



New Voices Championing New Tobacco Products

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Philip Morris International-sponsored research, portrayed as independent, advances the company's corporate strategy.

Key points

- Independent evidence that heated tobacco products (HTPs) are “reduced-risk” is lacking. Nevertheless, many new groups funded by the Foundation for a Smoke-Free World, a tobacco industry front group, conduct research that aligns with Philip Morris International (PMI)’s corporate strategy to promote HTPs as “reduced-risk products” and to shape public opinion to accept them.
- The Foundation and many of its grantees actively echo PMI’s “smoke-free” narrative, despite PMI continuing to sell billions of cigarettes a year.
- The Foundation, its grantees and industry allies make policy recommendations for “risk-proportionate regulation,” to influence public policy toward favorable treatment of these new products, including fewer restrictions such as lower taxes on products marketed as “reduced-risk.”
- Foundation-funded reports omit that they are funded by PMI which undermines government policies of non-engagement with the tobacco industry.

Definitions

Newer nicotine and tobacco products

These chiefly include:

- e-cigarettes/electronic nicotine delivery systems (ENDS), commonly termed “vapes”
- nicotine pouches, do not contain tobacco
- heated tobacco products (HTPs), contain tobacco and there is some evidence of combustion
 - **IQOS:** a heated tobacco product produced by Philip Morris International (PMI)

Tobacco industry terms for newer nicotine and tobacco products, mentioned in quotations

- Reduced-risk products (RRPs)
- Alternative products
- Harm reduction products
- Tobacco heating system (THS), i.e. a heated tobacco product

Introduction

The World Health Organization Framework Convention on Tobacco Control (WHO FCTC) is effective in bringing down smoking prevalence in countries that have implemented the policies it recommends.¹ Governments' actions around the world to strengthen tobacco control and reduce the social acceptance of smoking has negatively affected the profits and reputation of the tobacco industry. Its sales, particularly in high-income countries, are declining and many low- and middle-income countries (LMICs) show a steady reduction. Tobacco industry interference has been identified as the main barrier² by governments in their efforts to protect public health. Hence, the industry needed a new corporate strategy to repair its public image, rebrand itself as a partner of public health, offer a narrative about its business and products that might be embraced outside the tobacco industry and elicit a positive response from governments.

A Reuters exposé on PMI's 2014 internal corporate strategy revealed the company's concern about "Markets where we have seen excessive fiscal or regulatory proposals"³ and identified areas where its challenges lie. PMI also pinpointed Asia as a region of focus to counteract intensifying tobacco control, in particular in South and South East Asia, naming **Bangladesh, Indonesia, India, Pakistan, the Philippines, Thailand and Vietnam**. However, PMI also stated that for the company, "It is not all gloom and doom."⁴

As outlined in the 2014 corporate document, PMI's strategy to protect its business and address obstacles included: introducing newer nicotine and tobacco products, which it terms "reduced-risk products" (RRPs); defending brand differentiation; preserving consumer rights to buy and enjoy consumer products; normalizing its business; and building the capacity of new stakeholders to execute its strategy (Appendix 1) via developing an alliance of "credible messengers" such as broad business organizations, think tanks and policy groups.

In 2020, STOP's **Addiction at Any Cost: Philip Morris International Uncovered** report documented how the

tobacco industry uses the concept of "harm reduction" to sell more products and improve its image.⁵ The report highlighted the coordination between PMI and its Foundation for a Smoke-Free World (the Foundation) and how it is effectively operating as a public relations and lobbying arm of PMI. PMI's statement that it would end sales of combustible cigarettes to date remains simple rhetoric as demonstrated by its ongoing production of billions of cigarettes and the opening of new cigarette factories, and a previous history of creating similar organizations to show its cigarettes were "safe."

This brief reviews how the activities of the Foundation and its grantees align with PMI's strategy as outlined in 2014 to promote its "smoke-free" narrative and influence public opinion to accept its new RRP as smoke-free products through the country reports it funded. Organizations that have accepted grants from the Foundation have become new voices to promote PMI's messages.

