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December 1, 2015

Paula A. Johnson, MD, MPH - Chairperson
Boston Public Health Commission
101 Massachusetts Avenue
Boston, MA 02118

Dear Dr. Johnson:

On behalf of the Conference of Boston teaching Hospitals (COBTH) I would like to express full support for the proposed regulation limiting tobacco and nicotine access by increasing the minimum legal sale age for tobacco products to 21. Over the past two decades, Boston has taken a leadership role in tobacco control initiatives and passage of this amendment would be one more effective tool in our efforts to reduce tobacco use. COBTH hospitals have been pleased to work with Commission and our community partners through organizations like the Boston Alliance for Community Health and the *Let's Get Healthy Boston* initiative, on efforts to reduce tobacco use in Boston.

Tobacco use remains the leading cause of preventable death in the United States, killing more than 480,000 people each year. It is known to cause cancer, heart disease and respiratory diseases, among other health disorders, and costs the U.S. as much as \$170 billion in health care expenditures each year. Each day, 580 persons under the age of 18 become regular, daily smokers; and almost one-third will eventually die from smoking.

National data show that 95 percent of adult smokers begin smoking before they turn 21, and a substantial number of smokers start even younger— about 80 percent of adult smokers first try smoking before age 18. While fewer than half (46%) of adult smokers become regular, daily smokers before age 18, four out of five become regular, daily smokers before they turn 21. This means the 18 to 21 age range is a time when many smokers transition to regular use of cigarettes.

A report issued earlier this year by the Institute of Medicine (IOM), one of the most prestigious scientific authorities in the United States, found that that raising the tobacco sale age to 21 will have a substantial positive impact on public health and save lives.⁸ The IOM report, based on a review of the literature and predictive modelling, found that raising the tobacco sale age will significantly reduce the number of adolescents and young adults who start smoking; reduce smoking-caused deaths; and immediately improve the health of adolescents, young adults and young mothers who would be deterred from smoking. The report predicts that raising the minimum age for the sale of tobacco products to 21 will, over time, reduce the smoking rate by about 12 percent and smoking-related deaths by 10 percent.

Raising the legal tobacco sale age to 21 would:

- Delay the age when young people first begin using tobacco and reduce the risk that they will transition to regular or daily tobacco use

- Increase the age gap between adolescents initiating tobacco use and those who can legally provide them with tobacco products
- Make it more difficult for younger adolescents to pass themselves off as 21-year-olds than they would 18-year-olds
- Simplify identification checks for retailers, since many state drivers' licenses, including Massachusetts', indicate that a driver is under the age of 21.

If enacted, this regulation will be an important component of a comprehensive tobacco control effort that offers benefits that would help reduce youth tobacco use and increase the likelihood that youth will grow up to be tobacco-free.

Thank you for the opportunity to express support for this important regulation and please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John Erwin". The signature is written in a cursive, flowing style.

John Erwin
Executive Director