

REFORMING NATIONAL TOBACCO POLICY

A Rational Approach

**For the Comprehensive Reform over the Production, Processing,
Manufacturing, Sale, Distribution and Marketing of
Tobacco and Tobacco Products**

Finding Civil Solutions in an Uncivil Environment

Revised and Reissued from an earlier version for the 110th Congress

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In appreciation and recognition of the dozens of people in the public health community, the tobacco producing community, religious organizations, pharmaceutical and biotech industries, and even some in the tobacco manufacturing sector who for the last 10 years have been willing to engage in an honest and open dialogue in order to develop and shape new ideas and find solutions for resolving this nation's tobacco challenges.

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National Tobacco Policy

The Need for Comprehensive Reform over the Production, Processing, Manufacturing
Sale, Distribution, and Marketing of Tobacco and Tobacco Products
111th Congress

INTRODUCTION

In November 2008 a new Congress and a new President were elected. What do the changes in Congress and the new Administration mean for the tobacco issue that has festered and remained unresolved for more than 4 decades? If Congress (and the Administration) stands by its promises of restoring ethics, accountability, transparency and bipartisan cooperation to our system of government, changes in the way in which tobacco is dealt with in this country could be far reaching.

Since the US Supreme Court (5-4 decision in March of 2000) concluded that FDA did not have jurisdiction over tobacco and that the Congress needed to resolve the issue of how tobacco products should be regulated, the US Congress has failed to complete its job. In the first sentence of the Supreme Court's decision, Justice O'Connor, writing for the majority noted: 'This case involves one of the most troubling public health problems facing our Nation today: the thousands of premature deaths that occur each year because of tobacco use'. More than six years later those 'troubling public health problems' remain.

Will the US Congress and the Administration decide that the time has finally come to deal with what is this nation's single most preventable cause of disease and death? Will the various committees of jurisdiction hold open, transparent, and substantive hearings about what this nation's tobacco policy agenda should be, stop the partisan bickering and enact fair but effective legislation dealing with a spectrum of issues related to tobacco?

Can the spectrum of stakeholders engage in a civil dialogue that will allow progress to be made not only in Congress but also in the private sector as well? How can such a discussion or dialogue take place?

(For more information and some thoughts on how the above questions and issues might be addressed, see **Tobacco and Tobacco at a Crossroads in the 21st Century**, at www.tobaccoatacrossroads.com .)

For several years now, the public health community, tobacco producers, consumers and even *some* in the tobacco industry have recognized that the 'status quo' serves no ones

interest except a few who have little to no regard for public health. What was once black and white now has many shades of gray. And with those shades of gray come numerous opportunities and challenges.

The use of tobacco products, and in particular the use of cigarettes is accountable for more than 400,000 premature deaths each year. Reducing the risks from tobacco, preventing children and adolescents from using tobacco products and providing adult consumers with complete, truthful and accurate information about tobacco products, are issues that should be of concern to not just the public health community but also to tobacco growers, consumers of tobacco, responsible and accountable manufacturers and policy makers as well.

In spite of a tobacco *buyout* several years ago thousands of tobacco farm families and their communities still face an uncertain future. The tobacco program that was designed to provide these communities with economic stability has all but been eliminated leaving nothing in its place. It is estimated that as much as 50% of the tobacco that is used in US cigarettes comes from overseas where the tobacco is cheaper, often produced with few regulatory controls and using labor practices unacceptable by US standards. Technological changes and continuing concerns about the health and safety of tobacco leaf and tobacco products means that growers, leaf dealers and manufacturers *must* begin changing their methods of business. These changes should involve consideration of the public health aspects of using tobacco products and providing incentives to manufacturers and growers to develop science-based products that lower the risks associated with tobacco use. Bringing the production and manufacturing of tobacco into the 21st century and giving greater attention to quality, safety and health issues has the potential for benefiting growers, public health, consumers of tobacco as well as responsible manufacturers. The unique opportunity that has been created by years of work and effort by growers, health organizations, and even some in industry must be addressed in the 111th Congress. The failure to act will mean continued use of tobacco by children and adolescents, continued instability for growers and manufacturers, a green light for the trafficking of tobacco, the continuation of premature death and disease, and continued confusion in the market place for consumers. Short term, piece meal approaches will only provide temporary fixes to an issue in need of more comprehensive reforms.

