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On behalf of more than 3.2 million Americans for Prosperity activists across the country, I write in regard to the FDA's review of IQOS Marlboro Heatsticks for designation as a modified risk tobacco product (MRTP) Docket No. FDA-2017-N-5994.

Under section 911 of Tobacco Control Act of 2009, the FDA has allowed manufacturers of tobacco products to submit new and innovative products to FDA for review as a MRTP. Designation of a product as an MRTP would allow the makers of this product to signal to consumers that consuming this product may reduce health risks compared to traditional tobacco products. Presenting this information to consumers is crucial to giving people the ability to make the most informed choices about what products they consume.

To be clear, Americans for Prosperity (AFP) is not a health organization and takes no stance on the specifics of the science on tobacco products or the IQOS products for which this MRTPA was submitted.

However, AFP is interested in the process by which the MRTPA is considered for the IQOS product.

Innovation in the health space requires millions of dollars in investment from private firms, but also a streamlined approval process and regulatory certainty. If companies view innovation in this space as too expensive and uncertain, it will reduce the probability that they will attempt to bring new products into this space.

The FDA should consider this MRTPA in a timely fashion and offer clear guidance and reasoning for any decision they make on this product. This will send the strongest possible signal that the FDA is open to innovation in the tobacco space and is serious about allowing consumers to learn about MRTPs.

Sincerely,

Brent Gardner
Chief Government Affairs Officer
Americans for Prosperity.