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7th APRIL 2022

PHILIP MORRIS LIMITED SUBMISSION TO THE INDEPENDENT REVIEW OF SMOKEFREE 2030 POLICIES

OVERVIEW

Despite strong progress in recent years, smoking prevalence remains high at 13.8% in the UK, with an estimated 6.7 million adult smokersⁱ. England alone is home to around 5.5 millionⁱⁱ smokers, and numerous projections show the Government's ambition for a smoke free 2030 is going to be missedⁱⁱⁱ. A recent forecast, based on the latest ONS data, suggests that England may not see the end of smoking for over two decades^{iv}.

But it is not just the headline figures that matter, for these hide the vast inequalities that exist which mean that cohorts of smokers are left behind. Those in lower socio-economic groups are disproportionately affected. For example, 31% of smoker households in England live in poverty^v, and the smoking prevalence among manual workers is nearly three times higher than it is for those in managerial and professional occupations^{vi}. Inequalities are geographic as well as demographic, for example: ONS data shows that in Q1 2020, just over 25% of the adult population in Blackpool smoked versus 4.2% in Richmond upon Thames^{vii}. Meanwhile, adults with a mental health condition have a smoking prevalence rate almost double that of the general population^{viii}.

The UK has long been a leader for harm reduction, but if we are to achieve the Government's ambition for a smoke-free England by 2030, change is urgently needed to level up in all communities across the nation. **In practice – and as this submission will set out in detail - this means access to a greater range of satisfying less harmful non-combustible alternatives such as heat-not-burn products, nicotine pouches and snus, as well as e-cigarettes. This should be delivered alongside strengthened measures to control the access to, and usage of, combustible tobacco products.**

Over the past decade, e-cigarettes – and the Government's pragmatic approach to them - have played a vital role in reducing harm and reducing smoking levels. Indeed, there are an estimated 3.3 million vapers in Great Britain today^{ix}. However, it is becoming clear that a one-size-fits-all approach will not be sufficient. The data suggests that the number of vapers is starting to level off, and it has been noted that between a third and half of all vapers are still dual using with smoked tobacco products^x. When asked how satisfying dual users find e-cigarettes, more than half said it was less satisfying than smoking^{xi}.

The potential to make a meaningful difference across the Nation is sizeable. ONS data shows that nearly 60% of smokers want to stop and nearly a third are undecided^{xii}. Equally, a survey of UK adult nicotine users found that a significant proportion of smokers were willing to switch to a less harmful alternative when provided with accurate information^{xiii}. Smokers were twice as likely to switch when they had a good familiarity of the product offering. Data also shows that satisfaction levels among smokers/former smokers with other alternatives are high, for example, approximately 72% of those who switch to IQOS, our signature heated tobacco system stop smoking altogether (with the remainder in various stages of conversion)^{xiv}.

Ultimately, there is a need for regulatory change if we are to achieve the ambition for a smoke-free 2030 and showcase the UK as a sustained leader in harm reduction. Regulation should be centred on helping adult smokers to quit or switch. This means providing access to accurate information and embracing the range of alternatives while protecting against youth or never smoker use or uptake. Accordingly, this submission will outline a two pronged approach to harm reduction. Taken together, we believe that this balanced package of measures, that both further helps curb cigarettes sales in the UK, whilst also accelerating switching to less harmful smoke-free alternatives, is essential to reaching Smoke-Free 2030. As per the Terms of Reference and against this backdrop the submission will also outline evidence from, and applications of, harm reduction in an international setting.



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REGULATORY REFORM: A MULTI-CATEGORY FRAMEWORK GOVERNING LESS HARMFUL ALTERNATIVES TO SMOKING

As outlined above, there is a clear need to reform the UK's regulation governing less harmful alternatives to smoking. The best thing any smoker can do is to quit - but for those who would otherwise continue to smoke, they should be supported to switch to a less harmful alternative that works for them if we stand a chance of reaching a smoke free 2030. In practice, this means introducing a future-proofed multi-category regulatory framework which embraces the full range of less harmful alternatives to smoking – notably: e-cigarettes, heat-not-burn products, snus and nicotine pouches. At the same time, the framework must protect against youth and never smoker uptake.

