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January 19, 2023

Jeffrey M. Zirger
Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road, N.E.
MS H21-8
Atlanta, GA 30329

Re: The National Health and Nutrition Examination Survey (NHANES), (OMB No. 0920-0950, Exp. 04/30/2023) – Revision — National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention (CDC) Docket No. CDC-2022-0133

Dear Mr. Zirger:

Truth Initiative welcomes the opportunity to submit comment regarding the National Health and Nutrition Examination Survey (NHANES).

Truth Initiative is America's largest nonprofit public health organization dedicated to a future where tobacco and nicotine are things of the past. Our mission is clear: achieve a culture where young people reject smoking, vaping and nicotine. We believe each individual has the right to live in a world free from tobacco and nicotine dependence and tobacco-related death and disease. Our proven-effective, nationally recognized truth® public education campaign has prevented millions of young people from smoking, our This is Quitting vaping cessation program has helped over 500,000 young people begin their journey to quit vaping, and over 590,000 students have engaged with our Vaping: Know the Truth school curriculum. These programs and others, along with our rigorous scientific research and policy work, are making strides to end the tobacco epidemic.

Truth Initiative applauds the goal of the NHANES to collect data measuring the health and nutrition status of the U.S. population. Because of the importance of the NHANES, we want to take this opportunity to suggest ways to improve the survey to enhance our understanding of tobacco product use among Americans.

Truth Initiative urges the CDC to consider the following recommendations regarding the NHANES.



1. Truth Initiative recommends changing the past day range in Questions SMQ.682, SMQ.710, SMQ.720, SMQ.740, SMQ.771, SMQ.845, SMQ.846, SMQ.849, SMQ.851, and SMQ.863.

Several questions throughout the NHANES survey ask about current use of tobacco products by asking if the participant used these products within the past 5 days. However, other national surveys that ask about current use of tobacco products, including the Population Assessment of Tobacco and Health Study, the National Youth Tobacco Survey, the Behavioral Risk Factor Surveillance System, the National Youth Risk Behavior Surveys, and the National Health Interview Survey, all ask if the participant used these products within the past 30 days. For consistency, we urge CDC to do the same in the NHANES.

2. Truth Initiative recommends adding more brand names of e-cigarettes to SMQ.846.

Currently, SMQ.846 asks the following: “During the past 5 days, including today, did you use e-cigarettes? You may also know them as JUUL™, vape-pens, vapes, hookah-pens, e-hookahs, or vaporizers. These are battery-powered, usually contain liquid nicotine, and produce vapor instead of smoke?” While JUUL remains a popular brand, it is important to include other brands that are popular with youth. We recommend that SMOK, Suorin, Vuse, blu, Elf Bar, and Stig be added as brand examples, which are all popular e-cigarette brands and most of which are used as brand examples in the National Youth Tobacco Survey.

Further, research suggests that youth may be using e-cigarette products and know them only by brand name, thus leading them to not consider themselves e-cigarette users. A study using 2018 data found that a notable proportion of adolescents reported using JUUL but did not answer affirmatively to questions about e-cigarette use, suggesting that asking about e-cigarettes alone will underestimate prevalence.¹ Thus, it is important to include brand-specific questions when assessing e-cigarette use.

3. Truth Initiative recommends adding brand examples of regular cigars, cigarillos, and little filtered cigars to SMQ.682, SMQ.692, and SMQ.771.

Similarly, brand name examples are important in questions about cigars in order to more accurately measure prevalence of use, especially of little cigars and cigarillos. A study of youth tobacco users found that 41 percent reported smoking Black & Milds (a leading cigarillo brand) or wrote in another cigar brand as the type of cigarette they usually smoke. This is likely due to the similarities in product design between little cigars/cigarillos and cigarettes. A third of these respondents answered “no” when asked if they had smoked a cigar in the past 30 days. Assessment of brand-specific cigars nearly doubled the reporting among adolescent users.² Thus, we would recommend changing SMQ.682, SMQ.692, and SMQ.771 to include brand name examples used in the National Youth Tobacco Survey: Swisher Sweets, Black and Mild, Garcia y Vega, Cheyenne, White Owl, and Dutch Masters.



