A MATTER OF TASTE

Tom Cravotta, president of TTI, reflects on the impact of growing regulations on the flavoring business.

By George Gay

Regulation is difficult to keep abreast of if you are not directly involved with the product or process being regulated. And tobacco flavor regulation, looked at internationally, seems particularly opaque for those of us looking in, so Tobacco Reporter recently took the opportunity to ask some questions of Tom Cravotta, president of Tobacco Technology Inc., USA.

Cravotta has been involved in tobacco product and leaf blend flavor development since 1977. Based in Maryland, USA, TTI is dedicated exclusively to the development and production of flavors for use on tobacco. It serves customers in more than 60 countries.

TR: The Canadian Bill C-32, which prohibits most flavor additives to cigarettes, little cigars and blunt-wrap tobacco, has been in force since July 2010. What effects has it had on the businesses that supply tobacco flavors, humectants and casings?

Cravotta: Simply stated, that business now no longer exists. However, Canada is traditionally a Virginia-style cigarette market, and Virginia-style cigarettes contain little or no flavor ingredients. Our greater concern is the precedent set by Canadian Bill C-32.

There is evidence that suggests an ingredients ban will not result in less smoking. Millions of consumers in China, the U.K., South Africa, Canada and Australia—traditional Virginia-style markets—smoke cigarettes that do not contain flavor ingredients. This begs the conclusion that ingredients do not make brands “more attractive.” The ban of ingredients in these markets will have little or no impact on the brands smoked.

On the other hand, in traditional American-blend markets—including the United States, Western Europe, Russia, Brazil, Mexico and Japan—an ingredients ban would impact the majority of brands now available to adult smokers. Consumers would lose the ability to purchase their brands of choice. Will they stop or reduce smoking? I know of no data that proves this assumption. I would suggest that they would choose simply to replace their current American-blended brand with Virginia-style cigarettes or some other alternative.

Regulations should not force manufacturers to market products that consumers do not prefer, nor take away the right of an adult smoker to purchase the products they choose. Without data to prove otherwise, it is my opinion that any presumed public health benefit of an ingredients ban is speculative.

TR: There was much talk at one time of how the provisions of Bill C-32 would be taken up by the FCTC and spread around the world. Where are we in respect of this project? Over 50 countries require tobacco manufacturers to report the ingredients used in their products to regulators. As a supplier to manufacturers, we provide the necessary information as part of our day-to-day business. But we also feel
very strongly that regulations should protect manufacturers’ disclosures of brand ingredient formulas. Public disclosure of that proprietary information would certainly provide the opportunity for illicit trading and criminal counterfeiters to benefit. We do all we can to protect the trade secrets of those to whom we supply as well as our own.

TR: Do other countries around the world have in force significant bills similar to Canada’s C32? No. However, countries regulate tobacco product ingredients either through required reporting, or in several cases, regulation of the ingredients that are permitted for use. It is the scientific basis for tobacco product ingredient regulation that has not been widely addressed. In fact, there are no internationally accepted scientific test methods for assessing tobacco product ingredients. As a scientist and considering the global regulatory atmosphere, this is a major concern.

The Framework Convention on Tobacco Control’s Conference of Parties has established a working group to outline guidelines for testing and measuring of the contents and emissions of tobacco products. They are to propose a scientific basis of tobacco product regulation. However, to my knowledge, this remains a goal and not an accomplishment.

TR: In most countries, perhaps all, the ingredients that may be added to tobacco are limited in some way or another, either through positive or negative lists. Are these restrictions clear and sensible? The lists are clear but I question whether they make sense. It appears to me that restrictions are being implemented as a result of political considerations. For example: tobacco control advocates and public health organizations, specifically the World Health Organization (WHO), have claimed that ingredients increase the toxicity and addictiveness of cigarettes. Yet, [the] WHO also stated that cigarettes without ingredients (nonflavored brands) have “never been demonstrated to be less dangerous or more addictive than those with ingredients.” In 2010, the European Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) concluded that there is no evidence that ingredients increase the addictiveness of tobacco products and found that it is very difficult to identify the role of individual additives in enhancing the tobacco products’ “attractiveness.” Without evidence to prove that ingredients enhance attractiveness, again I question the basis for extreme ingredient list restrictions.

TR: Would you prefer that things were otherwise? Certainly. I speculate that all of us in the industry would choose reasonable and science-based regulation and reporting as determined by all parties—governments, public health advocates and industry experts.