

Sent by:
[redacted]
.nz

17/02/2021 11:58 pm

To: [redacted]
cc: Carolyn.Shivanandan@health.govt.nz, nick.[redacted]
[redacted] [redacted]
bcc:

Subject: wondering if you can help with our understanding around very low nicotine cigarettes

Hi Sally

I received a response from Eric - his thoughts are in caps after my queries in the message below.

Richard

Dear Eric

I hope you are keeping well.

I am getting in touch because the issue of VLNCs has potentially become a live one in NZ.

The context is that the new Govt Minister is committed to preparing an action plan for consultation setting who NZ's smokefree goal can be achieved. As you will probably remember we have advocated strongly that mandated VLNCs should be a key intervention, and we recently re-iterated that call in this blog.

<https://blogs.otago.ac.nz/pubhealthexpert/five-strategic-approaches-to-achieving-the-smokefree-aotearoa-2025-goal/> [blogs.otago.ac.nz]

The Minister and Ministry of Health team are gathering information about the feasibility of such an approach and a query has come up (see below) about which VLNCs are available and the technical feasibility of mandating such products.

My understanding is that:

1. The only (?) available VLNCs at the moment are a range of varying concentration products (including 0.4mg/ml) produced as 'Spectrum' by the company 22nd Century in the US using low nicotine level tobacco plants. However, these products are currently mainly (wholly?) available for research purposes and are not for sale to the general public. I am not sure if 'Magic' low nicotine cigs are still available in Europe - I think these were produced by 22nd Century as well.

22ND CENTURY HAS APPLIED FOR A MODIFIED RISK TOBACCO PRODUCT APPLICATION AND THE FDA ADVISORY BOARD REVIEWED THAT APPLICATION A YEARS OR SO AGO. THEIR INTENTION WAS TO MARKET IT UNDER THE NAME "VLN". I AM NOT SURE OF THE STATUS OF THAT APPLICATION, BUT THIS NEWS RELEASE (

<https://www.globenewswire.com/news-release/2021/01/11/2156515/0/en/22nd-Century-Group-Expands-VLN-Tobacco-Growing-Program-to-Support-Anticipated-Demand-of-the-Company-s-Reduced-Nicotine-Content-Cigarettes.html>). IT DOES SUGGEST THEY ARE GEARING UP FOR A LARGER SCALE PRODUCTION, SO THEY MIGHT BE ABLE IN A POSITION TO MAKE THEM AVAILABLE ON THE SCALE NEEDED IN NZ.

1. Other very low nicotine cigarettes (Next, Quest) have been produced in the past by major tobacco companies but these were not successful within a market where nicotine-containing cigs etc were still available and none of the big tobacco companies currently produce such a product commercially. I was not aware that Pall Mall Slims Silver, or Virginia Slims Superslims etc are VLNCs.

AGREED THAT NONE OF THEM CURRENTLY PRODUCE VLNCs; HOWEVER, THEY ARE FULLY CAPABLE OF DOING SO. IF VIA GENETIC ENGINEERING, IT WOULD TAKE A WAY SINCE THEY WOULD HAVE TO GROW THE CROPS. IF EXTRACTION, IT MIGHT BE MUCH EASIER. NOT SURE ABOUT PALL MALL OR VIRGINIA SLIMS – I HAVE NOT HEARD THAT.

1. It is perfectly feasible for cigarette and other tobacco products to be made with a minimal level of nicotine concentration through the use of genetically engineered low nicotine plants (or I believe that nicotine can be extracted/degraded from tobacco). Note, genetically engineered products could be an issue in the NZ context.

CORRECT, SEE ABOVE. THIS IS NOT A TECHNICAL CHALLENGE. THAT SAID, I AM SURE THE INDUSTRY WILL MAKE IT SOUNDS LIKE A HUGE HURDLE. LARGE SCALE PRODUCTION MIGHT BE BUT STARTING IN NZ MAY NOT PRESENT THE SAME LEVEL OF CHALLENGES.

Would you be able to respond with your expert views on these points and perhaps be available to talk to the Ministry or Minister's team. If you can't help could you suggest anyone who we could approach (e.g. Neil B, Dorothy H, Tracy Smith?)

Thanks very much.

Richard

From: Sally Stewart <sally.stewart@health.govt.nz>
Sent: Monday, February 15, 2021 3:43 PM
To: Richard Edwards <richard.edwards@otago.ac.nz>
Cc: Carolyn Shivanandan <Carolyn.Shivanandan@health.govt.nz>
Subject: wondering if you can help with our understanding around very low nicotine cigarettes

Kia ora Richard, we're wondering if you can help us better get our heads around VLNC or if you can suggest who can. The background is that Chris Bullen suggested to the Minister that these only exist in research contexts, which we didn't think was right. The Minister asked us to follow up (and also answer the question about whether it's technically feasible – which it clearly is).

Carolyn has been doing some digging around and her note is copied below. Are you – or can you think of someone – we can talk with to better understand the various options on the market internationally.