The effects of long term (decades-long) use of newer nicotine and tobacco products are not known yet. However, evidence shows nicotine exposure during adolescence, a critical period during brain development, can cause addiction and harm brain development.^{6,7} Adolescent vaping has been reported as a problem in Australia,⁸ Malaysia,⁹ the U.K.¹⁰ and U.S.A.¹¹ Applying the precautionary principle, governments in about 40 countries have banned newer nicotine and tobacco products and many have strictly regulated them.¹²

Many of the tobacco industry's messages are contested or remain unproven. Questions have been raised as to whether manufacturers' definitions of "smoke-free" can be backed by science. Researchers have found that emissions from heated tobacco products contain the same harmful constituents as those released in cigarette smoke.¹³ Currently, there is insufficient evidence that these products are not harmful or are effective cessation tools.¹⁴ Additionally, there is evidence that "reduced-risk" messaging can be misinterpreted, for example, if consumers equate "reduced-risk" with "risk-free" or "harm-free."¹⁵

Corporate strategy 1: Promote new tobacco products through PMI's global "smoke-free" PR campaign.

In 2016, PMI announced it was delivering a "smoke-free future" and was transforming.¹⁶ However, six years later PMI shows no evidence of exiting the cigarette business or of halting the promotion and sales of cigarettes, despite referring to them as being harmful. In a comprehensive review of PMI's marketing, Stanford University has dismissed PMI's "Smoke-Free Future" and "Moving Beyond Smoke" campaigns as industry propaganda.¹⁷ Two central ways the company has perpetuated its propaganda are through its front groups and via global marketing campaigns.

PMI launched the Foundation in September 2017, initially committing US \$960 million over 12 years.¹⁸ PMI has remained its sole funder. Besides co-opting the term "smoke-free" used by the public health community, the Foundation also claimed its interests are aligned with public health and complement the work of public health groups, a claim that has been denounced by many such groups.^{19, 20, 21}

In 2019, PMI launched its global UNSMOKE campaign,²² which has two dedicated websites: "Unsmoke Your World," which targets the public,²³ and "Unsmoke Your Mind," which targets opinion leaders and policymakers and attempts to persuade them to accept its science on heated tobacco products.²⁴ As detailed in STOP's Addiction at Any Cost report, the campaign lobbied governments and challenged WHO FCTC-based smoke-free legislation. This campaign was part of its on-going attempts to revamp its public image²⁵ as it called out to "smokers, non-smokers, regulators and agents of change"²⁶ for dialogue.

Corporate strategy 2: Choose "credible messengers" to suggest the need for heated tobacco products.

In its 2014 internal strategy document, PMI said, "We lack ideological think tanks and taxpayers' organizations in many markets."³ Since its launch, the Foundation has

identified and commissioned groups around the globe to conduct research, which appears to align with PMI's strategy to have credible messengers.

To date, the Foundation has awarded about 200 grants in more than 40 countries (Appendix 2). The grantees are varied with most having no previous record of research or involvement in tobacco control.²⁷ Through their research, these new voices champion the need for "safer alternatives" and provide a rationale for governments to embrace PMI's new tobacco products.

In 2014, PMI launched its new heated tobacco product, IQOS, described as "smoke-free"²⁸ and reported in media as a "smokeless cigarette,"^{29 30} which till 2016 formed less than 1% of its sales. Other newer products from PMI include e-cigarettes, snus and nicotine pouches.³¹ While PMI promotes these products as safer alternatives, there is ambiguity around the health risks of these products.³² Independent research is lacking as the majority of research on HTPs is funded by the tobacco industry.³³

The Foundation has targeted grants to countries that PMI identified as priority markets in 2014, such as **India, Indonesia, Japan, Pakistan** and the **U.K.** The Foundation also gave grants for research in countries that have banned heated tobacco products such as **Australia, Norway, Mexico, Thailand, Brazil** and **Sri Lanka.**

The Foundation funded NGOs that had no prior record of working on tobacco issues. In **Bangladesh**, for example, the Foundation funded an NGO devoted to addressing disability among children, the Child Sight Foundation, to investigate tobacco smoking amongst slum dwellers in Dhaka.³⁴ This group was given another grant to conduct research in **Bangladesh, Malaysia, Nepal** and **Sri Lanka** under the name CSF Global.³⁵ The national organization and CSF Global do not declare receiving support from the Foundation among their partners or funders.³⁶ Similarly in the **Philippines**, a local NGO working on empowerment of local communities and children³⁷ was funded to review the Philippines government's cessation program, and to conduct an exploratory study of the market and policy environment for non-tobacco products.³⁸

The Foundation's grants to **Pakistan** included establishing a new group, Alternate Research Initiative (ARI) which was then given five grants to conduct research focusing on new tobacco products, publish the research in journals,³⁹ publicize the findings in the media^{40, 41} and make policy recommendations.