We have provided an overview of the products deemed to be less harmful than continued smoking at Annex A, but below we briefly outline each in turn. It is vital to note that these products are completely different to cigarettes and other forms of combustible tobacco. As noted by the Office for Health Improvement and Disparities, *“The evidence shows that while nicotine is the addictive substance in cigarettes, it is relatively harmless. In fact, almost all the harm from smoking comes from the thousands of other chemicals in tobacco smoke, many of which are toxic.”*^{xv} Independent experts have identified a list of harmful and potentially harmful constituents (HPHCs) found in tobacco smoke associated with causation of smoking-related diseases. Tobacco smoke is formed on lighting a cigarette as a result of tobacco combustion and it is the combustion process that is responsible for the formation of many of the HPHCs present in cigarette smoke. Given the absence of combustion, the below are all smoke free products, which have the potential to significantly reduce exposure to HPHC compared to cigarettes, for smokers who switch to them completely.

- **E-cigarettes:** heat e-liquids to produce a nicotine-containing aerosol which is inhaled. There are an estimated 3.3 million vapers in Great Britain, though numbers appear to be beginning to plateau.
- **Heat-not-burn products (HnB):** specially designed tobacco sticks are electronically heated to produce a nicotine-containing aerosol. Despite challenging regulation, HnB products have shown a strong growth trajectory in the UK since launching. As of December 2021, there were over 140,000 users of IQOS, our signature heated tobacco system.
- **Nicotine pouches:** pre-portioned pouches containing nicotine that are placed between the lip and gum. Nicotine pouches generally do not contain tobacco. Official data on usage is not available, though anecdotally, awareness and interest in the product is thought to have risen rapidly over the past two years in the UK.
- **Snus (Swedish-style):** specially treated tobacco available in pre-portioned pouches or as loose tobacco, which - similar to nicotine pouches - is placed between the lip and gum. Snus is currently banned for sale and distribution in the UK. In Sweden, the only EU Member State where snus is allowed, snus has contributed in the past decades to a significant reduction of cigarette smoking (the lowest among all EU Member States), and as a result, the lowest rate of tobacco-related mortality and the lowest incidence of male lung cancer.

To date, the UK's regulation of tobacco and nicotine products such as those outlined above have largely been driven by EU laws such as the EU Tobacco Products Directive negotiated in 2012-2014, and have not kept pace with innovation. This was at a point in time before Public Health England's landmark report concluding that e-cigarettes were around 95% less harmful than smoking^{xvi}; before the potential for e-cigarettes to accelerate the end of smoking was widely understood; and before other smoke-free products such as heat-not-burn and nicotine pouches were made available in the UK. As a result, existing rules are piecemeal with differing degrees of regulation applying to different products. By-way-of example: snus is banned^{xvii}; nicotine pouches fall outside the scope of tobacco and nicotine regulations; heat-not-burn products are inadvertently regulated alongside



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combustible tobacco products; and e-cigarettes are largely governed by EU law which is in places deemed to be without merit.

The EU law on which much of our tobacco and nicotine laws are based represents a political compromise designed to meet the diverse needs of the EU Parliament and the EU's 27 constituent countries - many of which are quite different from the UK. The UK's departure from the EU provides an opportunity not only to update legislation to reflect changes in technology, innovation, and our understanding of their real world impact, but also a chance to introduce a system better suited to our national priorities. In practice, this means introducing a future-proofed multi-category framework which embraces the full range of less harmful alternatives to smoking – notably: e-cigarettes, heat-not-burn products, snus and nicotine pouches. At the same time, the framework must protect against use and uptake by unintended audiences such as youth.