Ngā mihi

Sally

There is evidence that very low nicotine cigarettes are available, or can be manufactured internationally. (e.g. Spectrum / Moonlight, Next, etc.) Research quoted in the ASPIRE report talks about 0.4mg/g as being the level of Nicotine needed to have an effect. This is significantly lower than cigarettes currently on the market in New Zealand.

There are also a variety of products seemingly marketed overseas by main stream tobacco companies that might meet the nicotine levels that are being discussed? For example Pall Mall Slims Silver, or Virginia Slims Superslims (which apparently has 0.1mg of nicotine). This is a link to a Victorian govt spreadsheet with testing information with various examples - <https://www2.health.vic.gov.au/Api/downloadmedia/%7B2B981D89-5DC2-4630-9335-2F8B3EAC1DFE%7D> [apc01.safelinks.protection.outlook.com]

It would be helpful to understand if any work has been done comparing the nicotine levels in these types of cigarettes with what has been proposed in experimental settings. There seems to be different ways to measure – mg/cigarette, mg/g, and just mg, and perhaps different ways to test and present data more broadly so I am wondering if it is not as straight forward as it would seem?

Sally Stewart Manager, Tobacco Control Programme s 9(2)(a)

Population Health and Prevention, Ministry of Health | www.moh.govt.nz
[apc01.safelinks.protection.outlook.com]

Professor/Ahorangi Richard Edwards

Co-Director, ASPIRE 2025 Research Centre

Department of Public Health | Te Tari Hauora Tūmatanui

School of Medicine and Health Sciences

University of Otago, Wellington | Te Whare Wānanga o Otāgo, Te Whanga-nui-a-Tara

PO Box 7343 | Wellington South | New Zealand | DD s 9(2)(a)

<http://www.otago.ac.nz/wellington/departments/publichealth/>

<https://aspire2025.org.nz/>

Web: <http://www.otago.ac.nz/wellington/departments/publichealth/staff/otago023413.html>

Twitter: @ProfEdwardsNZ

E-mail: richard.edwards@otago.ac.nz

Skype: [pr.edwards.nz](https://www.skype.com/people/pr.edwards.nz)

From: Richard Edwards <richard.edwards@otago.ac.nz>

Sent: Monday, February 15, 2021 4:48 PM

To: Sally Stewart <sally.stewart@otago.ac.nz>

Cc: Carolyn Shivanandan <carolyn.shivanandan@otago.ac.nz>;

<carolyn.shivanandan@otago.ac.nz>;

Janet Hoek <janet.hoek@otago.ac.nz>;

<janet.hoek@otago.ac.nz>

Nick Wilson

Andrew Waa

Subject: Re: wondering if you can help with our understanding around very low nicotine cigarettes

Hi Sally

I have contacted Eric Donny from North Carolina (see <https://school.wakehealth.edu/Faculty/D/Eric-C-Donny>) who is first author of this article: <https://tobaccocontrol.bmj.com/content/26/e1/e37> .

See message below.

Great to see that the Minister is pursuing this option.

I'll forward on his response.

Richard

Dear Eric

I hope you are keeping well.

I am getting in touch because the issue of VLNCs has potentially become a live one in NZ.

The context is that the new Govt Minister is committed to preparing an action plan for consultation setting who NZ's smokefree goal can be achieved. As you will probably remember we have advocated strongly that mandated VLNCs should be a key intervention, and we recently re-iterated that call in this blog.

<https://blogs.otago.ac.nz/pubhealthexpert/five-strategic-approaches-to-achieving-the-smokefree-aotearoa-2025-goal/>

The Minister and Ministry of Health team are gathering information about the feasibility of such an approach and a query has come up (see below) about which VLNCs are available and the technical feasibility of mandating such products.

My understanding is that:

1. The only (?) available VLNCs at the moment are a range of varying concentration products (including 0.4mg/ml) produced as 'Spectrum' by the company 22nd Century in the US using low nicotine level tobacco plants. However, these products are currently mainly (wholly?) available for research purposes and are not for sale to the general public. I am not sure if 'Magic' low nicotine cigs are still available in Europe - I think these were produced by 22nd Century as well.
2. Other very low nicotine cigarettes (Next, Quest) have been produced in the past by major tobacco companies but these were not successful within a market where nicotine-containing cigs etc were still available and none of the big tobacco companies currently produce such a product commercially. I was not aware that Pall Mall Slims Silver, or Virginia Slims Superslims etc are VLNCs.
3. It is perfectly feasible for cigarette and other tobacco products to be made with a minimal level of nicotine concentration through the use of genetically engineered low nicotine plants (or I believe that nicotine can be extracted/degraded from tobacco). Note, genetically

engineered products could be an issue in the NZ context.

Would you be able to respond with your expert views on these points and perhaps be available to talk to the Ministry or Minister's team. If you can't help could you suggest anyone who we could approach (e.g. Neil B, Dorothy H, Tracy Smith?)

Thanks very much.

