

Supplement 3. The Menthol Ban Scenario

We consider the impact of a menthol ban that is applied to both cigarettes and little cigars, so that substitution from menthol cigarettes to menthol cigars, especially little cigars, is minimal. We rely on a recent expert elicitation,¹ in which experts were asked to estimate the transitions in regular cigarette and NVP use under a menthol cigarette and cigar ban. We developed and pilot tested a questionnaire that focused on tobacco use transitions of current smokers (age 18-24 menthol, age 35-54 menthol, and age 35-54 non-menthol) and potential menthol smokers (age 12-24).

Expert Selection

We adopted a three-pronged approach to the identification of experts. First, we selected lead and senior authors of studies identified in a scoping review on the impact of menthol and flavor bans.¹⁴ Second, we searched Scopus to identify individuals who were among the most published authors on the topic of menthol tobacco. Similar to the method adopted by the FDA for their expert panel,²¹ we selected the top 30 authors identified by Scopus and removed those with an H-Index of <20. Finally, we consulted expert advisors of our FDA-sponsored TCORS 2.0 Center (CAsToR) on their recommendations. We sent invitations to the 12 top-ranked experts requesting their participation. All but one invitee agreed to participate, leaving a final sample of 11 experts.

Elicitation Process

First, we asked the experts to review a compilation of background materials. In the first round, experts completed an online questionnaire using the Qualtrics platform. For the second round, we shared the anonymized responses to the questionnaire along with a summary of the group mean, minimum and maximum for each transition with each participating expert. Experts were given the option of revising their responses, which enabled them to consider others' answers and possibly

move toward consensus.²⁻⁴ In addition to their revisions, we also asked experts to indicate their level of confidence for each question (1=not at all to 4=very).

Method Used to Estimate Transitions in the Menthol Ban Scenario

For each age/menthol group, we estimated average net transitions under the ban. Individual net transitions were calculated as the change in use for each product category between the Status Quo and Menthol Ban Scenarios, i.e., the net transitions due to the ban. For example, if an expert indicated that out of 100 menthol smokers, 40 would transition to NNDPs under the status quo and 60 under the menthol ban, then the net transition due to the ban is 20 (=60-40). We then calculated the mean net transition over all 11 experts. While different combustible products were included in the Status Quo and Menthol Ban Scenarios, we aggregated all combustibles (cigarettes and cigars) into a category of total combustibles. Experts were first asked about transitions by those ages 12-24 who would have otherwise initiated into menthol cigarette use. The process allowed for transitions through the age of 30 for initiation. The experts were then asked to estimate the transitions under a ban by menthol smokers at age 18-24 and 35-54, and non-menthol smokers age 35-54 for both genders. The outcomes include "continue to be (illicit) menthol smokers," "switch to non-menthol smoking," "switch to cigar use," "switch to smokeless tobacco use," "switch to NNDP" (novel nicotine delivery products, and "quit" (discontinue any nicotine product use). For the 18-24 and 35-54 years old age groups, experts were asked transitions over a two-year period under the Status Quo (no ban) and under the menthol Ban. In developing the relevant transitions for the model, we use the difference in these transitions for each product category in order to obtain the net change as a result of the ban. In characterizing each of the transitions, illicit menthol cigarette users are retained as menthol smokers, with the same cessation and switching rates as menthol cigarette smokers in the

Menthol Ban Scenario

We consider transitions into cigar use as non-menthol cigarette use to create a change in combustible use. This is a conservative strategy in that the health impacts are similar or less for cigars compared to cigarettes. Since the experts indicated little impact of menthol ban (?) on smokeless use (2% for ages 18-24 and <1% for ages 35-54), those users are assumed to transfer to non-menthol cigarette use (a conservative strategy). Although the survey also allowed for switching to heated tobacco and HTP risks are similar to NVPs, transfers to NNNDP use are assumed to all be into NVP use. While compiling the inputs from 11 experts, one expert gave anomalous response that “most menthol smokers will switch to non-menthol cigarette, NVP and smokeless tobacco in the status quo scenario” and “most menthol smokers will switch to non-menthol cigarettes, and those who would switching to NVPs, smokeless or quit smokers will allow switch to non-menthol cigarette”. Since his response deviates greatly from the rest of the experts, his response was removed from the sample.

