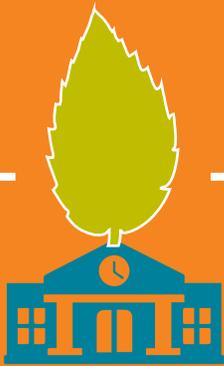


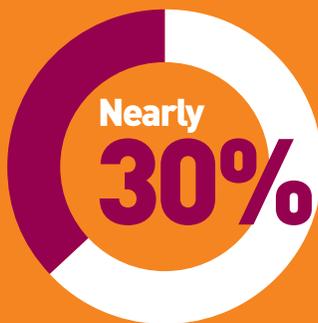
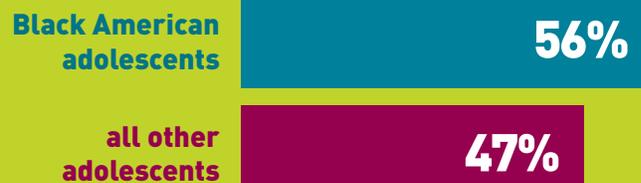
MENTHOL

The chemical compound menthol makes cigarettes easier to smoke and harder to quit.

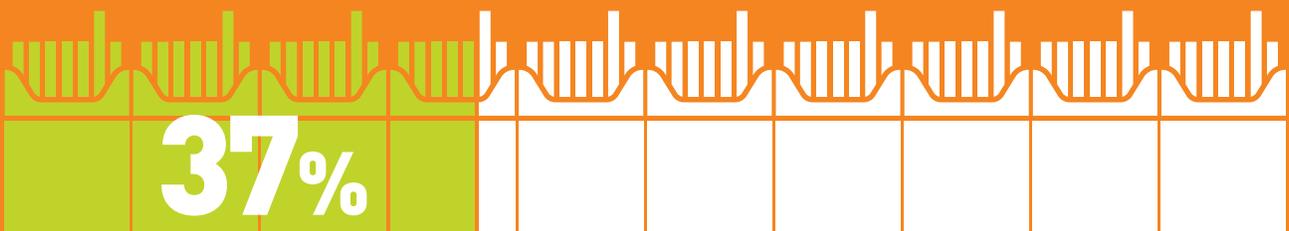


In 2021, 150,000 middle and high school students used menthol cigarettes

From 2018–2020, 56% of Black American adolescents who had smoked in the past 30 days used menthol cigarettes, compared with 47% for all other adolescents.



of high school students who used flavored e-cigarettes vaped menthol in 2021.



Menthol makes up a large portion — 37% in 2020 — of the cigarette market in the U.S.

BACKGROUND

The chemical compound menthol makes cigarettes easier to smoke and harder to quit. Menthol creates a cooling effect, reduces the harshness of cigarette smoke, and suppresses coughing. Those effects may make menthol cigarettes **more appealing to young, inexperienced smokers**, and research shows that they are more likely to **addict youth**. Because Black Americans use menthol cigarettes at higher rates, menthol also contributes to health inequities.

Menthol-flavored e-cigarettes, as well as other nicotine-containing products like pouches and lozenges, are also a concern. Among high school students who used flavored e-cigarettes in 2021, nearly 30% used menthol e-cigarettes.¹ And with menthol e-cigarette sales on the rise, there are concerns that menthol in tobacco products most popular with young people are playing a role in addicting a new generation to nicotine.

WHAT IS MENTHOL?

- > Menthol is a **chemical compound** extracted from peppermint or corn mint plants or created synthetically. It reduces the harshness of cigarette smoke due to its characteristic cooling effects on the mouth and throat.^{2,3} It also **suppresses the coughing reflex,⁴ which makes inhaling smoke from cigarettes more tolerable.**
- > Menthol was first added to cigarettes in the 1920s and 1930s, and became **widespread** in the 1950s and 1960s.⁵⁻⁷
- > Although most cigarettes contain some menthol, **certain brands use menthol in greater quantities**, making it detectible as a characterizing flavor.⁸ Tobacco manufacturers market and advertise those brands as “menthol cigarettes.”



Menthol creates a cooling effect, reduces the harshness of cigarette smoke, and suppresses coughing. Those effects may make menthol cigarettes more appealing to young, inexperienced smokers.

- Current **law prohibits** the use of characterizing **flavorings** in cigarettes, **except for menthol**. Public health groups have urged the Food and Drug Administration to ban menthol cigarettes for over a decade. After being sued for inaction on this issue, the **FDA reported in April 2021 that it plans to move forward to remove menthol from cigarettes and all flavors, including menthol, from cigars.**
- Although the FDA effectively banned certain cartridge-based flavored e-cigarettes products in 2020, menthol was one of the many exemptions to the policy. The FDA is currently deliberating on **whether menthol e-cigarettes currently on the market are appropriate for the protection of public health.**

PATTERNS OF USE IN THE U.S.

- In 2018, **6.85% of people** aged 12 or older used menthol cigarettes.⁹
- **Menthol cigarettes are slowing the reductions in overall cigarette smoking rates.** From 2005 to 2015, the decline in cigarette consumption was greater for non-menthol cigarettes than menthol cigarettes.^{10,11}
 - Between 2005 and 2015, non-menthol cigarette use among those 18+ decreased overall from 14.7% to 9.6%, according to research published in 2020.¹⁰ For the same group and timeframe, menthol cigarette use decreased overall from 5.3% to 4.4% — a much slower rate of decline, indicating that menthol cigarettes are slowing the decline of tobacco use in the U.S.¹⁰ And although use of menthol cigarettes significantly decreased for groups including women, 18- to 24-year-olds, 35- to 54-year-olds, non-Hispanic Whites, participants with high school degrees/GEDs, those with higher incomes, and those living in the northeast, there were greater decreases in the same groups for non-menthol cigarettes.¹⁰



- Menthol cigarette use remained stable or did not significantly decrease among males, adults ages 25–34 and 55+, American Indians/Alaskan Natives, and Hispanics between 2005 and 2015.¹⁰
- Menthol smoking prevalence now exceeds non-menthol smoking prevalence among both youth and young adults.¹⁰

- Research shows an association between menthol tobacco use and mental health symptoms:
 - Tobacco users who currently used menthol-flavored tobacco products reported anxiety and depression at higher prevalence than non-menthol tobacco users.¹²
 - Menthol cigarette use was correlated with more lifetime psychiatric hospitalizations in a study of young adult smokers with severe mental illness.¹³
 - Among individuals with substance abuse disorders, more than half (53.2%) of smokers used menthol cigarettes, compared to 30% of smokers in the general population who did so.¹⁴
- Youth remain the age group most likely to use menthol cigarettes.
- Among current cigarette smokers (those who have smoked in the past 30 days), **39.9% used menthol cigarettes** in 2018,⁹ compared to **38.8%** from 2012 to 2014 and **35%** from 2008 to 2010.¹¹
- Menthol cigarette smoking is more prevalent among **youth**,¹⁵ **female** smokers,¹⁵⁻¹⁹ **racial and ethnic minorities**,¹⁵⁻²⁰ **sexual minorities**²¹ and those with **mental illness**.^{18,22}
- **Black American** smokers **predominantly use menthol cigarettes**.¹⁵ In 2018, **85%** of Black American smokers aged 12 and older preferred menthol cigarettes.⁹
- Menthol cigarette use is **significantly lower among youth whose parents had at least a college degree** compared to those with less education.²³ Young people also exclusively used menthol cigarettes at significantly lower rates if their annual household income was high and if they lived in a home that was owned rather than not.²³



Tobacco users who currently used menthol-flavored tobacco products reported anxiety and depression at higher prevalence than non-menthol tobacco users.