We recommend that a multi-category framework governing less harmful non-combustible alternatives to smoking is introduced, and we recommend this framework includes:

1. **Targeted communications to adult smokers and adult nicotine users:** targeted communications to adult smokers and adult nicotine users should be permitted. For example: by email, digital channels, one-to-one conversations, through pack inserts or at the point of sale. This would mean adult smokers can be informed about their options, while minimising the potential to reach unintended audiences such as young people or never smokers. Notably, we do not consider that mass communications such as those on bus stops or billboards are appropriate.
2. **Extend health warnings on e-cigarettes to all less harmful alternatives:** less harmful alternatives should be required to hold a Government approved health warning on all packaging akin to those used for e-cigarettes. Health warnings should, in a unified and clear manner, state that they are not risk free, contain nicotine which is addictive and are intended for adult use only.
3. **Reporting obligations and post-market surveillance requirements:** Post-market surveillance should check regulatory compliance of products and assess the extent to which they are reaching the intended audience of adult smokers. Studies of market trends (data on product usage, including switching rates associated with different tobacco and nicotine products, initiation, youth awareness and use, patterns of tobacco and nicotine use, dual usage, poly usage etc) would help to assess the impact of the regulatory framework on these products and facilitate evaluation that could recommend targeted adjustments if unintended developments occur. This surveillance and monitoring system should be paid for by manufacturers and require them to report market data to be assessed alongside independently collected data.
4. **Guidance to regulate flavours based on promotion:** Government guidance should be created to regulate flavours based on promotion rather than product. Guidance should be clear that nicotine products should never be marketed, or sold, in ways that mimic youth-oriented products, for example by using branding or packaging that mimics confectionary, or other youth-oriented products. This would ensure products are not particularly appealing to youth and never smokers.
5. **Common-sense registration requirements for the sale of less harmful alternatives to smoking:** While not seeking to burden the economy's small business, a common-sense approach to registration requirements would give greater oversight to Trading Standards in ensuring that products are not sold to minors.



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Any changes to tobacco and nicotine policy need to robustly protect against unintended consequences – and there are many ways to achieve this. As demonstrated in the above five recommended features of any regulatory framework, due consideration needs to be given to:

- Protecting youth and preventing non-nicotine user uptake by ensuring changes are strictly focused on helping adult smokers switch where they do not quit e.g. they must be targeted.
- Ensuring there are robust measures and processes in place to prevent nicotine products from being sold to youth (including enhanced age verification for offline and online sales, frequent 'Mystery Shopper' actions, and adequate sanctions in case of sales to minors).
- Ensuring there are sensible consumer protection measures in recognition that a framework which rightfully encourages innovation for harm reduction is likely to result in an increased number of products on the market.
- Ensuring there are processes in place for assessing new innovations, as it is likely that further products with the potential to reduce harm will be developed in the foreseeable future.

Alongside delivering a multi-category framework as outlined above, it is important to continue to strengthen measures to control combustible tobacco use and access. While the UK has been a global leader in tobacco control – as detailed above – there are areas where we could go further.

FURTHER MEASURES TO COMBAT SALES OF COMBUSTIBLE TOBACCO

It is our long-standing aspiration that by 2025 at least 40 million smokers globally switch to PMI's smoke-free products and stop smoking. We believe that with the right regulatory encouragement and support for smoke-free products from all relevant stakeholders, including governments and the public health community, civil society and industry stakeholders, cigarette sales can end within 10 to 15 years in many countries.^{xviii} Industry, with its capabilities to develop a range of less harmful alternatives which can replace smoking, has a vital role to play in accelerating this transition, and the right regulatory framework is essential to incentivise this.

In this context, alongside delivering a multi-category framework, we believe it is important to continue to strengthen measures to control combustible tobacco use and access. While the UK has been a global leader in tobacco control there are areas where we could go further to ensure smoking is not seen as an accessible or attractive option for adults wishing to use nicotine – possible measures are detailed further below.



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We believe the Government should:

1. **Continue the use of taxation as a way to discourage smoking**: fundamentally, one of the most important mechanisms to discourage smoking is to maintain increases in taxation on combustible tobacco at a rate that encourages smokers to quit or switch to less harmful alternatives than smoking.
2. **Allow inserts in combustible tobacco packaging**: by legalising and mandating inserts into all combustible tobacco product packaging, so that smokers can receive Government approved messaging encouraging them to quit or switch to a less harmful alternative in a highly targeted manner. This could easily be implemented via secondary legislation.
3. **Extend the ban on characterising flavours to all combustible tobacco products and associated accessories**: ensure the ban on cigarettes and hand rolling tobacco with characterising flavours applies to all combustible tobacco products and to all associated accessories (e.g., menthol strips, mentholated cigarette papers etc.) designed to add a characterising flavour.
4. **Restrict trade advertising exclusively to less harmful alternatives to smoking**: the only permissible communications to the trade press should be in relation to less harmful alternatives to smoking. Communications regarding combustible tobacco products should not be permitted.
5. **Introduce a requirement to hold a license for retail sales of combustible tobacco**: ensuring consistency and responsibility across retail outlets.

