



The Perspective of the Campaign for Tobacco-Free Kids on Harm Reduction

As public health advocates, we support policies, programs and products with a strong evidence base that have been proven to reduce the number of people who get sick and die from tobacco use – *whether by reducing the number of smokers or by reducing the harm to those who smoke cigarettes*. The behavior of the tobacco industry is inconsistent with genuine harm reduction.

Harm reduction is an important public health strategy that Tobacco-Free Kids supports.

- Harm reduction can be an important public health tool to reduce or minimize health harms, including when applied to reduce the harm caused by certain addictive products.
- Properly administered, a harm reduction approach to reduce the use of harmful addictive products, like illicit drugs or tobacco products, can help people to stop using these products and reduce their health risk, as well as significant social and legal risks, as is the case with illicit drugs.
- To be successful, a harm reduction strategy that involves the use of alternative harmful, addictive products needs to be carefully targeted to addicted users, overseen and/or conducted under rules established by health or governmental agencies whose *only interest* is to reduce harm and administered with proper government controls to prevent its sale and distribution to youth and non-users.

We support genuine harm reduction targeted to smokers to assist smokers currently addicted to cigarettes. Tobacco industry actions opposing proven tobacco control measures and promoting products that create and sustain addiction stand in the way of that progress.

- Smokers need accurate information about what products and treatments are available that are proven effective at helping smokers quit. Nicotine is highly addictive and quitting is hard under any circumstance.
- Tobacco industry opposition to proven tobacco control measures, misinformation campaigns and distortion of the concept of harm reduction makes quitting even harder.

Tobacco industry claims of harm reduction are not new. From special filters to “light” and “low tar” cigarettes, many times they have introduced new products claiming to reduce harm, but in ways that have instead expanded sales by attracting youth and deterring smokers from quitting cigarettes.

- The term harm reduction has been co-opted by the tobacco industry on multiple occasions to support the marketing of products they describe as less harmful than cigarettes, but instead resulted in more people still smoking and more kids starting to smoke. The industry has co-opted the concept of harm reduction to divert attention from their continuing to aggressively market cigarettes and other addictive substances.
- The tobacco industry claimed that light and low tar cigarettes were less hazardous. Public health leaders believed them. It took decades before the public discovered that they were not less hazardous despite the fact we now know the tobacco industry knew the truth decades earlier.
- Decades later, a U.S. Court found that the tobacco industry’s ‘light’ and ‘low’ scheme was intended to “keep smokers smoking; to stop smokers from quitting; to encourage people, especially young people, to start smoking; and to maintain or increase corporate profits.”
- Rather than reducing harm, the tobacco industry’s misuse of harm reduction has historically resulted in more smokers and fewer quitters, and as a result greater suffering and death.

Genuine harm reduction can help reduce the harm caused by tobacco products, but only if properly administered. A regulated approach to harm reduction when it involves a product that is itself harmful and/or addictive includes the following critical elements:

- Rigorous scientific review by government agencies who conclude in advance that there is strong evidence that the alternative product will reduce a person’s health risk (under the conditions that the products will be used).

- Controls to provide the alternative products directly to specific populations that are already addicted to a more harmful product.
- Safeguards to ensure that the alternative product does not encourage, enable or lead people who are not already using the harmful product or who have previously quit using it to start.
- Controls over product packaging, marketing and claims.
- Distribution of the alternative product or access to services by health or governmental officials as part of a therapeutic intervention whose purpose is to treat or reduce harm to the individuals who use the product. Distribution should be monitored by the government.
- Distribution in controlled settings where the alternative product is accessible only to individuals already addicted to the more harmful product.
- Guidance and instructions for use so the product is used effectively and safely to reduce harm and increase the smoker's ability to successfully quit smoking.

Not all countries or locations will have the ability or capacity to regulate products in this manner. Even if a country has a regulatory infrastructure in place, it may not be robust enough to prevent abuse. The government's capacity should be given consideration when determining the best approach.

The behavior of the tobacco industry is inconsistent with genuine harm reduction, and prioritizes maintaining and expanding their customer base over reducing the number of people using tobacco.

As it has in the past when faced with the risk that more smokers were likely to quit smoking because of their health concerns, the tobacco companies have introduced a new generation of products that they claim will reduce the harm caused by the cigarettes they continue to sell.

The tobacco industry's vision of harm reduction fails to adhere to the critical safeguards of regulated harm reduction. *Regulated harm reduction does NOT:*

- Lead youth or other non-tobacco users to initiate use of the addictive product.
- Allow for the alternative product to be sold widely in settings or locations accessible to the general public and without instructions for how to use the product most effectively.
- Include advertising or marketing that reaches a broad audience using imagery and features that could make the product attractive or appealing to anyone that is not already addicted to the more harmful product.
- Permit marketing claims that mislead consumers about the impact of using the product.
- Permit a manufacturer or the industry responsible for causing the problem to drive the solution, profit from the solution, or control distribution of the alternative product.

The experience in the U.S. is an example where the tobacco companies marketed e-cigarettes without safeguards necessary for true harm reduction. The consequences of these actions were predictable.

- Thousands of flavors of e-cigarettes entered the market. Youth use of e-cigarettes quickly reached epidemic levels, with millions of young people using the products.
- The products also attracted young adult users, the majority of whom have never been smokers.
- Every major U.S. public health authority found that there was inadequate evidence to conclude that e-cigarettes are effective at helping smokers quit. The World Health Organization reached a similar conclusion.

The new generation of tobacco products helps the tobacco industry maintain and expand the commercial market for their products, while claiming they are acting in the interest of harm reduction. At the same time, the industry continues to aggressively market cigarettes and vigorously oppose policy solutions that are proven to reduce smoking and save lives.