Similarly in **Italy**, the Foundation supported three grants to establish the Center of Excellence for the Acceleration of Harm Reduction (CoEHAR) at the University of Catania.⁴² Once established, CoEHAR lobbied other countries with messages that align with PMI's narrative (see below).

Corporate strategy 3: Develop and disseminate simple messages through newly funded organizations.

In PMI's 2014 corporate strategy, it identified the need for "the right messages" for "market specific augmentation." Included in this strategy are "one-liners for PMI and allies" to use. Appendix 3 provides examples of PMI's one-liners which have been echoed by the Foundation, its grantees and its allies.

Broadly, the one-liners:

- Describe HTPs as safer alternatives to smoking/cigarettes.
- Make a case for switching from cigarettes to HTPs.
- Lobby for "risk-proportionate regulations," for example, applying lower taxes to HTPs than cigarettes.

Several Foundation-funded country reports (Pakistan, the Philippines, Türkiye and Ukraine) also echoed the one-liners or nuanced versions of them (Appendix 4).

PMI's one-liners reflected in the Foundation's grantees' reports

One-liner 1: HTPs are safer alternatives to smoking/cigarettes.

Türkiye's Foundation-funded economic report refers to e-cigarettes and HTPs as "reduced harm products that

are relatively safer suppliers of nicotine that constitute a less risky alternative product for smokers who do not/could not quit."⁴³

There is conflicting evidence about the actual harmfulness of these products, with the global consensus being that more independent research is needed.

One-liner 2: Newer nicotine and tobacco products are 95% safer than smoking/cigarettes.

In 2015, a review of the evidence for the U.K. government claimed that e-cigarettes were 95% safer than cigarettes. PMI has claimed its "tobacco heating system" (THS) has an average of 95% lower levels of harmful constituents and is less toxic than cigarette smoke.⁴⁴ Philip Morris Korea has also claimed that its HTPs contain 90% fewer toxic chemicals than regular cigarettes.⁴⁵ However according to WHO, there is no clear evidence on the long-term impacts of using them or being exposed to them.⁴⁶

The Foundation and its grantees have reported the 95% statistic in various places without providing the appropriate context.

The president of the Foundation stated e-cigarettes have been "found to be up to 95 percent less harmful than combustible cigarettes" ⁴⁷ The "95% safer" claim appears in the Foundation-funded country reports of **Pakistan, the Philippines** and **Ukraine**.²⁹ According to the Philippines' report, electronic cigarettes are "95% safer than smoking, pose no risk of nicotine poisoning, and can help people quit smoking and reduce their cigarette consumption."²⁸

In Italy, Foundation grantee CoEHAR stretched the "95% safer" message to include HTPs.⁴⁸

The Bangladesh government is currently preparing amendments to their Smoking and Tobacco Products Usage (Control) Act. Five members of CoEHAR, along with nine other proponents of harm reduction, sent an 18-page letter to the Ministry of Health calling on the Bangladesh government to embrace "alternative

products,” including HTPs, because “these products are likely, beyond any reasonable doubt, to be much less harmful than smoking (90-100% less harmful depending on product and regulatory standards).”⁴⁹

While e-cigarettes and HTPs have been accepted in the U.K., in LMICs there is usually little or no regulatory framework in place to protect youth. Youth in many of these countries have been aggressively targeted.⁵⁰ Youth who use e-cigarettes, who have never smoked, increase their chance of smoking traditional cigarettes later in life by two to four-fold.⁵¹ In these settings, a ban on such products is a precautionary approach.

| **One-liner 3: The “quit or die” approach does not work.**

Smoking prevalence is on the decline in numerous countries that have implemented the WHO FCTC and before these new products entered their market, including Australia, India, New Zealand, Singapore, South Africa, Sri Lanka, the U.K. and Thailand. Australia in 2014, before the advent of newer nicotine and tobacco products, had a smoking prevalence of 14.7%.⁵² Smoking prevalence was on a downward trajectory in New Zealand when in 2012 (17.7%) they announced their smoke-free 2025 goal.⁵³ Their latest data shows a prevalence of less than 10% in 2021.