FISCAL IMPLICATIONS

We have considered the impact of a two-pronged approach (comprising of measures to support adult smokers to switch to less harmful alternatives, while also combatting the sale of combustible tobacco) to reform on receipts to the Exchequer. Tobacco duty receipts have been in long run decline as smoking prevalence across the UK has fallen in recent years. In 2021, tobacco duty receipts were around £10 billion^{xix}. Our analysis shows that it is feasible to introduce reforms which support smokers to switch to less harmful alternatives where they would otherwise continue smoking, and curb the sale of combustible tobacco while broadly maintaining Treasury receipts. We would be happy to share detailed analysis with you should that be of interest, but at a high level, this would involve augmenting the existing excise system to be more risk-based in recognition that not all tobacco products are the same. This includes vastly accelerating the increases in excise on hand rolled tobacco until parity with cigarettes is achieved, while continuing increases in the excise escalators for both; and implementing a fully specific excise regime for cigarettes. At the same time, excise on less harmful alternatives than smoking should be kept low, or where excise is not currently applicable, the tax treatment maintained. Our analysis shows that the right fiscal framework would not only support the Nation's public health objectives, it would also maintain revenue for the Exchequer.

CONCLUSION

We support the Government's ambition to reach its target for a smoke-free England by 2030 and welcome the undertaking of this review. We strongly believe that key to bringing down smoking prevalence across all corners of the Nation, particularly among deprived communities, will be a two-pronged approach to regulatory reform which seizes on our new found freedoms having left the European Union. We believe it is vital that those adult smokers who don't quit have greater access to less harmful alternatives – and this should include heat-not-burn products along with other alternatives such as e-cigarettes, nicotine pouches and snus. We believe this should be delivered alongside certain strengthened measures to control the access to, and usage of, combustible tobacco products.



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BACKGROUND - HARM REDUCTION: INTERNATIONAL EVIDENCE AND APPLICATION

Harm reduction is a public health strategy that has been successfully used in many different contexts, including smoking and tobacco. The adoption of harm reduction principles in public health have been effective and are endorsed by the WHO among others. It is a matter of common consensus that while nicotine is addictive, it is not the primary cause of smoking related diseases, and that substitute products for cigarettes which avoid burning tobacco can significantly reduce harm. As noted by the Office for Health Improvement and Disparities, *“The evidence shows that while nicotine is the addictive substance in cigarettes, it is relatively harmless. In fact, almost all the harm from smoking comes from the thousands of other chemicals in tobacco smoke, many of which are toxic.”*^{xx}

Real world international evidence indicates that countries such as the UK, which have embraced e-cigarettes as a less harmful alternative, have reduced smoking levels faster than others which have prohibited or criticised them. We therefore suggest that when making its recommendations, the independent review considers the relative performance of the UK in reducing smoking compared to other OECD countries, and in particular the implications of different approaches taken to harm reduction products.

INTERNATIONAL DATA CONFIRMS THAT HARM REDUCTION IS AN EFFECTIVE TOOL

A brief comparison of smoking prevalence across Australia, England, Japan and New Zealand (NZ) highlights the impact that switching to less harmful alternatives can have on smoking rates. Please note: given the impact of COVID-19 on data collection^{xxi} the below comparison uses data up to 2019^{xxii}.

- Between 2013 and 2016, Australia’s current smoking rate decreased by just -0.9 percentage points (total over 3 years), compared to -1.6 percentage points in NZ and -2.9 percentage points in England^{xxiii}.
- Between 2016 and 2019, Australia’s smoking prevalence reduced a further -0.9 percentage points, compared to -1.6 percentage points in England and -2.3 percentage points in NZ.

