



1001 E. Fayette Street • Baltimore, Maryland 21202
Catherine E. Pugh, Mayor
Mary Beth Haller, Interim Commissioner of Health

January 2, 2019

Dr. Scott Gottlieb, Commissioner
Food and Drug Administration
Dockets Management Staff (HFA-305)
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Eliminating Youth Electronic Cigarette and Other Tobacco Product Use: The Role for Drug Therapies; Public Hearing; Request for Comments

Dear Commissioner Gottlieb:

The Baltimore City Health Department (“BCHD”) writes to offer its **support** of the Food and Drug Administration’s (“FDA”) proposed rule “Eliminating Youth Electronic Cigarette and Other Tobacco Product Use” (ID: FDA-2018-N-3952; Federal Register Number: 2018-24126).

In Baltimore City, electronic smoking devices or electronic cigarettes (“e-cigarettes”) have been heavily marketed as a “healthier” alternative to smoking conventional tobacco, and potentially as an avenue toward cessation. These ads make no mention of the negative health effects of nicotine use and abuse, nor do they discuss the frequent inclusion of potential cancer-causing substances, including formaldehyde and aerosol.

Worse yet, e-cigarette manufacturers are targeting youth through the introduction of tastes or aromas such as fruit, chocolate, vanilla, candy, amongst others. In 2009, the FDA acknowledged a similar tactic with conventional tobacco products and the danger it posed to youth; ultimately, banning the sale of flavored cigarettes, excluding menthol. In recent years, BCHD has identified flavored e-cigarettes as a common product bought by minors in Baltimore. As recently as 2014, 33% of Baltimore City high school students reported having used electronic smoking devices.¹ As of 2016, 20% of Baltimore City middle school students reported having used electronic smoking devices.²

Nationally, research conducted by the National Institute of Drug Abuse shows that youth are using e-cigarettes at higher and higher rates, with usage up to 9.5 percent among 8th graders,

¹ “2014 Youth Risk Behavior Survey Results.” Youth Risk Behavior Survey 2014, Maryland Department of Health, https://phpa.health.maryland.gov/ccdpc/Reports/Documents/2014_YRBS_Reports/2014BaltimoreCityHS_Summary_Tables.pdf.

² “2016 Youth Risk Behavior Survey Results.” Youth Risk Behavior Survey 2016, Maryland Department of Health, <https://phpa.health.maryland.gov/ccdpc/Reports/Documents/2016%20YRBS%20YTS%20Reports/2016Baltimore%20CityMS%20Summary%20Tables.pdf>.

14.0 percent among 10th graders, and 16.2 percent among 12 graders.³ This research also highlights the abundance of teen exposure to electronic smoking device advertisements, reaching as many as 70% of teenagers. More alarmingly, 70% of the youth who use e-cigarettes believe that only flavoring is in the product, completely unaware of the presence of nicotine and other additives.

We know that Nicotine is incredibly addictive, and especially harmful to developing brains. E-cigarettes have established a new method for youth to start a lifetime of nicotine dependence. It is imperative that the FDA implement rules that will mitigate the adverse health effects of electronic smoking devices, while also establishing preventative measures that will limit marketing exposure to children and teenagers. Once more, BCHD urges the FDA's support of "Eliminating Youth Electronic Cigarette and Other Tobacco Product Use."


Sincerely,

Mary Beth Haller
Interim Baltimore City Health Commissioner

³ National Institute on Drug Abuse. "Teens and E-Cigarettes." NIDA, National Institute on Drug Abuse, 11 Feb. 2016, www.drugabuse.gov/related-topics/trends-statistics/infographics/teens-e-cigarettes.

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