



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

August 7, 2013

Leslie Kux, Assistant Commissioner for Policy
U.S. Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

RE: Menthol in cigarettes and tobacco products; Docket No. FDA–2013–N–0521

Dear Assistant Commissioner Kux:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 110,600 family physicians and medical students nationwide, I write in response to the [request for comments](#) on menthol in cigarettes and tobacco products as published by the Food and Drug Administration (FDA) in the July 24, 2013 *Federal Register*.

The FDA seeks input so the agency can make more informed decisions about menthol in cigarettes in later rulemaking. In 2009, the AAFP had supported a FDA proposal to ban cigarettes with fruit, candy, and spice flavors. At that time we urged the FDA to also ban menthol as a flavoring agent. Therefore we are now pleased that the FDA is refocusing efforts to understand the effect of menthol in cigarettes and tobacco products.

The AAFP shares and appreciates the FDA's commitment to science-based approaches that address public health issues. As such, we appreciate that the FDA released the agency's preliminary scientific evaluation of public health issues related to the use of menthol in cigarettes. The AAFP agrees with the FDA's initial findings in that "there is likely a public health impact of menthol in cigarettes." As such, the AAFP continues to advocate that the FDA use its authority to regulate tobacco and force manufacturers to remove menthol as a flavoring agent.

We find it alarming that data indicates a high use of mentholated tobacco products by African-Americans. According to the Substance Abuse and Mental Health Services Administration, 84.5% of African Americans that smoke use menthols. While tobacco products and menthol cigarettes remain hazardous to any user, the AAFP urges the FDA to research further the role of mentholated cigarettes in tobacco-related health disparities among smokers.

www.aafp.org

President

Jeffrey J. Cain, MD
Denver, CO

President-elect

Reid B. Blackwelder, MD
Kingsport, TN

Board Chair

Glen Stream, MD
Spokane, WA

Directors

Barbara Doty, MD, Wasilla, AK
Richard Madden, Jr., MD, Belen, NM
Robert Wergin, MD, Milford, NE
Wanda D. Filer, MD, York, PA
Rebecca Jaffee, MD, Wilmington, DE
Daniel R. Spogen, MD, Reno, NV

Carlos Gonzales, MD, Patagonia, AZ
H. Clifton Knight, MD, Indianapolis, IN
Lloyd Van Winkle, MD, Castroville, TX
Ravi Grivois-Shah, MD, (New Physician Member), Oak Park, IL
Sarah Tully Marks, MD, (Resident Member), Shorewood, WI
Aaron Meyer (Student Member), St. Louis, MO

Speaker

John S. Meigs, Jr., MD
Brent, AL

Vice Speaker

Javette C. Orgain, MD
Chicago, IL

Executive Vice President

Douglas E. Henley, MD
Leawood, KS

The AAFP stands by fully committed to assist in the development of educational campaigns related to the dangers of menthol and overall tobacco use. The AAFP's [Tar Wars](#) campaign is a tobacco-free education program for fourth- and fifth-grade students. The goal of the program is to educate and motivate students to be tobacco free, mobilize health care professionals to become proactive in their community's health education, and encourage community involvement in support. Our separate [Ask and Act](#) campaign encourages family physicians to ask all patients about tobacco use, then to act to help them quit. We look forward to updating these campaigns to further highlight the specific dangers of menthol in cigarettes.

We appreciate the opportunity to provide these comments and make ourselves available for any questions you might have or clarifications you might need. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Glen Stream MD". The signature is written in a cursive, slightly slanted style.

Glen Stream, MD, MBI, FAAFP
Board Chair