1. Voluntary action by the industry - including the e-cigarette industry – is insufficient. Industry wide regulatory action is essential.

FDA's approach must be comprehensive and not be limited to sales restrictions to prevent illegal sales to youth.

3. It is essential to address the problem of youth use of other tobacco products as well as e-cigarettes.

FDA's Plan Must Include Meaningful Action Against Youth Usage

1. FDA must enforce pre-market review. FDA must actively enforce the legal requirement preventing products that were not commercially marketed as of August 8, 2016, or that were modified after that date, from being sold without premarket review. FDA must also rescind the four-year suspension of premarket review for newly deemed products on the market as