4. *Truth Initiative recommends asking about use of nicotine pouches.*

Tobacco companies have begun selling nicotine pouches, which are sold as pouches similar to snus but do not contain tobacco leaf. Instead, the pouches are filled with a nicotine powder. Tobacco companies have indicated in applications submitted to the FDA that these products are for consumers who want alternatives to smoking cigarettes – or even to quit smoking cigarettes - but not necessarily stop nicotine consumption. Anecdotal evidence from Twitter indicates many young vapers are recommending Zyn nicotine pouches to their friends who are looking to quit vaping or smoking. Additionally, sales of nicotine pouches have increased considerably since 2016.³ Thus, we recommend adding the following questions:

Nicotine pouches are small, flavored pouches that contain nicotine, and are placed between the lip and gum. Nicotine pouches are different from other smokeless tobacco products such as snus, dip, or chewing tobacco, because they do not contain any tobacco leaf. Common brands are Zyn, on!, and Velo.

During the past 30 days, including today, did you use a nicotine pouch?

Yes

No

REFUSED

DON'T KNOW

5. *Truth Initiative recommends adding questions about flavored tobacco product use.*

Flavors play a significant role in drawing youth and young adults to tobacco products. Federal law bans flavors in cigarettes — excluding menthol — but not in other tobacco products, such as smokeless tobacco, cigars, hookah and e-cigarettes. These products come in an array of candy, fruit, dessert and cocktail flavors, such as sour apple, cherry, grape, chocolate, strawberry margarita, appletini, piña colada, cotton candy and cinnamon roll. Flavored tobacco products also typically have bright, colorful packages and are often sold individually and cheaply, making them even more appealing to youth and young adults. It would be helpful to know the prevalence of flavored tobacco product use among youth and adults to inform policymakers making policy decisions regarding flavored tobacco products. This information would also be useful for identifying disparities in flavored tobacco use.

The CDC should add questions regarding the use of flavored e-cigarettes, cigars, pipes, and smokeless tobacco products in the NHANES because:

- E-cigarette manufacturers capitalize on offering many kid-friendly flavors, such as mint, cotton candy and gummy bear.⁴ Youth e-cigarette users cite flavors as a top reason they began using e-cigarettes, second only to use by a family member or



friend.⁵

- As a result of the Family Smoking Prevention and Tobacco Control Act in 2009, the Food and Drug Administration banned flavored cigarettes, except menthol. Because the FDA did not at that time have jurisdiction over cigars, cigar manufacturers took advantage of this loophole and began to heavily market and promote flavored cigar products.⁶
- Many hookah tobacco companies offer multiple flavors in their product lineup, which may entice hookah use among young people.⁷ A focus group of young adult hookah smokers showed that participants found the wide variety of hookah flavors appealing and liked that they could personalize their smoking experience by mixing and customizing flavors.⁸ Additionally, young adults perceive hookah as less harmful and less addictive than cigarettes.^{9–12}
- A study of internal tobacco industry documents found that smokeless tobacco product manufacturers added flavors to their products to attract new users, especially young males.¹³

A number of tobacco products are available in “concept” flavors, with vague non-characterizing descriptions on packaging that do not expressly refer to the flavors therein. For example, Elf Bar’s Elfbull Ice, Tropical Rainbow Blast, and Energy and Swisher Sweets’ Purple Swish, Island Bash, Tropical Storm, Diamonds, Green, and Smooth are all concept-flavored tobacco products. Because youth and young adults may not recognize these products as being flavored, it is important to include examples of concept flavors in questions regarding flavored tobacco products.

Thus, we recommend adding the following questions after SMQ.692A and SMQ.692B:

Were any of the products that you smoked flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or concept flavors such as “ice”, “purple”, or “island bash”, or any other flavor?

