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Statement of R.J. Reynolds Tobacco Company

**Before the U.S. House of Representatives
Committee on Energy and Commerce
Subcommittee on Health and the Environment**

**Concerning the Jurisdiction of the
Food and Drug Administration
Over the Manufacture of Cigarettes
March 25, 1994**

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R.J. Reynolds Tobacco Co. welcomes this opportunity to correct three erroneous claims that have been made about Reynolds Tobacco and its products: 1) that cigarettes are "addictive"; 2) that Reynolds Tobacco adds nicotine to its products; and 3) that the company manipulates nicotine yields to create, maintain or satisfy "addiction."

Attached to this testimony are four documents that the committee might find helpful: 1) a February 28 letter from Reynolds Tobacco's chief executive officer to Dr. David Kessler, the food and drug commissioner, informing him that RJR does not add nicotine to its products; 2) a March 3 letter from the company's general counsel to ABC News, correcting misrepresentations about the company that were made during a recent "Day One" news report; 3) a March 22 preliminary report from Battelle Memorial Institute, through its Battelle Columbus Operations, documenting the fact that nicotine yields are not increased during RJR's tobacco reconstitution process (a final report will be available within a week); and 4) a chart that tracks the industrywide reductions that have occurred in cigarette "tar" and nicotine yields during the past 40 years.

CLAIM: CIGARETTES ARE "ADDICTIVE"

During the past several years, there have been a wide variety of attempts to convince the American public that cigarettes are "addictive," and some public officials have even gone so far as to put cigarettes in the same class as such truly addictive drugs as heroin and cocaine. One does not have to be a trained behavioral scientist to see this is not true. All one needs to do is simply ask, and honestly answer, the following question: "Would an airline passenger rather board a plane piloted by someone who had just had a couple of beers, smoked crack, shot heroin, popped some pills or smoked some cigarettes?"

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The allegation that smoking cigarettes is "addictive" is part of a growing and disturbing trend that has destroyed the meaning of the term "addiction" by characterizing any enjoyable activity as "addictive," whether it is eating sweets, drinking coffee, exercising or playing video games. Under that very loose definition of "addiction," Americans are currently raising a new generation of "caffeine and sugar addicts" and "exercise and video junkies." This defies common sense.

The simple fact is, cigarettes do not meet the classic criteria for addiction, and to suggest that cigarettes are as "addictive" as cocaine or heroin, as anti-smokers frequently do, trivializes the very serious problem our nation faces in battling the use of truly addictive and illegal drugs.

The use of such addictive substances as cocaine, heroin, alcohol and barbiturates eventually leads to major lifestyle disruptions, and their use interferes with the user's ability to perform normal, routine functions such as working, driving or maintaining healthy relationships with family members. Truly addictive drugs invade every aspect of an addict's life. Overcoming an addiction to these substances, requires the addict to completely change his or her behavior, lifestyle and attitudes. In contrast, when a smoker quits smoking cigarettes, that is all that he or she needs to do.

Equating cigarette smoking with the use of heroin or cocaine could actually encourage experimentation with those drugs by suggesting that it is no more difficult to quit using cocaine or heroin than it is to quit smoking cigarettes. That is clearly not the case.

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The fact is, there are currently almost 43 million American adults who have quit smoking, and almost all of them did so on their own, without any help. According to statistics compiled by the Public Health Service for the National Center for Health Statistics, today there are more former smokers (almost 43 million) in the United States than there are adults who currently smoke cigarettes on a daily basis (41 million). And almost all of them quit without the aid of nicotine substitutes, counseling or other aids. That result would hardly have been achievable if cigarettes were truly addictive, or if they even began to approach the addictive nature of such substances as cocaine and heroin.

Ironically, suggestions that cigarettes are "addictive" also work against government efforts to encourage smokers to quit because by telling smokers that they are "addicted," they provide smokers with an excuse to avoid quitting. As a Scripps Howard columnist who happens to be a former smoker put it earlier this week:

"By pretending that smokers are helpless addicts, slaves to a tobacco conspiracy, drug addicts unable to control their own actions, the addiction-conspiracy peddlers help make a very simple decision to stop become impossible.

"There's actually no conspiracy but there's a secret about smoking.

"To quit, you have to decide you want to quit.

"Then you quit."

CLAIM: R.J. REYNOLDS ADDS NICOTINE TO ITS PRODUCTS

Recent reports have claimed that R.J. Reynolds increases the level of nicotine in its products during the manufacturing process. That allegation is simply untrue, and the company has sent a letter (copy attached) to FDA Commissioner David Kessler informing him that Reynolds Tobacco does not spike the nicotine level in its products. In fact, the company's processes result in a reduction in the amount of nicotine in cigarettes when compared to unprocessed tobacco.

