

Estratégia Nacional de Luta Contra o Cancro 2021 - 2030

Resposta à Consulta Pública

Albarraque, 29 de Julho 2022

Exmos. Senhores,

A Tabaqueira, subsidiária da Philip Morris International em Portugal, vem por este meio participar na consulta pública para a Estratégia Nacional de Luta Contra o Cancro 2021 – 2030, no seguimento da publicação do Relatório Europeu de Luta contra o Cancro, em Fevereiro de 2022 e, também, da consulta pública sobre o Plano Nacional de Saúde 2021 – 2030, para o qual já tivemos a oportunidade de contribuir, em Maio passado, defendendo de que forma é que uma estratégia de redução de riscos pode ser uma abordagem complementar importante à prevenção e à cessação tabágicas, contribuindo ainda mais para a redução da prevalência das doenças relacionadas com o tabagismo em Portugal.

A Estratégia Nacional de Luta Contra o Cancro 2021 – 2030 contém uma série de dados importantes sobre o impacto de diversos fatores no desenvolvimento do cancro e permite, também, entender os principais objetivos e estratégias para alcançar a redução da prevalência da doença oncológica no nosso país.

O nosso contributo centra-se, pois, na implementação de estratégias em saúde pública que possam ser introduzidas para reduzir a carga da doença relacionada com o tabagismo em Portugal, nomeadamente através da promoção de uma abordagem de redução de riscos para apoiar os fumadores adultos que de outra forma continuariam a fumar cigarros.

Apesar da nicotina não ser inócua e provocar dependência, são os constituintes químicos nocivos presentes no fumo dos cigarros, resultantes da combustão do tabaco, os principais responsáveis pelas doenças relacionadas com o tabagismo. Embora deixar de fumar seja sempre a melhor opção para os fumadores adultos, muitos não o fazem. É, portanto, imperativo considerar a implementação de alternativas pragmáticas e eficazes para aqueles que continuam a consumir nicotina na sua forma mais nociva: os cigarros. A estratégia de redução de riscos para tabaco, ao oferecer aos fumadores adultos alternativas aos cigarros, menos nocivas e sem fumo, pode desempenhar um papel complementar às políticas existentes centradas na cessação e prevenção tabágicas, ao ajudar a reduzir os riscos de doenças associados ao tabagismo¹. Por outras palavras, a implementação de uma estratégia de redução de riscos para o tabaco pode contribuir para a redução da carga das doenças associadas ao tabagismo e a alcançar um futuro sem fumo, onde os cigarros serão totalmente substituídos por produtos alternativos que fornecem nicotina, mas de uma forma menos nociva do que continuar a fumar.

Mais ainda, o potencial de modificação do risco das alternativas sem fumo comparativamente aos produtos de tabaco que sofrem um processo de combustão foi recentemente reconhecido pelo Parlamento Europeu nas suas recomendações finais sobre o *Report for a Comprehensive and Coordinated EU Strategy to Fight Cancer*², nomeadamente quando refere “convida a Comissão a acompanhar as avaliações científicas dos riscos para a saúde relacionados com os cigarros eletrónicos, os produtos do

¹ <https://www.emireviews.com/flagship-journal/article/pragmatism-and-smoking-cessation-the-role-of-harm-reduction-in-creating-healthier-smoke-free-societies-j190321/>

² <https://www.europarl.europa.eu/committees/en/beca/home/highlights>

tabaco aquecido e os novos produtos do tabaco, incluindo a avaliação dos riscos da utilização destes produtos em comparação com o consumo de outros produtos do tabaco, e o estabelecimento a nível europeu de uma lista de substâncias contidas nestes produtos e por eles emitidas³.

Neste documento, partilhamos a nossa visão e a nossa ambição para alcançar um futuro sem fumo e para reforçar a importância de uma estratégia de redução de riscos para o tabaco como abordagem complementar das políticas de prevenção e de cessação tabágicas de combate ao Cancro.

