

COMMENTS OF THE NATIONAL ASSOCIATION OF COUNTY AND CITY HEALTH OFFICIALS
On Required Warnings for Cigarette Packages and Advertisements Proposed by Food and Drug Administration
Docket No. FDA-2010-N-0568
January 11, 2011

The National Association of County and City Health Officials (NACCHO) is pleased to submit the following comments on required warnings for cigarette packages and advertisements proposed by the Food and Drug Administration November 12, 2010.

NACCHO represents the nation's 2800 local health departments. These city, county, metropolitan, district and tribal departments work every day to ensure the conditions that promote health and equity, combat diseases, and improve the quality and length of all lives for all people in their communities through public health policies and services.

Cigarette smoking remains the leading preventable cause of death in the United States. Local health departments are committed to advancing efforts aimed at preventing tobacco use, promoting tobacco use cessation, protecting the public from secondhand smoke, and eliminating tobacco-related health disparities.

NACCHO applauds the Food and Drug Administration for its commitment to reducing tobacco use in the United States. It is important that there are strong federal efforts to reduce smoking because state and local government budget cutbacks in recent years have curtailed efforts by local health departments to conduct media campaigns against smoking.

The comments below address the proposed warnings for cigarette packages and how they may be most effective in helping to advance smoking cessation and prevention of smoking among target populations, including youth.

Regarding the images identified by the FDA in the proposed rule, NACCHO makes the following general recommendations:

- Use images with children to impact the behavior of parents and other adults
- Use images showing the dramatic physical effects of smoking
- Include images that illustrate the increased smoking-related risk of other diseases, in addition to cancer
- Use some images that emphasize the positive effects of quitting smoking
- Use white text on black background for greater impact
- NACCHO does not support continued use of the Surgeon General's warning unless it can be on the side of the package where it will not detract from the images and warning messages.

NACCHO makes the following specific recommendations for images to be included within the nine graphic health warnings:

WARNING: Cigarettes are addictive. **Image #1-1B**

WARNING: Tobacco smoke can harm your children. **Image #2-1B**



WARNING: Cigarettes cause fatal lung disease. **Image #3-3B**

WARNING: Cigarettes cause cancer. **Image #4-3B**

WARNING: Cigarettes cause strokes and heart disease. **Image #5-4B**

WARNING: Smoking can kill you. **Image #7-1B**

WARNING: Quitting smoking now greatly reduces serious risks to your health. **Image #9-1B**

NACCHO believes that a smoking cessation resource should be included on cigarette packaging. In order to increase the efficacy of cessation efforts, smokers need to be informed about where they can go for help. Contact information for the cessation resource should include a phone number and web address in order to increase accessibility to all populations. There should be one phone number that connects to resources in the caller's state, if possible.

Thank you for the opportunity to submit these comments on the proposed rule on Required Warnings for Cigarette Packages and Advertisements. NACCHO and the nation's local health departments look forward to working with the FDA to reduce smoking.