YOUTH AND YOUNG ADULTS

Young people use menthol tobacco products, including cigarettes and e-cigarettes, at disproportionately high rates, which could facilitate nicotine addiction.

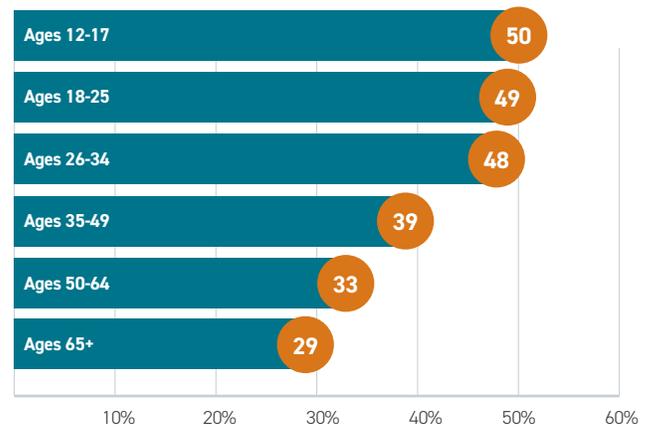
CIGARETTES

- > Menthol reduces the harshness of cigarette smoke, which may appeal to young, inexperienced smokers.^{2,24,25}
- > Preference for menthol among cigarette smokers remains inversely correlated with age: 49.7% of 12-17-year-old cigarette smokers used menthol compared to 29.2% of those 65 years old or older in 2018.⁹
- > Longitudinal studies show that initiation with menthol cigarettes facilitates progression to established cigarette use among young smokers.^{26,27}
- > In young people, using menthol cigarettes and cigars first is associated with continued cigarette use.²⁸ Data from nationally representative samples show that the youngest cigarette smokers use menthol at the highest rates (Figure 1).^{9,15,16}
- > In 2021, 150,000 middle and high school students used menthol cigarettes, based on the National Youth Tobacco Survey.²⁹ 38.8% of middle and high school students who used cigarettes used menthol cigarettes.²⁹
- > A nationally representative study found that, among youth and young adults, non-menthol cigarette prevalence declined from 2004 to 2010. By contrast, menthol cigarette prevalence remained constant among youth and increased among young adults over this period.¹⁵

E-CIGARETTES

- > Flavors are a top reason why young people begin using e-cigarettes. Research shows that mint and menthol e-cigarette use among high

Menthol cigarette preference among cigarette smokers in the U.S by age, 2018



Source: Tobacco control⁹

school users rose from 16% in 2016 to 57.3% in 2019.³⁰ Among high school JUUL users, 67.5% reported that their preferred flavor was mint or menthol.³⁰ Another study, conducted before JUUL pulled its other flavors from the market, found that mint was one of the most popular flavors among high school student JUUL users, but that menthol was less so.³¹ Study authors caution that leaving mint and menthol flavors on the market undermines the purpose of removing flavors — which is to prevent kids from using e-cigarettes at all.³¹

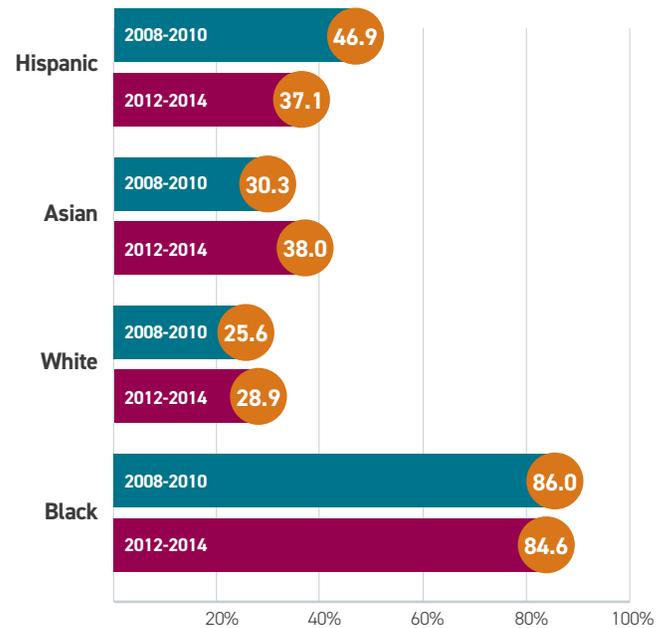
- > In 2021, 470,000 middle and high school students used menthol-flavored e-cigarettes in the past 30 days, according to the NYTS.¹
- > Among high school students who currently used any type of flavored e-cigarettes, in 2021, 29.8% used menthol-flavored e-cigarettes.¹
- > Menthol-flavored e-cigarettes continue to rise in popularity. By March 2020, menthol-flavored e-cigarette sales had risen to an all-time high of 57.7% market share.

MINORITY GROUPS

CIGARETTES

- > Menthol cigarettes disproportionately harm Black Americans. Among Black Americans over 1980-2018, menthol cigarettes were responsible for 1.5 million new smokers, 157,000 smoking-related premature deaths and 1.5 million life-years lost, according to a 2021 study published in Tobacco Control.³² While Black Americans constitute 12% of the total U.S. population, these figures represent, respectively, 15%, 41% and 50% of the total menthol cigarette-related harm.
- > Most Black American youth smokers use menthol cigarettes. From 2008 to 2010, 94.9% of Black American youth current smokers used menthol cigarettes. Other racial and ethnic groups used them in lower numbers, including just over half — 51.3%— of white youth current smokers.¹⁵
- > From 2008 to 2010, menthol cigarette use among young adult current smokers (ages 18 to 25) was 93.9% among Black Americans, compared with 36.3% among whites, 47.3% among Hispanics and 49.7% among Asian-Americans.¹⁵
- > Menthol and non-menthol cigarette use among adolescents fell by more than half between 2012 and 2020. From 2018-2020, 0.95% of Black American adolescents smoked menthol cigarettes in the past 30 days, about half of the 1.98% of non-black adolescents who smoked menthol cigarettes.³³ Menthol use went down for Black American adolescents but not significantly as it did for adolescents who were white, Hispanic, or other race/ethnicities.³³ From 2018–2020, 56% of Black American adolescents who had smoked in the past 30 days used menthol cigarettes, compared with 47% for all other adolescents.³³ From 2012–2014, a

Menthol cigarette use among current smokers (aged 12+) in the U.S. by race/ethnicity



Source: Tobacco control⁹

majority of both Black American (68%) and all other adolescent smokers (51%) used menthol cigarettes.³³

- > In 2020, 51% of lesbian and gay smokers and 46% of bisexual smokers used menthol cigarettes, compared with 39% of heterosexual smokers.⁷

E-CIGARETTES

- > Black American young adults between the ages of 18-34 were less likely to use non-tobacco and non-menthol flavored e-cigarettes than white respondents, according to research published in Drug and Alcohol Dependence in 2018.³⁴
- > White youth were dual users of e-cigarettes and menthol cigarettes at higher rates compared to Black American youth (2.2% vs. 0.3%).²³

HEALTH EFFECTS

Menthol cigarettes offer no health benefit to smokers, and, in fact, are easier to start smoking and more difficult to quit than regular cigarettes. Truth Initiative® agrees with the Tobacco Products Scientific Advisory Committee that menthol cigarettes pose a threat to public health above and beyond that posed by regular cigarettes.