Encontrar soluções para ajudar os fumadores portugueses

Tal como referido anteriormente, defendemos que a cessação tabágica será sempre a melhor opção para qualquer fumador, mas a realidade é que muitos fumadores não deixam de fumar. Estima-se que existam hoje mais de 1,1 mil milhões de fumadores a nível mundial, dos quais 1,7 milhões são portugueses. Para além disso, a Organização Mundial da Saúde (OMS) estima que existam mil milhões de fumadores em 2025⁴. Na nossa opinião, estas pessoas que, de outra forma continuariam a fumar, merecem uma abordagem pragmática e uma solução concreta que seja cientificamente reconhecida como uma forma menos nociva de consumo de nicotina e de tabaco, e que as afaste definitivamente dos cigarros.

Hoje, essa solução existe. Nos últimos anos, tiveram lugar vários desenvolvimentos tecnológicos e científicos significativos, relacionados com os produtos de tabaco que têm o potencial de serem uma alternativa menos nociva para os fumadores, quando comparada com os cigarros. Referimo-nos a produtos que contêm nicotina, mas que não queimam o tabaco ou produzem fumo, incluindo produtos em que o tabaco é aquecido em vez de queimado (produtos de tabaco aquecido), cigarros eletrónicos ou produtos sem fumo para uso oral, como as bolsas de nicotina, são uma melhor alternativa de consumo de nicotina do que continuar a fumar. O processo de combustão é responsável pela formação de muitos dos constituintes nocivos ou potencialmente nocivos presentes no fumo dos cigarros e que estão associados as doenças relacionadas ao tabagismo. Os produtos que não envolvem combustão, como os cigarros eletrónicos, os produtos de tabaco aquecido e as bolsas de nicotina, embora não isentos de risco, constituem uma melhor alternativa a continuar a fumar.

Atualmente já existe um consenso entre a comunidade científica que, embora a nicotina provoque dependência, o seu consumo não é a principal causa de doenças relacionadas com o tabagismo, e que estes produtos, que não queimam o tabaco, podem reduzir significativamente os riscos associados ao tabagismo⁵. Conforme referido por muitas organizações internacionais na área da saúde, nomeadamente o *Office for Health Improvement and Disparities in the UK* (outubro 2021), *“as evidências mostram que, embora a nicotina seja a substância que provoca dependência nos cigarros, é relativamente inócua. Na verdade, quase todos os riscos causados pelo fumo provêm dos milhares de outros constituintes químicos que estão igualmente presentes no fumo do tabaco, muitos dos quais são tóxicos. (...) Aconselhar os fumadores sobre os riscos relativos dos produtos que contêm nicotina em comparação com o tabaco que é queimado, é uma parte importante do apoio à cessação”*⁶ ou, como refere o Professor Riccardo Polosa, *“A chave para reduzir os efeitos negativos do consumo de cigarros associados à saúde passa por evitar a exposição crónica a constituintes químicos que são libertados durante a combustão do tabaco de cigarros*

³ https://www.europarl.europa.eu/doceo/document/TA-9-2022-0038_EN.html

⁴ <https://www.thelancet.com/infographics/tobacco>

⁵ <https://www.nejm.org/doi/full/10.1056/NEJMp1707409>

⁶ 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>

grávidas, pais, mulheres em idade fértil, pessoas doentes, professores e outros trabalhadores, quer ainda, e apenas para os fumadores em relação aos quais os métodos convencionais de cessação se provem ineficazes, a existência de alternativas, comprovadas pela Direção-Geral da Saúde, que consubstanciem redução de riscos e da nocividade [sublinhado nosso].”¹⁴

