



May 5, 2009

The Honorable Joshua M. Sharfstein, MD
Acting Commissioner
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20903

Dear Acting Commissioner Sharfstein;

The Association of Tobacco Use and Dependence (ATTUD) is a non-profit organization of providers dedicated to the promotion of and increased access to evidence-based tobacco treatment for the tobacco user. As such, we are writing to support the Food and Drug Administration (FDA) enforcement action against manufacturers of “electronic cigarettes”. These products should be removed from the market until and unless they are proven safe and effective.

As you know, these “electronic cigarettes” are being marketed as alternatives to cigarettes and other tobacco products. Manufacturers and retailers of these products claim that electronic cigarettes are safe, and even that these products can help smokers quit traditional cigarettes.

Simply stated, there is no scientific evidence whatsoever that these products do what these manufacturers and distributors claim nor is there evidence published in peer reviewed scientific journals that these products are safe. Specifically, the World Health Organization (WHO), in a release dated September 19, 2008, stated that, “WHO has no scientific evidence to confirm the product’s safety and efficacy.”

The efficacy of these “electronic cigarettes” (if any) is unknown. Consequently, many smokers attempting to reduce or eliminate their cigarette consumption with “electronic cigarettes” may become frustrated and give up their cessation attempts.

A number of smokers will die in the interval between an unsuccessful attempt and a future attempt. As the foremost organization of tobacco treatment professionals, ATTUD's position is to encourage only those attempts (evidence based) with the highest probability of success. Fortunately, there are seven (7) FDA approved tobacco treatment medications.

In addition, these “electronic cigarettes” are not inexpensive. Money spend on unproven therapies is money not spent on proven therapies.

Finally, there is reason to fear that naive children can be exposed to these products which could serve as a gateway tobacco product. Clearly, children do not need any more exposure to tantalizing tobacco products.

For these reasons, we support FDA action to take these products off the market. Thank you for your consideration.

Sincerely,

/s/ Mike Burke

Michael Burke, EdD
ATTUD President

/s/ John Hughes

John R. Hughes, MD
ATTUD President elect