This is interesting, because Australia, England and NZ have similarly strict approaches to tobacco control but differ in their approach to harm reduction. While England and NZ endorse harm reduction (although in New Zealand this came much later than England), Australia has been an outlier among OECD countries, banning the domestic sale of e-cigarettes, heat-not-burn and nicotine pouches. Indeed, Australia has arguably the strictest supply and demand curbs on combustible tobacco of these four countries, with regular annual excise increases of 12.5% during this period, in addition to having implemented plain packaging four years earlier than England. This suggests that harm reduction is an extremely (perhaps the most) effective policy, and a good complement to more traditional strategies.

The potential of harm reduction is further evidenced by the case of Japan. In Japan, smoking reduced by -1 percentage point between 2013 and 2016 (very similar to Australia’s -0.9). However, between 2016 and 2019, the Japanese smoking rate reduced by -5.2 percentage points, as almost three in every ten Japanese smokers stopped smoking cigarettes. This coincided with the national roll-out of heat-not-burn products. A study by researchers at the American Cancer Society, published in the British Medical Journal’s ‘Tobacco Control’ concluded: *“Cigarette sales begin to substantially decline at the time of the introduction of IQOS in each of 11 Japanese regions...The introduction of IQOS likely reduced cigarette sales in Japan.”*^{xxiv}

In 2013, Japan had the highest smoking rate of the four countries, and Australia the lowest by a clear margin (1.8 percentage points lower than New Zealand, 2.6 lower than England, and 3.5 lower than Japan). But by 2019, Japan’s smoking rate was the lowest, and Australia’s the highest. The regulatory framework for cigarettes in Japan is more permissive than Australia, England, and New Zealand, yet the Japanese smoking rate has reduced



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faster. We do not highlight this to advocate for more permissive regulation of cigarettes – in fact, as outlined above, we support a number of measures to further restrict the sale and use of combustible tobacco. Instead, we highlight this example as it demonstrates that a regulatory framework which supports adult smokers to switch to less harmful alternatives can be extremely effective in accelerating reductions in smoking prevalence.

The potential role for less harmful alternatives to reduce the harms of smoking is also apparent in Sweden. Snus is banned in the UK and all EU countries except Sweden, where it overtook cigarettes in popularity among men in 1996. Snus has a very high conversion rate – one study of a data set from 2003-11 found that 87% of men and 86% of women smokers who switched to daily use of snus stopped smoking in Sweden,^{xxv} and other studies have found similar results^{xxvi}. This switching has resulted in Sweden enjoying the lowest rate of smoking in Europe (7%). This compares to an EU average of 25%, and rates of 15% and 16% in its Nordic neighbours Finland and Denmark.^{xxvii}



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BACKGROUND – PHILIP MORRIS LIMITED: A SMOKE FREE FUTURE

Philip Morris Limited (“PML”) is the UK & Ireland affiliate of Philip Morris International (PMI). Philip Morris International (PMI) is a leading international tobacco company working to deliver a smoke-free future and evolving its portfolio for the long-term to include products outside of the tobacco and nicotine sector. In 2016, PMI announced our ambition to deliver a smoke-free future and ultimately stop selling cigarettes altogether. We are committed to support the Government in reaching its target of a smoke-free England by 2030, by providing a range of less harmful, non-combustible alternatives than smoking to the millions of adults who would otherwise continue to smoke. Accordingly, we have developed a portfolio of non-combustible alternatives, which is led by *IQOS*, our signature heated tobacco system. We believe that heat-not-burn (HnB) products, together with other less harmful alternatives than smoking such as e-cigarettes, nicotine pouches and snus have a vital role to play in meeting the bold ambition for a smoke-free future.