During World No Tobacco Day 2021, the Foundation claimed that tobacco control is at a cross-roads, that it’s time to go beyond a “quit or die” approach and that “some of the most effective tools available to reduce health risk, among them e-cigarettes and heated tobacco products (HTPs), are ignored or misunderstood.”⁵⁴

Foundation grantee Knowledge-Action-Change (KAC) made a submission to the Hong Kong government stating, “[S]mokers who, for whatever reason, could not give up nicotine had only two options: quit or die. But there is now a ‘third way’ for smokers to switch away from smoking—the combusted cigarette being by far the deadliest nicotine delivery system—to a safer nicotine product through a policy of tobacco harm reduction.”⁵⁵ Hong Kong’s successful tobacco control program resulted in smoking prevalence declining from 23.3% in 1982 to

10.5% in 2015⁵⁶ to 9.5% in 2021.⁵⁷ Hence there is no need for a “third way” as this is not part of proven tobacco control measures such as tax increases, prominent pictorial warnings on packs and bans on tobacco marketing outlined in the WHO FCTC.

| **One-liner 4: While nicotine is addictive, it’s “relatively harmless.”**

For decades the tobacco industry dismissed the addictiveness of nicotine, including claiming it is a naturally occurring substance in plants, such as potatoes, tomatoes and eggplants.⁵⁸ The association with plants contributes to a public perception that it is harmless. Industry executives even swore under oath that nicotine is not addictive.⁵⁹ However with the internal industry documents being made public on what they knew about the harmful nature of their products, tobacco companies now claim nicotine is addictive. But nicotine is not harmless. It poses several health hazards including increased risk of cardiovascular, respiratory and gastrointestinal disorders,⁶⁰ and impacts brain development of children exposed to nicotine.

PMI is now reviving the “nicotine is harmless” concept through one-liners and again associating its harmlessness with plants such as potatoes, tomatoes and eggplants, and claiming, “scientific innovation provides increasingly better ways to deliver nicotine while preserving the perceived benefits and enjoyment for the consumer.”⁶¹ In Pakistan, Foundation grantee ARI’s media statement that their quit rate is “one of the lowest in the world” has the article recommending, “If smokers can find satisfactory alternatives to cigarettes that do not involve combustion but provide nicotine, they would avoid almost all disease risks.”⁶²

| **One-liner 5: Adopt “risk-proportionate regulation” policy.**

When PMI launched its global UNSMOKE campaign in 2019, it used the concept of “risk-proportionate regulation” to influence public policy—that governments’ tobacco control measures should not apply to these new products because “these new products can help move

adult smokers away from cigarettes” and that public policy should be supportive to assist smokers’ move to “these better alternatives as quickly as possible.”⁶³ This term has been promoted by the Foundation, its grantees and its allies to influence public policy for more favorable treatment of these new products.

The Foundation explicitly states it funds research in “THR and risk-proportionate regulation.”⁶⁴ The Foundation’s president has promoted the concept by commenting, with respect to the South African government, “Regulation and taxes on nicotine products should be proportionate to the risk these products pose to the public.”⁶⁵ This term is also promoted by CAPHRA,^{66, 67} a member of PMI-funded INNCO,^{68, 69} British Chamber of Commerce Philippines⁷⁰ (whose spokesperson was the former President of PMI Philippines), new Malaysian think tank DARE,⁷¹ and other vaping groups.

Recently the **Philippines** passed a new vape law (Vaporized Nicotine Products Regulation Act) which was criticized by professional medical societies, national government agencies and civil society groups as backward and retrogressive,⁷² but lauded by CAPHRA as the “most progressive and risk-proportionate vaping legislation in Asia Pacific.”⁷³

The concept of risk-proportionate policy is echoed in Foundation-funded **Ukraine** country report, which states, “For taxation to generate the correct price signals for consumers and producers, the final price of a product must be proportional to its health hazard.”⁷⁴

A letter from harm reduction proponents co-signed by CoEHAR members to the **Bangladesh** government calls for risk-proportionate regulation: “The aim should be to encourage the migration from high-risk to low-risk products and support positive behaviour change. Regulators should take great care to avoid the perverse consequences of prohibitions and use regulation instead. Risk-proportionate regulation provides a robust basis for controlling the consumer nicotine market ... ”⁷⁵ A similar letter was sent to the **Malaysian** Prime Minister urging the Malaysian government to “regulate with a regulatory framework that is proportionate to the product’s relative

risk profile to tobacco.”⁷⁶

Meanwhile, while touting the “risk-proportionate regulation” principle, PMI and its allies continue to oppose tobacco control policies for cigarettes.⁷⁷

Corporate strategy 4: Lobby to change the definition of tobacco products

Convincing governments, the public health community and the public that its new products are different from and safer than cigarettes is fundamental to PMI’s strategy. It’s doing this by using the terminology “combustible” (for cigarettes) and “non-combustible” (for HTPs, ENDS and others). PMI, in its 2020 annual report, stated, “To date, we have been largely successful in demonstrating to regulators that our RRP’s are not cigarettes due to the absence of combustion, and as such they are generally taxed either as a separate category or as other tobacco products ... ”⁷⁸ This differentiation in terminology is used in Foundation country reports including those for **Bangladesh, Malaysia, Pakistan, the Philippines, Türkiye and Ukraine**. Making this differentiation enables the utilization of the reports by tobacco companies and their allies to lobby for policy change.