Based on estimates from the experts for would-be menthol smokers at ages 12-24 in the Menthol Ban Scenario (Table S3.1), we use the mean net transition to model the decomposition of the would-be menthol smokers in the Menthol Ban Scenario (Figure S3.1 below). The transitions are multiplied by the former menthol initiation rate at each age for each gender through age 40, where M1=2.4% become illicit menthol smokers, M2=38.3% (=30.3%+5.6%+2.4%) become non-menthol smokers (including non-menthol cigar users and smokeless users), M3=17.3% become NVP users, and the remaining 42.0% are transferred back to never smokers. Never smokers are kept in a separate permanent never smoker category, so that they do not later initiate into the NVPs use and smoking. This allows for increased initiation of non-menthol smoking and vaping. The same level

of transitions of would-be menthol smokers is assumed in all future years after the menthol ban, thus leading to increasing effects of a ban over time.

For transition rates from current menthol smokers (ages 18-24 and ages 35-54) in the Menthol Ban Scenario (see Figure S3.2), we do not directly apply experts' estimates for the Menthol Ban Scenario because of their dependence on the Status Quo scenario. Instead, we use the difference between experts' estimate in the Status Quo and the menthol ban scenarios to re-distribute would-be menthol smokers in the Menthol Ban Scenario. These transitions are in terms of direct transitions in prevalence. While transitions in the expert elicitation are within a two-year period, we assume the original change in prevalence takes place in the first year for simplicity. That change is maintained over time subject to the cessation rates of the respective products. After the first year of menthol ban when a sudden reduction in the menthol smoking prevalence is incorporated, all the remaining menthol smokers become illicit menthol smokers but their cessation rate and switching rate to NVP use in the following years are assumed to be the same as what were assumed for menthol smokers in the Menthol Status Quo Scenario and no switching to non-menthol smokers anymore. Consequently, a menthol ban continues to have long term effects (in future years) through the increased (Status Quo) cessation rate of non-menthol smokers who have switched from menthol(?) smoking.

Based on the expert data for menthol smokers ages 18-24 (Table S3.2), we estimated the difference between the Status Quo scenario and the Menthol Ban Scenario and computed the increment of each group relative to the diminished menthol cigarette smokers as shown in Figure S.3.2. Based on the expert elicitation, 10.1% switch to illicit menthol cigarettes or cigars, 48.0% (43.8%+0.9%+3.3%) switch to non-menthol cigarettes, 24.2% switch to NVPs and 17.7% quit. These transitions are multiplied by the menthol cigarette smokers prevalence at each age by gender.

While the expert elicitation was in terms of ages 18-24, we allowed the transitions to occur through age 30. Thus, the transitions from current menthol smokers ages 18-30 are modelled as a one-time change.

The transition rate for menthol smokers ages 35-54 (Table S3.3) is obtained based on experts' estimates of the difference between the Status Quo and Menthol Ban Scenario for those ages 35-54. As shown in Table S3.3, 8.8% switch to illicit menthol cigarettes or cigars, 59.2% (54.5%+3.7%+1.0%) switch to non-menthol cigarettes, 17.3% switch to NVPs and 14.7% quit. These transitions are multiplied by the menthol cigarette smokers prevalence by age and gender. While the expert elicitation was in terms of ages 35-54, we allowed the transitions to all menthol smokers above age 30.

For the transition rate from non-menthol smokers age 35-54 in the Menthol Ban Scenario, we allow for no change compared to the rate in the Status Quo Scenario based on the results in Table S3.4.

Table S.3.1. Transitions of Ages 12-24 Who Would Have Initiated as Menthol Smokers Under a Menthol Ban, in Percentage Terms (out of 100 age 18-24 menthol smokers in the Status Quo)

Population	Status Quo	Total Population with Menthol Ban			
		Mean	Median	Min	Max
Become non-menthol cigarette users (exclusively or with other products)	0	30.3	25.0	1.9	79.0
Become non-menthol cigar users (exclusively or with other products, but not cigarettes)	0	5.6	2.0	0.0	20.0
Become illicit menthol cigarette or cigar user	0	2.4	1.0	0.0	10.0
Total combustible use (status quo all menthol cigarettes)	100	38.3	35.0	3.5	83.0
Become exclusive smokeless tobacco or other oral tobacco product users	0	2.4	2.0	0.0	5.0
Become novel nicotine delivery product users (NNDP), such as e-cigarettes or heated tobacco products (exclusively or in combination with other products, but not cigarettes or cigars)	0	17.3	20.0	3.4	25.0
No tobacco or novel nicotine delivery product use	0	42.0	41.0	6.0	92.3