Congress and the Administration should give primary attention to:

- **Reforming tobacco agriculture policy, including the tracking, monitoring and testing (quality, health, and safety) of all domestic and imported foreign leaf.**
- **Establishing fair but effective oversight over the manufacture, sale, distribution, labeling and marketing of manufactured tobacco products (ie a separate chapter under the FD&C Act, effective surveillance etc.)**
- **Curtailing the illegal manufacture, sale, trafficking and smuggling of tobacco and tobacco products.**

All of these areas have a common thread in that they relate to issues involving the production, processing, manufacture, sale, distribution, labeling, and marketing of *tobacco and tobacco products* in interstate and foreign commerce. All of these areas, if implemented in tandem, have the ability to protect public health, provide stability for tobacco producing communities and establish a set of rules and standards under which tobacco producers and responsible tobacco manufacturers should operate.

I WHY A NEW NATIONAL TOBACCO POLICY IS URGENTLY NEEDED

For more than four (4) decades, the U.S. Congress has all but ignored the findings and conclusions of more than 25 Surgeon General's reports, choosing instead to perpetuate a system and structure that has allowed tobacco companies to profit while prematurely taking the lives of millions of Americans. Failure to enact comprehensive reforms also threatens the well being of people living and working in the tobacco producing states. The current system has cost taxpayers dearly as they have had to foot the bills for billions of dollars in Medicare and Medicaid costs attributed to tobacco use. Even the tobacco manufactures are at long last being forced to reassess their future. After years of denial, some manufacturers have now acknowledged that their products are addictive and cause significant harm. As one of the major manufacturers (formerly RJ Reynolds Tobacco) who has consistently resisted change and accountability had noted on their website;

We produce a product that has significant and inherent health risks for a number of serious diseases....

That acknowledgment alone justifies change.

Given all of these facts, the question is what can and should be done? The last few decades, under which the tobacco industry has come under intense scrutiny, has brought the issue of tobacco to a new *crossroads*. Do we perpetuate the past and find ourselves stagnating in a long drawn out stalemate that serves no real purpose, or do we now move towards the achievement of workable and effective solutions? Some believe that the continuation of attacks on the industry is the *only* way to win the war on tobacco. That may be true. Much depends on what tobacco manufacturers choose to do. There are some companies and others in the industry who still believe that denying the evidence, preserving the 'status quo' and resisting change is the only way to safeguard their profit-making interests.

But most importantly there are an ever-increasing number of interests that have been dialoguing and are continuing to dialogue to find common ground. Thus, with the tobacco buyout behind us, with a Congress and a new Administration committed to openness, transparency and inclusiveness, the time may be ripe to decisively and *constructively* decide what this nation's future tobacco policy should be, including how such products should be produced, manufactured, shipped, and marketed in interstate and foreign

commerce. As we move to reversing decades of mistakes, deceptions and injustices we will need a cohesive, workable, flexible but integrated new policy in place.

- Growers must recognize that production methods must move into the 21st century and that priority should be given to the development of the highest quality leaf. This includes acceptance that the use of tobacco is a public health problem and that new technologies and types of tobacco have the *potential* for reducing the risks associated with tobacco and tobacco products.
- Public health organizations must recognize that not all tobacco products carry the same risks and that through scientific and technological innovations (couple with effective regulatory oversight), it is feasible to lower the risks and relative risks of tobacco and tobacco products.
- Manufacturers must accept greater responsibility and accountability for the products they produce as well as accepting a regulatory framework that governs how tobacco and tobacco products are produced, processed, manufactured, sold, labeled, and marketed.
- The Administration and tobacco state and non-tobacco state members of Congress, Republicans and Democrats have both an opportunity and a responsibility to work together to establish a rational, workable system to oversee all facets of tobacco and tobacco product production and manufacture.

