

New Tobacco Products Do Not Protect Public Health

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In 2019, the Food and Drug Administration (FDA) gave a green light to heated tobacco products becoming widely available on the U.S. market, allowing the marketing of the IQOS ("I quit ordinary smoking") electronic device by Philip Morris through the premarket tobacco product application pathway (1). A modified risk tobacco product application is still pending at the FDA, but the decision through the premarket tobacco product application route indicates that the FDA has found that the product is appropriate for the protection of public health.

Different countries are following very different approaches to respond to this new generation of products, ranging from nonregulation to an increasing number of countries with complete bans on manufacture, importation, and sale of some new products, especially e-cigarettes. These countries compare the issue to the Boeing 737 Max: Regulatory authorities around the world have rightly applied the precautionary principle, in the interests of public health and life, to halt the use of these planes until the causes of the crashes and the real dangers are clarified. Governments trusted the airline industry to police itself, but it fell short, and the airline industry generally has a better reputation than the tobacco industry with regard to safety and concern for the public.

The 40 or so countries that have enacted bans on e-cigarettes have done so because there are too many unanswered questions about the ingredients, effects, and impact on public health in lowand middle-income countries. What are the toxic effects of inhaling the many chemicals, in addition to nicotine, that are vaporized by these products? Do the new products help smokers quit or conversely keep them smoking as dual users? Would some users use the new products as a longterm replacement for conventional cigarettes, which is not how true cessation products are designed to work? Do they encourage youth to enter the path to nicotine addiction and conventional smoking? Will these trendy products "renormalize" tobacco use? Is it right to consider e-cigarettes and heated tobacco products together in policy terms?

Harm reduction has a historical place in public health (2) as methadone maintenance does in heroin addiction. Harm reduction has also been interpreted as recommending alternative nicotinecontaining products such as smokeless tobacco, e-cigarettes, or heated tobacco products instead of conventional cigarettes, thus replacing a very harmful product with a less but still harmful product. The concept is intuitive and attractive and therefore very tempting for smokers, health professionals, and politicians. Unfortunately, this is a onesided view of a much more complex public health problem.

Motivated by the FDA approval of IQOS, we present arguments for why a harm reduction strategy should not be used as a population-based strategy in tobacco control. Tobacco harm reduction policy is based on incorrect assumptions and claims, which are outlined in the sections below.

"Smokers Cannot or Will Not Quit Smoking"

This premise is wrong. Millions of smokers worldwide have quit, and most have stopped



by willpower alone (3). The majority of smokers want to quit, and the main policy goal must be to motivate and support tobacco users to quit and achieve long-term abstinence (4, 5).

"Alternative Nicotine Delivery Products Are Highly Effective for Smoking Cessation"

There is lack of evidence to support the use of these new products as smoking cessation tools. Even the manufacturers of e-cigarette JUUL (Juul Labs, Inc.) admit their product is "not intended to be used as a cessation product, including for the cure or treatment of nicotine addiction" (6). In the United States, no e-cigarette or other noncombustible product has been approved by the FDA for smoking cessation; in fact, no applications have been made to the FDA for these products as being efficacious for cessation. On the contrary, in reallife settings, their use seems to undermine smoking cessation, possibly because the new products are promoted

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as "safe." No independent studies have tested the effect of heated tobacco devices, such as IQOS, on long-term smoking cessation.

"Smokers Will Replace Conventional Cigarettes with These New Products"

Studies show that the majority of e-cigarette users continue to smoke both conventional cigarettes and e-cigarettes (7–12), with a nonsignificant reduction in consumption of conventional cigarettes (13–15). There are limited data on heated tobacco products, but one independent study found that all current users continued to use cigarettes as well (16).

"Alternative Nicotine Delivery Products Are More or Less Harmless"

Conventional cigarettes have extraordinarily devastating health consequences; therefore, all other products in comparison will be "less harmful." However, less harmful is not the same as harmless.

Independent studies have shown that harmful substances in emissions from these products are not reduced by the oft-claimed 95% (17–19). One study found that dual use was not associated with reduction in carcinogen or toxin levels (20), whereas another large study found that toxicant exposure was higher among dual users than among smokers of conventional cigarettes alone (12). These new products might even contain new harmful toxicants, such as those associated with flavorings.

Using only e-cigarettes instead of combustible cigarettes will probably reduce users' overall exposure to toxicants (21), but reduction in exposure to toxicants does not necessarily lead to significant reduction in harm. Evidence supports a significant effect of very low-dose combustible tobacco smoke exposure (a few cigarettes per day or occasional use) in causing coronary heart disease (22); there is a nonlinear dose-response relationship, and the excess risk in smokers of only five cigarettes per day is about 50% compared with nonsmokers (23). Reducing smokingrelated health risks requires complete cessation.

There is little evidence on the health effects of heated tobacco devices, and most studies have been performed by the tobacco industry (24). Data show no improvement of lung function after switching from combustible to heated tobacco (24). The tobacco industry's own data also fail to show a consistently lower risk of harm (24).

"These Products Do Not Encourage Youth Initiation"

These new products, especially with candy or fruit flavors, strongly appeal to youth (25), even youth at low risk of taking up smoking. Some countries have seen a significant spread of e-cigarette use among youth (26–28). The FDA commissioner stated that the United States is experiencing epidemic-level rises in youth e-cigarette use (29).

There is substantial evidence that youths' use of these new nicotine-containing products increases their risk of future smoking (21, 30, 31, 32). Globally, the industry is using social media and young influencers to promote their products, seen by millions of mainly young people.

"The Tobacco Epidemic Cannot Be Curbed"

Countries with strong tobacco control (e.g., high price, plain packaging, comprehensive marketing bans, smokefree public spaces and workplaces, intensive antismoking campaigns, free national cessation services) have experienced impressive declines in smoking prevalence (33).

The New Products Are the Industry's Adaptation to Increased Regulation of Cigarettes and Declining Consumption and Acceptability of Smoking

These new products are primarily manufactured by the multinational tobacco industry, which has a strong economic interest in expanding use of these products to as many smokers and nonsmokers as possible. Since the 1950s, the industry has manufactured "safer" tobacco products (filtered and light, mild, ultralight, and low-tar cigarettes). Publicly available internal tobacco industry documents show that the tobacco companies have attempted to deter smokers from quitting by developing products that appeared to be less harmful, less addictive, or more socially acceptable: "Quitters may be discouraged from quitting, or at least kept in the market longer.... The safe cigarette would have wide appeal, limited mainly by the social pressures to quit" (34). The industry had knowledge that such products had no health advantage and did not help smokers quit (35). The industry has not changed.

After the launch of their heated tobacco products, a major tobacco company last year announced plans to phase out manufacturing of cigarettes and move into smoke-free products (36). Yet, the tobacco industry continues to oppose tobacco control measures for ordinary cigarettes, such as tax increases and smoke-free areas, and persists with sophisticated advertising in low-income countries, such as Indonesia. Internal industry documents show that the tobacco companies have no intention, as some of them claim they do, to stop manufacturing conventional cigarettes (37). Evidently, tobacco companies are attempting to appear as responsible members of society and as part of the solution so that they may rehabilitate their reputation, more effectively influence decision makers, and sell more tobacco products.

In summary, there may be a role for harm reduction in tobacco control for a minority of high-risk smokers. However, it is not a population-based strategy. Unfortunately, the FDA ruling on IQOS, and also allowing e-cigarettes freely on the market, might have global repercussions by implying the contrary.

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