Table S.3.2. Transitions of age 18-24 Menthol Smokers in the Status Quo and Menthol Ban Scenarios in Percentage Terms (out of 100 age 18-24 menthol smokers in the Status Quo)

Population	Status Quo	Menthol Cigarette and Cigar Ban	Net Effect	Final Transition as a Percent of Menthol Smokers in the Status Quo
Product Type	Mean	Mean	Absolute difference	Percent of 71.2%
Continue to be menthol cigarette smokers (exclusively or with other products)	71.2	-	-71.2	
Switch to non-menthol cigarettes (exclusively or with other products, except menthol cigarettes)	5.6	36.8	31.2	43.8% (31.2/71.2)
Switch to cigars, especially little cigars, filtered cigars, or cigarillos (exclusively or with other products, but not cigarettes)	3.4	-	0.7	0.9% (0.7/71.2)
Switch to non-menthol cigars, especially little cigars, filtered cigars or cigarillos (exclusively or with other products, but not cigarettes)	-	4.1		
Switch to illicit menthol cigarette or cigar use	-	7.2	7.2	10.1% (7.2/71.2)
Switch to exclusive smokeless tobacco or other oral tobacco products	1.7	4.1	2.4	3.3% (2.4/71.2)
Switch to novel nicotine delivery products (NNDP), such as e-cigarettes or heated tobacco products (exclusively or in combination with other products, but not cigarettes or cigars)	8.3	25.5	17.2	24.2% (17.2/71.2)
Quit regular use of all tobacco or novel nicotine delivery products	9.8	22.4	12.6	17.7% (12.6/71.2)

Table S3.3. Transitions of Age 35-54 Menthol Smokers in the Status Quo and Menthol Ban Scenarios in Percentage Terms (out of Age 35-54 100 menthol smokers in the status quo)

Population	Status Quo	Menthol Cigarette and Cigar Ban	Net Effect	Final Transition as a Percent of Menthol Smokers in the Status Quo
Product Type	Mean	Mean	Absolute difference	Percent of 71.2%
Continue to be menthol cigarette smokers (exclusively or with other products)	71.2	-	-71.2	
Switch to non-menthol cigarettes (exclusively or with other products, except menthol cigarettes)	4.5	43.3	38.8	54.5% (38.8/71.2)
Switch to cigars, especially little cigars, filtered cigars, or cigarillos (exclusively or with other products, but not cigarettes)	1.5	-		
Switch to non-menthol cigars, especially little cigars, filtered cigars or cigarillos (exclusively or with other products, but not cigarettes)	-	4.1	2.6	3.7% (2.6/71.2)
Switch to illicit menthol cigarette or cigar use	0.0	6.3	6.3	8.8% (6.3/71.2)
Switch to exclusive smokeless tobacco or other oral tobacco products	1.9	2.6	0.7	1.0% (0.7/71.2)
Switch to novel nicotine delivery products (NNDP), such as e-cigarettes or heated tobacco products (exclusively or in combination with other products, but not cigarettes or cigars)	8.2	20.5	12.3	17.3% (12.3/71.2)
Quit regular use of all tobacco or novel nicotine delivery products	12.7	23.2	10.5	14.7% (10.5/71.2)

Table S.3.4. Transitions of Non-Menthol Smokers at Age 35-54 in The Status Quo and Menthol Ban Scenario

Population	Status Quo	Menthol Cigarettes and Cigars Ban	Absolute difference
Product Type	Mean	Mean	
Switch to be menthol cigarette smokers (exclusively or with other products)	2.3	-	-2.3
Continue to smoke non-menthol cigarettes (exclusively or with other products, except menthol cigarettes)	75.3	76.9	1.6
Switch to cigars, especially little cigars, filtered cigars, or cigarillos (exclusively or with other products, but not cigarettes)	0.8	-	-0.8
Switch to non-menthol cigars, especially little cigars, filtered cigars or cigarillos (exclusively or with other products, but not cigarettes)	-	1.1	1.1
Switch to exclusive smokeless tobacco or other oral tobacco products	1.8	1.7	-0.1
Switch to novel nicotine delivery products (NNDP), such as e-cigarettes or heated tobacco products (exclusively or in combination with other products, but not cigarettes or cigars)	8.4	8.5	0.1
Quit regular use of all tobacco or novel nicotine delivery products	11.4	11.8	0.4