- > Menthol flavoring contributes to addiction in youth smokers.^{2,3,5,35}
- > Recent research points to multiple mechanisms that may play a role in the addictive potential of menthol. Menthol fundamentally alters nicotine receptors, masks the adverse sensory properties of tobacco products (which ultimately may enhance nicotine intake and drive relapse), and alters nicotine metabolism, increasing its bioavailability, according to a 2020 review published in *Nicotine & Tobacco Research*.³⁶
- > Adolescent menthol smokers show significantly higher levels of nicotine dependence, tolerance and emotional attachment to cigarettes, compared to non-menthol smoking peers, according to a 2020 study.³⁷

CIGARETTES

- > There are no health benefits associated with smoking menthol cigarettes, compared with smoking non-menthol cigarettes.³⁸
- > Menthol cigarettes are as dangerous to an individual's health as non-menthol cigarettes,¹⁵ and menthol cigarette smokers are as likely to experience premature morbidity and mortality as non-menthol cigarette smokers.³⁹
- > Menthol cigarettes were responsible for 10.1 million extra smokers, 3 million life years lost and 378,000 premature deaths between 1980 and 2018, according to a 2021 study published in *Tobacco Control*.⁴⁰ Menthol cigarettes were also responsible for slowing down the decline in smoking prevalence by 2.6% (from 13.7% in 1980 vs. 11.1% in 2018).⁴⁰
- > Adult menthol smokers report taking less time to have their first cigarette after waking than non-menthol smokers. Time to first cigarette is an important indicator of nicotine addiction.⁴¹⁻⁴³ Scientific evidence establishes that adult menthol smokers are less likely than non-menthol smokers to successfully quit smoking^{5,44-52} despite greater quit intentions⁴⁹ and quit attempts.^{46,49,53} Studies show significantly reduced rates of quitting among Black American^{5,44,45} and Hispanic menthol smokers compared with non-menthol smokers.⁴⁵
- > Adolescent menthol cigarette smokers were more likely to smoke more frequently and be more dependent on cigarettes compared to non-menthol cigarette smokers.⁵⁴ Adolescents who smoked menthol cigarettes were less likely to report intentions to quit in the next year, a finding that runs counter to trends in adult menthol smokers.⁵⁴



Menthol cigarettes offer no health benefit to smokers, and, in fact, are easier to start smoking and more difficult to quit than regular cigarettes.

E-CIGARETTES

- ⊗ In menthol-flavored e-cigarettes, there are health concerns related to pulegone — a compound found in prepared oil extracts of certain mint plants. Pulegone is a known carcinogen, and the tobacco industry has in the past reduced the amount of this compound in menthol tobacco products as a result of toxicity concerns. The FDA banned pulegone as a food additive in 2018, yet studies have identified that substantial amounts of this additive are found in mint and menthol e-liquid in the U.S. — raising concerns about the potential toxicity of these popular flavors.
- ⊗ Young people who vape fruit-, menthol-, and mint-flavored e-cigarettes with higher nicotine concentrations had greater nicotine dependence compared to those who used e-cigarettes with lower nicotine levels, according to a 2021 Truth Initiative study.⁵⁵

MARKETING IN THE U.S.

- ⊗ Menthol makes up a large portion of the cigarette market in the U.S.: 37% in 2020^{56,27}, up from 26% in 2000.
- ⊗ The tobacco industry has a well-documented history of developing and marketing mentholated brands to racial and ethnic minorities and youth.⁵⁸⁻⁶²
- ⊗ In a national sample of U.S. tobacco retailers, price promotions for the Newport brand of menthol cigarettes were nearly twice as common in neighborhoods with the highest proportion of Black residents, and prices for Newport cigarettes were cheaper in neighborhoods with the greatest proportion of youth, Black residents, and lower-income households.⁶³
- ⊗ Young people living in areas with lower incomes, higher proportions of racial/ethnic minorities, and higher smoking rates in D.C. had 7.2 times the odds of being exposed to flavored tobacco marketing, compared with those not living in those communities according to a 2021 Truth Initiative study published in the *Annals of Behavioral Medicine*.⁶⁴
- ⊗ Tobacco stores in Washington, D.C. neighborhoods with higher percentages of Black residents had more marketing for flavored tobacco products — especially for flavored cigars — compared to neighborhoods with lower percentages of Black residents, according to a 2022 study published by the University of Kentucky College of Medicine in collaboration with Truth Initiative researchers.⁶⁵
- ⊗ Similar marketing trends were seen in California, where tobacco retailers in neighborhoods with greater proportions of Black residents were significantly more likely to advertise menthol cigarettes compared to stores in neighborhoods with the lowest proportion of Black residents, according to a 2021 study published in *Tobacco Control*.⁶⁶ The study also found that Newport cigarettes were about 25 cents cheaper in neighborhoods with higher proportions of Black residents, compared to stores with the lowest proportion of Black residents.⁶⁶
- ⊗ Evidence from tobacco industry documents shows that the industry studied smokers' menthol preferences and manipulated menthol levels to appeal to a variety of smokers, including adolescents and young adults.^{24,25,59,67}
- ⊗ Evidence from tobacco industry documents also shows that tobacco companies specifically targeted Black Americans with menthol cigarette advertising.^{62,68-70}



- A 2011 review found that menthol marketing is higher in publications and venues that appeal to Black American audiences.⁶¹
- Numerous studies show targeted marketing of menthol cigarettes at the point of sale in Black American communities throughout the U.S.⁷¹⁻⁷⁵

POLICY IN THE U.S.

- The 2009 Family Smoking Prevention and Tobacco Control Act gave the FDA the authority to regulate tobacco products. The law specifically prohibits the use of characterizing flavorings in cigarettes, except for menthol.⁷⁶ Nonetheless, it preserves the FDA's regulatory authority to ban menthol.
- In March 2011, The Tobacco Products Scientific Advisory Committee (TPSAC) published a review of menthol cigarettes' effect on youth and other vulnerable populations, a requirement of the Tobacco Control Act. The committee concluded that "the removal of menthol cigarettes from the marketplaces would benefit public health in the United States."



