

March 27, 2009

Dear Representative :

Our organizations are writing to inform you that we cannot support H.R. 1261, the Youth Prevention and Tobacco Harm Reduction Act, as a substitute to H.R. 1256, the Family Smoking Prevention and Tobacco Control Act. As organizations dedicated to improving oral health care, we are concerned that provisions relating to spit tobacco products in H.R. 1261 will be counterproductive to encouraging children and adults to turn away from tobacco use.

H.R. 1261 is premised on the idea that spit tobacco products are less harmful than cigarettes. Science does not support that notion:

- **Smokeless tobacco is not a healthy alternative to cigarette smoking; both products pose health risks.** Compared to cigarettes, smokeless tobacco products are less likely to cause lung cancer but they are associated with oral (mouth) and pharyngeal (throat) cancers, as well as cancers of the stomach and pancreas.^{i,ii,iii} These cancers progress rapidly and can be deadly if not diagnosed and treated early.
- **Smokeless tobacco is not a viable nicotine replacement therapy to help cigarette smokers quit, but a “gateway drug” that can lead users to a lifetime of cigarette smoking.**^{iv,v,vi,vii} Among persons who had used both smokeless tobacco and cigarettes in their lifetime, 31.8 percent started using smokeless tobacco first.^{viii} Researchers have found that adolescent boys who use smokeless tobacco products are highly likely to become cigarette smokers within four years of starting.^{ix} That is one among many reasons the United States Surgeon General has classified the smokeless tobacco alternative as a “public health myth”.^x

In sum, we believe that taxpayer dollars should not be spent encouraging the use of smokeless tobacco products which may contain more than 28 cancer-causing agents. Ergo, smokeless tobacco is not a healthier (or less harmful) alternative to cigarettes. We further believe the FDA is the only federal agency with the expertise and infrastructure to appropriately regulate tobacco products, regardless of whether they are smoked, chewed or dipped.

For these reasons we recommend that you vote for H.R. 1256, the Family Smoking Prevention and Tobacco Control Act when it comes to the floor.

Sincerely,

Academy of General Dentistry
American Academy of Periodontology
American Association for Dental Research
American Association of Dental Consultants
American Association of Dental Examiners
American Association of
Oral and Maxillofacial Surgeons

American Association of
Public Health Dentistry
American Dental Association
American Dental Education Association
Association for State and Territorial Dental
Directors

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- ⁱ The S.T.O.P. Guide (The Smokeless Tobacco Outreach and Prevention Guide): A Comprehensive Directory of Smokeless Tobacco Prevention and Cessation Resources. Applied Behavioral Science Press, 1997.
- ⁱⁱ Hatsukami, D & Severson, H, “Oral Spit Tobacco: Addiction, Prevention and Treatment,” *Nicotine and Tobacco Research* 1:21-44, 1999.
- ⁱⁱⁱ “The Smokeless Tobacco Outreach and Prevention Guide,” Applied Behavioral Science Press, 1997.
- ^{iv} Institute for Social Research, The University of Michigan, *Monitoring the Future*, <http://monitoringthefuture.org/pressreleases/00cigpr.pdf>.
- ^v American Academy of Pediatrics, “Things You Should Know about Smokeless Tobacco,” <http://www.aap.org/advocacy/chmchew2.htm>.
- ^{vi} CDC, “Is smokeless tobacco safer than cigarettes?,” *SGR4Kids*, www.cdc.gov/tobacco/sgr/sgr4kids/smokless.htm.
- ^{vii} Severson HH, Forrester KK, Biglan A. Use of smokeless tobacco is a risk factor for cigarette smoking. *Nicotine Tob Res.* 2007 Dec;9(12):1331-7.
- ^{viii} Substance Abuse and Mental Health Services Administration, Office of Applied Studies. (March 5, 2009). *The NSDUH Report: Smokeless Tobacco Use, Initiation, and Relationship to Cigarette Smoking: 2002 to 2007*. Rockville, MD.
- ^{ix} Tomar, S, “Is use of smokeless tobacco a risk factor for cigarette smoking? The U.S. experience,” *Nicotine & Tobacco Research* 5(4):561-569, August 2003.
- ^x Richard H. Carmona, U.S. Surgeon General, [Testimony](#) before the House Committee on Energy and Commerce Subcommittee on Commerce, Trade, and Consumer Protection, June 3, 2003.