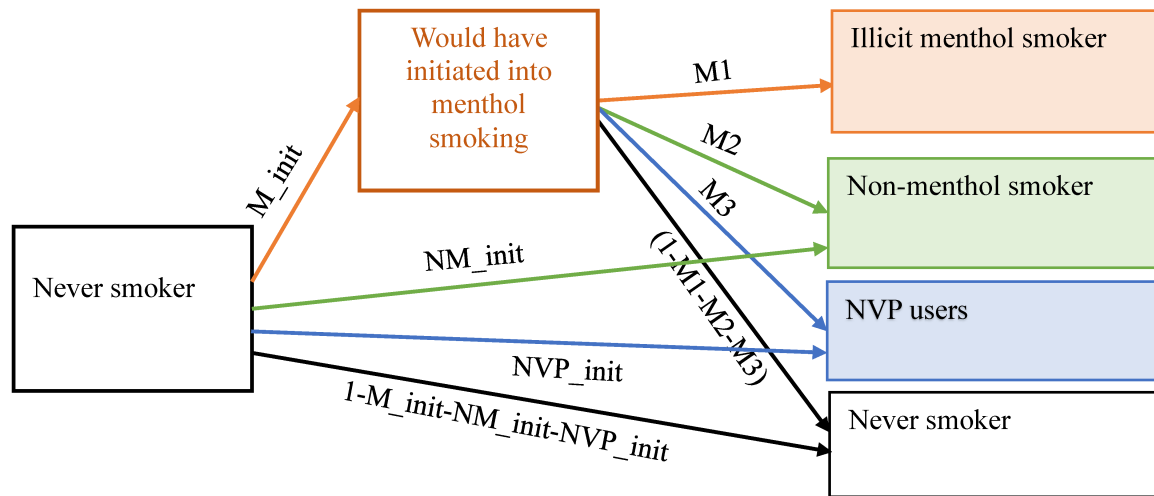
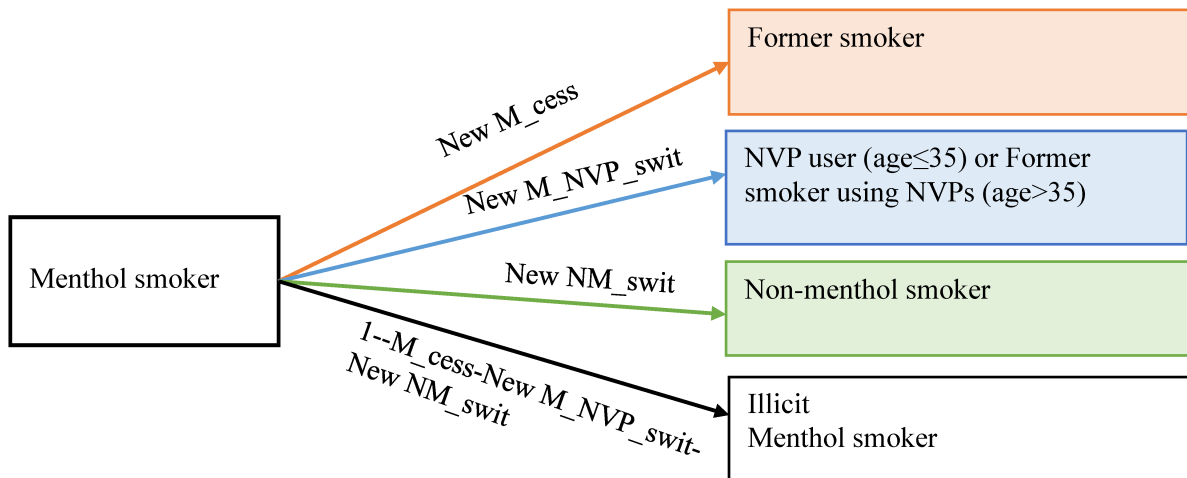
Figure S.3.1: Transitions from Never Smokers in the Menthol Ban Scenario

