



We are providing a comment as representatives from the Premium Cigar Association. A United States based association that represents over 3000 specialty retail tobacconists and over 250 premium cigar manufacturers which comprise an estimated 330,000 jobs internationally. Below is evidence that should be considered by the New Zealand Parliament when revising the Smokefree Environments and Regulated Products (Smoked Tobacco) Amendment Bill. This bill, unaltered, would significantly limit the number of retailers able to sell premium cigars, and removes the ability of adults to make decisions for themselves in the future. The year restriction for tobacco sales would ban all people born on or after January 1, 2009, from ever buying tobacco products, effectively banning tobacco sales moving forward. This is a prohibitionist action and ought to consider the facts before moving forward.

- Due to a wide range of factors, most important of which is the lack of inhalation, and frequency of use, the health consequences of smoking premium cigars are substantially less harmful to those who smoke other types of tobacco products. This was proven in the NIH/FDA PATH Study and the NASEM Study, which was commissioned by the FDA, published in March 2022. Both the PATH Study and the NASEM Study are federally commissioned, independent studies on the patterns of use, health effects and marketing of premium cigars.
- The patterns of use for premium cigars is an important reason to be treated distinctly differently than other tobacco products. Any and all restrictions proposed by the health committee, should consider the lack of daily/weekly use when drafting proposed sweeping rules on all tobacco products. The average premium cigar smoker reported smoking cigars 1.2 days out of 30 days. This has been consistently showcased in Eurobarometer studies and the NIH/FDA PATH Study, which also determined that the average age of starting to smoke premium cigars was at 30 years old.
- The NASEM Study notes: “There is insufficient evidence to determine if occasional or non-daily exclusive cigar use in general is associated with increased health risks.”¹
- Premium cigars are different than any other tobacco product for all of the reasons above and the storage and the way they are purchased. The storage of premium cigars requires strict humidity and temperature control of around 70%RH and 21°C. These strict storage requirements need specialty retail locations to sell premium cigars.
- Many premium cigar manufacturers and cigar tobacco growers are based in the United States. If premium cigar sales were further restricted in New Zealand, many manufacturers and growers would likely have to reduce employment and development. These small farming communities would see a change in demand, which would lead to job loss and reduction in wages.

¹ National Academies of Sciences, Engineering, and Medicine. 2022., 16

- Data provided by the CDC publishes up to date information on youth access to tobacco products, and youth usage of tobacco products. This study has shown that there is a stark decline in youth smoking across the U.S. which is the largest tobacco market in the world. Since 2019, smoking among youth has decreased by over 29%. The rules already in place are proving to be effective and further regulation is unnecessary.

Considering the above, premium cigars should benefit from a different regulatory treatment within the Smokefree Environments and Regulated Products (Smoked Tobacco) Amendment Bill, which should primarily focus on products affecting the overall smoking prevalence in New Zealand.

National Academies of Sciences, Engineering, and Medicine. 2022. Premium Cigars: Patterns of Use, Marketing, and Health Effects. Washington, DC: The National Academies Press.
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