- Lorillard Tobacco Company (now R.J. Reynolds Tobacco Company) challenged the integrity of the TPSAC in a lawsuit against the FDA, alleging that several experts the agency appointed to the committee were conflicted and therefore must be removed. The judge in the case sided with Lorillard and prohibited the FDA from using the TPSAC menthol report. The FDA appealed, and, in January 2016, the D.C. Circuit reversed the district court's decision, allowing the agency to rely on the TPSAC menthol report to take action to regulate menthol tobacco products.
- In July 2013, the FDA published its own report that also concluded that the removal of menthol cigarettes from the market would improve public health. At the same time, the FDA requested public comment seeking additional information to help the agency make informed decisions about menthol in cigarettes. In March 2018, the FDA again requested public comment on the role that menthol in tobacco products plays in attracting youth, in the likelihood of quitting smoking, and in the use of other tobacco products, including cigars and e-cigarettes.
- In April 2021, in response to a citizen petition and a lawsuit from public health groups against the FDA for delaying banning menthol, the FDA announced plans to move forward to remove menthol from cigarettes and remove all flavors, including menthol, from cigars.
- In April 2022, the FDA **proposed product standards** to prohibit menthol as a characterizing flavor in cigarettes and prohibit all characterizing flavors in cigars.
- In October 2023, the FDA sent the proposed rules to remove menthol cigarettes and flavored cigars from the market to the White House Office of Management and Budget for final review, a long-awaited development since the FDA announced the proposal in 2021.
- In December 2023, the Biden Administration delayed finalizing the proposed rules until March 2024.

STATE AND LOCAL POLICIES

While many localities have prohibited flavored tobacco products in some way, most of these exclude menthol, mint or wintergreen. However, several [localities](#) do include menthol in their flavor bans. As of September 30, 2023, 127 jurisdictions have fully comprehensive policies that prohibit sales of all types of flavored tobacco products, including menthol/mint/wintergreen tobacco products, at all retailers.⁷⁷ Despite research showing that menthol cigarettes are easier to start smoking and harder to quit,⁷⁰ only 2.96% of the U.S. population is covered by a comprehensive state or local flavored tobacco sales restriction.

Research provides strong evidence that local policies restricting flavored tobacco products reduce availability, marketing, and sales of such products — some of the immediate intended outcomes of the legislation, according to Truth Initiative research published in *Nicotine & Tobacco Research*.⁷⁸

As of September 30, 2023⁷⁹:

- > **Massachusetts** prohibits the sale of all flavored tobacco products, including menthol, except in smoking bars.
- > In **California**, 94 localities including Los Angeles County, Oakland, Sacramento, and San Francisco, prohibit the sale of all flavored tobacco products, including menthol.
- > Six localities in **Colorado**, including Aspen, prohibit the sale of all flavored tobacco products, including menthol.
- > Five localities in **Maine** prohibit the sale of all flavored tobacco products, including menthol.
- > 10 localities in **Minnesota** prohibit the sale of all flavored tobacco products, including menthol.
- > **Manheim, New York** prohibits the sale of all flavored tobacco products, including menthol.
- > **Chicago, Illinois** prohibits the sale of flavored tobacco products, including menthol, within 500 feet of any city high school.⁸⁰

See Truth Initiative's [full list of state and local flavored tobacco policies](#).



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Tobacco industry opposition

At the local, state and national levels, the tobacco industry has worked hard to undermine government efforts to restrict the availability of menthol tobacco products. In California, a bill prohibiting the sale of most flavored tobacco products was signed into law in August 2020, despite heavy opposition from the tobacco industry. In fact, the industry implemented a media blitz of television and social media ads, arguing the law would increase racial profiling by law enforcement.⁸¹⁻⁸⁵ The tobacco industry then was able to gather enough signatures to seek a referendum, which Californians will vote on in November 2022.⁸⁶ As of December 31, 2021, the political action committee to overturn the law has contributed more than \$21 million to the campaign, including \$10.3 million from R.J. Reynolds and \$9.8 million from Philip Morris.⁸⁷

The industry often cites a concern that menthol bans will lead to a market for dangerous illicit trade, despite sparse and overstated evidence to support that concern.⁸⁸⁻⁹⁰ Research shows that illicit menthol cigarette purchases were low following menthol bans in seven Canadian provinces.⁹¹ The tobacco industry has also attempted to spread fear that menthol bans unfairly target Black Americans and would lead to further criminalization of the community. R.J. Reynolds, also the maker of the leading menthol cigarette brand Newport, recruited prominent Black leaders, including civil rights activist Rev. Al Sharpton, to host town halls across the country on the subject. The public health community criticized these events as deceptive and exploitative.⁹²

The tobacco industry also opposes menthol sales restrictions by warning of severe economic losses for communities. A case study of **Minneapolis and Saint Paul, Minnesota** co-authored by Truth Initiative researchers shows that restricting menthol cigarette sales from convenience stores in the two cities would result in projected annual profit losses of about \$6M for Minneapolis and \$4M for Saint Paul – contrasting sharply with tobacco industry estimates of losses of at least six times greater.⁹³ Also, the number of tobacco retailers in both cities remained largely the same as it was prior to the ban, suggesting economic stability. The Minnesota examples suggest that it is possible to successfully implement flavor regulations without an overwhelmingly negative economic impact for tobacco retailers.

ESTIMATED EFFECTS OF MENTHOL BANS

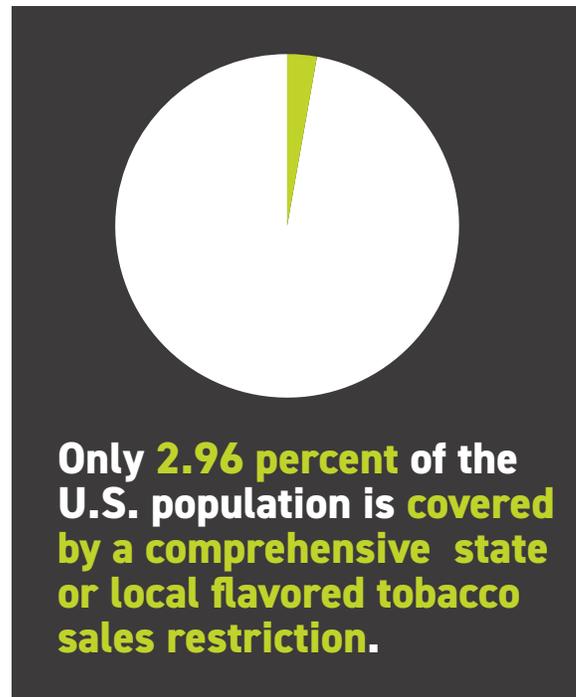
UNITED STATES

- A hypothetical ban on menthol cigarettes and cigars in the U.S. would reduce overall smoking by 15% by 2026 due to menthol smokers quitting smoking and vaping, according to study published in the British Medical Journal in 2022.⁹⁴ The study also finds that by 2060, a national menthol ban would reduce cumulative deaths from smoking and vaping by 650,000 (5%) and save 11.3 million life-years (8.8%).⁹⁴
- A hypothetical menthol ban in New York City was projected to save an average of \$1,836 in healthcare costs per person, or \$1.62 billion among all adult smokers over a 20-year period.⁹⁵
- A study of U.S. adult menthol smokers found that a ban on menthol cigarettes or on all menthol products was effective in reducing cigarette purchases, but that tobacco marketing strategies including offering replacement products might undermine the benefits of such a ban.⁹⁶