Desde 2017, a lei portuguesa reconhece a redução dos danos causados pelo tabaco como uma estratégia complementar às políticas de prevenção e cessação para os fumadores adultos que de outra forma continuariam a fumar. No entanto, embora este princípio tenha sido incorporado na Lei portuguesa já há cinco anos, ainda não foi totalmente traduzido em medidas concretas pelo regulador que poderiam encorajar os fumadores adultos a mudar para alternativas menos nocivas e que tenham um melhor perfil toxicológico do que fumar, na eventualidade de não deixarem de fumar com o apoio dos métodos tradicionais de cessação tabágica. A Diretiva da União Europeia sobre Produtos do Tabaco define a toxicidade como um dos principais fatores de risco associados ao consumo de produtos do tabaco¹⁵. Uma regulação que permita a diferenciação baseada no perfil toxicológico do tabaco e de outros produtos contendo nicotina versus os cigarros têm o potencial de encorajar os fumadores adultos, que de outra forma continuariam a fumar, a considerar e a mudar completamente para alternativas sem fumo. Para que tal diferenciação tenha impacto, deverá prever as medidas regulamentares mais restritivas para os produtos mais nocivos - os que queimam tabaco – distinguindo-os claramente os produtos menos nocivos, que têm um melhor perfil toxicológico.

Evidência sobre a eficácia de uma estratégia de redução de riscos para o tabaco

Os dados na União Europeia confirmam que existem vários produtos alternativos aos cigarros que - ao evitarem a combustão - representam uma alternativa muito melhor para os fumadores adultos, reduzindo significativamente a sua exposição a substâncias tóxicas. Na UE, muitas instituições de avaliação de riscos publicaram provas que apoiam a existência de um diferencial na exposição a substâncias nocivas e potencialmente nocivas entre cigarros e produtos sem fumo - tais como produtos de tabaco aquecido - incluindo o Instituto Nacional de Saúde Pública e Ambiente dos Países Baixos¹⁶, o Conselho Superior de Saúde da Bélgica¹⁷ e o Instituto Federal Alemão de Avaliação de Riscos¹⁸.

Dados internacionais, incluindo a evidência do mundo-real, demonstram que a mudança para alternativas menos nocivas pode ter um grande potencial para acelerar o declínio do tabagismo e reduzir a carga de saúde pública das doenças relacionadas com o tabagismo. Países como o Reino Unido ou a Nova Zelândia reconhecem explicitamente o potencial destas alternativas nas suas políticas, implementando uma estratégia de redução de riscos para o tabaco, como complemento às políticas de prevenção e cessação tabágica.

¹⁴ https://www.pgdlisboa.pt/leis/lei_mostra_articulado.php?nid=1066&tabela=leis

¹⁵ Ver Recital 13 TPDII: “In order to carry out their regulatory tasks, Member States and the Commission require comprehensive information on the ingredients and emissions from tobacco products to assess the attractiveness, addictiveness and toxicity of tobacco products and the health risks associated with the consumption of such products.”

¹⁶ Slob, W. et al., 2020 A Method for comparing the Impact on carcinogenicity of tobacco products: A Case Study on Heated Tobacco Versus Cigarettes, in: Risk Analysis Vol 40(7), available at: <https://onlinelibrary.wiley.com/doi/epdf/10.1111/risa.13482>

¹⁷ Superior Health Council of Belgium, New Tobacco Products: Heated Tobacco Products, April 2020, available at: https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/201026_shc-9538_new_tobacco_products_vweb.pdf; Electronic cigarettes, June 2022, available at: [20220616_hgr-9549_advies_e-sigaret_vweb_0.pdf](https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/20220616_hgr-9549_advies_e-sigaret_vweb_0.pdf) (belgium.be)

¹⁸ German Federal Institute for Risk assessment (2018): <https://link.springer.com/article/10.1007/s00204-018-2215-y>

