



**Testimony before the Mansfield, MA Board of Health
Regarding Nicotine-Free Generation
Lindsey Stroud
Tobacco Harm Reduction 101
April 10, 2025**

Members of the Mansfield, Mass. Board of Health:

Thank you for your time today to discuss a generational ban on the sale of nicotine products, also known as a nicotine-free generation (NFG). My name is Lindsey Stroud and I'm a Creator and Manager of Tobacco Harm Reduction 101 (thr101.org), an educational resource focused on evidence-based tobacco policy.

While commendable, nicotine-free generation bans overlook the historic declines in youth tobacco and nicotine product use in recent years. Additionally, young adult smoking rates are at record lows in the Commonwealth. As such, severe bans are unnecessary. Instead of implementing more restrictive policies that lead to significant revenue losses, policymakers should reexamine existing policies like the 2020 flavor ban, which have not yielded significant declines compared to neighboring states. A more thorough review of existing bans, coupled with well-funded tobacco control programs, could more effectively achieve public health goals.

Key Points:

- Youth use of traditional tobacco and modern nicotine products is at record lows in Massachusetts and the United States.
- In 2023, only 3.4 percent of Massachusetts high school students reported past-month use of combustible cigarettes and 16 percent reported using e-cigarettes.
- Between 1993 and 2023, current use of cigarettes among Massachusetts high school students decreased by 90.5 percent.
- In 2024, among U.S. middle and high school students, 5.9 percent reported current e-cigarette use, 1.8 percent were using nicotine pouches, and 1.4 percent were currently smoking combustible cigarettes.
- Between 2019 and 2023, current e-cigarette use among U.S. youth declined by 70.5 percent while cigarette use dropped by 67.4 percent.
- Massachusetts' flavor ban and tobacco tax increase has had mixed results.
- According to national survey data, the rate of e-cigarette use among Massachusetts high schoolers in 2023 (18.3%) was comparable to rates in neighboring states like Connecticut (11.5 percent), New Hampshire (16.7 percent), Rhode Island (16.5 percent), and Vermont (16.1 percent).



- The usage rates for combustible cigarettes among high school students in 2023 were also similar across the region, with Massachusetts at 3.4 percent, Connecticut at 3 percent, New Hampshire at 3.9 percent, and Rhode Island at 3.1 percent.
- Smoking rates among young adults aged 18 to 24 in Massachusetts are at an all-time low, with only 3.6 percent currently smoking in 2023 – an 81.7 percent decrease from 2013.
- E-cigarette use among young adults has also declined, dropping from 16.3 percent in 2022 to 14 percent in 2023.
- Tobacco product retailers in Mansfield are already doing a good job in not selling to minors. Since 2011, the FDA has conducted inspections on 247 retailers, resulting in only 15 warning letters to violators who sold to minors. Only 6 percent of inspections resulted in violations.
- Data suggest that the 2020 flavor ban and tax increase may not have effectively contributed to the intended declines in smoking rates and may need reevaluation.
- Between 2020 and 2023, smoking rates declined more sharply in New Hampshire than in Massachusetts, with New Hampshire seeing a 25.2 percent reduction, compared to Massachusetts' 11.7 percent decrease.
- Further, during the same period, Massachusetts' tax revenue fell by 28.6 percent, while New Hampshire saw only a 6.5 percent decline.
- In 2023, Massachusetts collected an estimated \$598 million in cigarette monies, yet allocated only \$6.1 million (1 percent) on programs to reduce youth use and help adults quit smoking.
- Policymakers should redirect existing tobacco funds toward more robust tobacco control programs instead of implementing bans

Record Lows in Youth Traditional Tobacco and Modern Nicotine Use

Youth use of traditional tobacco products has reached record lows, with a decline also observed in the use of modern nicotine products, including e-cigarettes, heated tobacco, and oral nicotine.