- In the reports for **Pakistan** and the **Philippines**, tobacco control measures are framed as “Tobacco and Combustible Smoking Control Efforts.”^{79, 80}
- The **Ukraine** country report raised concerns about the parliamentary policy development, saying, “In 2021 Ukraine plans to adopt a unified taxation on combustible cigarettes and HRP’s [harm reduction products] though discussions about this that are currently ongoing in the Parliament. ... The Parliament of Ukraine is getting ready to consider a bill on making HRP’s equal to combustible cigarettes not only in terms of taxation but also in terms of other forms of regulation.”⁸¹
- **Kazakhstan’s** 2021 country report proposed the Ministry of Health should be requested to substantiate the impact of newer nicotine and tobacco products on improving public health and reducing health care costs.⁸² The report

recommended that the head of the National Chamber of Entrepreneurs, the Atameken, is most effective at meetings of industry committees and they should be consulted since they also work with representatives of government agencies. In April 2022, the Atameken attempted to change the definition of heated tobacco products and to lobby for a lower level of tax.⁸³ Local advocates appealed to the international community for support and to expose this tactic by the tobacco industry.⁸⁴ Kazakhstan's definition of tobacco remains unchanged and the tax for heated tobacco products is the same rate as cigarettes.⁸⁵

In countries that have banned ENDS and HTPs, the country reports call for more research or the establishment of a center to conduct research, or simply challenge the government for not considering alternative products.

Türkiye banned the import of electronic cigarettes in 2020.⁸⁶ **Türkiye's** report, for example, recommends that "More research is needed on alternative products. In contrast to combustible tobacco products, those products are fairly new on the market and more time is needed for clear scientific evidence about them to build."⁸⁷

The approximately 100 million smokers in **India** provide an attractive market for PMI to promote its new tobacco products for switching to a "much better choice."⁸⁸ In May 2019, PMI in a press statement urged the government of India to create a regulatory environment for devices such as its IQOS. Also in May, the Foundation in a statement that complimented PMI, stated it was seeking to partner with "all who share our goal to end smoking in the world," and committed to "accelerate an end to smoking in this generation" in India.⁸⁹ In June, the Ministry of Health in a preventive measure asked all state governments in the country not to partner or collaborate with the Foundation because of its links to PMI.

Vida News, which received a Foundation grant to improve communication about tobacco harm reduction in India, promoted news to counter India's Prohibition of Electronic Cigarettes bill in 2019.⁹⁰ In September 2019, India banned e-cigarettes in view of their increased use among adolescents and to protect public health.⁹¹

Corporate strategy 5: Resurrect self-regulation through a marketing code for HTPs

Over the years, tobacco companies have tried to persuade governments to avoid bans or regulations by persuading them to adopt their voluntary self-regulation proposals. These codes have no penalties, are ineffective and basically unenforceable. In 2001, when governments were negotiating the WHO FCTC, the transnational tobacco companies issued their collective international tobacco marketing standards (ITMS) to pre-empt bans on advertising and promotion of tobacco being included in the treaty.⁹² The ITMS failed as governments proceeded to include Article 13 in the WHO FCTC, which obligates Parties to implement a comprehensive ban on all tobacco advertising, promotions and sponsorship.

Seventy-five percent of the 182 Parties to the WHO have a comprehensive ban on tobacco advertising, promotion and sponsorship (TAPS).⁹³ This TAPS ban would pose an impediment to PMI's marketing of its new products. In 2020, PMI reported that its IQOS product was sold in 64 markets and about half of these countries (52%) are LMICs. PMI stated, "To be successful, we must: promote brand equity successfully; anticipate and respond to new adult consumer trends; develop new products and markets and broaden brand portfolios ... convince adult smokers to convert to our RRP; ensure effective adult consumer engagement, including communication about product characteristics and usage of RRP."⁹⁴

Countries that have banned HTPs include **Australia, Brazil, India, Mexico, Norway, Thailand, Singapore and Sri Lanka** (Annex 2). PMI indicated that although several countries had banned the sale of heated tobacco products, it will still "advocate for regulations that would allow under a well-defined framework the sale of IQOS and other scientifically substantiated smoke-free products in these countries."⁹⁵

In June 2022, a voluntary marketing code for HTPs was announced through the Foundation-funded Tobacco Transformation Index, to be released in 2023 to guide the industry.⁹⁶ PMI and other companies selling HTPs are the

only beneficiaries of this code. As in the previous voluntary standards, the Foundation claims the right to advertise and promote its “reduced-risk” products to existing customers and to not promote to youth and non-smokers.