O exemplo do Japão e da Coreia do Sul

O potencial de redução de riscos é evidenciado pelo caso do Japão, onde os dados disponíveis mostram a ligação entre o lançamento do IQOS, em 2016, e uma quebra da comercialização de cigarros^{19 20}, de cerca de 1 ponto percentual entre 2013 e 2016. No entanto, entre 2016 e 2019, essa mesma comercialização foi reduzida em 5,2 pontos percentuais, na medida em que quase três em cada dez fumadores japoneses deixaram completamente de fumar cigarros. Tal facto, coincidiu com a comercialização do produto de tabaco aquecido em todo o país. Um estudo realizado por investigadores da American Cancer Society, publicado no 'Tobacco Control' do British Medical Journal concluiu que *“as vendas de cigarros começam a diminuir substancialmente no momento da introdução do produto de tabaco aquecido em 11 regiões japonesas (...) A introdução deste produto reduziu provavelmente as vendas de cigarros no Japão”*²¹.

Este exemplo é ainda mais interessante após os resultados apresentados por um estudo recente da Philip Morris International²² que analisou as taxas de hospitalização aguda observada versus esperada relativamente ao agravamento da doença pulmonar obstrutiva crónica (DPOC) antes e após a introdução de produtos de tabaco aquecido no Japão. Este estudo utilizou dados de admissões hospitalares disponibilizados pela base de dados da Medical Data Vision (MDV) que inclui dados de 200 milhões de doentes internados em mais de 300 hospitais públicos japoneses.

Embora a prevalência da doença pulmonar obstrutiva crónica (DPOC) seja relativamente baixa no Japão, verificou-se uma redução significativa nas taxas de hospitalização, após o ano de 2017. Esta tendência de redução verifica-se depois da introdução dos produtos de tabaco aquecido no final de 2014, numa cidade Japonesa, e que foram alargados a todo o país, em 2016. Durante dois anos foi possível observar-se a evidência científica necessária que confirma esta tendência.

É, no entanto, muito importante salientar que estes resultados não indicam uma relação causal entre a utilização de produtos de tabaco aquecido e a redução das taxas de hospitalização. Embora estes dados sejam encorajadores e continuemos a realizar estes estudos observacionais noutros países²³, são necessários estudos adicionais que determinem se a redução nas taxas de hospitalização por DPOC foi causada por esta alteração do consumo para os produtos de tabaco aquecido.

Na Coreia do Sul uma publicação independente recente²⁴ concluiu que "a mudança para produtos nicotina ou de tabaco sem combustão (*Noncombustible Nicotine or Tobacco Products - NNTP*) entre os fumadores iniciais de cigarros (*Combustible Cigarettes – cc*) estava associada a um menor risco de doenças cardiovasculares (*Cardiovascular Disease - CVD*) do que a continuar a fumar cigarros". É também importante mencionar que na cessação do consumo de cigarros, o uso de NNTP estava associado a um maior risco de doenças cardiovasculares, comparativamente à cessação sem o uso de NNTP.

¹⁹“Effect of IQOS introduction on cigarette sales: evidence of decline and replacement,” June 2019, Tobacco Control, Michal Stoklosa, American Cancer Society

²⁰ 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

²¹ 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>

²² <https://www.pmisience.com/whats-new/pmi-science-srnt-2021/angela-van-der-plas-srnt-2021-real-world-data>

²³ A recent study's findings provide insights into the potential impact of HTP commercialization on the hospitalizations associated with COPD and IHD - [Frontiers | Ischemic Heart Disease and Chronic Obstructive Pulmonary Disease Hospitalizations in Japan Before and After the Introduction of a Heated Tobacco Product | Public Health \(frontiersin.org\)](https://www.frontiersin.org/articles/10.3389/fpubh.2021.700001/full)

²⁴ Choi, S. et al., 2021 [Combined Associations of Changes in Noncombustible Nicotine or Tobacco Product and Combustible Cigarette Use Habits With Subsequent Short-Term Cardiovascular Disease Risk Among South Korean Men: A Nationwide Cohort Study](https://doi.org/10.1161/CIRCULATIONAHA.121.054967), Circulation 144:1528–1538. DOI: [10.1161/CIRCULATIONAHA.121.054967](https://doi.org/10.1161/CIRCULATIONAHA.121.054967)