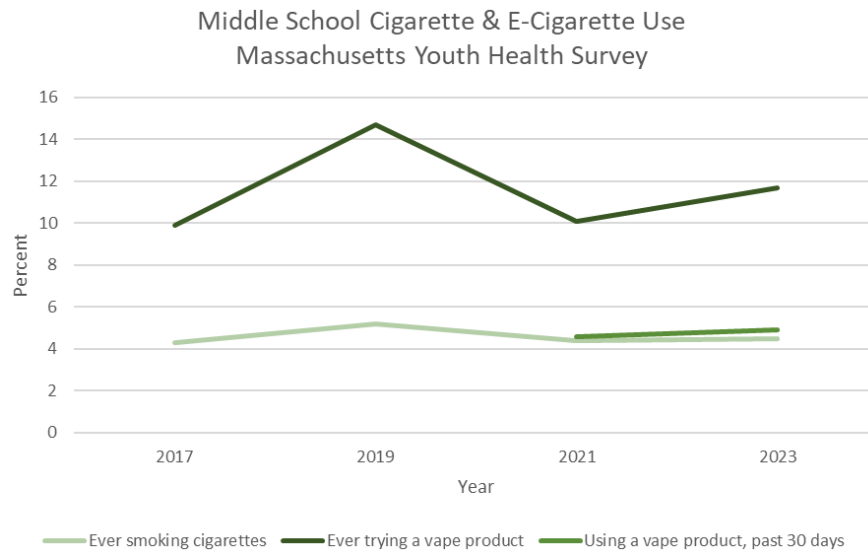
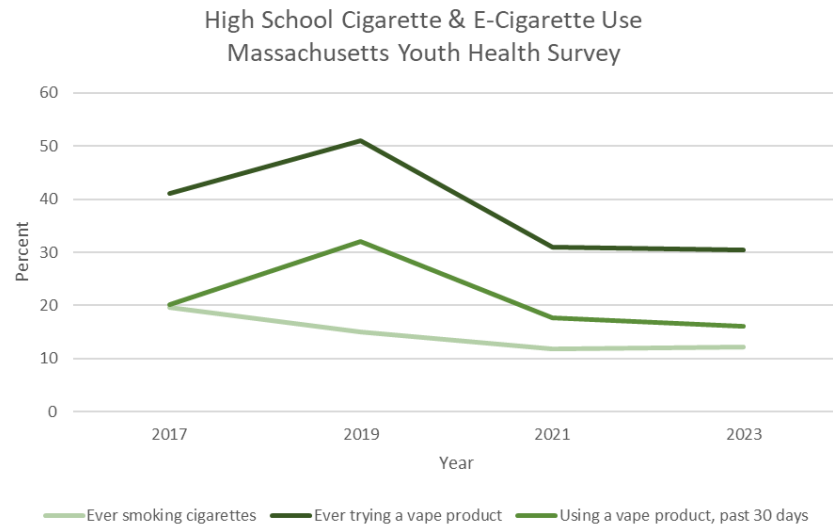
According to the 2023 Massachusetts Youth Health Survey:¹

- 30.4 percent of high school students and 11.7 percent of middle school students have tried a vapor product at least once.
- 16 percent of high school students and 4.9 percent of middle school students were currently using e-cigarettes (defined as having used the product on at least one occasion in the 30 days prior)
- 12.1 percent of high school students and 4.5 percent middle school students have tried a combustible cigarette

These figures are among the lowest recorded. From 2019 to 2023, ever-use of combustible cigarettes decreased by 19.9 percent among high school students and declined by 13.5 percent



among middle school students. Among high school students, current use of e-cigarettes decreased by 50 percent from 32 percent of high schoolers vaping in 2019 to 16 percent in 2023.