However, reports have emerged that PMI is targeting and promoting its products to youth around the world.⁹⁷ In 2019, after a Reuters exposé was published,⁹⁸ PMI suspended its global social media marketing campaign which used influencers to reach youth. The use of social media influencers reportedly continues.⁹⁹

Foundation-funded reports omit tobacco industry links and funding

Foundation-funded country reports acknowledge their funding from the Foundation, but not that the source of the funds is PMI. Readers of these reports may not be aware that PMI is the sole funder of the Foundation.

It is an obligation for the 182 Parties to the WHO FCTC under Article 5.3 to protect public health policies on tobacco control from the commercial and other vested interests of the tobacco industry.¹⁰⁰ Following PMI’s announcement on the launch of the Foundation in 2017, WHO announced that it would not partner with the Foundation and called on governments and the public health community to adopt the same policy.¹⁰¹

Omission of tobacco industry funding has implications for countries that have implemented Article 5.3 and have measures of non-engagement with the tobacco industry and those furthering its interests. Such disclosure is crucial to governments and the public health community, where measures to advance Article 5.3 are in place that reject industry-sponsored reports.¹⁰² **India, Poland**¹⁰³ and **Vietnam**,¹⁰⁴ for example, reject any engagement with or research produced by the Foundation.

Another omission in these country reports is that they fail to address Article 5.3. This issue is missing in reports on Bangladesh, China, Georgia, Kazakhstan, Malaysia, the Philippines, Russia, Türkiye, Ukraine and Uzbekistan.

Conclusion and recommendations

PMI has no plans to exit the tobacco business. It recorded a net revenue of US \$29.6 billion (b) in 2018, US \$29.8b in 2019, US \$28.7b in 2020 and US \$31.4b in 2021, the bulk of its profits from selling cigarettes.^{105,106} According to PMI, “We also recognize that our part in this transformation must be funded from our existing cigarette business. ... Therefore, during the transformation, we intend to remain a leading international cigarette manufacturer.”¹⁰⁷ In 2021, it sold about 625 billion cigarettes globally.¹⁰⁸

Since tobacco consumption is declining across the globe, PMI has introduced new nicotine and tobacco products to keep current consumers addicted to nicotine and recruit new young users. It has introduced an elaborate strategy to normalize¹⁰⁹ its new products.

According to WHO, all forms of tobacco are harmful.¹¹⁰ The tobacco industry is not a partner in public health. Governments and the public health community must protect tobacco control efforts from being undermined or derailed by PMI’s tactics, or those of its front groups and allies.

Recommended actions:

- Raise awareness about the harmful nature of all tobacco products.
- Establish measures to limit interactions with the tobacco industry to only when strictly necessary and ensure the transparency of these interactions.
- Reject the Foundation and reports funded by the Foundation.
- Reject partnerships and non-binding or non-enforceable agreements with the tobacco industry and those that further its interests.
- Governments should refer to available resources to equip themselves to implement WHO FCTC Article 5.3.¹¹¹

Appendix 1

2014 Philip Morris International's Corporate Strategy¹¹²

Recreated from PMI's "Corporate affairs approach and issues" document

What are we aiming for?

1.	No surprises	Political intelligence gathering	Early warning systems in place
			Right mindset – "Healthy paranoia"
2.	Playing the political game	Full political engagement	Build allies across several ministries
			Ability to influence the influencers
			Complete political power map
			Speak the right language – be relevant
3.	Shaping the public opinion	Media relations	Ability to find right spin
			Ability to sell stories direct and indirect
			Established relationships with - key reporters
4.	Utilizing the low hanging fruit	Use our own people	Employees
			Distributors
			Suppliers
5.	Alliance of credible messengers	Third party coalition building	Broad business organizations
			Trade and retailer organizations
			IPR, TM, anti-counterfeiting orgs.
			Think tanks and policy groups
6.	Establishing a critical mass	Ability to mobilize broad groups	Retailer mobilization
			Grower mobilization
			Consumer mobilization
			Marketing and advertising organizations
7.	Have the best expertise on our side	Effective use of consultants	Lobbyists
			Door-openers
			Strategists
			Spin doctors
8.	The right messages	Market specific argumentation	One-liners for PMI and allies
			Message testing research
			Impact assessment studies
			Legal opinions