O exemplo da Suécia

O perfil de menor nocividade dos produtos de tabaco aquecido na redução dos riscos associados ao tabagismo é também evidente na Suécia. O *snus* é proibido em todos os países da União Europeia, excepto na Suécia, onde ultrapassou os cigarros em popularidade entre os homens em 1996. Este produto tem uma taxa de conversão muito elevada - um estudo que analisou um conjunto de dados recolhidos entre 2003 e 2011 revelou que 87% dos homens e 86% das mulheres fumadoras que mudaram para o uso diário de *snus* deixaram de fumar na Suécia²⁵, tendo outros estudos chegado a resultados semelhantes²⁶. Esta mudança fez com que a Suécia registasse a mais baixa taxa de tabagismo da Europa (7%). Tal prevalência compara com uma média de de 25% na União Europeia, e taxas de 15% e 16% nos seus vizinhos nórdicos, Finlândia e Dinamarca, respectivamente²⁷. Mais ainda, a Suécia é o país da União Europeia com a menor taxa de prevalência de cancro do pulmão²⁸.

O potencial do *snus* para contribuir para a redução dos danos do tabaco foi também reconhecido pela Agência Americana para a Segurança Alimentar e para o Medicamento (*Food and Drug Administration – FDA*) que, em outubro de 2019, autorizou pela primeira vez a comercialização de produtos através sob a designação de “produto de risco modificado do tabaco” (*Modified Risk Tobacco Product - MRTP*)²⁹. Esta autorização foi dada a oito produtos de tabaco sem fumo *snus*, um tipo de produto oral sem fumo que na União Europeia só é permitido na Suécia, uma exceção que foi concedida quando o país aderiu à UE em 1995.

Estes oito produtos receberam a autorização de comercialização para poderem alegar "*a utilização do General Snus em vez de cigarros coloca-o(a) num risco mais baixo de cancro da boca, doenças cardíacas, cancro do pulmão, AVC, enfisema, e bronquite crónica*". Embora a FDA tenha concluído que os produtos podem ser comercializados com informações específicas sobre os riscos mais baixos de certos efeitos para a saúde em comparação com o consumo de cigarros, isto não significa que os produtos sejam seguros ou "aprovados pela FDA". Todos os produtos do tabaco são potencialmente nocivos e as pessoas que não os utilizam não devem começar a fumar.

O exemplo do Reino Unido

Uma tendência semelhante tem sido observada em Inglaterra. Desde que os cigarros eletrónicos se tornaram populares, há cerca de uma década, a redução da prevalência do tabagismo acelerou, o que levou muitos peritos britânicos, e o próprio Governo, a considerar os cigarros eletrónicos como um instrumento estratégico de redução de riscos para as políticas de controlo do tabagismo. Em 2011, a prevalência do tabagismo era de 19,8%, e em 2019 tinha diminuído para 13,9% (ou seja, 5,9 pontos percentuais, eliminando quase um terço em oito anos)³⁰. Como declarado pela *Public Health England*, "*o vaping está associado a deixar de fumar com sucesso*" e "*as taxas de abandono do vaping foram mais elevadas do que com qualquer outro método em todas as regiões de Inglaterra*"³¹.

