



HEATED TOBACCO PRODUCTS: Countering Industry Arguments

Heated Tobacco Products (HTPs): Same dog, new tricks

Heated tobacco products (HTPs) are the tobacco industry's newest way to keep people addicted to tobacco and attract new users, including young people. Tobacco companies have sought to market HTPs as "reduced risk" because the companies claim using the products does not involve burning or combustion, and they claim to market these products only to existing smokers. However, the industry has a long history of making false claims about the health risks of its products, most notably in the marketing of "light" and "mild" cigarettes that were no safer than other cigarettes. In addition, HTPs have been marketed around the world in ways that appeal to young people.

INDUSTRY ARGUMENT: HTP use carries less risk than smoking conventional cigarettes.

RESPONSE: The health impacts of HTP use are not yet well-established. Given these products' relative newness and similarity to conventional cigarettes, there is no long-term impact research to support such "reduced-risk" claims. What is certain is that long-term exposure to the chemicals found in HTP emissions (such as nicotine, carbon monoxide, various aldehydes, and others) increase a person's risk for a multitude of serious health issues including heart disease, stroke, and certain cancers.¹⁻⁶ It is therefore reasonable to argue that long-term HTP use may lead to negative health outcomes and that these chemicals are so harmful to the human body that reducing exposure does not decrease one's risk of disease in equal proportion. The "reduced-risk" messaging is highly reminiscent of the tobacco industry's earlier attempts to mislead consumers into thinking "light," "mild," and "low-tar" cigarettes were less harmful. Internal tobacco industry documents show that tobacco companies deliberately promoted these cigarettes knowing they would provide false reassurance without any health benefits.⁷ As we now know, "low-tar" cigarettes pose a unique harm of increased risk of lung adenocarcinomas.⁸ Given that it took decades to uncover the full extent of the devastating health impacts of conventional cigarettes, the public should remain skeptical of "reduced-risk" and similar claims around HTPs until the health impacts of HTP use, both short and long term, are fully understood.

INDUSTRY ARGUMENT: The U.S. Food and Drug Administration (FDA) allowed Philip Morris International (PMI) to market its HTP, IQOS, as a "reduced risk" product, indicating that it is a safer alternative to smoking.

RESPONSE: This is a false claim. The FDA allowed PMI to

The "reduced-risk" messaging is highly reminiscent of the tobacco industry's history of misleading consumers into thinking "light," "mild," and "low-tar" cigarettes were less harmful.

market IQOS with "reduced exposure" information, which is not the same as "reduced risk." The FDA website states, "Even with this action, these products are not safe, nor FDA approved."⁹ The authorization does not allow PMI to make any other modified risk claims or any assertions that IQOS products are endorsed or approved by the FDA, or that the FDA deems the products to be safe for use by consumers.

In addition, the FDA's authorization applies solely to IQOS, not HTPs generally, and includes only four IQOS products (IQOS system & charger, and three varieties of Heatsticks).⁹ Newer or different versions of IQOS products available globally are not currently included. Furthermore, no other government has a regulatory "reduced exposure" claim pathway for HTPs similar to the US. In fact, 182 governments have international obligations under the WHO Framework Convention on Tobacco Control that require HTPs, as tobacco products, be subject to the highest degree of regulation.¹⁰

INDUSTRY ARGUMENT: HTP marketing does not target young people or non-smokers.

RESPONSE: PMI first launched its HTP 'IQOS' in Japan and Italy in 2014.¹¹ A brief look into PMI's IQOS marketing in Italy disproves their claim that they do not market to

young people or people who have never smoked. The IQOS launch in Italy was extremely flashy, involving IQOS ‘Embassies’ and ‘Boutiques’ in major cities and vacation destinations throughout the country.¹² At these sleek, trendy stores, young-looking staff engaged new customers through product tutorials and free trials, as well as promotional events and parties that appeal to a younger demographic. PMI also utilized various social media platforms and popular influencers with young followers to market IQOS to a wide audience.¹¹ PMI’s tactics were effective; a 2019 study found that nearly half of all IQOS ever-users in Italy had never smoked conventional cigarettes.¹³ Furthermore, 619,000 non- or former smokers expressed intention to try IQOS in the future.¹³