- > CDC data collected in 2021 shows that most U.S. adults (62.3%) support policies to eliminate menthol cigarettes, with 57.3% supporting a policy prohibiting the sale of all tobacco products. This number has grown since data was collected in a 2018 survey, which found that 56.4% of adults reported supporting the federal removal of menthol cigarettes.⁹⁷ The 2018 survey also found that support was especially strong among Black Americans (60.5%) and other groups who have been targeted by the tobacco industry, including women (62.5%) and Hispanic/Latinos (69.3%).
- > Among U.S. smokers, about 25–64% would attempt to quit smoking and 11–46% would consider switching to other tobacco products, including 15–30% to e-cigarettes, in response to a hypothetical menthol ban.⁹⁸
- > Black American smokers were more likely to report intentions to quit (47%) compared to white individuals (34%), according to a 2020 review of effects of a menthol ban.⁹⁸ A survey of menthol smokers in Minnesota also found that Black American menthol smokers were twice as likely to report quitting intentions compared to white menthol smokers (76.0% vs. 30.3%, respectively).^{98,99}
- > Among young adult menthol smokers (aged 18-24), 64.6% reported that they would quit smoking and not use any other products if menthol cigarettes were banned.¹⁰⁰
- > Adult dual users of e-cigarettes and cigarettes who used menthol cigarettes were more likely to prefer menthol flavored e-cigarettes compared to other flavors.¹⁰¹

INTERNATIONAL

- > Menthol bans were found to reduce sales and increase smoking cessation with only partial substitution for non-menthol cigarettes, according to an international review of implemented and hypothetical menthol bans.⁹⁸
- > A 2017 ban on menthol tobacco products in Ontario, Canada resulted in significant reduction in menthol cigarette and total cigarette sales after the ban went into effect, compared to a province without



- a menthol ban.¹⁰² Although most smokers who used menthol cigarettes before they were banned in certain provinces in Canada switched to non-menthol cigarettes, 21.5% quit smoking.¹⁰³ Menthol smokers were 1.6 times more likely to try to quit and 2.3 times more likely to remain quit compared to non-menthol smokers.¹⁰³ In Alberta, Canada, after a menthol ban went into effect, brands that identified as menthol before the ban were repackaged after the ban to convey that they were menthol replacements.¹⁰⁴
- > A ban on menthol-flavored cigarettes went into effect in EU countries in May 2020, but bans menthol as a characterizing flavor instead of as an ingredient, applies to cigarettes but not other products, and took four years to go into effect, weaknesses which the tobacco industry exploited.¹⁰⁵ For example, Japan Tobacco International (JTI), the third largest tobacco multinational, rebranded some of its menthol cigarettes in the months before the law went into effect, claiming that the products did not have the "characterizing flavor" specifically banned, though the company admitted that there is no way to know this for sure.¹⁰⁶ A subsequent investigation found significant levels of menthol in JTI's newer products.¹⁰⁷



ACTION NEEDED: MENTHOL IN TOBACCO PRODUCTS

Consistent with a vision of a future where tobacco is a thing of the past, **Truth Initiative supports the following policies regarding menthol in tobacco products:**

- › The FDA should issue product standards to remove menthol and finalize that rule as quickly as possible to accelerate the process of protecting the public from menthol tobacco products.
- › The **FDA must issue a product standard eliminating menthol as a characterizing flavor from all tobacco products**, particularly cigarettes, cigars and other combustible tobacco.
- › The FDA should **regulate menthol in e-cigarettes the same way that it does other flavored e-cigarettes**. FDA authorization of menthol e-cigarettes would be inconsistent with the agency's handling of other e-cigarette flavors.
- › **State and local entities** should enact policies **prohibiting the sale of flavored tobacco products**, including menthol, mint and wintergreen flavors.
- › The **marketing** of all flavored tobacco products, including menthol, should be **restricted so that it does not target youth or minorities**.

These actions are especially urgent because the FDA has repeatedly failed to act, despite long-standing, overwhelming evidence that a menthol ban would benefit public health.