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The company has also sent a letter to ABC News (copy attached) concerning a "Day One" segment that clearly implied that Reynolds Tobacco "boosts" the nicotine content of its cigarettes by adding nicotine to reconstituted tobacco. This could not be farther from the truth. Nicotine is, in fact, lost during the process, so the reconstitution process actually results in tobacco with lower yields of nicotine than either 1) unprocessed tobacco leaf or 2) the small pieces of tobacco and tobacco stems used to manufacture the reconstituted sheets.

For the committee's information, the reconstitution process was developed to reduce raw material waste by making the most efficient use of the tobacco that is purchased without compromising the taste or smoking characteristics of the final product. The reconstitution process is similar to the process used to produce paper. Once the tobacco pulp is formed into sheets of tobacco, nicotine and other natural flavorings that were extracted with water from the tobacco during the process are returned to their original source.

Battelle, a highly respected independent laboratory, recently reviewed RJR's reconstitution process and analyzed reconstituted tobacco produced by that process. Their tests confirmed that the process does not increase nicotine in the final tobacco sheet and that some nicotine is, in fact, lost during the process. A copy of Battelle's preliminary report is attached.

Contrary to statements made by Congressman Mike Synar in the "Day One" report, the tobacco industry has never hidden the fact that it uses reconstituted tobacco. Had Congressman Synar or ABC's reporters conducted even a cursory review of the public information on reconstituted tobacco, they would have learned that the process has been extensively discussed in published documents by the National Cancer Institute (in at least five reports), the Surgeon General (in at least three Surgeon General's Reports) and others. The Surgeon General's Reports also document that the use of reconstituted tobacco results in a reduction of nicotine.

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**CLAIM: REYNOLDS TOBACCO MANIPULATES THE NICOTINE IN ITS
PRODUCTS TO CREATE, MAINTAIN OR SATISFY ADDICTION**

This claim is also false. The fact is, Reynolds Tobacco and the other tobacco companies do market a broad range of cigarette products in response to the demands and tastes of today's adult cigarette smokers; and within that range of products, there is also a range of "tar" and nicotine yields. The company does not, however, establish specific nicotine yields or manipulate nicotine to create, maintain or satisfy "addiction."

It is important to understand that nicotine plays an essential role in the taste and "mouthfeel" of cigarette smoke, which are variables that affect smokers' enjoyment. (It is also interesting to note that tobacco is not the only common source of nicotine. Nicotine naturally occurs in a variety of common vegetables including tomatoes, potatoes, eggplant and green peppers.)

A wide variety of cigarette brands and styles are available today largely as a result of blending techniques and other manufacturing processes that developed over many decades. In addition to using blending techniques, cigarette manufacturers reduce "tar" yields through the puffing of tobacco, filtration, air dilution and tobacco reconstitution. These developments help manufacturers provide smokers with the wide selection of tastes and "tar" yields that they demand.

It is a simple fact that reducing "tar" yields automatically results in proportional reductions in nicotine. So as American smokers have demanded lower "tar" products over the years, the average nicotine yields in American cigarettes have also declined (by more than 60 percent over past 40 years, as detailed in the attached chart). Since 1970, U.S. cigarette manufacturers have been required to disclose "tar" and nicotine yields in product advertising (as determined by a method established by the FTC).

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The committee should be aware of the fact that cigarettes are an agriculturally based commodity and that the quality and smoking characteristics of tobacco, the primary raw material, can vary greatly from farm to farm and year to year. To ensure that any particular brand of cigarette tastes and smokes the same from month to month and year to year, tobacco companies must blend their products for consistency.

The committee should also be aware that any suggestions -- however erroneous -- that Reynolds Tobacco or any other manufacturer manipulates the nicotine levels in its products to create, maintain or satisfy an "addiction" would also indict, as drugs, a wide variety of consumer products industries that maintain product consistency and offer a variety of brand-style choices.

For example, soft drinks are available with varying caffeine levels, and caffeine-free versions are also available. Using the same logic that is being used to argue that cigarettes should be regulated as a drug, one could argue that the FDA should be regulating soft drinks as a drug, since: 1) unlike the practice of cigarette manufacturers with respect to nicotine, soft-drink manufacturers routinely add caffeine (a substance that so-called "caffeine addicts" seek because of its properties as a stimulant) to some of their products; and 2) soft-drink manufacturers have the ability to reduce or eliminate naturally occurring caffeine.

Similarly, American consumers can now buy beverages that have alcohol contents ranging from less than .05 percent (so-called "non-alcoholic" beer) to 190 proof (95 percent alcohol), with choices available for many proof levels in between. Alcohol is a physically addictive intoxicant that is often used to relieve stress and anxiety. Nonetheless, Reynolds Tobacco is not aware of any serious proposals for the FDA to regulate wine, beer or spirits as a drug.

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The bottom line is, smokers are no different from other American consumers in their demand for variety and choice (as evidenced by the fact that, today, the average supermarket stocks 30,000 different items). American cigarette manufacturers currently produce more than 500 cigarette brand styles, and the fact that those styles offer a variety of tastes and "tar" yields, is entirely consistent with the American consumers' preference for variety and choice. #####

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