



September 3, 2019

Dear Mayor Rothschild and City Council Members,

We, the undersigned trade associations, are supportive of raising the age to 21 to purchase all products that contain nicotine. We want to do everything we can to ensure that tobacco and nicotine products are kept out of the hands of anyone underage. We believe that the legal age of purchase issue is a matter of statewide concern. Ideally, the national purchase age will soon create a completely level playing field for all tobacco and vapor sellers. In the meantime, a patchwork of regulations and licenses across the state is problematic for retailers.

Our groups represent tobacco and vapor retailers in Pima County and the city of Tucson who will be regulated by the proposed ordinance. AFMA and APMA together represent more than 200 convenience stores in Pima County, as well as the major grocery retailers and independents stores.

The proposed changes will likely shift sales to other stores outside of the County's and City's jurisdictions like Oro Valley, Marana, Sahuarita, South Tucson, and the Native American reservations. Additionally, when customers make the drive for their tobacco and vapor purchases, their sales tax revenues will leave with them – not just for those products alone, but for all ancillary purchases as well.

For all age-restricted products, one set of known and consistent standards is critical. We are responsible retailers and have been the front line of enforcement for age-restricted sales for decades. With a single set of laws, we can effectively train our employees, ensure our compliance with the law and reduce the number of underage sales.

We appreciate that there have been opportunities for stakeholder input and some changes to address stakeholder feedback.

We understand that the County and the City are attempting to address a problem with these changes. We agree that the rise in youth vaping is an issue deserving of our attention and action. However, we cannot agree with the proposed city-by-city solution.

We respectfully oppose the proposed ordinance as drafted and invite the County and City to work with us to address the youth vaping issue at the state level and national level.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Mark Miller
President
Arizona Food Marketing Alliance
602-252-9761

Amanda Gray
Executive Director
Arizona Petroleum Marketers Association
602-330-6762

SEP 03 19 PM 2:02 POC/KCF/BL
AAB