



The Consumer Advocates for Smoke-free Alternatives Association

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Request for extension of comment deadline

I am writing on behalf of The Consumer Advocates for Smoke-free Alternatives Association (“CASAA”) to request an extension of the comment period for the Food and Drug Administration’s (“FDA”) advance notice of proposed rulemaking (“ANPRM”) entitled “Regulation of Flavors in Tobacco Products” (Docket No. FDA-2017-N-6565). CASAA is a public health and education NGO and is the leading representative of consumers who use--or who might choose in the future to use--low-risk, smoke-free tobacco/nicotine products, including e-cigarettes and smokeless tobacco.

We are requesting that the comment period for the advance notice of proposed rulemaking be extended by the FDA for an additional 90 days, from its current 90 days to a total of 180 days.

Days before issuing the ANPRM on Regulation of Flavors in Tobacco Products, FDA also issued an ANPRM entitled “Tobacco Product Standard for Nicotine Level of Combusted Cigarettes,” Docket No. FDA-2017-N-6189. Taken together, these two ANPRMs request information to support a fundamental and monumental shift in FDA’s approach to regulating tobacco/nicotine products. This shift would obviously have a profound impact on not only the industry, but on the consumers who use these products. Given the significance of the questions posed and the gravity of the potential impact on consumers, 90 days is an insufficient amount of time to respond to FDA’s questions.

Based upon the foregoing, we respectfully request that FDA extend the comment deadline by an additional 90 days.

Respectfully,
Alex Clark
CEO, CASAA

Your Comment Tracking Number: 1k2-93fw-utg6