

RJR's Camel Snus MRTTP applications fail to demonstrate both reduced harm to individuals and benefit to the public health

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RJR must meet both prongs of legal mandate

Camel Snus, *as actually used by consumers*, must *both*:

1. Significantly reduce risk of disease to individuals, ***and***
2. Benefit the health of the population as a whole

How is snus “actually used by consumers”?

- RJR assumes smokers will “switch completely” to Snus
- Complete switching is rare -- dual or poly-use predominates

Camel Snus does not significantly reduce disease risk to individuals

- RJR's studies show more nitrosamines (NNN and NNK) and heavy metals (cadmium and arsenic) than cigarette smoke
- Dual use = increased exposure to toxicants and disease risk

Considering youth, young adults, and other non-users, Camel Snus doesn't benefit population health as a whole

- RJR did not consider appeal or impact of marketing claims on youth
- RJR did not consider role of flavored Camel Snus on youth use
- Youth likely to misperceive risks of Camel Snus
- Camel Snus marketing likely to result in initiation and dual use