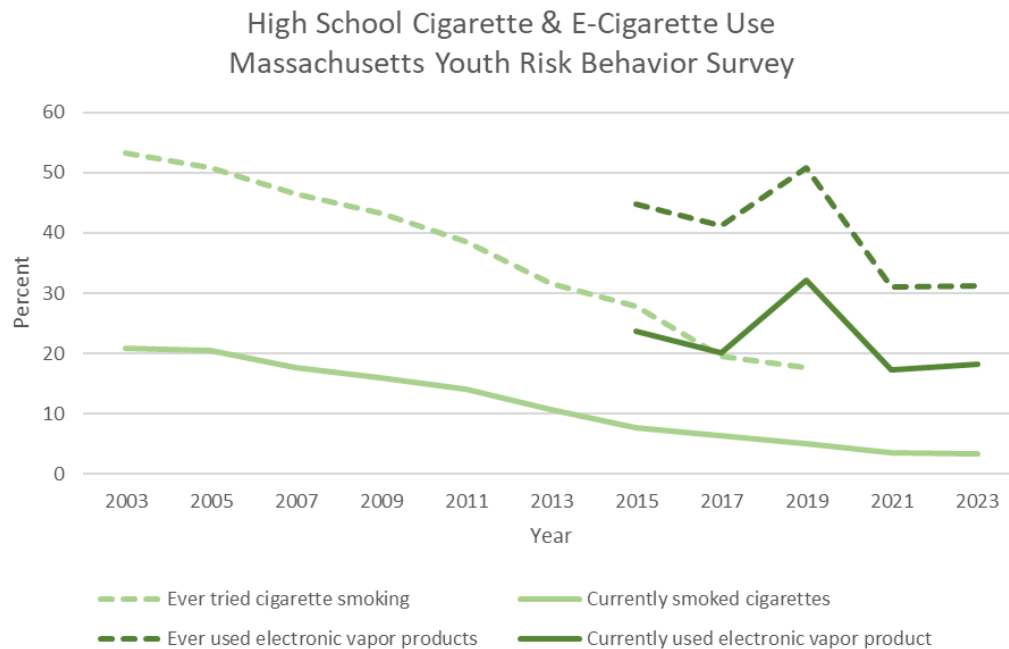


Other state-specific surveys have seen similar declines. In 2023, according to the Centers for Disease Control and Prevention's (CDC) biennial Youth Risk Behavior Survey (YRBS), among high school students in the Bay State:²

- 3.4 percent were currently smoking cigarettes



- 0.9 percent were currently smoking cigarettes frequently (20 days or more)
- 0.8 percent were currently smoking cigarettes on all days of the survey.



These are some of the lowest levels recorded for youth use of combustible cigarettes. In 1995 (the first year the YRBS surveyed Massachusetts high schoolers), 30.2 percent of students were currently smoking, 15.5 percent reported frequent cigarette use, and 11.9 percent reported daily use.

Among Massachusetts high schoolers, between 1993 and 2023:

- Frequent cigarette use dropped by 95.1 percent
- Daily cigarette use decreased by 94.5 percent
- Current cigarette use plummeted by 90.5 percent

Among all U.S. students, use of traditional tobacco and modern nicotine products is at historic lows. According to the CDC's National Youth Tobacco Survey, only 8.1 percent of U.S. middle and high school students reported currently using any tobacco and/or modern nicotine product.³

In 2024, among U.S. middle and high school students:

- 5.9 percent were currently using e-cigarettes
- 1.8 percent were currently using nicotine pouches



- 1.4 percent were currently using cigarettes
- 1.2 percent were currently using cigars

Again, these are some of the lowest rates recorded and are massive decreases in just the past five years. Between 2019 and 2023, among U.S. middle and high school students:

- Current cigar use decreased by 77.4 percent
- Current e-cigarette use decreased by 70.5 percent
- Current cigarette use decreased by 67.4 percent

While a modern product, use of nicotine pouches has increased slightly, from 1.5 percent of students in 2023 to 1.8 percent in 2024. While use should be monitored, the percentage of youth using nicotine pouches does not warrant restrictive policies.

Since 2012, the Monitoring the Future Survey has been examining youth use of snus – another oral nicotine product with similar properties to nicotine pouches but which contains actual tobacco. That year, 5.7 percent of U.S. youth in grades 8, 10, and 12 reported past-year use of snus.⁴ Between 2012 and 2023, the percentage of U.S. youth using snus in the past year dropped by 80.2 percent to 1.1 percent of youth.