Richard

From: Sally Stewart <sally.stewart@health.govt.nz>

Date: Monday, 15 February 2021 at 3:43 PM

To: Richard Edwards <richard.xxxxxxx@xxxxx.xx.xx>

Cc: Carolyn Shivanandan <Carolyn.Shivanandan@health.govt.nz>

Subject: wondering if you can help with our understanding around very low nicotine cigarettes

Kia ora Richard, we're wondering if you can help us better get our heads around VLNC or if you can suggest who can. The background is that Chris Bullen suggested to the Minister that these only exist in research contexts, which we didn't think was right. The Minister asked us to follow up (and also answer the question about whether it's technically feasible – which it clearly is).

Carolyn has been doing some digging around and her note is copied below. Are you – or can you think of someone – we can talk with to better understand the various options on the market internationally.

Ngā mihi

Sally

There is evidence that very low nicotine cigarettes are available, or can be manufactured internationally. (e.g. Spectrum / Moonlight, Next, etc.) Research quoted in the ASPIRE report talks about 0.4mg/g as being the level of Nicotine needed to have an effect. This is significantly lower than cigarettes currently on the market in New Zealand.

There are also a variety of products seemingly marketed overseas by main stream tobacco companies that might meet the nicotine levels that are being discussed? For example Pall Mall Slims Silver, or Virginia Slims Superslims (which apparently has 0.1mg of nicotine). This is a link to a Victorian govt spreadsheet with testing information with various examples - <https://www2.health.vic.gov.au/Api/downloadmedia/%7B2B981D89-5DC2-4630-9335-2F8B3EAC1DFE%7D>

It would be helpful to understand if any work has been done comparing the nicotine levels in these types of cigarettes with what has been proposed in experimental settings. There seems to be different ways to measure – mg/cigarette, mg/g, and just mg, and perhaps different ways to test and present data more broadly so I am wondering if it is not as straight forward as it would seem?

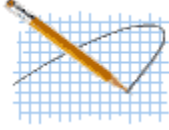
Sally Stewart IManager, Tobacco Control Programme | s 9(2)(a)

Population Health and Prevention, Ministry of Health | www.moh.govt.nz

Statement of confidentiality: This e-mail message and any accompanying attachments may contain information that is IN-CONFIDENCE and subject to legal privilege.

If you are not the intended recipient, do not read, use, disseminate, distribute or copy this message or attachments.

If you have received this message in error, please notify the sender immediately and delete this message.



Sent by:
denis.choiniere@canada.c
a

To: [REDACTED]
cc:
bcc:

17/04/2021 12:06 am

Subject: VLNC

Hi! Sally

Here are some references, in case you do not have them.

Denis

1) **Report: Consultation on Tobacco Addictiveness Reduction Measures**, Berlin, Germany, 15–16 May 2018,

https://www.who.int/tobacco/publications/prod_regulation/meeting-report-tobacco-addictiveness-reduction-measures/en/

2) **Advisory note: global nicotine reduction strategy, WHO Study Group on Tobacco Product Regulation**,

https://www.who.int/tobacco/publications/prod_regulation/nicotine-reduction/en/

3) **FCTC COP5, Report of the WG on Articles 9 and 10, ANNEX 3: BACKGROUND PAPER ON TOBACCO ADDICTIVENESS REDUCTION**,

https://apps.who.int/gb/fctc/PDF/cop5/FCTC_COP5_9-en.pdf (see also section “corrigenda”, for corrections to this Annex, in https://www.who.int/fctc/cop7/FCTC_COP_7_8_EN.pdf)

De : Choiniere, Denis (HC/SC)

Envoyé : 2021-04-15 15:58

À : 'Sally Stewart' <sally.stewart@health.govt.nz>
Objet : VLNC

Hi! Sally

My colleague Mathew Cook and I were quite involved in the COP working group on articles 9 and 10, especially on the aspect of addictiveness reduction. I am sure he would be pleased to join me in a chat with you in the coming weeks.

Best,

Denis

De : Sally Stewart <sally.stewart@health.govt.nz>
Envoyé : 2021-04-15 15:49
À : Choiniere, Denis (HC/SC) <denis.choiniere@canada.ca>
Objet : RE: Menthol Ban

Thanks again Denis, this is interesting.

Did you do some work on denicotinising cigarettes? If you did, it might be useful to chat sometime in the coming weeks.

Regards

Sally

From: Choiniere, Denis (HC/SC) <denis.choiniere@canada.ca>
Sent: Friday, 16 April 2021 1:55 am
To: Sally Stewart <sally.stewart@health.govt.nz>

Cc: Brendon Baker <Brendon.Baker@health.govt.nz>
Subject: Menthol Ban

Hi! Sally,

Geoff Fong (University of Waterloo) sent me these documents, which could be of interest to you.

Best,

Denis

Statement of confidentiality: This e-mail message and any accompanying attachments may contain information that is IN-CONFIDENCE and subject to legal privilege.

If you are not the intended recipient, do not read, use, disseminate, distribute or copy this message or attachments.

If you have received this message in error, please notify the sender immediately and delete this message.

This e-mail message has been scanned for Viruses and Content and cleared by the Ministry of Health's Content and Virus Filtering Gateway



- put-in-cabinet-data.json

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982