Appendix 2

Foundation Grantees and Regulation of HTPs by Country

		Foundation grants awarded	Regulation of heated tobacco products*
1.	Malawi∞	22	Illegal to be marketed
2.	U.S.A	19	Regulated
3.	India	18	Banned
4.	U.K.	13	Sold
5.	Pakistan	11	Illegal to be marketed
6.	South Africa	8	Regulated
7.	Indonesia	7	Illegal to be marketed
8.	Japan	7	Regulated
9.	China	5	Illegal to be marketed
10.	Bangladesh	3	Illegal to be marketed
11.	Greece	3	Sold
12.	Italy	3	Regulated
13.	Philippines	3	Sold
14.	South Korea	3	Regulated
15.	Australia	2	Banned
16.	Canada	2	Sold
17.	Liberia	2	Regulated
18.	Malaysia	2	Regulated
19.	Mexico	2	Banned
20.	Nepal	2	Regulated
21.	Norway	2	Banned
22.	Russia	2	Sold
23.	Russian Federation	2	Sold
24.	Thailand	2	Banned
25.	Türkiye	2	Regulated
26.	Ukraine	2	Sold
27.	Vietnam	2	Illegal to be marketed
28.	Argentina	1	Sold
29.	Brazil	1	Banned
30.	Egypt	1	No advertising
31.	Georgia	1	Regulated

		Foundation grants awarded	Regulation of heated tobacco products*
32.	Germany	1	Unregulated
33.	Israel	1	Regulated
34.	Kazakhstan	1	Sold
35.	Maldives	1	Regulated
36.	Moldova	1	Regulated
37.	Northern Cyprus	1	--
38.	Oman	1	Sold
39.	Poland	1	Sold
40.	Serbia	1	Sold
41.	Sri Lanka	1	Banned
42.	Sweden	1	Regulated
43.	Uzbekistan	1	Illegal to be marketed
44.	Global	41	
45.	Eastern Mediterranean	1	
46.	Europe	2	
47.	Latin America	1	

Countries in bold: PMI identified these countries as important to investors (May 2022) <https://www.pmi.com/investor-relations/overview>

∞Projects in Malawi are focused on transition from tobacco cultivation to other activity

*Global state of tobacco harm reduction: <https://gsth.org/countries/profile/>

Appendix 3

PMI's One-Liners Echoed by the Foundation and Its Allies

Philip Morris International	The Foundation, Its Grantees/Affiliates
Safer alternatives to smoking/combustibles ¹¹³	<p>The Foundation "... the foundation's aim is to help smokers quit via <u>safer alternatives</u>."¹¹⁴</p> <p>INNCO (Foundation grantee) "... denying people access to <u>safer alternatives</u> simply because of where they live."¹¹⁵</p> <p>AVI, India (Member of INNCO) "... deprive the country's 11 crore smokers of <u>safer options</u>."¹¹⁶</p>
RRPs are 95% safer than smoking/cigarettes "Tobacco heating system (THS) <u>aerosol</u> has an average of 95 percent lower levels of harmful and potentially harmful constituents (<u>HPHCs</u>) and is less toxic than cigarette smoke." ¹¹⁷	<p>Derek Yach "... war against nicotine which will only push people back to smoking cigarettes & make more people sick. Vaping is 95% less harmful & should be encouraged as a ..."¹¹⁸</p> <p>BOTEC Analysis LLC, U.S.A. (Foundation grantee) "United Kingdom: A leader in tobacco control, the country has proactively helped smokers switch to e-cigarettes, which have been shown to be <u>95% safer</u>."¹¹⁹</p>
"Quit or die" does not work ¹²⁰	<p>The Foundation "World No Tobacco Day: It's Time to Go Beyond <u>Quit or Die</u>"¹²¹</p> <p>"... their message was stark: quit, or die."¹²²</p> <p>Knowledge-Action-Change's submission to the Hong Kong government "... smokers who, for whatever reason, could not give up nicotine had only two options: <u>quit or die</u>. But there is now a 'third way' for smokers to switch away from smoking—the combusted cigarette being by far the deadliest nicotine delivery system—to a safer nicotine product through a policy of tobacco harm reduction."¹²³</p> <p>Vapers PH, Philippines (Member of INNCO) "... WHO continues to insist on the <u>quit-or-die</u> approach 'which we all know is ineffective against smoking as WHO's own data show that there are still 1.1 billion smokers globally, resulting in 8-million deaths due to smoking-related illnesses annually."¹²⁴</p>

