



Date: May 27, 2020

To: Alessia Cerantola, Andrei Ciurcanu (Project Coordinators, OCCRP)

Copy: Sandra Mullin (Senior Vice President, Policy, Advocacy and Communication at Vital Strategies),
Anna Gilmore (Director, Tobacco Control Research Group at the University of Bath)

Dear Ms. Cerantola, Mr. Ciurcanu,

Following your publication of a series of Vital Strategies-sponsored articles regarding Philip Morris International (PMI) and its affiliates, we are writing to put you on notice that there are significant factual errors contained throughout the writing, and request that you correct these errors immediately.

As our review process continues, we may ask for additional corrections. However, it is vital that you begin the process of aligning your sponsored content with the facts – many of which you did not provide PMI with an opportunity to respond to prior to publication – as soon as possible. We believe, and hope you do as well, that readers should not be misinformed or misled.

Your piece “Blowing Unsmoke” included the following mistakes, which must be rectified.

- 1. You wrote that “the U.S. Food and Drug Administration rejected the claim that using the [IQOS] device cuts the risk of tobacco-related diseases.”**

This is false. The U.S. Food and Drug Administration (FDA) has yet to make a decision on PMI’s modified risk tobacco product applications (MRTPAs) for *IQOS*, which will determine whether *IQOS* can be marketed with risk-related messages. You are confusing, either accidentally or deliberately, a January 2018 public meeting of the FDA’s Tobacco Products Scientific Advisory Committee, which extensively discussed our *IQOS* MRTP applications. To be clear, the Committee’s considerations are recommendations made to the FDA and they are non-binding.

- 2. Professor Anna Gilmore wrongly claims there “are only a few independent analyses on the safety of IQOS and how it compares to ordinary cigarettes in terms of the harm done to the body over time.”**

Prof. Gilmore is misinformed. In fact, there are numerous reviews and [studies](#) – including several from government and regulatory authorities – which contribute to a growing body of independent evidence that closely aligns with PMI’s findings. For example, in April 2019, the FDA [authorized](#) *IQOS* for sale in the U.S. through the agency’s pre-market tobacco authorization pathway. To do so, under U.S. federal law, the agency had to conclude that the commercialization of *IQOS* would be “appropriate for the protection of public health.” In the FDA’s own words, among several key considerations that led it to authorize the sale of *IQOS* was a finding that “the products produce fewer or lower levels of some toxins than combustible cigarettes.” Additionally, and perhaps of interest to Prof. Gilmore, the [UK Committee of Toxicity conducted a review of available evidence](#) on two heated tobacco products, one of which was *IQOS*, and concluded: “There would likely be a



reduction in risk for conventional smokers deciding to use heat-not-burn tobacco products instead of smoking cigarettes.” Public Health England relied on this review in their subsequent [report](#), and concluded: “The available evidence suggests that heated tobacco products may be considerably less harmful than tobacco cigarettes and more harmful than e-cigarettes.”

3. You claimed that “IQOS is picking up sponsorships that a tobacco company would normally be barred from: Formula 1 cars in Australia and Japan...”

This is wrong. *IQOS* branding has never been featured on any Formula 1 cars. If you have evidence showing *IQOS* branding on a Ferrari F1 car at the races you mention, we request that you immediately produce such evidence.

Furthermore, as corrections are made throughout your series we expect that these changes will be clearly highlighted in each piece and consistently conveyed in all related versions of your writings, so that readers can assess the veracity of your project. Where you have distributed content to third parties, we request that you notify them immediately and ensure that corrections are published with due prominence in both print and online versions. We will be following up with each outlet to ensure that the corrections are made.

Please know that in keeping with PMI’s commitment to fostering open and transparent dialogue, we will make all of our correspondence regarding the erroneous information you have published available to the public via our website and through our owned media channels.

All of our rights are hereby reserved.

Sincerely,

Dr. Moira Gilchrist

VP Strategic and Scientific Communications
Philip Morris International