REFERENCES

- 1 Park-Lee E, Ren C, Sawdey MD, et al. Notes from the field: e-cigarette use among middle and high school students—National Youth Tobacco Survey, United States, 2021. *Morbidity and Mortality Weekly Report*. 2021;70(39):1387.
- 2 Tobacco Products Scientific Advisory Committee. *Menthol Cigarettes and Public Health: Review of the Scientific Evidence and Recommendations*. Rockville, MD: Center for Tobacco Products, Food and Drug Administration;2011.
- 3 Yerger VB, McCandless PM. Menthol sensory qualities and smoking topography: a review of tobacco industry documents. *Tobacco Control*. 2011;20 Suppl 2:ii37-43.
- 4 Millqvist E, Ternesten-Hasseus E, Bende M. Inhalation of menthol reduces capsaicin cough sensitivity and influences inspiratory flows in chronic cough. *Respiratory Medicine*. 2013;107(3):433-438.
- 5 Tobacco Products Scientific Advisory Committee's Report and Recommendations on the Impact of the Use of Menthol in Cigarettes on the Public Health. 2011.
- 6 Ogden M. Senior Director of Regulatory Oversight, R. J. Reynolds Tobacco Company. Tobacco Products Scientific Advisory Committee Meeting Minutes. Available at: <http://www.fda.gov/downloads/AdvisoryCommittees/CommitteesMeetingMaterials/TobaccoProductsScientificAdvisoryCommittee/UCM229742.pdf>. Updated July 15, 2010. Accessed.
- 7 Reid JR. A History of Mentholated Cigarettes: "This Spud's For You". Phillip Morris. Legacy Tobacco Documents Library. Bates No. 2081595850/5863. Available at: <http://legacy.library.ucsf.edu/tid/tvj86c00>. Accessed.
- 8 Ai J, Taylor KM, Lisko JG, Tran H, Watson CH, Holman MR. Menthol Content in US Marketed Cigarettes. *Nicotine & Tobacco Research: Official Journal of the Society for Research on Nicotine and Tobacco*. 2015.
- 9 Delnevo CD, Ganz O, Goodwin RD. Banning menthol cigarettes: a social justice issue long overdue. In. Vol 22: Oxford University Press US; 2020:1673-1675.
- 10 Mattingly DT, Hirschtick JL, Meza R, Fleischer NL. Trends in prevalence and sociodemographic and geographic patterns of current menthol cigarette use among US adults, 2005–2015. *Preventive Medicine Reports*. 2020;20:101227.
- 11 Villanti AC, Mowery PD, Delnevo CD, Niaura RS, Abrams DB, Giovino GA. Changes in the prevalence and correlates of menthol cigarette use in the USA, 2004-2014. *Tobacco Control*. 2016;25(Suppl 2):ii14-ii20.
- 12 Cohn AM, Johnson AL, Hair E, Rath JM, Villanti AC. Menthol tobacco use is correlated with mental health symptoms in a national sample of young adults: implications for future health risks and policy recommendations. *Tobacco Induced Diseases*. 2016;14(1):1-10.
- 13 Brunette MF, Ferron JC, Geiger P, Villanti AC. Menthol cigarette use in young adult smokers with severe mental illnesses. *Nicotine and Tobacco Research*. 2019;21(5):691-694.
- 14 Gubner NR, Williams DD, Pagano A, Campbell BK, Guydish J. Menthol cigarette smoking among individuals in treatment for substance use disorders. *Addictive behaviors*. 2018;80:135-141.
- 15 Giovino GA, Villanti AC, Mowery PD, et al. Differential trends in cigarette smoking in the USA: is menthol slowing progress? *Tobacco Control*. 2015;24(1):28-37.
- 16 Caraballo RS, Asman K. Epidemiology of menthol cigarette use in the United States. *Tobacco Induced Diseases*. 2011;9 Suppl 1:S1.
- 17 Rock VJ, Davis SP, Thorne SL, Asman KJ, Caraballo RS. Menthol cigarette use among racial and ethnic groups in the United States, 2004-2008. *Nicotine & Tobacco Research: Official Journal of the Society for Research on Nicotine and Tobacco*. 2010;12 Suppl 2:S117-124.
- 18 Hickman NJ, 3rd, Delucchi KL, Prochaska JJ. Menthol use among smokers with psychological distress: findings from the 2008 and 2009 National Survey on Drug Use and Health. *Tobacco Control*. 2014;23(1):7-13.
- 19 Rath JM, Villanti AC, Williams VF, Richardson A, Pearson JL, Vallone DM. Correlates of current menthol cigarette and flavored other tobacco product use among U.S. young adults. *Addictive Behaviors*. 2016;62:35-41.
- 20 Mukherjee A, Wackowski OA, Lee YO, Delnevo CD. Asian American, Native Hawaiian and Pacific Islander tobacco use patterns. *American Journal of Health Behavior*. 2014;38(3):362-369.
- 21 Fallin A, Goodin AJ, King BA. Menthol cigarette smoking among lesbian, gay, bisexual, and transgender adults. *American Journal of Preventive Medicine*. 2015;48(1):93-97.
- 22 Cohn AM, Johnson AL, Hair E, Rath JM, Villanti AC. Menthol tobacco use is correlated with mental health symptoms in a national sample of young adults: implications for future health risks and policy recommendations. *Tobacco Induced Diseases*. 2016;14:1.
- 23 Patel A, Hirschtick JL, Cook S, et al. Sociodemographic Patterns of Exclusive and Dual Use of ENDS and Menthol/Non-Menthol Cigarettes among US Youth (Ages 15–17) Using Two Nationally Representative Surveys (2013–2017). *International Journal of Environmental Research and Public Health*. 2021;18(15):7781.
- 24 Klausner K. Menthol cigarettes and smoking initiation: a tobacco industry perspective. *Tobacco Control*. 2011;20 Suppl 2:ii12-19.
- 25 U.S. Department of Health and Human Services. Preventing tobacco use among youth and young adults: a report of the Surgeon General. Atlanta, GA: US Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health. 2012.
- 26 Nonnemaker J, Hersey J, Homsy G, Busey A, Allen J, Vallone D. Initiation with menthol cigarettes and youth smoking uptake. *Addiction*. 2013;108(1):171-178.
- 27 Dauphinee AL, Doxey JR, Schleicher NC, Fortmann SP, Henriksen L. Racial differences in cigarette brand recognition and impact on youth smoking. *BMC Public Health*. 2013;13(1):170.
- 28 Villanti AC, Johnson AL, Halenar MJ, et al. Menthol and mint cigarettes and cigars: Initiation and progression in youth, young adults and adults in Waves 1–4 of the PATH Study, 2013–2017. *Nicotine and Tobacco Research*. 2021;23(8):1318-1326.