Yes

No

REFUSED

DON’T KNOW

What flavors were the cigarettes, pipes, regular cigars, cigarillos, little filtered cigars, water pipes, and hookahs with tobacco that you used in the past 30 days? (Select one or more)

Menthol

Mint

Clove or spice

Fruit

Chocolate

Alcoholic drinks (such as wine, margarita, or other cocktails)

Candy, desserts, or other sweets

Concept flavors like ice, purple, or island bash



Some other flavor not listed here
REFUSED
DON'T KNOW

We recommend adding the following question after SMQ.849:

What flavors were the e-cigarettes that you used in the past 30 days? (Select one or more)

Tobacco
Menthol
Mint
Clove or spice
Fruit
Chocolate
Alcoholic drinks (such as wine, margarita, or other cocktails)
Candy, desserts, or other sweets
Concept flavors like ice, purple, or island bash
Some other flavor not listed here
REFUSED
DON'T KNOW

We recommend adding the following questions after SMQ.853:

Were any of the smokeless tobacco products that you used in the past 30 days flavored to taste like menthol, mint, clove or spice, alcoholic drinks, candy, fruit, chocolate, or concept flavors such as “frost”, “mellow”, or “robust”, or any other flavor?

Yes
No
REFUSED
DON'T KNOW

What flavors were the smokeless tobacco products that you used in the past 30 days?
(Select one or more)

Menthol
Mint
Clove or spice
Fruit
Chocolate
Alcoholic drinks (such as wine, margarita, or other cocktails)
Candy, desserts, or other sweets
Concept flavors like ice, purple, or island bash
Some other flavor not listed here
REFUSED
DON'T KNOW



6. Truth Initiative recommends asking about the nicotine strength of e-cigarettes used.

Given that the use of higher concentration of nicotine is associated with greater dependence¹⁴ and that nicotine strengths have increased in e-cigarettes in the last several years,¹⁵ we recommend asking about the strength of nicotine in the e-cigarettes used. A recent study from the CDC in partnership with Truth Initiative shows that sales of e-cigarettes with the highest levels of nicotine (5% or greater nicotine strength) have grown drastically in the past five years, increasing from 5% of total e-cigarette sales in 2017 to 81% in 2022, a nearly 15-fold increase. For disposable e-cigarettes, which are the most popular type of e-cigarette with youth and come in many flavors, the increase is even steeper. More than 90% of disposable e-cigarettes sold contained the highest levels of nicotine, compared to 0% in 2017.¹⁵

What was the concentration of nicotine in the e-cigarette you used most often in the past 30 days?

- 1-3mg/mL or 0.1-0.3%
- 4-6mg/mL or 0.4-0.6%
- 7-12mg/mL or 0.7-1.2%
- 13-17mg/mL or 1.3-1.7%
- 18-24mg/mL or 1.8-2.4%
- 25-39mg/mL or 2.5-3.9%
- 40-49mg/mL or 4.0-4.9%
- 50-59mg/mL or 5.0-5.9%
- 60+mg/mL or 6.0+%
- REFUSED
- DON'T KNOW

7. Truth Initiative recommends adding a question about whether any attempts to quit e-cigarettes have been made.

We recommend asking respondents who currently use e-cigarettes if they have made any attempts to quit e-cigarette use in the past 12 months:

During the past 12 months, have you stopped using e-cigarettes for longer than one day because you were trying to quit using e-cigarettes?

- Yes
- No
- REFUSED
- DON'T KNOW

Truth Initiative appreciates CDC taking these comments into account as it develops the NHANES. As we stated above, Truth Initiative greatly values data from the NHANES. It is



critical that we have the appropriate information about tobacco products in order to best determine how to protect the public health from the deadly effects of tobacco, especially as the breadth and variety of tobacco products continues to change. Please do not hesitate to contact Maham Akbar, Public Policy Director at makbar@truthinitiative.org or 202-454-5932, should you need more information or have questions about this submission.

Sincerely,

A handwritten signature in black ink that reads "Robin Koval". The signature is fluid and cursive.

Robin Koval
CEO and President



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