Are republicans and democrats, and various Congressional committees with jurisdiction over tobacco up to the task? Can Congress take the 'blueprint' that so many have worked on and turn it into substantive win/win comprehensive policy reforms? We believe it can and must be done.

What we know and what we know needs to be addressed is that:

- *Tobacco and tobacco products* are produced, processed, manufactured, distributed, sold and marketed in interstate and foreign commerce.
- The use of tobacco products (particularly cigarettes) is recognized as a major public health problem and that currently there is no single effective regulatory agency to oversee its manufacture, sale, distribution, labeling and marketing.
- The old (1938) tobacco program no longer served the interests of the growers it was designed to assist. At the same time a new tobacco agricultural system needs to be established, in order to monitor, track and test both domestic and foreign tobacco.
- New technologies, advancements in science and methods of producing, processing and manufacturing *tobacco and tobacco products* are now available and will continue to be developed. These technologies if applied properly and with

regulatory guidance and oversight could significantly curtail the disease and death caused by tobacco and give US growers and responsible manufacturers a competitive edge.

- Tobacco products should be manufactured, labeled, tested and marketed using comparable (but not necessarily identical) standards that are used for other consumer products (foods, drugs, cosmetics etc.).
- A fair (but effective) and stable regulatory system under a separate chapter of the FD&C Act will provide a level playing field and establish a set of rules and guidelines which will allow *all* manufacturers and growers to operate in a more stable environment. Consumers of tobacco deserve to be provided with complete, truthful and accurate information about the risks and relative risks of tobacco and tobacco products (as well as with other nicotine based products).
- The production, manufacture, sale, distribution, labeling, marketing, importation and exportation of tobacco and tobacco products needs to be better integrated, including better coordination among, HHS (FDA, CDC, NIH), USDA, EPA, FTC, ATF, USTR, DOJ, DHS etc. This also means more direct and indirect engagement between stakeholders (health organizations, growers, manufacturers, distributors, consumers, researchers, governmental agencies etc.) and less rhetoric.
- The American public expects corporations to act responsibly and to be accountable, especially in situations in which a manufacturer produces and sells an inherently dangerous product.
- There has been an increase in the distribution of illegally manufactured and bootlegged cigarettes which impact on federal and state revenues, pose public health problems, negatively impact on growers and responsible manufacturers and even promote criminal and terrorist activities.
- Billions of dollars in tobacco-related health care costs are being shouldered by the American taxpayer at a time when health care costs continue to rise at close to double-digit rates.
- The use of transgenic (GMO) tobacco holds great promise for the development of drugs, industrial enzymes and other products.
- Preventing the initiation of tobacco use and providing assistance to those who want to quit should be given a high priority.
- Failure to act will only perpetuate the public health problems associated with tobacco use, perpetuate instability in tobacco producing states and communities, destabilize the tobacco manufacturers, and increase litigation.

II WHAT ARE THE COMPONENTS OF A NEW NATIONAL TOBACCO POLICY?

- a) Oversight over the manner in which tobacco products are manufactured, sold, distributed, labeled and marketed (FDA).
- b) Reform and restructuring tobacco agricultural production policies that recognize the dangers associated with tobacco use and which gives producers (and manufacturers) the incentives to develop science based lower risk quality leaf.
- c) Curtailing the bootlegging, illegal sales and distribution of tobacco and tobacco products.
- d) Better integration of federal agencies and the establishment of a private sector tobacco policy research center.

a) **Oversight over the manner in which tobacco products are manufactured, sold, distributed, labeled and marketed (FDA)**