Figure S.3.2 Transitions from Menthol Smoker in the Menthol Ban Scenario

Supplement 4. Results of the Menthol Status Quo and Menthol Ban Scenarios by Gender

Public Health Impact under the Base Case Status Quo and Menthol Ban Scenarios

Table S4.1 presents the 2021-2060 US menthol and non-menthol smoking and NVP prevalence, deaths, and LYLs for males and females ages 18-99. Results from 2026 and 2060 are presented to display short-term and long-term changes. The results are generally greater in relative terms for females due to their higher rates of menthol cigarette use relative to total cigarette use.

Under the Status Quo Scenario, adult (ages ≥ 18) menthol smoking prevalence declines from 5.8% in 2021 to 4.7% in 2026 and 2.5% in 2060 for males and from 5.1% in 2021 to 4.3% in 2026 and 2.3% in 2060 for females, while non-menthol smoking prevalence declines from 8.5% in 2021 to 6.7% in 2026 and 3.2% in 2060 for males and from 5.8% in 2021 to 4.6% in 2026 and 2.1% in 2060 for females. Cumulative SVADs include 10.0 million males and 4.2 million females, translating to 102.1 million male and 41.2 million female LYLs.

Under the Menthol Ban Scenario, adult menthol smoking prevalence declines to 0.4% in 2026 and 0.1% in 2060 for males and to 0.3% in 2026 and 0.1% in 2060 for females, while non-menthol smoking prevalence increases to 9.6% in 2026 and declines to 4.8% in 2060 for males and to 7.2% in 2026 and 3.6% in 2060 for females. Cumulative SVADs include 9.7 million males and 3.9 million females, translating to 95.2 million male and 36.8 million female LYLs.

By 2060, combined menthol and non-menthol smoking prevalence falls from 5.7% under the status quo to 4.9% with a menthol ban for males (a 13% relative reduction) and from 4.5% to 3.7% for females (17% reduction). The 2060 NVP prevalence under the status quo and menthol ban are 6.7% and 8.5% for males (25% increase) and 4.5% and 5.8% for females (28% increase).

Cumulative SVADs are reduced in relative terms by 4.6% (0.4 million males; 0.3 million females),

and LYLs are reduced by 7.9% (6.9 million males; 4.4 million females).

Sensitivity analysis by Gender

Table S4.2 contains the sensitivity analysis broken down by gender. The impacts are of the same sign and similar in magnitude by gender.

Supp 4..1. Smoking and NVP Prevalence, Smoking and Vaping Attributable Deaths, Life-Years Lost and Public Health Impact, By Gender, Ages 18 and Above, 2021-2060

Status Quo Scenario									
		MALE				FEMALE			
Category	Category/Year	2021	2026	2060	Cumulative Impact*	2021	2026	2060	Cumulative Impact*
Prevalence	Never smoker	59.7%	62.1%	72.2%	20.9%	68.6%	70.1%	78.3%	14.2%
	Menthol smoker	5.8%	4.7%	2.5%	-57.3%	5.1%	4.3%	2.3%	-53.9%
	Nonmenthol smoker	8.5%	6.7%	3.2%	-61.8%	5.8%	4.6%	2.1%	-63.9%
	All Smokers	14.3%	11.5%	5.7%	-60.0%	10.9%	9.0%	4.5%	-59.2%
	Former smoker	21.3%	19.9%	9.5%	-55.4%	17.6%	17.0%	8.9%	-49.6%
	Exclusive NVP user	3.2%	4.4%	6.7%	109.6%	1.9%	2.6%	4.5%	140.7%
	Former smoker-NVP user	1.2%	1.4%	0.3%	-74.4%	0.8%	0.9%	0.2%	-79.5%
	All NVP users	4.5%	5.8%	7.0%	58.3%	2.7%	3.5%	4.6%	73.3%
	Former NVP user	0.3%	0.7%	5.5%	1868%	0.2%	0.4%	3.7%	2132.0%
Smoking and vaping attributable deaths	Menthol smoker	51,083	48,519	23,865	1,522,092	26,372	25,616	15,554	880,187
	Nonmenthol smoker	83,797	72,531	26,320	1,990,971	38,445	33,593	11,602	918,274
	Former smoker	135,834	144,048	138,524	6,212,810	39,964	45,443	53,843	2,288,041
	Exclusive NVP user	19	121	3,985	60,509	0	7	1,228	14,897
	Former smoker-NVP user	3,595	5,243	4,630	241,155	1,416	1,926	1,190	75,546
	Former NVP user	0	0	1,512	11,600	0	0	204	1,212
	Total	274,328	270,461	198,836	10,039,137	106,198	106,585	83,621	4,178,156
Life-years lost	Menthol smoker	899,390	825,693	343,306	24,361,382	435,860	416,319	212,825	13,485,248
	Nonmenthol smoker	1,353,358	1,149,146	409,599	31,561,363	596,145	506,597	172,211	13,560,658
	Former smoker	1,057,982	1,100,435	780,242	40,765,617	265,265	304,025	270,173	12,730,946
	Exclusive NVP user	809	4,870	99,586	1,814,641	12	301	30,921	433,456
	Former smoker-NVP user	64,156	89,255	39,988	3,302,218	21,659	28,449	10,747	944,031
	Former NVP user	0	2	28,428	254,156	0	0	3,682	24,560
	Total	3,375,694	3,169,401	1,701,148	102,059,376	1,318,941	1,255,691	700,559	41,178,899