Philip Morris International	The Foundation Grantees/ affiliates
While nicotine is addictive, it's relatively harmless. ¹²⁵	<p>Alternate Research Initiative, Pakistan (Foundation grantee)</p> <p>"If smokers can find satisfactory alternatives to cigarettes that do not involve combustion but provide nicotine, they would <u>avoid almost all disease risks</u>."¹²⁶</p>
Risk-proportionate regulation/tax ^{127, 128}	<p>The Foundation</p> <p>"Our work: ... The availability of, and economics associated with, THR and <u>risk-proportionate regulation</u> ..."¹²⁹</p> <p>"The WHO and governments must commit to revising the FCTC to explicitly build a <u>risk-proportionate regulatory system</u>. #GFN21"^{130, 131}</p> <hr/> <p>Dr. Kgosi Letlape, president of the Africa Harm Reduction Alliance, South Africa (Grantee of the Foundation) proposed "... tax needed to be <u>proportionate to the risk</u>."¹³²</p>

Appendix 4

PMI's One-Liners vs Messages in Select Foundation Grantee Country Reports

PMI	Pakistan¹³³	Philippines¹³⁴	Türkiye¹³⁵	Ukraine¹³⁶
Embrace safer alternatives to smoking/ combustibles ¹³⁷	E-cigarettes are the main option for a safer nicotine delivery system available in Pakistan and are used by middle- and upper-middle-class smokers in upscale urban localities.	All respondents agree that vaping is better than cigarettes in many respects.	In recent years, several researchers have suggested e-cigarettes and HTPs as reduced harm products that are relatively safer suppliers of nicotine that constitute a less risky alternative product for smokers who do not/could not quit.	... a smoking cessation service should offer alternatives to those who for some reason cannot or do not want to quit their own nicotine addiction, to satisfy needs for nicotine that are less harmful for their health ...
RRPs are 95% safer than smoking/ cigarettes “Tobacco heating system (THS) aerosol has an average of 95 percent lower levels of harmful and potentially harmful constituents (HPHCs) and is less toxic than cigarette smoke.” ¹³⁸	Smoking also poses higher losses to the GDP compared to HRP's which are 95% safer than conventional smoking products.	This study reported that electronic cigarettes (EC) are 95% safer than smoking, pose no risk of nicotine poisoning, and can help people quit smoking and reduce their cigarette consumption.		Some consumers migrate to new products because they view them as a less harmful alternative to cigarettes and/or an effective way to quit smoking.

PMI	Pakistan¹³²	Philippines¹³³	Türkiye¹³⁴	Ukraine¹³⁵
Switch from cigarettes to less harmful tobacco products/alternatives ^{139, 140, 141}	While most countries in the world have succeeded in reducing the number of smokers through their progressive regulations on less harmful alternatives...	Consumers of HTPs: Thirty percent (30%) believe that vaping is not as harmful as cigarettes. Tobacco alternatives are presented as less harmful to health and would be helpful to those who are trying to quit smoking.	In recent years, several researchers have suggested e-cigarettes and HTPs as reduced harm products that are relatively safer suppliers of nicotine that constitute a less risky alternative product for smokers who do not/could not quit.	These products are less harmful than traditional cigarettes, while smokers are increasingly switching to them in order to give up smoking conventional cigarettes.
Risk proportionate regulation/tax ^{142, 143}	... to achieve a smoke-free Pakistan before 2030, effective cessation services should be made accessible and affordable ...		In addition, designing a tobacco tax system that favors products perceived to be safer while discouraging the products that are perceived as more harmful may be an option.	The cost of a dose of nicotine in different products should be inversely proportional to the product's overall harmfulness.

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About STOP (Stopping Tobacco Organizations and Products)

STOP is a global tobacco industry watchdog whose mission is to expose the tobacco industry strategies and tactics that undermine public health. STOP is funded by Bloomberg Philanthropies and comprised of a partnership among the Tobacco Control Research Group (TCRG) at the University of Bath, The Global Center for Good Governance in Tobacco Control (GGTC), the International Union Against Tuberculosis and Lung Disease (The Union) and Vital Strategies. For more information, visit exposetobacco.org.