It is ironic that of all the *legal* products that are ingested, inhaled, and absorbed into the body, the one product that has escaped oversight by the FDA (and the one that causes the greatest harm) is the manufactured tobacco product and in particular the combustible cigarette. There is a growing consensus among the public health community, growers and even some manufacturers that FDA regulatory authority over tobacco products (as a separate Chapter of the FD & C Act) is long over due and inevitable. The time has come to get beyond the rhetoric and to institute a fair and effective regulatory scheme that will serve the long-term interests of public health and involve all responsible stakeholders. That regulatory scheme needs to include:

- Requiring warning labels and other information on all tobacco products and advertisements that allows adults of tobacco to fully understand the risks and relatives associated with the products they are using
- Restricting advertising and marketing that is misleading and deceptive (consistent with the First amendment). This includes advertising and marketing targeted at children and adolescents as well as advertising that makes unsubstantiated, false and misleading claims.
- Enforcing laws to prevent the sale, access to, and distribution of tobacco products to children and adolescents.
- Requiring that tobacco products disclose toxins, ingredients, country or origin and other information that users of tobacco are entitled to.
- Establishing good manufacturing practices (GMP's) for the manufacture of tobacco products.

- Requiring that all manufacturers of tobacco products register with the FDA.
- Encouraging the development of technologies, tobacco products, and non-tobacco based products (with regulatory oversight) that have an expectation of reducing risks associated with tobacco use.
- Supporting more research and development in both in the public and private sector that is peer reviewed and properly evaluated using sound scientific methods. This should include research on the use of GMO tobacco.

Those in Congress who argue that regulating tobacco under FDA is a 'slippery slope' to the regulation of other products (food, drugs, cosmetics etc.) or that regulation will lead to a 'ban' fail to recognize that the other products already are covered under the FD&C Act. In fact the regulation of those products serves as the 'model' for what can and should be accomplished with respect to tobacco under a *separate chapter* of the FD&C Act. Would those in Congress who say they oppose FDA oversight of tobacco, take the position that our foods, pharmaceuticals, dietary supplements, and cosmetics be allowed to be marketed with virtually no controls (which is the case for tobacco products)? Yet that is exactly what Congress has done when it comes to tobacco products.

b) Reform and Restructuring of Tobacco Agriculture Production

Few would disagree with the statement that the tobacco program, established by Congress in 1938 and successful for so many years was in need of major reforms.

When Congress provided tobacco growers and quota holders with a 'buyout' under which growers would be compensated through funds allocated by the tobacco industry, Congress (intentionally or unintentionally) also repealed other important provisions of the 1938 program leaving virtually nothing in its place.

Because we know that tobacco and tobacco products carry inherent risks in their use, and have been used in illegal activities (smuggling and illicit sales), it also makes sense that there be a system and structure in place that ensures the integrity of the crop in its production, processing, distribution, and eventual use in manufactured cigarettes. This should include keeping the production of tobacco in traditional growing areas and possibly using significantly upgraded cooperatives as a means to implementing many components of a new system. The purpose of such a structure would not be to perpetuate the *old program* but rather to establish a system and framework for the future --- one that serves the needs of growers, manufacturers and public health alike. The new system becomes complimentary to the regulatory oversight of manufactured tobacco products by FDA and as well as to efforts aimed at preventing illegal activity in the manufacture, distribution and sale of tobacco products. It should include:

- Establishing a system under which all aspects of production and distribution can be carefully monitored and tracked and under which the interests and expertise of key parties can be more effectively utilized. This should include requiring that all producers and others dealing with the production, distribution and marketing of leaf register with appropriate authorities (such as USDA).
- Ensuring that all imported tobacco meets the same standards of domestic tobacco and is monitored and tracked in a similar fashion as domestic leaf.
- Identifying and implementing technologies at the production level that can reduce risks associated with the tobacco, as well as ensuring that pesticides and other chemicals used in the production of tobacco meet strict US standards.
- Ensuring that tobacco production is restricted to areas already producing tobacco, making it easier to monitor, test and certify the tobacco.
- Ensuring that GMO (genetically modified) tobacco is monitored, tested and certified.