Investigations by *Reuters* and *The Times* revealed that both PMI and British American Tobacco’s (BAT) aggressive use of social media and young-looking influencers to market HTPs is a global pattern.^{14,15} For instance, the BAT-sponsored Instagram page for its HTP ‘glo’ features dozens of posts aimed at a younger demographic and includes product giveaways and chances to win free trips to Abu Dhabi, Ibiza, Milan, and other ‘party cities’.¹⁶ In addition, the page has various affiliated hashtags, one being #discoverGlo.¹⁷ The page features young influencers from around the world ‘discovering new passions with Glo’ as well as Glo device giveaways for “yourself and a friend.”¹⁷ Together, the language and lifestyle, fashion, and music content imply the page is targeted toward new users. Marketing tactics designed to attract non-smokers further undermine the industry’s claim that HTPs are intended to be a “reduced-risk” product; on the contrary, non-smokers who initiate tobacco use with HTPs become at-risk for tobacco-related health harms.

INDUSTRY ARGUMENT: HTPs are integral to building PMI’s “smoke-free future” and BAT’s “a better tomorrow.”

RESPONSE: Internal documents from PMI show that its primary motivation for creating IQOS and other ‘reduced risk’ products was to maintain profitability in the face of an increasingly hostile environment for conventional tobacco products.¹⁸ The reality behind the “smoke-free” tagline is that PMI seeks to distance itself from its role in the global tobacco epidemic, and recast its corporate image. Through new “reduced-risk” product lines, PMI and other tobacco companies retain customers and attract new ones. For instance, BAT places its tobacco and nicotine products along a ‘risk continuum’ where consumers are encouraged to shift among products rather than quit altogether.¹⁹

These false displays of concern for public health are part of an industry-wide rebranding effort to improve public image, build credibility in the health and research sectors, and to achieve a more favorable regulatory environment

for HTPs and other new products. The legitimacy of the claims to want a “smoke-free future” and “a better tomorrow” are undermined by the tobacco industry’s continued investment in their conventional cigarette brands and constant legal challenges of legislation that would effectively reduce tobacco use.²⁰⁻²⁴

INDUSTRY ARGUMENT: HTPs are ‘smokeless’ products and should not be subject to the same regulatory framework as conventional cigarettes.

RESPONSE: The tobacco industry uses this argument for several reasons. First, asserting that HTPs are ‘smokeless’ and therefore ‘safer’ creates the potential to circumvent the smoke-free laws that many countries, jurisdictions, and cities have fought hard to pass. Other tobacco control measures such as health warning labels, plain packaging, higher tax rates, and marketing restrictions may be undermined if HTPs are exempted from the regulatory frameworks applied to traditional smoked tobacco products.

Whether HTPs emit smoke or another aerosol is not as critical to public health as whether they emit harmful chemicals, and they do.²⁵⁻²⁷ Therefore, HTPs should be subject to the same regulatory framework as conventional cigarettes in order to limit exposure to toxic emissions for bystanders, including vulnerable populations.

INDUSTRY ARGUMENT: The tobacco sticks used in HTP devices are not cigarettes.

RESPONSE: A heated cigarette — like those used in PMI’s ‘IQOS,’ BAT’s ‘glo,’ and KT&G’s ‘lil’ — has the same basic components as a conventional cigarette: compressed tobacco and a filter enclosed in a paper wrapper. Like conventional cigarettes, major heated cigarette brands are available in a variety of flavors and are sold in packs. Some are even co-branded with major cigarette brands like Marlboro and Kent. Tobacco companies insist that heated cigarettes are not cigarettes primarily to avoid the strict regulations and higher taxes placed on conventional cigarettes.

INDUSTRY ARGUMENT: HTPs help smokers quit.

