

Letters

We welcome letters from readers, particularly commentaries that reflect upon or take issue with material we have published. The writer's name, affiliation, address, and telephone number should be included. Because of space limitations, letters are subject to abridgment.

Saccharin and Cigarettes

TO THE EDITOR:

The American Council on Science and Health is a national group of scientists interested in promoting balanced evaluations of the public health and environmental issues that confront our society. We have recently published our own detailed report on saccharin and concluded that it should remain approved as a food additive without the need for a special warning label.

We agree with Dr. William Havender ("Saccharin and Human Risk," *Regulation*, March/April 1979) that the decision to use or not to use saccharin is the responsibility of the individual, not the government. We also agree that saccharin's alleged risks and benefits should be provided to consumers to allow them to make informed choices. However, in our opinion, warning labels are not the appropriate method for conveying this information.

The current warning label for saccharin is an obvious scare tactic and is, moreover, more strongly worded than the warning for cigarettes. As mandated by the Saccharin Study and Labeling Act of 1977, the following warning must be carried on all consumer products containing saccharin and be prominently displayed in all retail establishments (except restaurants) selling saccharin products: USE OF THIS PRODUCT MAY BE HAZARDOUS TO YOUR HEALTH. THIS PRODUCT CONTAINS SACCHARIN WHICH HAS BEEN DETERMINED TO CAUSE CANCER IN LABORATORY ANIMALS. In contrast, the warning required for cigarette packages and cigarette ad-

vertising reads: WARNING: THE SURGEON GENERAL HAS DETERMINED THAT CIGARETTE SMOKING IS DANGEROUS TO YOUR HEALTH.

Clearly, the risks from saccharin are insignificant compared with the risks from cigarette smoking. Yet these are the only two products subject to such labeling requirements. To equate these risks is to mislead the public. In any event, the saccharin label, like that for cigarettes, is seemingly ignored by most consumers. Sales of artificially sweetened products continue at pre-ban levels, and cigarette smoking is increasing among certain segments of the population. Efforts to improve public awareness about the risks encountered in everyday life should be an integral part of basic education, not promoted through sensational and misleading package labels.

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Cigarette Advertising

TO THE EDITOR:

Surprisingly, Gideon Doron is one of the very few commentators who recognize the principle that brand advertising does not result in overall market expansion (see *Regulation*, "Smoking and the Advertising Ban," March/April 1979). Among those who misunderstand this today are many who believe a ban on cigarette print advertising would be in the public interest.

A couple of additional points may be of interest to your readers. First, during the heyday of the anti-smoking broadcasting, 1968 to 1970, the consumption trend for cigarettes was not uniform. Sales declined by 3.7 billion units in 1968 and by 16.7 billion in 1969, but increased by 7.6 billion units in 1970. One cannot, of course, be sure of such a short-term trend, but the figures do bring into question the idea that a high level of anti-smoking broadcasting alone

was a major factor in shrinking consumption.

Second, there is another reason for being cautious about the idea: In the late 1960s before federal revenue sharing came along, state and local governments were particularly in need of additional revenues and therefore many of them sharply increased cigarette excise taxes. The increases, of course, were passed along to consumers. While I cannot prove the point, economic theory would suggest that the higher prices may well have depressed demand in 1968 and 1969. . . .

Third, the article mentions that per capita cigarette consumption consistently fell in the years 1964-1970 in the population eighteen and over. I do not know the source of these data. In any event, they may be skewed by the entry of a "bubble" of teenagers into the population in the later sixties—that is, entry of a group whose smoking rates (while too high, surely) are relatively low. In the conventional per capita measurement, there was an increase in cigarette consumption for two of the years referred to—1965 and 1966.

Also, the author's quotation from the American Cancer Society survey—"most teenage boys and girls now start to smoke before they are in junior high"—is a bit misleading. What the survey reported, I think, was that of the relatively small number of teenagers who do smoke, most began in grade school. However, I am not sure that the survey is to be trusted.

The final sentence in the article expresses "a certain sympathy for the FTC." If I interpret this correctly, it is an expression of the author's view that the federal regulatory authorities indeed have a responsibility to bring about reduced consumption of cigarettes. On that point we would differ. It is our view that persons who are considering whether or not to smoke are entitled to all of the relevant factual information they can get from any source, including the federal government. But the decision is the individual's responsibility, not the government's. In this situation, the individual decisions are "votes" that, taken together, express desirable public policy.

It is most unfortunate that the Federal Trade Commission and other agencies feel a compulsion to take direct steps toward behavior control.

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