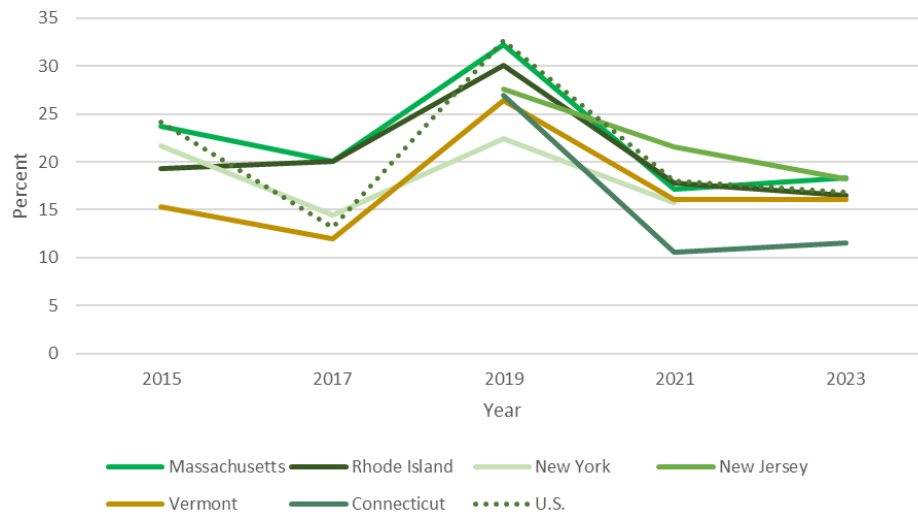
Existing State Ban Has Limited Effects

Interestingly, in 2020, Massachusetts banned the sale of menthol cigarettes and other flavored tobacco products, including non-tobacco-flavored e-cigarettes, largely to affect youth e-cigarette use. Yet, vapor product use among Bay State high schoolers mirrors trends in neighboring states and national data.

In 2023, 11.5 percent of Connecticut high school students, 16.7 percent of New Hampshire high school students⁵, 16.5 percent of Rhode Island high schoolers⁶, and 16.1 percent of Vermont high school students were currently using e-cigarettes – compared to the 18.3 percent of Massachusetts high schoolers vaping in 2023.

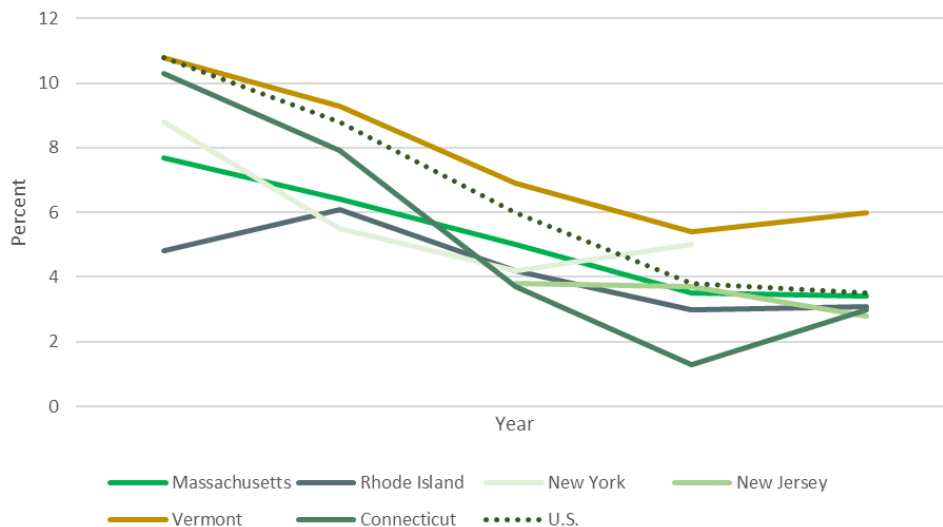


Current E-Cigarette Use Youth Risk Behavior Survey



Combustible cigarette use also shows similar rates of use. In 2023, three percent of Connecticut students, 3.9 percent of New Hampshire students, and 3.1 percent of Rhode Island high schoolers were currently smoking cigarettes – compared to 3.4 percent of high schoolers smoking in Massachusetts the same year.