IQOS launched in the UK in 2016. The latest data indicates that, despite existing laws making it challenging to proactively communicate with adult consumers about HnB products, the category as whole has experienced clear growth trajectory in the UK. Notably:

- *IQOS*, our signature heated tobacco system, and/or *HEETS*^{xxxviii} are available in over 15,000 supermarkets and conveniences stores, and more than 400 vape stores UK wide^{xxxix}.
- There were more than 140,000 estimated users of *IQOS* in the UK as of 31 December 2021, reflecting around 60% growth over the preceding 12 months.^{xxx}
- In Q4 2021, the market share for *IQOS*'s *HEETS* consumables reached 2.7% of the total cigarette and heated tobacco unit market in the UK, representing growth of 0.9 percentage points vs Q4 2020. In addition, *HEETS* reached an offtake share of nearly 6% in London on the same basis, an increase of 2.1 percentage points versus Q4 2020.^{xxxi}
- Our estimates as of 31 December 2021 show that 21.2 million people globally were using *IQOS*. Of this number, an estimated 15.3 million – or approximately 72% - had switched to *IQOS* and stopped smoking, with the remainder in various stages of conversion.^{xxxii}
- More generally, proprietary data shows that dual use with smoking among UK HnB users is significantly lower than it is for vapers.^{xxxiii}

As the above data shows, the market is sizeable, and growing, and many adult smokers have already successfully made the switch. As of 31 December 2021, *IQOS* was available for sale in 68 markets.

In Japan the available evidence links the launch of *IQOS* in 2016 to an accelerated decline in cigarette smoking^{xxxiv},^{xxxv}. So far, the real-world evidence has indicated that introducing HnB products can have a beneficial impact. Notably, in July 2020^{xxxvi} and March 2022^{xxxvii} the U.S. Food and Drug Administration (FDA) authorized the marketing of two *IQOS* variants in the US as Modified Risk Tobacco Product (MRTP), with a reduced exposure claim. The FDA has concluded that switching completely from cigarettes to *IQOS* significantly reduces your body's exposure to harmful or potentially harmful chemicals and they determined that the issuance of the MRTP orders with reduced exposure claims would be “appropriate to promote the public health and is expected to benefit the health of the population as a whole”.

We have invested significant resources in the science and research behind our smoke-free products, including *IQOS*. Indeed, there is substantial independent verification of our proprietary science as well as independent evidence. The science backing HnB products as a less harmful alternative to smoking is clear – and at the centre of this is the absence of combustion. We have and always will welcome further independent review and



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challenge of our work and products, and that is why we welcomed the Government's commitment, in 2019, to launch a Call for Independent Evidence on HnB products.