- 29 Gentzke AS, Wang TW, Cornelius M, et al. Tobacco Product Use and Associated Factors Among Middle and High School Students—National Youth Tobacco Survey, United States, 2021. *MMWR Surveillance Summaries*. 2022;71(5):1.
- 30 Cullen KA, Gentzke AS, Sawdey MD, et al. E-cigarette use among youth in the United States, 2019. *JAMA*. 2019;322(21):2095-2103.
- 31 Leventhal AM, Miech R, Barrington-Trimis J, Johnston LD, O'Malley PM, Patrick ME. Flavors of e-cigarettes used by youths in the United States. *JAMA*. 2019;322(21):2132-2134.
- 32 Mendez D, Le TT. Consequences of a match made in hell: the harm caused by menthol smoking to the Black American population over 1980–2018. *Tobacco Control*. 2021.
- 33 Miech RA, Leventhal AM, Johnson LD. Recent, national trends in US adolescent use of menthol and non-menthol cigarettes. *Tobacco Control*. 2021.
- 34 Chen JC, Green KM, Arria AM, Borzekowski DL. Prospective predictors of flavored e-cigarette use: a one-year longitudinal study of young adults in the US. *Drug and Alcohol Dependence*. 2018;191:279-285.
- 35 Hoffman AC, Simmons D. Menthol cigarette smoking and nicotine dependence. *Tobacco Induced Diseases*. 2011;9 Suppl 1:S5.
- 36 Wickham RJ. The biological impact of menthol on tobacco dependence. *Nicotine and Tobacco Research*. 2020;22(10):1676-1684.
- 37 Cwalina SN, Majmundar A, Unger JB, Barrington-Trimis JL, Pentz MA. Adolescent menthol cigarette use and risk of nicotine dependence: Findings from the national Population Assessment on Tobacco and Health (PATH) study. *Drug and Alcohol Dependence*. 2020;206:107715.
- 38 Food & Drug Administration TPSAC. Preliminary Scientific Evaluation of the Possible Public Health Effects of Menthol Versus Nonmenthol Cigarettes. Food and Drug Administration <http://www.fda.gov/downloads/UCM361598.pdf>. Accessed.
- 39 Hoffman AC. The health effects of menthol cigarettes as compared to non-menthol cigarettes. *Tobacco Induced Diseases*. 2011;9 Suppl 1:S7.
- 40 Le TT, Mendez D. An estimation of the harm of menthol cigarettes in the United States from 1980 to 2018. *Tobacco Control*. 2021.
- 41 Ahijevych K, Parsley L. Smoke constituent exposure and stage of change in black and white women cigarette smokers. *Addictive Behaviors*. 1999;24:115 - 120.
- 42 Muscat JE, Liu HP, Stellman SD, Richie JP, Jr. Menthol smoking in relation to time to first cigarette and cotinine: results from a community-based study. *Regulatory Toxicology and Pharmacology: RTP*. 2012;63(1):166-170.
- 43 Rosenbloom J, Rees VW, Reid K, Wong J, Kinnunen T. A cross-sectional study on tobacco use and dependence among women: Does menthol matter? *Tobacco Induced Diseases*. 2012;10(1).
- 44 Stahre M, Okuyemi KS, Joseph AM, Fu SS. Racial/ethnic differences in menthol cigarette smoking, population quit ratios and utilization of evidence-based tobacco cessation treatments. *Addiction*. 2010;105:75-83.
- 45 Gundersen DA, Delnevo CD, Wackowski O. Exploring the relationship between race/ethnicity, menthol smoking, and cessation, in a nationally representative sample of adults. *Preventative Medicine*. 2009;49(6):553-557.
- 46 Pletcher MJ, Hulley BJ, Houston T, Kiefe CI, Benowitz N, Sidney S. Menthol cigarettes, smoking cessation, atherosclerosis, and pulmonary function: the Coronary Artery Development in Young Adults (CARDIA) study. *Archives of Internal Medicine*. 2006;166:1915-1922.
- 47 Gandhi K, Foulds J, Steinberg M, Lu S, Williams J. Lower quit rates among Black American and Latino menthol cigarette smokers at a tobacco treatment clinic. *Int J Clin Pract*. 2009;63(3):360-367.
- 48 Okuyemi KS, Faseru B, Sanderson Cox L, Bronars CA, Ahluwalia JS. Relationship between menthol cigarettes and smoking cessation among Black American light smokers. *Addiction*. 2007;102(12):1979-1986.
- 49 Trinidad DR, Pérez-Stable EJ, Messer K, White MM, Pierce JP. Menthol cigarettes and smoking cessation among racial/ethnic groups in the United States. *Addiction*. 2010;105:84-94.
- 50 Levy DT, Blackman K, Tauras J, et al. Quit attempts and quit rates among menthol and nonmenthol smokers in the United States. *American Journal of Public Health*. 2011;101(7):1241-1247.
- 51 Okuyemi K, Ahluwalia J, Ebersole-Robinson M, Catley D, Mayo M, Resnicow K. Does menthol attenuate the effect of bupropion among Black American smokers? *Addiction*. 2003;98(10):1387-1393.
- 52 Delnevo CD, Gundersen DA, Hrywna M, Echeverria SE, Steinberg MB. Smoking-cessation prevalence among U.S. smokers of menthol versus non-menthol cigarettes. *American Journal of Preventative Medicine*. 2011;41(4):357-365.
- 53 Levy DT, Pearson JL, Villanti AC, Blackman K, Vallone D, Abrams D. Modeling the future effects of a menthol ban on reduced smoking prevalence and deaths averted in the United States. *American Journal of Public Health*. 2011;101(7):1236-1240.
- 54 Mantey DS, Chido-Amajuoyi OG, Omega-Njemnobi O, Montgomery L. Cigarette smoking frequency, quantity, dependence, and quit intentions during adolescence: comparison of menthol and non-menthol smokers (national youth tobacco survey 2017–2020). *Addictive Behaviors*. 2021;121:106986.
- 55 Do EK, O'Connor K, Kreslake JM, Friedrichsen SC, Vallone DM, Hair EC. Influence of Flavors and Nicotine Concentration on Nicotine Dependence in Adolescent and Young Adult E-Cigarette Users. *Substance Use & Misuse*. 2022;57(4):632-639.
- 56 Commission FT. *Federal Trade Commission Cigarette Report for 2020*. 2021.
- 57 Federal Trade Commission. *Federal Trade Commission Cigarette Report for 2016*. 2018.
- 58 Kelton MH, Jr., Givel MS. Public policy implications of tobacco industry smuggling through Native American reservations into Canada. *International Journal of Health Services: Planning, Administration, Evaluation*. 2008;38(3):471-487.

- 59 Kreslake JM, Wayne GF, Connolly GN. The menthol smoker: tobacco industry research on consumer sensory perception of menthol cigarettes and its role in smoking behavior. *Nicotine & tobacco research: official journal of the Society for Research on Nicotine and Tobacco*. 2008;10(4):705-715.
- 60 Cruz TB, Wright LT, Crawford G. The menthol marketing mix: targeted promotions for focus communities in the United States. *Nicotine & Tobacco Research: Official Journal of the Society for Research on Nicotine and Tobacco*. 2010;12 Suppl 2:S147-153.
- 61 Anderson SJ. Marketing of menthol cigarettes and consumer perceptions: a review of tobacco industry documents. *Tobacco Control*. 2011;20 Suppl 2:ii20-28.
- 62 U.S. Department of Health and Human Services. Tobacco Use Among U.S. Racial/Ethnic Minority Groups- Black Americans, American Indians and Alaska Natives, Asian Americans and Pacific Islanders and Hispanics: A Report of the Surgeon General. Atlanta, Georgia: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 1998: U.S. Department of Health and Human Services;1998.
- 63 Mills SD, Henriksen L, Golden SD, et al. Disparities in retail marketing for menthol cigarettes in the United States, 2015. *Health & Place*. 2018;53:62-70.
- 64 Chen-Sankey JC, van de Venne J, Westneat S, et al. Real-Time Context of Tobacco Marketing Exposure and Community Vulnerability—An Ecological Momentary Assessment Among Young Adults. *Annals of Behavioral Medicine*. 2021.
- 65 Rose SW, Anesetti-Rothermel A, Westneat S, et al. Inequitable distribution of FTP marketing by neighborhood characteristics: further evidence for targeted marketing. *Nicotine and Tobacco Research*. 2022;24(4):484-492.
- 66 Henriksen L, Schleicher NC, Fortmann SP. Menthol cigarettes in black neighbourhoods: still cheaper after all these years. *Tobacco Control*. 2021.
- 67 Sutton CD, Robinson RG. The marketing of menthol cigarettes in the United States: Populations, messages, and channels. *Nicotine & tobacco research: official journal of the Society for Research on Nicotine and Tobacco*. 2004;6(Suppl_1):S83-91.
- 68 Gardiner PS. The Black Americanization of menthol cigarette use in the United States. *Nicotine Tobacco Research*. 2004;6(Suppl_1):S55-65.
- 69 MSA Inc. The Growth of Menthols, 1933-1977. 1978. Brown & Williamson. Legacy Tobacco Documents Library. Bates No. 621053370/3446. Available at: <http://legacy.library.ucsf.edu/tid/rqp21f00>. Accessed.
- 70 The Beaumont Organization. 1979 Consumer Wants Study: Areas of Opportunity for R. J. Reynolds. 1980. R. J. Reynolds. Legacy Tobacco Documents Library. Bates No. 500098049/8054. Available at: <http://legacy.library.ucsf.edu/tid/oqx89d00>. Accessed.
- 71 Yerger VB, Przewoznik J, Malone RE. Racialized geography, corporate activity, and health disparities: tobacco industry targeting of inner cities. *Journal of Health Care for the Poor and Underserved*. 2007;18(4 Suppl):10-38.
- 72 Widome R, Brock B, Noble P, Forster JL. The relationship of neighborhood demographic characteristics to point-of-sale tobacco advertising and marketing. *Ethnicity & Health*. 2013;18(2):136-151.
- 73 Henriksen L, Schleicher NC, Dauphinee AL, Fortmann SP. Targeted advertising, promotion, and price for menthol cigarettes in California high school neighborhoods. *Nicotine & Tobacco Research*. 2012;14(1):116-121.
- 74 Seidenberg AB, Caughey RW, Rees VW, Connolly GN. Storefront cigarette advertising differs by community demographic profile. *American Journal of Health Promotion*. 2010;24(6):e26-e31.
- 75 Pearson JL, Cantrell J, Ganz O, et al. Lorillard brands' availability, price and advertising: association with neighborhood. 19th Annual Society for Research on Nicotine and Tobacco Research Meeting. In. Boston, MA2013.
- 76 Food and Drug Administration. *Tobacco Control Act Overview*. 2015.
- 77 Initiative T. *Local restrictions on flavored tobacco and e-cigarette products*. January 22, 2024.
- 78 Rogers T, Brown EM, Siegel-Reamer L, et al. A comprehensive qualitative review of studies evaluating the impact of local US laws restricting the sale of flavored and menthol tobacco products. *Nicotine and Tobacco Research*. 2022;24(4):433-443.
- 79 Initiative T. *Local restrictions on flavored tobacco and e-cigarette products*. January 22, 2024.
- 80 City of Chicago Office of the City Clerk. Amendment of Municipal Code Titles 3 and 4 concerning tax on non-cigarette tobacco products and associated tobacco-related regulations <https://chicago.legistar.com/LegislationDetail.aspx?ID=2548696&GUID=356C2E71-C013-4E70-9931-DB9163D8010A&Options=Advanced&Search=>. Published 2016. Accessed June 21, 2016.
- 81 Critics argue California's ban on e-cigarettes and flavored tobacco products is ineffective. *The Center Square - California*. September 4, 2020, 2020.
- 82 McGreevy P. Proposed California ban on flavored tobacco sales sparks discussion of systemic racism. *Los Angeles Times*. August 24, 2020, 2020.
- 83 Coalition Continues to Grow in Opposition to California's Proposed Menthol Cigarette Ban. *Neighborhood Forward*. August 4, 2020, 2020.
- 84 Korte L. Gavin Newsom signs ban on sales of flavored tobacco products in California stores. *The Sacramento Bee*. August 28, 2020, 2020.
- 85 Aguilera E. Goodbye 'banana smash' cigarillos: Governor quickly signs bill to ban flavored tobacco. *Cal Matters*. August 28, 2020, 2020.
- 86 McGreevy P. California's ban on flavored tobacco sales blocked as referendum qualifies for ballot. *Los Angeles Times*. January 22, 2021, 2021.
- 87 Campaign Finance - California Coalition for Fairness, Sponsored by Manufacturers. California Secretary of State Shirley N. Weber, Ph.D. <https://cal-access.sos.ca.gov/Campaign/Committees/Detail.aspx?id=1431407&session=2021>. Accessed April 4, 2022.
- 88 Fooks GJ, Peeters S, Evans-Reeves K. Illicit trade, tobacco industry-funded studies and policy influence in the EU and UK. *Tobacco Control*. 2014;23(1):81.
- 89 Balwicki Ł, Stoktosa M, Balwicka-Szczyrba M, Tomczak W. Tobacco industry interference with tobacco control policies in Poland: legal aspects and industry practices. *Tobacco Control*. 2015.

