco use is a major risk factor for COPD, which is a leading cause of death in the United States and accounts for increased hospital readmission rates due to acute exacerbations of the disease. Smoking at a young age can result in respiratory disease later in life that can seriously impact quality of life. As the lung health experts in their hospitals and in their communities, respiratory therapists are the key practitioners in helping people quit smoking.

**Prohibiting menthol cigarettes will reduce youth smoking.** Menthol cools and numbs the throat, reduces the harshness of tobacco smoke, and makes cigarettes more appealing to new smokers, particularly young people. As is well-documented in the proposed rule, menthol facilitates experimentation, progression to regular smoking of menthol cigarettes and contributes to greater nicotine dependence.4 Half of youth who have ever tried smoking started with menthol cigarettes5 and menthol cigarettes were responsible for 10.1 million additional new smokers between 1980 and 2018.6 According to the Centers for Disease Prevention and Control (CDC), smoking and secondhand smoke exposure during childhood and teenage years can slow lung growth and development which can increase the risk of developing COPD in adulthood. The proposed product standard to prohibit menthol in cigarettes is an important and critical step in preventing youth from becoming new smokers.
Prohibiting menthol cigarettes would decrease tobacco-related health disparities and advance health equity, especially among Black Americans. Menthol cigarettes have caused substantial harm to public health, and particularly to Black Americans. For more than 60 years, the tobacco industry has targeted Black Americans with marketing and price promotions for menthol cigarettes, and as a result, 85% of Black smokers smoke menthol cigarettes compared to 29% of White smokers. Consequently, Black Americans are less likely to successfully quit smoking and suffer disproportionately from tobacco-related disease and death. Despite accounting for 12% of the population, Black Americans represented 41% of premature deaths caused by menthol cigarettes between 1980 and 2018. In addition to youth and Black smokers, preference for menthol is also disproportionately high among Hispanic and Asian smokers, lesbian, gay, and bisexual smokers, smokers with mental health problems, socioeconomically disadvantaged populations, and pregnant women. Importantly, the proposed product standard is expected to substantially decrease tobacco-related health disparities and to advance health equity across population groups.

On behalf of the American Association for Respiratory Care, we urge the FDA to act swiftly to issue this lifesaving rule in final form.

Respectfully submitted,

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