- ⁱ ONS (published in 2021) <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/bulletins/smokingprevalenceintheukandtheimpactofdatacollectionchanges/2020>
- ⁱⁱ Ibid
- ⁱⁱⁱ Cancer Research (2020) <https://news.cancerresearchuk.org/2020/02/25/england-off-track-to-meet-governments-2030-smoke-free-target/>
- ^{iv} PML commissioned analysis from Frontier Economics. Based on achieving a 0% smoking prevalence. Further detail / methodology available upon request.
- ^v Action on smoking and health (2022) <https://ash.org.uk/media-and-news/press-releases-media-and-news/a-third-of-smoking-households-in-england-are-living-in-poverty-with-rates-highest-in-the-north/>
- ^{vi} ONS (published in 2021)
25.2% routine and manual workers / 8.8% managerial and professional occupations
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/bulletins/smokingprevalenceintheukandtheimpactofdatacollectionchanges/2020>
- ^{vii} Ibid
- ^{viii} PHE (2020): <https://www.gov.uk/government/publications/health-matters-smoking-and-mental-health/health-matters-smoking-and-mental-health#:~:text=The%20association%20between%20smoking%20and,with%20a%20mental%20health%20condition.>
- ^{ix} ONS (published in 2021)
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/bulletins/smokingprevalenceintheukandtheimpactofdatacollectionchanges/2020>
- ^x PHE evidence review (2021) <https://www.gov.uk/government/publications/vaping-in-england-evidence-update-february-2021/vaping-in-england-2021-evidence-update-summary> which states: "The proportion of vapers who also smoke has declined since 2012, from 74% to 38% in the ASH-Adult and from 92% to 51% in the STS survey."
- ^{xi} ASH (2021) <https://ash.org.uk/wp-content/uploads/2021/06/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2021.pdf>
- ^{xii} ONS (published in 2021)
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/bulletins/smokingprevalenceintheukandtheimpactofdatacollectionchanges/2020>
- ^{xiii} Based on the results of a survey of UK adult and nicotine users conducted by Kantar on behalf of PMI. Please get in touch for further results of this survey.
- ^{xiv} PMI Investor Relations, 2021 Q4 Results: <https://www.pmi.com/investor-relations/reports-filings>
- ^{xv} Office for Health Improvement and Disparities (2021): <https://www.gov.uk/government/publications/smoking-and-tobacco-applying-all-our-health/smoking-and-tobacco-applying-all-our-health>
- ^{xvi} PHE (2015) <https://www.gov.uk/government/news/e-cigarettes-around-95-less-harmful-than-tobacco-estimates-landmark-review#:~:text=An%20expert%20independent%20evidence%20review,to%20help%20smokers%20quit%20smoking.>
- ^{xvii} Snus is banned for sale and distribution in the UK owing to EU law.
- ^{xviii} PMI, Integrated Report 2020 (published in 2021): <https://www.pmi.com/docs/default-source/pmi-sustainability/pmi-integrated-report-2020.pdf>
- ^{xix} HMRC (2021) <https://www.gov.uk/government/statistics/hmrc-tax-and-nics-receipts-for-the-uk/hmrc-tax-receipts-and-national-insurance-contributions-for-the-uk-new-annual-bulletin#tobacco-duty-receipts>
- ^{xx} Office for Health Improvement and Disparities (2021): <https://www.gov.uk/government/publications/smoking-and-tobacco-applying-all-our-health/smoking-and-tobacco-applying-all-our-health>
- ^{xxi} UK data is not comparable with previous years, Japan has paused its survey
- ^{xxii} Australian data is based on the [National Drug Strategy Household Survey 2019 Data - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au) English data is based on ONS; Japan data is based on National Health and Nutrition Survey ([国民健康・栄養調査 | 厚生労働省 \(mhlw.go.jp\)](https://www.mhlw.go.jp)) an English language reconstruction of the data is also available via <https://www.frost.com/news/press-releases/sales-of-conventional-cigarettes-in-japan-reduce-by-34-since-launch-of-heated-tobacco-products/> New Zealand data is based on the NZ Health Survey
- ^{xxiii} Note that Australia's survey is triennial, unlike the annual reporting in England, Japan and New Zealand, which is why we have focused on these time periods.
- ^{xxiv} Stoklosa et al (2020) <https://pubmed.ncbi.nlm.nih.gov/31209129/>
- ^{xxv} Ramstrom et al (2016) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129320/>
- ^{xxvi} Clarke et al (2019) <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-019-0335-1>
- ^{xxvii} Eurostat: https://ec.europa.eu/eurostat/databrowser/view/sdg_03_30/default/table?lang=en
- ^{xxviii} HEETS consumable: our Electrically Heated Tobacco Product that is intended for use exclusively with IQOS.
- ^{xxix} AC Nielsen Scan track (Dec-21), Stores in Universe and Numeric Distribution data / and PML internal
- ^{xxx} PML Internal estimate as of 31 December 2021
- ^{xxxi} PMI Investor Relations, 2021 Q4 Results: <https://www.pmi.com/investor-relations/reports-filings>
- ^{xxxii} Ibid
- ^{xxxiii} Based on the results of a survey of UK adult and nicotine users conducted by Kantar on behalf of PMI. Please get in touch for further results of this survey.
- ^{xxxiv} Stoklosa, M. et al., 2020. Effect of IQOS introduction on cigarette sales: Evidence of decline and replacement. *Tob. Control.* 29, 381–387. <http://dx.doi.org/10.1136/tobaccocontrol-2019-0549>
- ^{xxxv} Cummings, K.M. et al., 2020 What is accounting for the rapid decline in cigarette sales in Japan? *Int. J. Environ. Res. Public Health* 2020, 17, 3570; doi:10.3390/ijerph17103570
- ^{xxxvi} [FDA Authorizes Marketing of IQOS Tobacco Heating System with 'Reduced Exposure' Information | FDA](https://www.fda.gov/press-releases/2021/s091421)
- ^{xxxvii} [Philip Morris Products S.A. Modified Risk Tobacco Product \(MRTP\) Applications | FDA](https://www.fda.gov/press-releases/2021/s091421)