- 90 Gallagher AW, Evans-Reeves KA, Hatchard JL, Gilmore AB. Tobacco industry data on illicit tobacco trade: a systematic review of existing assessments. *Tobacco Control*. 2019;28(3):334-345.
- 91 Paraje G, Stoklosa M, Blecher E. Illicit trade in tobacco products: recent trends and coming challenges. *Tobacco Control*. 2022;31(2):257-262.
- 92 Levin M. Battling Menthol Restrictions, R.J. Reynolds Reaches Out to Sharpton, Other Black Leaders. FairWarning Inc. Published 2017. Accessed.
- 93 Ackert K, Brock B, Friedrichsen SC, et al. Countering tobacco industry tactics on the economic costs of restricting menthol tobacco. *Tobacco Control*. 2020;29(e1):e113-e114.
- 94 Levy DT, Meza R, Yuan Z, et al. Public health impact of a US ban on menthol in cigarettes and cigars: a simulation study. *Tobacco Control*. 2021.
- 95 Li Y, Sisti J, Flórez KR, et al. Assessing the health and economic impact of a potential menthol cigarette ban in New York City: a modeling study. *Journal of Urban Health*. 2021;98(6):742-751.
- 96 Guillory J, Kim AE, Nonnemaker JM, et al. Effect of menthol cigarette and other menthol tobacco product bans on tobacco purchases in the RT1 iShoppe virtual convenience store. *Tobacco Control*. 2020;29(4):452-459.
- 97 Czaplicki L, Schillo B, Rose SW, Zhou Y, Vallone D. National support for a menthol cigarette sales ban. *Public Health Reports*. 2021;136(2):183-191.
- 98 Cadham CJ, Sanchez-Romero LM, Fleischer NL, et al. The actual and anticipated effects of a menthol cigarette ban: a scoping review. *BMC Public Health*. 2020;20(1):1-17.
- 99 D'Silva J, Amato MS, Boyle RG. Quitting and switching: menthol smokers' responses to a menthol ban. *Tobacco Regulatory Science*. 2015;1(1):54-60.
- 100 Wackowski OA, Manderski MT, Delnevo CD. Young Adults' Behavioral Intentions Surrounding a Potential Menthol Cigarette Ban. *Nicotine & tobacco research: official journal of the Society for Research on Nicotine and Tobacco*. 2014.
- 101 Rest EC, Brikmanis KN, Mermelstein RJ. Preferred flavors and tobacco use patterns in adult dual users of cigarettes and ENDS. *Addictive Behaviors*. 2022;125:107168.
- 102 Chaiton M, Schwartz R, Shuldiner J, Tremblay G, Nugent R. Evaluating a real world ban on menthol cigarettes: an interrupted time-series analysis of sales. *Nicotine and Tobacco Research*. 2020;22(4):576-579.
- 103 Chung-Hall J, Fong GT, Meng G, et al. Evaluating the impact of menthol cigarette bans on cessation and smoking behaviours in Canada: Longitudinal findings from the Canadian arm of the 2016–2018 ITC Four Country Smoking and Vaping Surveys. *Tobacco Control*. 2021.
- 104 Brown J, DeAtley T, Welding K, et al. Tobacco industry response to menthol cigarette bans in Alberta and Nova Scotia, Canada. *Tobacco Control*. 2017;26(e1):e71-e74.
- 105 Menthol Cigarettes: Industry Interference in the EU and UK. <https://tobaccotactics.org/wiki/menthol-interference-eu-uk/>. Updated December 15, 2021. Accessed March 31, 2022.
- 106 Ben Stockton LM, Alessia Cerantola, Andrei Ciurcanu. 'Impossible to enforce': Big Tobacco exploiting loopholes in European menthol ban. *inews.co.uk*. November 2, 2021, 2021.
- 107 Andrei Ciurcanu AC. *Japan Tobacco International Making a Mint by Circumventing Menthol Cigarette Ban*. Organized Crime and Corruption Reporting Project; November 2, 2021 2021.



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