

***DRAFT FOR COMMENT***

***(24.01.06)***

**All Tobacco Products are Deadly  
and Addictive:**

**Product Diversity Challenges  
Regulation and Communication**

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Conference of the Parties - Technical Briefing

*Geneva, 7 February 2006*


# Tobacco Products are Complex Drug and Toxin Delivery Systems

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- All products are deadly and addictive regardless of their form or disguise
- Nicotine dosing controlled by pharmaceutical techniques
- Toxins include those for "flavour" such as certain tar components and residual pesticides, herbicides, fertilizers and processing chemicals
- Regulation and communications will require science-based guidance

# **Tobacco Delivered Nicotine**

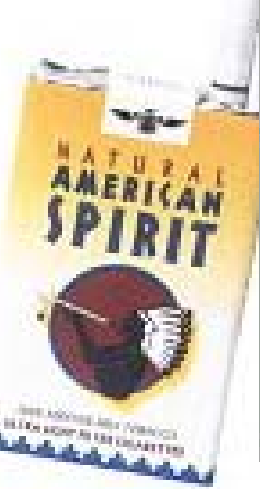
## **The "Ultimate" Chemical Cocktail**

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- **Most addictive**
  - **Most toxic**
  - **Explosively fast delivery**
  - **Optimal particle size**
  - **pH controlled**
  - **Sensory "optimization"**
  - **Chemical cocktail designed to addict:**
    - Ammonia increases dose**
    - Acetaldehyde synergy**
    - "smoothing" menthol**
    - MAO Inhibiting Effects**

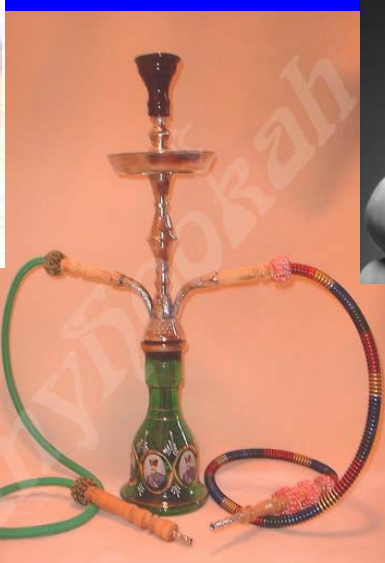
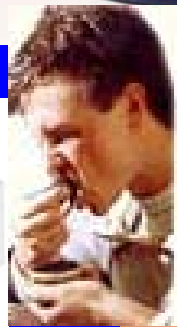
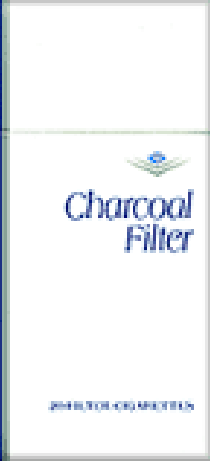
# Diverse Existing Products

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- **Cigarettes (incl. Bidis and Kreteks):** Vary in ingredients and deliveries of nicotine and toxins
- **Oral/Smokeless:** Vary in form, ingredients and deliveries (e.g., 1-10 mg nicotine/g)
- **Pipes (incl. Waterpipes):** Vary in design, size, and ingredients and deliveries
- **Cigars:** Vary in size, ingredients and deliveries (e.g. 10-200+mg nicotine)
- **Roll-Your-Own:** Vary in tobaccos, papers, filters and other ingredients



MILD SEVEN



# The Virus is Mutating – How will the WHO FCTC Keep Up?

Eclipse

EXalt

Accord

Nicestie

Lights

Advance

water

Stonewall

Omni / Quest

Ariva

SCOR / MUS

Ariva - Higher Dose?

nicotine beer

Revel

lollipops

wafers

# Emerging Products: How to Test, What to Communicate?

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- Electronic smoke generator cigarette substitute (Philip Morris)
- Carbon fuelled cig substitute (RJR and JT)
- Cigarettes with novel tobacco strains and processing, filters with palladium and other substances
- Oral smokeless products in new forms, using new ingredients processing methods
- Tobacco/medicinal "cross-over" products such as tobacco incorporating gum, lozenges, inhalation systems

# Health Claims: Implied and on Internet

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*Tobacco control efforts and communications are increasingly countered with health claims implied by marketing and on websites*

- "Science" is often misused as support
- Strong and ethical science needs to be brought to bear to provide truthful communications

# “Provide smokers with a choice and a reason not to quit”

“Reduces second hand smoke by 80%”



“...may present less risk of cancer”

“No messy ashes”

“Water filtered”



“Anytime. Anywhere.”



“for when you can't smoke”



[Nicotine lollipop]  
“dietary supplement”



“No smoking?  
No problem”

Available in

- Original
- Peppermint



“Less smoke around you”

“[It] will not kill them as quick or as much as other brands”

# Communication gaps will be filled by the Tobacco Industry

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- When products are left out of communications, the void will be filled by the industry
- Consumers also may not unreasonably assume that the problem poses relatively little health risk “or it would have included a strong health warning” (as has happened with cigars, waterpipes and other products)

# Products Need General AND Specific Communications

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- In general, consumers can be advised that all tobacco products are deadly and addictive
- Products differ, however, in specific warnings, and some of these are already well established, e.g., lung cancer risk is high for cigarettes but not oral smokeless tobacco; oral lesions are common with oral smokeless tobacco
- Unfortunately, many products have received relatively little study and new products will emerge for which epidemiological data do not exist. How should their warnings be determined?

# Science-Based Communications for new & little-studied products

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- Leaving warnings off little-studied products and new products is not consistent with the FCTC recommendations for communication of risks on all tobacco products
- Diverse products could relatively quickly and evaluated as to basic characteristics (e.g., contents and emissions) in the TobLabNet and warnings be issued on the basis of their potential (not their population demonstrated effects)
- This is consistent with other areas of toxin regulation and warnings, e.g., cleaning fluids, fuels, paint, pesticides and many other products carry warnings on the basis of their ingredients and previously established effects of those ingredients

# Science-Based Communications could provide incentives for constructive industry development

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- If the warnings are based on potential risks of product contents and emissions. The burden is on product developers to develop products and the science base for potential differentiation of products
- When (not if) tobacco product marketers request differentiated communications, and their requests include seemingly extensive science (though frequently it will be their in-house "science"), an independent assessment, as could be provided by TobLabNet and WHO) will be critical, particularly if tobacco companies go to the courts

# Market Potential will Continue to Lead Tobacco Manufacturers to Maximize Addiction Potential

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- Although all tobacco products are addictive, addiction potential can be increased or decreased by product characteristics. Examples include:
  - Children-targeted flavouring
  - Graduated nicotine dosing in oral smokeless products to be marketed in progression to maximize
  - Chemicals to increase free-base nicotine
  - Chemicals to synergistically produce stronger addictive effects than
- WHO and many national regulatory agencies rely on science base for evaluation of addictiveness ("abuse liability") (e.g., WHO Expert Committee on Drug Dependence), these methods have been applied to tobacco and nicotine products

# Conclusions

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- A science base exists to begin the process of compliance to WHO FCTC product related articles
- Laboratory methods exist and many laboratories have begun to collaborate to enable regulation and communications for existing, emerging and new products to begin.
- The process is analogous, in many respects, to that of tracking mutating virus strains, addictive drugs, environmental toxins and disease. In this case, the tobacco industry will be the source of the evolving tobacco product "strains". Ongoing surveillance and science-based guidance is vital support regulatory decision making concerning tobacco control efforts embodied by the WHO FCTC

# Contact Details

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