Menthol Ban Scenario									
		MALE				FEMALE			
Category	Category/Year	2021	2026	2060	Cumulative Impact *	2021	2026	2060	Cumulative Impact *
Prevalence	Never smoker	59.7%	61.7%	70.0%	17.2%	68.6%	69.9%	76.9%	12.1%
	Menthol smoker	5.8%	0.4%	0.1%	-98.5%	5.1%	0.3%	0.1%	-98.4%
	Nonmenthol smoker	8.5%	9.6%	4.8%	-42.9%	5.8%	7.2%	3.6%	-38.3%
	All Smokers	14.3%	9.9%	4.9%	-65.4%	10.9%	7.5%	3.7%	-66.3%
	Former smoker	21.3%	20.6%	9.6%	-55.0%	17.6%	17.6%	8.9%	-49.4%
	Exclusive NVP user	3.2%	5.0%	8.5%	164.7%	1.9%	3.1%	5.8%	210.9%
	Former smoker-NVP user	1.2%	7.0%	8.8%	-73.5%	0.8%	1.4%	6.0%	-77.4%
	All NVP users	4.5%	2.5%	0.3%	98.2%	2.7%	4.5%	0.2%	122.6%
	Former NVP user	0.3%	0.7%	6.6%	2260.8%	0.2%	0.5%	4.5%	2663.1%
Smoking and vaping attributable deaths	Menthol smoker	51,083	4,409	1,515	172,510	26,372	2,383	1,043	98,958
	Nonmenthol smoker	83,797	102,113	37,211	2,790,339	38,445	49,186	18,167	1,367,181
	Former smoker	135,834	145,339	141,001	6,303,873	39,964	45,759	54,744	2,316,726
	Exclusive NVP user	19	121	4,578	68,087	0	7	1,466	17,568
	Former smoker-NVP user	3,595	7,769	5,295	310,429	1,416	2,871	1,520	103,390
	Former NVP user	0	0	1,662	12,641	0	0	233	1,369
	Total	274,328	259,751	191,262	9,657,880	106,198	100,206	77,173	3,905,192
Life-years lost	Menthol smoker	899,390	73,193	18,326	2,695,009	435,860	38,484	12,230	1,479,148
	Nonmenthol smoker	1,353,358	1,647,004	575,978	44,419,838	596,145	756,752	265,542	20,506,821
	Former smoker	1,057,982	1,117,480	791,117	41,581,500	265,265	307,513	274,077	12,949,902
	Exclusive NVP user	809	4,888	116,538	2,056,349	12	301	37,215	513,526
	Former smoker-NVP user	64,156	126,070	43,145	4,129,424	21,659	41,963	12,905	1,288,841
	Former NVP user	0	2	31,561	278,770	0	0	4,257	28,071
	Total	3,375,694	2,968,636	1,576,663	95,160,891	1,318,941	1,145,014	606,226	36,766,308