RESPONSE: According to the WHO, “There is insufficient independent evidence to support the use of [HTPs] as a population level tobacco cessation intervention to help people quit conventional tobacco use. HTPs contain tobacco, and the use of these products constitutes tobacco use, thereby contributing to the burden of tobacco in countries where they are sold.”²⁸

While the body of evidence on HTPs and smoking cessation is still fairly small, most studies have not found HTPs to be effective smoking cessation devices.^{29,30} On the contrary, most HTP users continue using conventional cigarettes as well as HTPs, rather than switching completely to HTPs.^{29,31,32} As a result, no country or jurisdiction has approved HTPs as a smoking cessation aid.²⁹ In addition, no HTP has been approved by any regulatory body as a safe and effective nicotine replacement therapy, and no HTP manufacturer is marketing these products as cessation devices.

INDUSTRY ARGUMENT: HTPs fit into a harm reduction framework.

RESPONSE: HTPs have no place in a harm reduction framework. They contain tobacco, and tobacco use in any form is dangerous. Furthermore, the health effects of HTP use are still not well-understood. Given these products' relative newness and similarity to conventional cigarettes, it is irresponsible to assert that the reduced toxicant levels of HTP emissions (as compared to conventional cigarettes) translate to a reduction in health risk. Cigarettes are a uniquely deadly product, so using them as a standard for comparison is not helpful for gauging another product's relative level of harm. Finally, HTPs emit toxic emissions, expose users to toxic chemicals, and do not help smokers quit smoking.³³

INDUSTRY ARGUMENT: HTPs and other new tobacco products are better for the environment.

RESPONSE: This is a classic tobacco industry tactic known as “greenwashing.” Greenwashing refers to the practice used by controversial industries to market their goods and/or image as environmentally friendly³⁴ to increase product sales and divert public attention from their own environmentally damaging practices.³⁵ A 2017 WHO report documents the detrimental environmental impacts of every stage of the tobacco life cycle; tobacco farming, curing, product manufacture, distribution, consumption and post-consumer waste all damage the environment.³⁶ Despite this, multi-national companies are still each producing hundreds of billions of cigarettes per year and none of their internal documents show intentions to proactively reduce production.³⁷ HTP devices still use disposable tobacco sticks/pods and the devices themselves must be disposed. Disposal of electronic devices is known to be harmful to soil, water, and the atmosphere.³⁸