Current Cigarette Use Youth Risk Behavior Survey



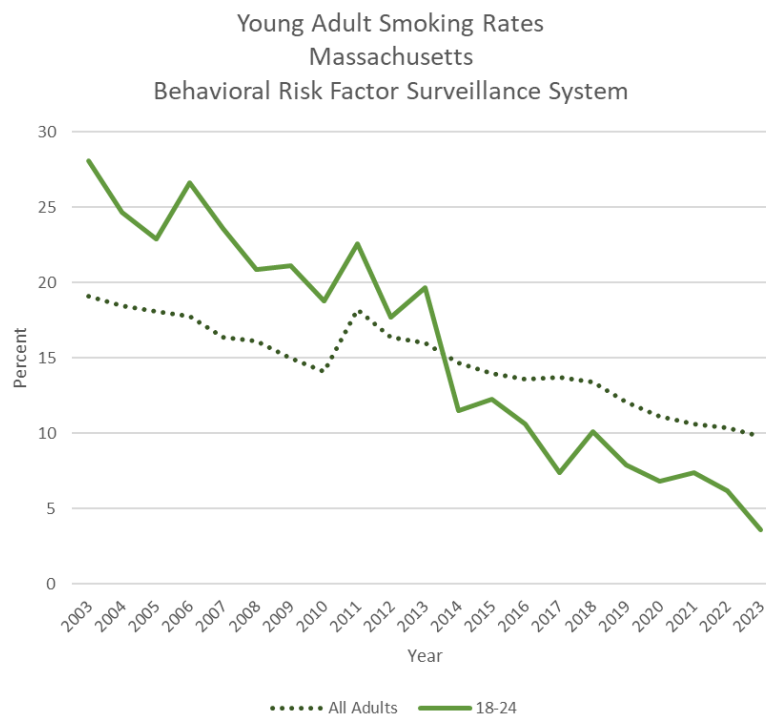
Policymakers should examine what other states are doing – including those without flavored restrictions – which have led to greater declines in youth vaping rates.



Young Adult Use of Combustible Cigarettes Almost Non-Existent, Vapor Product Use Declining

Similar to declines in youth use, the percentage of young adults aged 18 to 24 years old who smoke is at record lows, while use of e-cigarettes has declined in recent years.⁷

According to the CDC's Behavioral Risk Factor Surveillance System survey, in 2023, only 3.6 percent of Massachusetts young adults were currently smoking. This is the lowest rate on record and represents an 81.7 percent decrease in 10 years from 2013 when nearly one fifth (19.7 percent) of young adults in the Bay State were currently smoking combustible cigarettes.



Further, only 14 percent of young adults reported using e-cigarettes in 2023, which was a 14.1 percent decline from 2022 when 16.3 percent of 18- to 24-year-olds were currently vaping. Comparatively, 12.9 percent of adults aged 25 to 34 years old were vaping in 2023 – a 33 percent increase from 2022. The same age group also witnessed a 54.1 percent decrease in combustible cigarette use during the same period.

Given the lows in the most harmful form of tobacco product, and the decreases in vapor product use among young adults, it is not necessary to add restrictions to sale of tobacco and novel nicotine products.



Retailers Already Do Good Job Not Selling to Minors

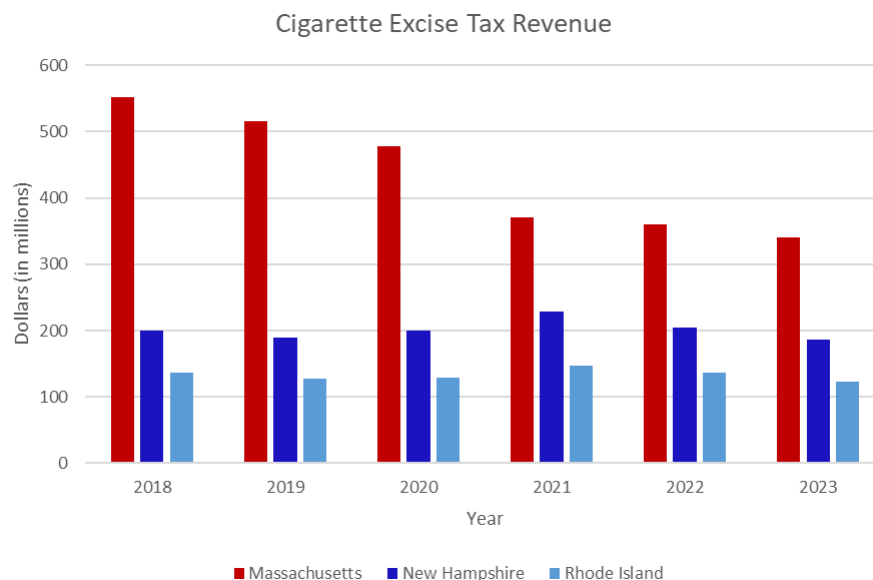
The U.S. Food and Drug Administration (FDA) routinely sends underaged persons into convenience, tobacco, and vapor product retailers in attempts to purchase tobacco and vapor products.

