



American College of Preventive Medicine
physicians dedicated to prevention

September 13, 2011

The Honorable Ron Kirk
United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Re: Exclusion of Tobacco and Alcohol and Their Products from Negotiations on the Trans Pacific Partnership (TPP) Trade Agreement

Dear Ambassador Kirk:

The American College of Preventive Medicine (ACPM) is pleased to provide comment on the proposed Trans Pacific Partnership Agreement (TPP), an Asia-Pacific regional trade agreement currently being negotiated among the United States and eight other partners. ACPM is the national medical society for nearly 2,500 preventive medicine physicians who are uniquely trained in both clinical and population-based medicine and are committed to disease prevention and health promotion.

As a result of the clear scientific evidence that illustrates the harmful effects of tobacco and alcohol use, ACPM has long worked to support public health policies that limit use of tobacco and alcohol products across all populations. As such, we strongly urge that you exclude alcohol and tobacco products, including cigarettes, cigars, and smokeless tobacco from all Free Trade Agreements including the TPP. With the significant progress achieved to date in the U.S. to enact and maintain strong anti-tobacco and alcohol use policies, U.S. trade negotiators should work to support such strong policies abroad and not ask any nation to weaken its current anti-smoking or alcohol control strategies.

Removing trade barriers may be desirable when the products being traded are beneficial, but tobacco is not a beneficial product. Cigarettes are the leading preventable cause of death and disease in the world.^{1,2} The U.S. and TPP partners all recognized this when each signed the world's first public health treaty, the Framework Convention on Tobacco Control (FCTC). The FCTC, states that "price and tax measures are an effective and important means of reducing tobacco consumption by various segments of the population, in particular young persons."³ Cutting tariffs on tobacco products is contrary to FCTC policies to reduce tobacco consumption. Negotiating a trade agreement with TPP partners that would lower tariffs on tobacco and increase the incidence of smoking would be inconsistent with US' support for the FCTC and with those nations' obligations under the FCTC.

Harmful use of alcohol is also one of the main factors contributing to premature deaths and avoidable disease burden worldwide and is causally related to more than 60 types of disease and injury.^{4,5,6} To protect and advance alcohol control, the U.S. should consider alcohol as “no ordinary commodity” in trade negotiations.⁷ Trade liberalization should not trump the goal of saving lives and promoting and protecting public health.

Excluding tobacco and alcohol products from the TPP and from all future free trade agreements is sound policy that is grounded in science and will protect the lives of our trading partners around the world.

Sincerely,



Miriam Alexander, MD, MPH, FACPM
President

¹ Singer MV, Feick P, Gerloff A. Alcohol and smoking. *Dig Dis*. 2011;29(2): 177-83. Epub 2011 Jul 5.

² World Health Organization. *Top Ten Causes of Death*. Accessed at <http://www.who.int/mediacentre/factsheets/fs310/en/index2.html>.

³ World Health Organization. *WHO Framework Convention on Tobacco Control*. WHO 2003. Accessed at http://www.who.int/tobacco/framework/WHO_FCTC_english.pdf.

⁴ World Health Organization. *Strategies to reduce the harmful use of alcohol*. WHO 20 Mar 2008. Accessed at http://apps.who.int/gb/ebwha/pdf_files/A61/A61_13-en.pdf.

⁵ Parry C, Patra J, Rehm J. *Alcohol consumption and non-communicable diseases: epidemiology and policy implications*. *Addiction*. 2011 Aug 5. Epub.

⁶ Murray CJ, Lopez AD. *Global mortality, disability, and the contribution of risk factors: Global Burden of Disease Study*. *Lancet*. 1997 May 17;349(9063):1436-42.

⁷ Alcohol and Public Policy Group. *Alcohol: no ordinary commodity--a summary of the second edition*. *Addiction*. 2010 May;105(5):769-79. Epub 2010 Mar 19.