



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), Yogi Hale Hendlin (Research Associate, University of California San Francisco)

Dear Ms. Cerantola, Mr. Ciurcanu,

As explained in my email dated May 27, 2020, our review process of the series of sponsored articles you have published regarding Philip Morris International and its affiliates is ongoing. We are writing to put you on notice that there are significant factual errors and misleading statements contained throughout the writing and request that you correct these immediately.

Your piece “Unsmoking for Health,” included the following mistakes and misleading statements among others, which must be rectified:

1. You wrote that IQOS heats “chemically treated tobacco plugs.”

This is misleading. The heated tobacco plugs used in IQOS are made by blending high-quality tobaccos of selected types and origins. These tobaccos are then ground, mixed with liquid and reconstituted back into a tobacco sheet to [make the tobacco plugs](#). To be clear, the tobacco is not “chemically treated” according to common definitions of this phrase. Unfortunately, you did not ask us to explain the manufacturing process. We would have gladly done so had we been given the opportunity.

2. You wrote PMI has invested “over \$3 billion in research to develop the IQOS.”

This is wrong by orders of magnitude. In our letter to the OCCRP on May 25 2020 we stated that: “Since 2008, PMI has invested over USD 7.2 billion to develop and scientifically substantiate smoke-free alternatives.”

3. You quote Yogi Hale Hendlin, a research associate with the University of California San Francisco saying certification of IQOS as a “‘reduced-harm’ or smoking cessation device anywhere in the world would exempt it from tobacco marketing regulations and allow it to be sold just about anywhere, at any time – and smoked anywhere too.”

This is a blatant mischaracterization of PMI’s actions, which would mislead readers to believe that, contrary to the facts, PMI is presenting IQOS as a cessation device or medical device. We made it clear in our letter of May 25, 2020 that:

- (1) PMI does not present – and never has – presented IQOS or any smoke-free product as a cessation device or medical device.



- (2) *IQOS* is not a cessation device, and therefore not intended for smokers who are looking for a means to quit nicotine and tobacco products all together – the best choice for any smoker. Please read our [Good Conversion Practices](#).

Further, the quote by the research associate you have published is either taken out of a wider context or reveals a basic lack of understanding of relevant regulatory frameworks. For example, in the U.S. – where research associate Hendlin appears to be based (University of California San Francisco) – *IQOS* is subject to the stringent regulations of the Family Smoking Prevention and Tobacco Control Act of 2009. Indeed, in April 2019, the U.S. [Food and Drug Administration \(FDA\) authorized the commercialization of *IQOS*](#) in the US under the premarket tobacco product application pathway. The FDA has yet to make a decision on PMI’s modified risk tobacco product applications (MRTPAs) for *IQOS*, which will determine whether the product can be marketed in the U.S. with risk-related messages in communications with U.S. consumers.

4. Dr. Hendlin (University of California San Francisco) and Prof. Anna Gilmore (University of Bath) claim PMI is in a “position to market *IQOS* as a medical device.”

IQOS is not a medical device and we do not present it as such. In none of the 53 markets where *IQOS* is sold throughout the world is it marketed as such. Please read our [Good Conversion Practices](#). This baseless and misleading speculation must be removed and a correction issued.

As noted in our previous corrections notice, 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 this sponsored project and the allegations you make. 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 note that we may revert on this particular piece of content if our on-going review uncovers additional errors. Additionally, we wish to remind you 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. Please confirm receipt of this email.

Sincerely,

Dr. Moira Gilchrist

VP Strategic and Scientific Communications
Philip Morris International