Between 2011 and February 2025, the FDA issued letters to 247 tobacco and vapor product retailers in Mansfield, Mass., resulting in only 15 warning letters and/or civil monetary issued to violators who sold to minors, or 6 percent.⁸

Existing Statewide Bans Lead to Lost Revenue, Neighboring States Seeing Increases

In 2020, the Commonwealth of Massachusetts banned the sale of flavored tobacco and vapor products, as well as increased the excise tax on those products. Both the ban and tax increase led to sharp declines cigarette and vapor tax revenue, while neighboring states experienced increases, without increases in smoking and/or vaping rates.

In 2020, Massachusetts collected \$477.4 million in cigarette tax revenue.⁹ Between 2020 and 2021, cigarette tax revenue declined by 22 percent, representing a loss of more than \$106 million. Comparatively, in neighboring New Hampshire, cigarette tax revenue increased by 14 percent, from \$199.5 million in 2020 to \$228.3 million 2021 – or an additional \$28.8 million in cigarette taxes.

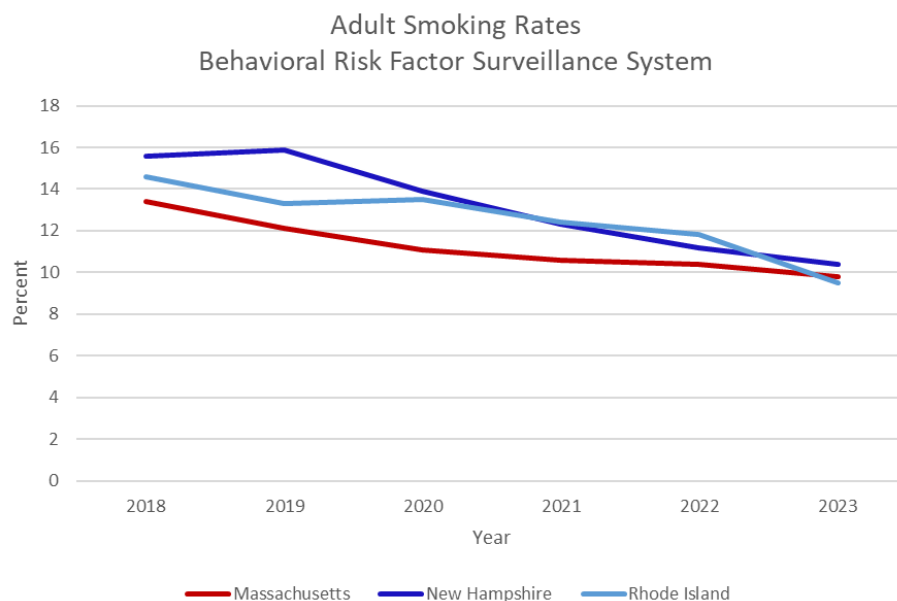


Interestingly, during the same period, smoking rates among all adults declined more sharply among New Hampshire adults in the year after the flavor ban and tax went into effect. Between



2020 and 2021, the percentage of New Hampshire adults who were smoking decreased by 11.5, compared to a 4.5 percent reduction in smoking rates among Massachusetts adults.¹⁰

In fact, between 2020 and 2023, smoking rates among adults in the Bay State decreased by only 11.7 percent, yet among adults in New Hampshire they decreased by 25.2 percent. Yet, tax revenue in Massachusetts is down by 28.6 percent from 2020, compared to only a 6.5 percent decline to revenue collected in New Hampshire.