²⁵ Ramstrom et al (2016) <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5129320/>

²⁶ Clarke et al (2019) <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-019-0335-1>

²⁷ Eurostat: https://ec.europa.eu/eurostat/databrowser/view/sdg_03_30/default/table?lang=en

²⁸ OECD, Health at a Glance: Europe 2020 : State of Health in the EU Cycle, [Incidence, survival and mortality for lung cancer | Health at a Glance: Europe 2020 : State of Health in the EU Cycle | OECD iLibrary \(oecd-ilibrary.org\)](#)

²⁹ [FDA Authorizes Modified Risk Tobacco Products | FDA](#)

³⁰ UK: Adult smoking habits in the UK - Office for National Statistics (ons.gov.uk)

³¹ Vaping in England: an evidence update including vaping for smoking cessation, February 2021 (publishing.service.gov.uk)

A decisão da FDA

Relativamente ao produto de tabaco aquecido da Philip Morris International existem evidências concretas do impacto positivo que este tipo do produto pode ter, tal como demonstrado no caso do Japão. O potencial de menor nocividade do produto foi também reconhecido pela Food and Drug Administration dos EUA (a FDA), quando em Julho de 2020³², e Março de 2022³³, autorizou a comercialização de duas categorias de produtos de tabaco aquecidos, nos Estados Unidos, como Produtos de Tabaco de Risco Modificado (MRTP), com a informação de modificação de exposição. Nesta autorização, a FDA concluiu que a mudança completa dos cigarros para produtos de tabaco aquecido reduz significativamente a exposição do organismo a componentes químicos nocivos ou potencialmente nocivos e considerou que a autorização de comercialização deste produto com a informação de modificação de exposição, “*é apropriada para a promoção da saúde pública, esperando-se também que traga benefícios para a saúde da população no geral*”.

O impacto negativo do tabagismo em Portugal

Os casos acima referidos representam exemplos reais dos benefícios da redução de danos como uma política válida para combater o consumo de cigarros.

De acordo com os últimos dados públicos disponíveis, segundo o Inquérito Nacional de Saúde de 2019, em Portugal, a prevalência de fumadores diários e ocasionais é de 17% entre as pessoas com 15 anos ou mais anos, o que equivale a mais de 1,5 milhões de portugueses. Entre os inquiridos, 14,2% confirmam que fumam regularmente, o que representa um decréscimo de 2,6 pontos percentuais desde 2014. Para além disso, de acordo com o Programa Nacional de Prevenção e Controlo do Tabagismo (PNPCT) da DGS, “*em 2019, segundo dados recolhidos no Dia Nacional da Defesa, 58,4% dos jovens de 18 anos de ambos os sexos disseram já ter fumado; 37,4% disseram ter consumido tabaco nos últimos 30 dias, o que representa uma variação relativa de -13,0% em relação a 2015*”³⁴.

Em Portugal, as duas estratégias consideradas para reduzir a prevalência do tabagismo em Portugal, e que merecem o nosso total apoio, são:

- a prevenção, através do combate à iniciação, via imposição de limites de idade;
- a cessação, através da distribuição de materiais de apoio, consultas médicas de cessação tabágica para dissuasão de consumo de cigarros.

Nos últimos anos, Portugal fez um percurso positivo na prevenção e na cessação tabágicas, tendo, por um lado, desencorajado a iniciação, através de campanhas, ações de sensibilização, e estabelecimento de protocolos, entre outras medidas e, por outro, encorajado os fumadores a deixarem de fumar completamente, através de um reforço das consultas de cessação tabágica.

A imagem em baixo representa o declínio relativo da prevalência de tabagismo em Portugal, comparando os anos 2005/2006 a 2014 e 2019. Apesar de ter conseguido atingir uma redução de 4,5 pontos percentuais entre 2005/2006 e 2019, a este ritmo e tendo em conta as atuais políticas de saúde atualmente implementadas, **serão necessários 20 anos até que se consiga alcançar uma prevalência**

