

Review of: "Effects of a Reduced Risk Claim on Adolescents' Smokeless Tobacco Perceptions and Willingness to Use"

Arielle Selya¹, K. Michael Cummings²

- 1 Pinney Associates
- 2 Medical University of South Carolina

Potential competing interests: Arielle Selya is an employee of PinneyAssociates, Inc., which provides consulting services on tobacco harm reduction to Juul Labs, Inc (JLI). JLI was not involved in any way with this letter. K. Michael Cummings provides expert testimony on the health effects of smoking and tobacco industry tactics in lawsuits filed against cigarette companies.)

Reduced Risk Claim for Smokeless Tobacco: A Deterrent Effect for Tobacco-Naïve Youth?

We read with interest the article by Chaffee et al. The authors conclude that a reduced-risk claim for Copenhagen snuff – recently authorized by the U.S. Food and Drug Administration (FDA)² – "decreased adolescents' smokeless tobacco harm perceptions" and "could increase some adolescents' susceptibility to smokeless tobacco, particularly those already using other tobacco products like e-cigarettes." This is an alarming statement, suggesting unintended effects of the Copenhagen reduced-risk claim; but we don't think it is warranted considering the full set of results.

Smokeless tobacco is not 100% safe, but on the continuum of harm of tobacco products³, smokeless tobacco products like Copenhagen convey substantially lower risks of lung cancer and cardiovascular disease than combustible tobacco.^{4, 5} Thus, the claim's effect on harm perceptions, rather than being a concern, in fact modestly corrects harmful misperceptions (from 64% to 56% who perceive "a lot" of harm from smokeless tobacco), especially among existing tobacco users (61.5% to 42.4%).

Regarding the claim's effect on willingness to use smokeless tobacco, the paper reports: "the claim did not increase willingness overall (17% vs. 20%; p=.41)." We view this as a favorable outcome, as it implies the claim has no unintended harmful effect on youth use. Moreover, non-users were significantly *less* likely to be willing to try smokeless tobacco after claim exposure (RR: 0.55, 95% CI: 0.35, 0.87) – suggesting the claim actually *deters* non-tobacco-using youth from using smokeless tobacco. Unfortunately, the summary in the abstract paints a more ominous picture for readers who might assume that FDA's science-based authorization of Copenhagen's reduced-risk claim was misguided and harmful to youth.

The abstract also notes, "the claim... did increase willingness among tobacco users (RR: 1.67; 95% CI: 1.05, 2.67)." However, given that smokeless tobacco is low on the continuum of harm^{3, 4} and that these youth are already tobacco users, this result is not necessarily concerning – particularly if the claim facilitates displacement of combustible tobacco with smokeless tobacco. While nicotine dependence is a risk for non-tobacco users, it is vital for youth who already use



tobacco to have truthful information about the relative risks of different products.

In summary, Chaffee et al.'s paper seems to turn a silk purse into a sow's ear. The authors conclusions fail to tell the full more optimistic story of their results, since they omit the reduced-risk potential of smokeless tobacco, and the claim's beneficial effects on correcting misperceptions and deterring non-users from trying smokeless tobacco.

References

- Chaffee BW, Couch ET, Popova L, Halpern-Felsher B. Effects of a Reduced Risk Claim on Adolescents' Smokeless Tobacco Perceptions and Willingness to Use. *J Adolesc Health*. Jun 9 2023;doi:10.1016/j.jadohealth.2023.04.025
- 2. FDA. U.S. Smokeless Tobacco Company Modified Risk Tobacco Product (MRTP)

 Application. https://www.fda.gov/tobacco-products/advertising-and-promotion/us-smokeless-tobacco-company-modified-risk-tobacco-product-mrtp-application
- 3. Zeller M, Hatsukami D. The Strategic Dialogue on Tobacco Harm Reduction: a vision and blueprint for action in the US. *Tob Control*. Aug 2009;18(4):324-32. doi:10.1136/tc.2008.027318
- 4. Levy DT, Mumford EA, Cummings KM, et al. The Relative Risks of a Low-Nitrosamine Smokeless Tobacco Product Compared with Smoking Cigarettes: Estimates of a Panel of Experts. *Cancer Epidemiology, Biomarkers & Prevention.* 2004;13(12):2035-2042. doi:10.1158/1055-9965.2035.13.12
- 5. Nahhas GJ, Cummings KM, Halenar MJ, et al. Smokeless Tobacco Use and Prevalence of Cardiovascular Disease Among Males in the Population Assessment of Tobacco and Health (PATH) Study, Waves 1–4. *Preventive Medicine Reports*. 2022/02/01/ 2022;25:101650. doi:https://doi.org/10.1016/j.pmedr.2021.101650

Qeios ID: 3EVT19 · https://doi.org/10.32388/3EVT19