



Dr. Robert Califf
Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

RE: Docket Number FDA-2021-N-1349 Tobacco Product Standard for Menthol in Cigarettes

Smokefree SC is commenting to voice its strong support for the Food and Drug Administration's proposed tobacco product standard prohibiting menthol as a characterizing flavor in cigarettes. Smokefree SC, a statewide coalition dedicated to supporting and amplifying the work of tobacco prevention and control stakeholders in South Carolina, is committed to eliminating premature death, disease, and other harms caused by tobacco products. This standard will reduce youth smoking, increase cessation, and decrease tobacco-related health disparities.

In South Carolina nearly 60% of high school smokers smoke menthol cigarettes. They smoke menthol because menthol creates a cooling sensation in the throat and airways, reducing the harshness of tobacco smoke. CDC data shows youth and young adults are more likely to try a menthol cigarette as their first cigarette, and those who start with a menthol cigarette are more likely to continue smoking. Prohibiting menthol as a characterizing flavor in cigarettes will reduce youth smoking.

Nearly 50% of South Carolina's adult smokers smoke menthol cigarettes. Menthol cigarettes are more difficult to quit than non-menthol cigarettes. By prohibiting menthol in cigarettes, smokers who want to quit will be more likely to succeed, which will significantly decrease the number of preventable deaths.

The effect of this policy in South Carolina will be particularly strong among Non-Hispanic Blacks who smoke, as 84% of them smoke menthol cigarettes. The tobacco industry has targeted vulnerable populations, especially Black Americans, with marketing and price promotions for years. Prohibiting menthol cigarettes will decrease health disparities that stem from the disproportionate concentration of smoking among Black Americans, and advance health equity among these vulnerable groups.

Smokefree SC stands with Public Health Organizations across the country in urging the FDA to act swiftly in issuing this rule.

Respectfully submitted,

A handwritten signature in black ink that reads "Barbara Derrick".

Barbara Derrick
Interim Executive Director