Difference between Menthol Status Quo and Menthol Ban Scenario									
Relative Reduction in Prevalence**	Menthol Smoker	-	-92.5%	-96.5%	-	-	-92.5%	-96.5%	-
	Nonmenthol Smoker	-	42.1%	49.6%	-	-	54.8%	70.7%	-
	All Smokers	-	-13.6%	-13.4%	-	-	-16.0%	-17.3%	-
	Exclusive NVP user	-	19.3%	25.2%	-	-	27.8%	28.5%	-
Gain***	Averted Deaths	-	10,710	7,575	381,257	-	6,378	6,448	272,964
	Averted life-years lost	-	200,764	124,484	6,898,485	-	110,676	94,333	4,412,592

Notes: NVP= nicotine vaping product, All smokers = combined menthol and non-menthol smokers. All NVP users= combined exclusive NVP user and Former smoker-NVP * The cumulative impact is measured in terms of the relative change from 2021-2060 for prevalence rates (i.e., (2060-2021)/2021) and the sum of the smoking and vaping attributable deaths or life years lost over the years 2021 through 2060. ** Relative reduction in prevalence is measured as the relative difference between the menthol status quo scenario and the menthol ban scenario, (i.e. (post ban – pre ban)/pre ban) in year 2026 and 2060. ***The gain is measured as the increase in the averted deaths and life-years lost from menthol status quo scenario to the menthol ban scenario.

Table S4.2. Sensitivity analysis of averted Smoking- and Vaping-Attributable Deaths and Life-Years Lost to NVP relative risks and individual transition parameters, by Gender, All ages, 2021-2060

Smoking- and Vaping-Attributable Deaths Averted by Menthol Ban					
Case	Description	Males	% change*	Females	% change*
1	Base Case	381,257		272,964	-
2	5% instead of 15% NVP risk	401,885	5.4%	285,324	4.5%
3	25% instead of 15% NVP risk	361,376	-5.2%	261,049	-4.4%
4	Increase overall smoking cessation rates by 50%	279,726	-26.6%	180,033	-34.0%
5	Reduce overall smoking initiation rates by 50%	355,050	-6.9%	262,526	-3.8%
6	Increase non-menthol cessation rates annually by 10%	490,326	28.6%	355,647	30.3%
7	Menthol cessation rate same as non-menthol rate	278,416	-27.0%	182,589	-33.1%
8	Increase NVP cessation rates by 50%	389,592	2.2%	279,174	2.3%
9	Increase NVP initiation rates by 100%	379,671	-0.4%	272,445	-0.2%
10	Menthol switching rate same as non-menthol rate	369,610	-3.1%	267,287	-2.1%
11	Increase overall switching rate by 50%	334,455	-12.3%	246,839	-9.6%
12	Reduce the annual decline in switching rate from 10% to 0%	286,893	-24.8%	217,731	-20.2%
Smoking- and Vaping-Attributable Life-Years Lost Averted by Menthol Ban					
1	Base Case	6,898,485		4,412,592	-
2	5% NVP risk	7,302,214	5.9%	4,621,900	4.7%
3	25% NVP risk	6,501,249	-5.8%	4,206,515	-4.7%
4	Increase overall smoking cessation rates by 50%	5,354,899	-22.4%	3,135,741	-28.9%
5	Decrease overall smoking initiation rates by 50%	6,039,512	-12.5%	4,090,267	-7.3%
6	Increase non-menthol cessation rates annually by 10%	8,512,072	23.4%	5,503,745	24.7%
7	Menthol cessation rate same as non-menthol rate	5,376,649	-22.1%	3,200,564	-27.5%
8	Increase NVP cessation rates by 50%	7,036,248	2.0%	4,500,279	2.0%
9	Increase NVP initiation rates by 100%	6,845,769	-0.8%	4,395,641	-0.4%
10	Menthol switching rate same as non-menthol rate	6,656,080	-3.5%	4,313,941	-2.2%
11	Increase overall switching rate by 50%	5,967,457	-13.5%	3,971,355	-10.0%
12	Reduce the annual decline in switching rate from 10% to 0%	5,049,036	-26.8%	3,478,404	-21.2%

Notes: NVPs= nicotine vaping products, % change is in terms of the relative difference from the base case, (e.g., (687,209-654,221)/654,221 for case 2 relative to case 1.

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