c) Curtailing the illegal manufacture, sale, distribution, trafficking, and smuggling of cigarettes

The illegal manufacture, sale distribution, trafficking and smuggling of cigarettes is a national and international problem that negatively impacts on manufacturers, growers, public health, and states. Several recent governmental reports have noted that the illegal trafficking of tobacco is a ‘worldwide multibillion dollar crime phenomenon with some cigarette smugglers having ties to terrorist groups’. Enacting and implementing policies to stop the illegal trafficking and smuggling of tobacco products would:

- Prevent irresponsible manufacturers who refuse to play by a fair set of rules from profiting at the expense of growers, responsible manufacturers, public health and the states.
- Require that anyone shipping tobacco products in interstate and foreign commerce must be registered and keep accurate records of all sales and distribution activities.
- Prevent the illegal distribution and trafficking of cigarettes from being used as means of raising revenue for terrorist activities.
- Be complimentary to policies implemented to regulate manufactured tobacco products by the FDA.
- Be complimentary to policies designed to reform the tobacco agricultural production system.

d) Better integration of federal agencies and the establishment of a private sector tobacco policy research center

- In order to effectively implement policy reforms, the numerous governmental agencies will need to better coordinate their efforts. Currently the left hand does not often know what the right hand is doing in spite of the fact that authorities and activities of one agency can significantly impact on the activities of another agency. Included should be agencies within the Department of Health and Human Services (such as the FDA, the CDC, and NIH), the Federal Trade Commission, the United States Department of Agriculture (USDA), the Environmental Protection Agency (EPA), Alcohol Tobacco and Firearms (ATF), and the Department of Homeland Security (DHS).
- In addition to addressing a number of issues through federal policy reforms, it is equally important to stimulate and encourage discussions within the private sector in order to shape and influence policy outcomes. One of the barriers to change has been the unwillingness of various stakeholders, experts and others to engage in a civil dialogue. Decades of deceit and distrust make it understandable as to why such dialogues and discussions are so difficult. Previous successful experiences between the public health community and growers however, would indicate that it is feasible to conduct a dialogue in a neutral independent setting. Such a process should be encouraged with consideration of the establishment of a more permanent tobacco policy research center, that would allow debate, discussion and dialogue to proceed in a civil manner on a spectrum of issues. (For more on this, see chapter IX in **Tobacco and Tobacco Products at a Crossroads in the 21st Century**, at www.tobaccoatacrossroads.com .

III WHO WOULD BENEFIT FROM A NEW NATIONAL TOBACCO POLICY?

- a) Public Health
- b) Growers and their communities
- c) Consumers of tobacco products
- d) Manufacturers (including tobacco, pharmaceutical, biotech companies etc.)
- e) Congress and the Executive Branch

a) Public Health

Tobacco remains a significant cause of death in the US accounting for approximately 400,000 deaths each year. By reforming and restructuring the manner in which tobacco and tobacco products are produced, manufactured and marketed, it is possible to significantly

reduce the number of deaths and prevent children and adolescents from using tobacco products. This could be achieved by:

- Providing full and complete warnings, and other information (warnings, additives, toxins etc.) that allows adult users of tobacco products to fully understand the risks and relative risk of various products.
- Providing better quality control standards and monitoring over the production and distribution of raw tobacco (domestic and imported).
- Prohibiting and preventing misleading and deceptive labeling and advertising including the misleading use of descriptors or other health claims which are not supported by scientific evidence (i.e. low/ light etc.)
- Encouraging and using technologies and science to reduce the toxins in tobacco and tobacco products.
- Using competition and market forces under a fair regulatory environment that will result in the removal of higher risk products from the market place and introduce science- based lower risk products into the market place.
- Ensuring that children and adolescents do not have access to or are encouraged to use tobacco products.
- Prohibiting the illegal manufacture, distribution and trafficking of tobacco products.
- Ensuring that health and scientific interests are represented in decisions concerning the production, manufacture, sale and marketing of tobacco products.
- Preventing the initiation of tobacco use and providing assistance to those who want to quit.
- Taxing tobacco products based upon their risks and relative risks.

