

**Response from R.J. Reynolds Tobacco Company to  
Pediatrics Article on Unintentional Child Poisonings  
Through Ingestion of Conventional and Novel Tobacco Products**

**April 2010**

- Certainly, adult tobacco consumers should be diligent in ensuring that children do not have access to any tobacco product, including dissolvable tobacco products.
- **Camel dissolvable tobacco products weren't even on the market during the years that were analyzed (2006-2008).**
- It's important to note from the paper that 91% of the accidental ingestions involved cigarettes, butts, cigars and traditional moist snuff, so it's clearly important that ALL tobacco and nicotine products be kept out of the hands of kids.
- Contrary to the study's assertion, accidental ingestion of tobacco products is not a "major" reason for infant and child toxic exposures reported to poison control centers. During the period of time covered in the study, tobacco products were involved in about 0.5% of pediatric exposures to products with potential harm (in 2007, out of nearly 1.3 million incidents, 6,724 involved tobacco, according to the American Association of Poison Control Center.)
- The paper was also remarkably selective in its focus. Any analysis of nicotine ingestion and poisoning should include all potential household sources of nicotine products. Yet notably absent from the paper was any mention of the potential accidental ingestion of Nicotine Replacement Therapies (NRT), which are regulated and approved by FDA. However, these products, too, clearly should be kept out of the reach of children.
- NRT tablets and gums contain as much as two to four times the amount of nicotine as a Camel Orb and come in such flavors as Cherry, Fruit Chill, White Ice Mint, Cinnamon Surge, FreshMint and Mint.
- According to data from the American Association of Poison Control Center data, from 1996-2007, accidental ingestion information includes:

<b>Substance</b>	<b>Exposures</b>	<b>Total Deaths</b>
Cosmetics	2,526,991 75% of them by children <6 years old	48
Electrolytes/Mineral supplements	279,351 73% of them by children <6 years old	63
Dietary Supplements	174,179 56% of them by children <6 years old	70
Nicotine Replacement Therapy drugs	9,138 38% of them by children <6 years old	5
Tobacco Products	97,132 87% of them by children <6 years old	4 (Of the four cases, AAPCC reported only one pediatric case (1997) and the fatality was associated with ingestion of cigarette butts.)

- Dissolvable tobacco products have been on the market for several years (Ariva in 2001 and Stonewall in 2003). Ariva contains 50 percent more nicotine than Camel Orbs; Stonewall contains four times more nicotine than Camel Orbs
- We have taken steps to help prevent accidental ingestion of Camel dissolvable tobacco products by youth, including:
  - Packaging the product in child-resistant packages in accordance with Consumer Product Safety Commission standards;
  - Printing the statement, “Keep out of reach of children” on the packaging; and
  - Providing information to poison control officials on our dissolvable tobacco products and the potential effects if a child were to accidentally ingest the products and experience adverse symptoms.
- We have not been informed of adverse events in children related to tobacco exposure involving Camel dissolvable tobacco products. After reading the paper, which refers to a potential incident in Oregon, we have reached out to the Oregon Poison Control Center to gather more information.
- The bottom line: Tobacco products, along with many other types of goods, need to be kept out of the hands of children.