

CORRESPONDENCE

Evidence, Policy, and E-Cigarettes

TO THE EDITOR: In their Perspective article in the April 7 issue,¹ Green et al. argue that the English approach to e-cigarettes could reframe the debate on these products. They cite our article,² implying that we were concerned about only one of the many studies in the Public Health England (PHE) review. That study was only one of our concerns, being the only source for the widely cited “95% safer” claim, especially given questions about conflicts of interest.³ We also discussed other evidence, some not quoted in the review, that raised serious questions about the safety of these products.⁴ Green et al. disregard the fact that harm reduction is only one element of a comprehensive drug strategy that, as in the successful Australian model, also encompasses reduction of demand and supply. It is misleading to suggest that there is a consensus on e-cigarettes in England, given that many members of the health community have continuing reservations.⁵ If we are to reframe the debate, maybe we should instead look to Australia, where adult smoking rates are now under 13%, without e-cigarettes.

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Dr. McKee reports that he chaired the Global Health Advisory Committee of the Open Society Foundations, which support and fund narcotics harm reduction. No other potential conflict of interest relevant to this letter was reported.

1. Green SH, Bayer R, Fairchild AL. Evidence, policy, and e-cigarettes — will England reframe the debate? *N Engl J Med* 2016; 374:1301-3.
2. McKee M, Capewell S. Evidence about electronic cigarettes: a foundation built on rock or sand? *BMJ* 2015;351:h4863.
3. Gornall J. Public Health England’s troubled trail. *BMJ* 2015; 351:h5826.
4. Pisinger C, Døssing M. A systematic review of health effects of electronic cigarettes. *Prev Med* 2014;69:248-60.
5. British Medical Association. E-cigarettes. June 30, 2016 (<https://www.bma.org.uk/collective-voice/policy-and-research/public-and-population-health/tobacco/e-cigarettes>).

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TO THE EDITOR: Green, Bayer, and Fairchild misrepresent the position of the Campaign for Tobacco-Free Kids on e-cigarettes. From the beginning, our organization has called for the

Food and Drug Administration (FDA) to regulate e-cigarettes. We have repeatedly stated that it is possible that e-cigarettes could benefit public health if they are properly regulated, shown to be effective at helping smokers quit smoking regular cigarettes completely, and responsibly marketed to smokers who cannot or will not otherwise quit.^{1,2} However, we have also raised legitimate concerns about the large and rapid increase in the use of e-cigarettes by young people in the United States and the irresponsible marketing of these products with the use of tactics similar to those long used to make regular cigarettes appealing to children.³ It is not by any definition “absolutist” to call for FDA regulation of e-cigarettes. Effective regulation by the FDA is critical to minimizing the risks posed by e-cigarettes and maximizing the potential benefits.

Matthew L. Myers, J.D.

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No potential conflict of interest relevant to this letter was reported.

1. Campaign for Tobacco-Free Kids. Comments submitted to the Food and Drug Administration on Docket No. FDA -2014-N-0189, RIN 0910-AG38, Proposed Rule on Deeming Tobacco Products to be Subject to the Federal Food, Drug, and Cosmetic Act, as Amended by the Tobacco Control Act; Regulations on the Sale and Distribution of Tobacco Products and Required Warning Statements for Tobacco Products. August 8, 2014 (http://tfk.org/2014_08_14_deeming_comment).
2. Campaign for Tobacco-Free Kids. Comments submitted to the Food and Drug Administration on Docket No. FDA-2014-N-1936: Electronic Cigarettes and the Public Health Workshop. July 2, 2015 (http://tfk.org/2015_07_02_cigarette_comments).
3. Myers ML. Testimony to the Senate Committee on Commerce, Science, and Transportation. June 18, 2014 (https://www.commerce.senate.gov/public/_cache/files/719fb08c-fc96-4d6a-bb29-d5a80898857f/67FF5AFDCED948A4B19BE14ABCFO6AFF.senate-commerce-hearing-myers-testimony-6-16-14.pdf).

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THE AUTHORS REPLY: We agree with Myers regarding the need to regulate electronic cigarettes sensibly to protect public health. Rules and policies should encourage smokers to switch to lower-risk tobacco products while also preventing non-smokers, particularly young people, from picking up these devices. Nevertheless, our intention was

to contrast the broad public stances toward e-cigarettes held by major antitobacco organizations in the United Kingdom and the United States. In the United States, many advocacy organizations claim to support tobacco harm reduction but effectively endorse prohibition by regulation. Although Myers and the Campaign for Tobacco-Free Kids may believe in the potential for e-cigarettes to benefit public health if regulated properly, their messaging does not support the use of e-cigarettes for harm reduction in the ways that the U.K. Action on Smoking and Health (ASH) does. The Campaign focuses primarily on the prevention of hypothetical risks to nonsmoking children, whereas ASH's emphasis is on improving the health of smokers who cannot or will not quit smoking cigarettes, which kill half of all long-term users, who lose more than 20 years of life, on average.

In response to McKee: we did not suggest that harm reduction is the only strategy to combat tobacco. Two of us (Bayer and Fairchild) have written extensively on laws, taxes, and campaigns to reduce the burden of tobacco. The focus in our recent article was on tobacco harm reduction, which should, of course, be implemented

as part of a comprehensive drug strategy. McKee is correct in pointing out that there is not complete consensus in the United Kingdom regarding e-cigarettes, as we noted in our article. But what we underscored and what makes the United Kingdom exceptional is that many leading organizations support e-cigarettes for harm reduction. In fact, 12 prominent British organizations signed a press release supporting the PHE report. These organizations included the British Lung Foundation, Cancer Research UK, Faculty of Public Health, and the Royal College of Physicians.¹

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Since publication of their article, the authors report no further potential conflict of interest.

1. Public Health England. E-cigarettes: an emerging public health consensus. September 15, 2015 (<https://www.gov.uk/government/news/e-cigarettes-an-emerging-public-health-consensus>).

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