

## **Canadian Cancer Society comment on Docket No.FDA-2011-N-0867**

In Belgium, legislation requires that ingredients of all tobacco products and their quantities be reported to the Belgium government on a brand by brand. In the case of cigarettes, this includes ingredients in the filter, paper and tobacco portions of the cigarette.

The Belgium Government has established a website to provide public accessibility to this reported information:

[http://www.health.belgium.be/pls/apex/f?p=EMTOC\\_SEARCH:1::CHANGELANGUA GE:::FSP\\_LANGUAGE\\_PREFERENCE:fr](http://www.health.belgium.be/pls/apex/f?p=EMTOC_SEARCH:1::CHANGELANGUA GE:::FSP_LANGUAGE_PREFERENCE:fr)

Here is an example for Marlboro:

[http://www.health.belgium.be/pls/apex/f?p=342:30:3299694417865889::NO::P30\\_EMT OC\\_ID:401138](http://www.health.belgium.be/pls/apex/f?p=342:30:3299694417865889::NO::P30_EMT OC_ID:401138)

(It is in French, but one can get the general idea of the additives listed – 61 in all – at the bottom, you can click to get to the next 15 in the list).

On this website, in the case of cigarettes, information for ingredients weighing less than 0.1% of the product is not expected to be provided for each ingredient, but is instead grouped. For cigars, information for ingredients weighing less than 0.5% of the product is not expected to be provided for each ingredient, but is instead grouped.

While ingredient reporting by tobacco companies to the Belgium government is required by law, ingredient reporting on this website is not required by law. Instead, the website depends on voluntary participation by companies. British American Tobacco, Japan Tobacco International, Imperial Tobacco, and Philip Morris International are among the companies participating voluntarily.

The Belgium website became live during the fourth quarter of calendar 2011. The new Belgium website has received only a small number of visits. The Belgium government made a deliberate choice not to publicize the website.

In the United States, if the FDA were to establish a website with lists of information pertaining to individual tobacco products, the FDA should ensure that tobacco manufacturers, importers and retailers (1) conform to section 911 of the Family Smoking Prevention and Tobacco Control Act regarding modified risk product claims related to any characterization of the contents of lists/information on or not on the website, and (2) conform to any prohibitions on advertising, promotion that is false, misleading or deceptive.