b) Growers and their communities

Tobacco will continue to be grown and produced throughout the world. The production of tobacco, the methods by which it is produced, the pesticides used etc. impact on the final manufactured product. US growers and others working in the tobacco arena have a historic opportunity right now to be a part of the solution rather than being a part of the problem. They can lead the way in producing a higher quality leaf that not only takes into account taste and color but also health and safety. Growers will benefit through:

- Establishing a new agricultural production system to replace the old tobacco program that will meet the needs of the future rather than trying to preserve the ways of the past.
- Keeping tobacco production in traditional tobacco producing regions (or until such time as it is feasible to effectively monitor and track production elsewhere).
- Setting quality assurance standards and monitoring the production, importation and export of all tobacco leaf.
- Curtailing the illegal production, manufacture, and distribution of unregulated/bootlegged tobacco and tobacco products.
- Establishing regulatory oversight over manufactured tobacco products which sets fair and uniform standards and which requires disclosure of information about the tobacco used in the manufactured product.
- Ensuring that grower interests are represented in decisions concerning the production, manufacture and marketing of *tobacco and tobacco products*.

c) **Adult Consumers of Tobacco Products**

While many believe that it would be ideal if no one smoked or used tobacco or nicotine, the reality is that at least for the foreseeable future tobacco products (and other nicotine containing products) will be used both here in the United States as well as around the world. Accepting FDA regulation of tobacco is a 'de facto' acceptance that tobacco products will continue to be available (i.e goal is not to ban tobacco or tobacco products). A new reality based national tobacco policy would benefit those using tobacco by:

- Ensuring that all tobacco products disclose ingredients, major toxins and other relevant warnings and information about the tobacco product so that consumers can fully comprehend the risks and relative risks of using a tobacco product (as well as other NRT, nicotine and cessation products).
- Ensuring that the labeling and advertising is truthful, accurate and not misleading;
- Ensuring that consumers know where the tobacco leaf was produced as well as where and under what conditions the manufactured product was made. This includes assurances that the tobacco leaf used in the tobacco product meets certain quality assurance standards and that the manufactured product meets GMP's (good manufacturing practices).
- By creating a regulatory scheme under FDA, under which manufacturers could compete (as well as be required) to develop products that would be scientifically validated as lower in risk.

- Giving users of tobacco assurances that manufacturers are held to a high level of corporate responsibility and accountability.

d) Manufacturers and others working in tobacco related jobs

The manufacturing of tobacco products will continue. No major health organization has suggested that tobacco or tobacco products be banned. Today, almost all tobacco manufacturers have acknowledged that the use of tobacco causes significant health risks and that children and adolescents should not use or have access to tobacco products. They have also indicated that adult consumers are entitled to complete and truthful information the risks and relative risk of the products of tobacco products and that technological advances should be used to reduce those risks further. That being the case, it is obvious that tobacco manufacturers would benefit from the establishment of a system that:

- Sets industry-wide standards that ensure consistency and continuity of both tobacco leaf and manufactured tobacco products, thereby leveling the playing within the industry.
- Prohibits tobacco products that don't meet governmental standards (manufacturing, labeling, GMP, marketing etc.) from being manufactured and distributed and sold.
- Establishes an independent third party (FDA) as the agency to oversee, develop and enforce fair manufacturing, labeling, and marketing standards. All tobacco manufacturers would have to 'register' and be accountable for their operations and business activities. Manufacturers would be given *due process* in the discussion, establishment and implementation of rules and regulations.
- Prohibits the production, processing, manufacture and distribution of tobacco leaf that does not meet uniform quality assurance standards.
- Prohibits the importation of tobacco leaf that does not meet US quality assurance standards.
- Provides incentives under a fair but effective regulatory system (FDA) to develop and market science-based products that can be scientifically shown to reduce risks associated with tobacco use.
- Provides opportunities for public 'engagement' in the discussion of science and other issues related to the production, manufacture sale, distribution and marketing tobacco and tobacco products.
- Gives manufacturers an opportunity to *seriously* demonstrate that they are corporately responsible and accountable.