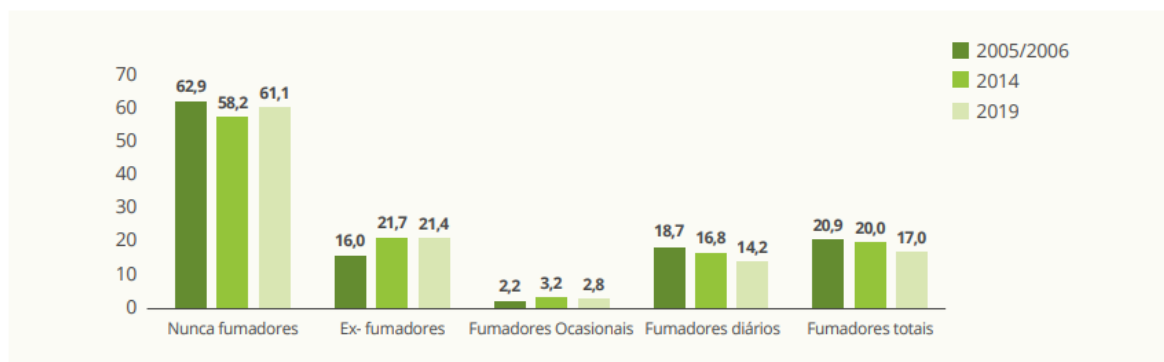
³² FDA Authorizes Marketing of IQOS Tobacco Heating System with ‘Reduced Exposure’ Information | FDA

³³ Philip Morris Products S.A. Modified Risk Tobacco Product (MRTP) Applications | FDA

³⁴ <https://www.dgs.pt/portal-da-estatistica-da-saude/diretorio-de-informacao/diretorio-de-informacao/por-serie-1219790-pdf.aspx?v=%3d%3dDwAAAB%2bLCAAAAAAABArySzitzVUy81MsTU1MDAFAH2FEfkPAAAA>

inferior a 5% dos fumadores diários um número considerado por países como o Reino Unido e a Nova Zelândia como um objectivo da Política de Controlo do Tabaco para uma população livre de fumo. Embora possamos assumir que parte da diminuição da prevalência é e continuará a ser devida às medidas de cessação do tabagismo implementadas, acreditamos que o Governo pode fazer mais para atingir os restantes 1,5 milhões de fumadores adultos³⁵ que continuam a fumar.

Gráfico 3. População residente com 15 ou mais anos segundo a condição perante o consumo de tabaco (%) | Portugal, 2005/2006 - 2019



Nota: as estimativas apresentadas não contemplam as situações "não sabe / não responde."

Dados ponderados para a população, não padronizados para a idade.

Fonte: INE/INSA, Inquéritos Nacionais de Saúde 2005/2006 e 2014; 2009; 2016; INE, Inquérito Nacional de Saúde 2019, 2020a. Disponível em: https://www.ine.pt/xportal/xmain?xpid=INE&xpgid=ine_base_dados

O Programa Nacional de Saúde estabelece como objetivo uma prevalência de 0% de tabagismo "a longo prazo" em cumprimento do disposto no 3º Objetivo de Desenvolvimento Sustentável das Nações Unidas, "Saúde e Bem-estar", nomeadamente o 3.a que inclui "Reforçar a implementação da Convenção-Quadro da Organização Mundial de Saúde para o Controlo do Tabaco em todos os países, conforme apropriado". A este propósito, é importante mencionar o *Plano Europeu de Luta contra o Cancro*, recentemente publicado, que visa sensibilizar e endereçar fatores de risco significativos, tais como, "os cancros provocadas pelo tabagismo, consumo de álcool, obesidade e falta de atividade física, exposição à poluição, substâncias cancerígenas e radiação, bem como outro tipo de cancros desencadeados por agentes infecciosos"³⁶.

