



December 1, 2023

Members of the St. Paul City Council

RE: Proposed Reduction in Allowed Tobacco Retail Licenses

Dear Mayor and Members of the City Council:

As the Executive Director of the National Association of Tobacco Outlets (NATO), a national retail trade association that represents more than 66,000 retail stores throughout the country including many in St. Paul, I am writing to submit our comments and concerns regarding a proposed change in your tobacco retail license ordinance to reduce the number of Tobacco Shop Licenses by one-third and reduce the number of available Tobacco Product Shop licenses by 40%.

We recognize that existing businesses are not impacted by these limits, and that they apply only to new establishments and locations. Nevertheless, the number is entirely arbitrary, chosen with no factual basis. The City Council should simply not be in the business of arbitrarily deciding what the marketplace will decide. There is simply no need to make this change. Consider that a recent analysis by the Centers for Disease Control and Prevention the Food and Drug Administration (FDA), and the National Cancer Institute of 2021 National Health Interview Survey (NHIS) data, Cornelius, et al, *Tobacco Product Use Among Adults – United States, 2021*, MMWR, May 5, 2023, showed that in 2021, only 11.5% of adults smoked cigarettes, “the lowest smoking prevalence recorded since 1965, . . . less than the 12% end-of-decade goal” of the Department of Health and Human Services.

Tobacco use has decreased and will continue to do so for the foreseeable future. The City Council need not interfere with that process by placing arbitrary limits on the number of outlets for the process, indeed a limit that may or may not ever come into play.

We trust that you will give serious consideration to all the facts and information contained in this letter to make an informed decision on whether to reduce the number of Tobacco Shop and Tobacco Product Shop licenses. Thank you for your time and willingness to hear from retailers.

Sincerely,

***David Spross***

NATO Executive Director