- Acceptance of FDA rules and standards would reduce litigation and liability lawsuits against *responsible* manufacturers.
- Ensures that *responsible* manufacturers are represented in decisions concerning the production, manufacture and marketing of tobacco products.
- Develop a new tax structure that taxes products based upon the relative risk of the product, thereby giving manufacturers and others the incentives to develop science based lower risk products.

e) **Congress and the Executive Branch**

For decades the US Congress (and the Administration) has been unwilling and unable to effectively and *comprehensively* deal with the tobacco issue. What few steps that have been taken have been on a piecemeal basis. As has been noted above there is both ***a need and an opportunity*** for the Congress (and the Administration) to provide long over due leadership in establishing a new national tobacco policy for this country. Doing so would:

- Establish a more cohesive integrated statutory structure under which *tobacco and tobacco products* are overseen and regulated. Agencies with specific areas of jurisdiction and expertise would take the lead in designated areas but coordinate their activities with sister agencies. For example, USDA and EPA would oversee agricultural issues; FDA would oversee tobacco products and coordinate with other agencies in the Department of HHS; DOJ/Treasury and Homeland Security would oversee issues related to taxation, as well as the illegal production and distribution of tobacco and tobacco products. As with other products and commodities, Congress would set the statutory policies and the federal regulatory agencies would be charged with implementation. Congress would maintain oversight but not be the day to day regulator (as had been the case for the last several decades). *All agencies would work towards common goals and objectives as part of new national tobacco strategies.*
- Ensure greater protection of the public health and in particular children and adolescents.
- Safeguard and stabilize tobacco- producing communities.
- Stabilize and ‘level the playing field’ for tobacco manufacturers who would all operate under the same uniform set of standards.
- Prevent the illegal trafficking of tobacco and tobacco products thereby protecting homeland security, public health, growers, manufacturers, and the states (revenues).

IV CONCLUSION

Resolving the issues confronting this nation's tobacco policies will require work on a number of fronts including product regulation, agricultural policy reforms and the illegal trafficking and smuggling of tobacco and tobacco products. This work includes both significant policy reforms as well as greater 'engagement' in the private sector. All of these issues (and issues related to them) are intertwined and must be considered and resolved in a complimentary fashion. Governmental agencies, which currently often act in a vacuum, must do a better job of integrating their activities. Health advocates, growers, scientists, and tobacco manufacturers must also be willing to safely engage and challenge each other on the parameters and elements of what a new national tobacco policy should contain and be willing to defend their positions. They must also be willing to find common ground that will move the issues forward both in the short term as well as in the long term. Most importantly, the tobacco industry itself must undergo a major shift toward public accountability and transparency that has not existed for the last four (4) decades.

Public health advocates, growers, manufacturers, consumers, the states, and even homeland security all have the potential to benefit **IF** the stakeholders, Congress and the new Administration can put their minds to bringing about fundamental changes to this industry and the manner under which it currently operates. Failure to act will only perpetuate the stalemate that has plagued this nation's federal tobacco policies for more than four decades.

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AHEAD

Alliance for Health Economic and Agriculture Development

About the Alliance

The Alliance is an informal organization whose purpose is to educate, stimulate, and facilitate discussions with and between, health advocates, growers, consumers, media, the scientific community, policy makers, manufacturers, biotech and pharmaceutical companies about a spectrum of issues related to the production, processing, manufacture, distribution, labeling, and marketing of tobacco and tobacco products. The Alliance is the outgrowth of the Southern Tobacco Communities Project, established in the mid-1990's through a grant from the Robert Wood Johnson Foundation that brought tobacco growers and the public health community together to engage in a dialogue about tobacco.

The Steering Committee members serve as individuals, each of whom has significant and unique experience in dealing with tobacco-related issues.