1. U.S. Food and Drug Administration (FDA). Harmful and Potentially Harmful Constituents in Tobacco Products and Tobacco Smoke: Established List. Updated Oct. 7, 2019. Available from: www.fda.gov/tobacco-products/rules-regulations-and-guidance/harmful-and-potentially-harmful-constituents-tobacco-products-and-tobacco-smoke-established-list
2. Auer R, et al. HeatNot-Burn Tobacco Cigarettes: Smoke by Any Other Name. *JAMA International Medicine*. 2017. 177(7):1050-1052.
3. Zuck, K. Evidence Related to the Health Risk of IQOS Use: Evaluation of Product Chemistry. Pre-sented January 24-25, 2018 at the USFDA Center for Tobacco Products. Slide 15.
4. Bekki K, et al. Comparison of Chemicals in Mainstream Smoke in Heat-not-burn Tobacco and Combustion Cigarettes. *J of UOEH*. 2017. 39(3):201-207.
5. Farsalinos, K. et al. Carbonyl emissions from a novel heated tobacco product (IQOS): comparison with an e-cigarette and a tobacco cigarette.
6. U.S. Department of Health and Human Services (USDHHS). How Tobacco Smoke Causes Disease. The Biology and Behavioral Basis for Smoking-Attributable Disease (Key Findings F5). Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health; 2010.
7. Bates, Clive & Rowell, Andy. (2004). Tobacco Explained... The truth about the tobacco industry... in its own words. Center for Tobacco Control Research and Education, UC San Francisco, University of California at San Francisco, Center for Tobacco Control Research and Education.
8. USDHHS. The Health Consequences of Smoking: 50 Years of Progress. A Report of the Surgeon General. Atlanta, GA: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health, 2014.
9. U.S. FDA. Philip Morris Products S.A. Modified Risk Tobacco Product (MRTP) Applications. Last updated: 7 July, 2020.
10. WHO. Decision: FCTC/COP8(22) Novel and emerging tobacco products. 2018.
11. Jackler RK et al. Global Marketing of IQOS The Philip Morris Campaign to Popularize “Heat Not Burn” Tobacco. SRITA White paper. February 21, 2020.
12. TobaccoIntelligence. How PMI Creates Brand Awareness for IQOS in Italy. 22 Nov. 2017.
13. Liu et al. Heat-not-burn tobacco products: concerns from the Italian experience. *Tobacco Control* 2019; 28(1):113-114.
14. Kirkham C. Exclusive: Philip Morris suspends social media campaign after Reuters exposes young ‘influencers.’ Reuters [online]. May 10, 2019.
15. Shukman H. British American Tobacco used young Instagram stars in its ads. *The Times* [online]. August 17, 2019.
16. Instagram. @glo_worldwide [BAT sponsored account]. Accessed 13 Nov. 2020.
17. Instagram. #discoverglo [BAT Glo affiliated link]. Access 13 Nov. 2020.
18. PMI. 10 year Corporate Affairs Objective and Strategies. 2014. PMI Reuters Documents. Reuters News; Thomson Reuters.
19. Inspiring Products Driving Change. Harm Reduction Focus Report 2016. [Accessed Nov.13, 2020].
20. Bloomberg News. BAT appeals to court after South Africa digs in on tobacco ban. Published May 30, 2020. [Accessed Nov. 16, 2020]
21. National Confederation of Industry (Confederação Nacional da Indústria) v. ANVISA (2018). [Accessed November 16, 2020]
22. BAT Uganda Ltd v. Attorney General & Center for Health, Human Rights and Development (2016). Tobacco Control Laws.
23. BAT Kenya, PLC v. Ministry of Health (2017). Tobacco Control Laws.
24. Honduras, et al. v. Australia (2018). Tobacco Control Laws.
25. Campaign for Tobacco Free Kids. Heated Tobacco Products: Global Regulations. May 2020.
26. Ruprech AA, et al. Environmental pollution and emission factors of electronic cigarettes, heat-not-burn tobacco products, and conventional cigarettes. *Aerosol Science and Technology*. 21 March 2017. 51(6):674-684.
27. Glantz SA. Heated tobacco products: the example of IQOS. *Tobacco Control* 2018;27:s1-s6
28. WHO Report on the Global Tobacco Epidemic, 2019. Geneva: World Health Organization; 2019.
29. Luk TT, Weng X, Wu YS, et al. Association of heated tobacco product use with smoking cessation in Chinese cigarette smokers in Hong Kong: a prospective study. *Tobacco Control*. Published Online First: 10 September 2020.
30. Dunbar MS, et al. Correlates of awareness and use of heated tobacco products in a sample of US young adults in 2018-2019. *Nicotine Tob Res* 2020:ntaa007.
31. Kang H and Cho S. Heated tobacco product use among Korean adolescents. *Tobacco Control*. Published Online First: 04 June 2019.
32. Hwang J, Ryu D, and Park S. Heated tobacco products: Cigarette complements, not substitutes. *Drug and Alcohol Dependence*. 2019. 204: 107576.
33. F. Houghton, S. Houghton, D. O'Doherty et al. Greenwashing tobacco—attempts to eco-label a killer product. *J Environ Stud Sci* 2019;9:82-85
34. B. Watson. The troubling evolution of corporate greenwashing, *The Guardian*, 20 August 2016 [online].
35. Tobacco and its environmental impact: an overview. Geneva: World Health Organization; 2017.
36. WHO. HTP Factsheet, 2nd Ed. 2020.
37. Campaign for Tobacco Free Kids. TakeAPart's. Tobacco Company Dossiers. Last Updated 13 Nov. 2020.
38. Li & Anchal. Environmental and health impacts due to e-waste disposal in China – a review. *Science of the Total Environment*. October 2020; Vol 737.