

As a scientist at RPCI, which has been a leader in tobacco research since the 1950s, and a site which originally conducted smoking machine testing of cigarettes, I endorse the FTC's move to rescind its guidance on cigarette tar and nicotine yields. There is ample evidence that the Cambridge filter pad method (also adopted by the International Organization for Standardization) is misleading to both consumers and regulators as an index of cigarette toxicity.¹⁻⁹ While most smokers do not know the precise tar and nicotine yields of their cigarettes,¹⁰ they are well aware of the labeling of their cigarettes as "light" 'mild' or 'ultralight' and believe them less harmful or somehow better for them.¹¹⁻¹⁶ These terms have become tropes, standing in for the numbers which have only in rare cases been displayed on packs.¹⁷ With the rescinding of this guidance statement on the use of tar and nicotine yields, the continued use of these descriptive terms, which act as stand-ins for the numbers, should be actionable as false and misleading claims. This would bring the United States in line with Australia, Canada, and the European Union, all of whom have already barred these misleading terms.¹⁸

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