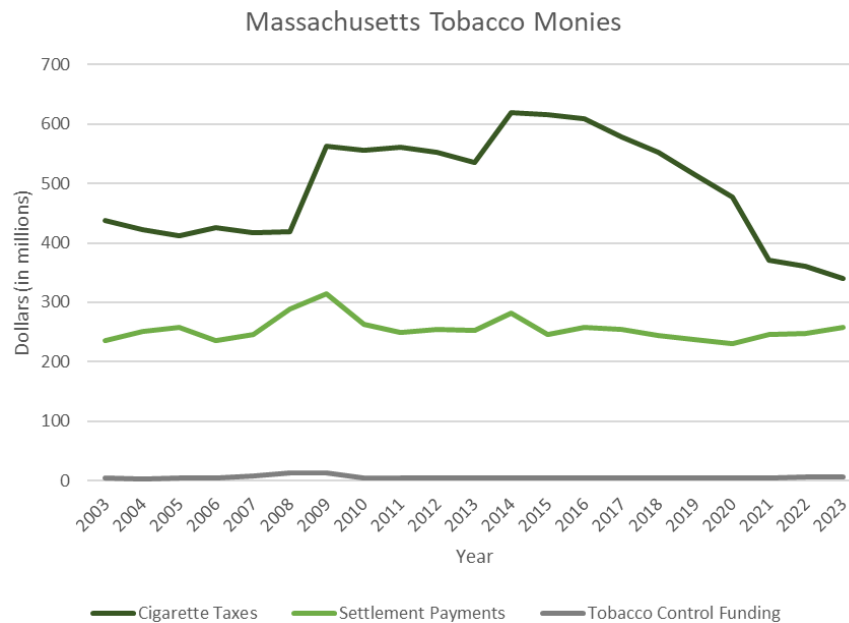


It is becoming more apparent that the 2020 flavor ban and tax increase did not lead to significant declines and the policy itself may need to be revisited.

City Council Should Urge Massachusetts Lawmakers to Invest More Towards Tobacco Control

Rather than enacting bans, policymakers should urge state lawmakers to use more of the existing tobacco monies towards tobacco control programs.

In 2023, Massachusetts collected \$257.1 million in tobacco settlement payments and \$340.9 million in cigarette excise tax revenue, yet the Commonwealth allocated only \$6.1 million towards tobacco control programs. For every \$1 Massachusetts received in tobacco monies in 2023, it spent only \$0.01 on programs aimed at reducing youth use and helping adults quit.



Conclusion

The substantial decrease in traditional tobacco and modern nicotine product use among youth and young adults in Massachusetts and the U.S. reflects significant progress in public health efforts aimed at reducing smoking rates. Generational bans – like most bans – fail to consider these significant strides. Rather than implementing draconian proposals which would force users to underground markets, policymakers should invest more of existing monies towards tobacco control programs to further reduce youth tobacco and modern nicotine product use.

¹ Massachusetts Department of Public Health, “Results of the Massachusetts Youth Health Survey 2023,” May 23, 2024, <https://www.mass.gov/doc/results-of-the-massachusetts-youth-health-survey-2023/download>.

² Centers for Disease Control and Prevention, “YRBS Explorer,” 2023, <https://yrbs-explorer.services.cdc.gov/#/>.

³ Ahmed Jamal, “Tobacco Product Use Among Middle and High School Students — National Youth Tobacco Survey,” *Morbidity and Mortality Weekly Report*, Centers for Disease Control and Prevention, October 17, 2024, <https://www.cdc.gov/mmwr/volumes/73/wr/mm7341a2.htm>.

⁴ Monitoring the Future, “Trends in 12 Month Prevalence of Use in 8th, 10th, and 12th Grade,” 2023, <https://monitoringthefuture.org/data/Prevalence2021/Snus.htm>.

⁵ Lindsey Stroud, “New Hampshire Youth E-Cigarette Use Significantly Down, Record-Low Combustible Use,” Independent Women’s Forum, October 15, 2024, <https://www.iwf.org/2024/10/15/new-hampshire-youth-e-cigarette-use-significantly-down-record-low-combustible-use/>.

⁶ Lindsey Stroud, “Latest Survey Data Show Declines in Rhode Island Youth Tobacco and Vapor Product Use,” Independent Women’s Forum, July 23, 2024, <https://www.iwf.org/2024/07/23/latest-survey-data-show-declines-in-rhode-island-youth-tobacco-and-vapor-product-use/>.

⁷ Centers for Disease Control and Prevention, “BRFSS Prevalence & Trends Data,” 2023, <https://www.cdc.gov/brfss/brfssprevalence/>.



⁸ U.S. Food and Drug Administration, “Tobacco Compliance Check Outcomes,” <https://timp-ccid.fda.gov/>. Accessed October 20, 2024.

⁹ Orzechowski and Walker, “The Tax Burden on Tobacco Historical Compilation Volume 58, 2023. Print

¹⁰ Centers for Disease Control and Prevention, *supra* note 7.