Em resposta à comunicação da Comissão Europeia sobre o *Plano Europeu de Luta contra o Cancro*, o Parlamento Europeu (PE) adotou, por iniciativa própria, o relatório *Reforçar a Europa na Luta contra o Cancro* e, entre outras recomendações, expôs a sua visão sobre a luta antitabaco na UE. O Parlamento Europeu sugere uma multiplicidade de medidas para alcançar os objetivos propostos pela Comissão até 2040. Entre outras medidas, o PE sugere "acompanhar as avaliações científicas dos riscos para a saúde relacionados com os cigarros eletrónicos, os produtos de tabaco aquecidos e novos produtos do tabaco, incluindo a avaliação dos riscos da utilização destes produtos em comparação com o consumo de outros

³⁵ Tabela 4 Prevalência de fumadores diários e ocasionais com 15 ou mais anos, por grupo etário (N.º e %) | Portugal, 2019 in PROGRAMA NACIONAL PARA A PREVENÇÃO E CONTROLO DO TABAGISMO | Portugal | 2020. <https://www.dgs.pt/portal-da-estatistica-da-saude/diretorio-de-informacao/diretorio-de-informacao/por-serie-1219790-pdf.aspx?v=%3d%3dDwAAAB%2bLCAAAAAAABAARYsZltzVUy81MsTU1MDAFHHzFefkPAAAA>

³⁶ https://ec.europa.eu/health/system/files/2022-02/eu_cancer-plan_en_0.pdf

*produtos do tabaco, (...)*³⁷. A este respeito, o Parlamento Europeu reconhece a necessidade das políticas europeias de controlo do tabaco para compreender e estimar os riscos para a saúde das alternativas sem fumo em relação aos riscos para a saúde dos cigarros.

Mais ainda, os dados para a Europa demonstram igualmente as limitações das actuais Políticas de Controlo do Tabagismo. Os últimos dados do Eurobarómetro (publicados pela Comissão Europeia) demonstram que a quantidade média do consumo diário de cigarros aumenta à medida que aumenta o período de tempo desde que o inquirido se tornou fumador. A média varia de 11,3 cigarros entre aqueles que fumaram durante cinco anos ou menos a mais de 15 cigarros por dia entre aqueles que fumaram durante mais de 20 anos. Em geral, quase metade dos fumadores actuais (49%) nunca tentaram deixar de fumar. Aqueles que fumam mais (21 ou mais cigarros por dia) são os menos susceptíveis de terem tentado deixar de fumar (47%), particularmente quando comparados com aqueles que fumam actualmente 5 cigarros ou menos por dia (58%). Este subgrupo de fumadores é o menos susceptível de deixar de fumar e tem uma elevada probabilidade de desenvolver doenças relacionadas com o tabagismo. As medidas existentes de controlo do tabaco não chegaram a este grupo de fumadores, uma vez que a prevalência entre este subgrupo tem permanecido estável desde 2017³⁸.

O progresso da ciência e da tecnologia significa que, atualmente, os fumadores, que de outra forma continuariam a fumar, podem ter acesso a produtos alternativos menos nocivos do que os cigarros. A disponibilidade destes produtos pode acelerar a redução da prevalência do tabagismo em Portugal e ser um complemento às medidas estratégicas já implementadas.

Por uma nova era para o controlo do tabagismo

A Tabaqueira, subsidiária da Philip Morris International em Portugal, está totalmente empenhada e comprometida com a ambição do Governo em acelerar a redução da prevalência do tabagismo em Portugal.

Estamos convictos que a ciência e a inovação tecnológica podem dar um contributo fundamental para o desenvolvimento de alternativas menos nocivas, em particular, os referidos produtos de tabaco aquecido ou os cigarros eletrónicos, cujo perfil de menor nocividade tem o potencial de reduzir os danos causados pelo tabagismo, e são a oportunidade de saúde pública deste século, uma vez que contribuem para uma redução significativa da carga de doença associada ao consumo de cigarros.

Como vimos acima, existem exemplos de diferentes países sobre como as abordagens de redução de danos podem ajudar a reduzir a prevalência do consumo de cigarros, através da redução da carga de doenças relacionadas com o tabagismo, ao mesmo tempo em que se garante que não há aumento no consumo de nicotina.

Os exemplos da Suécia, do Japão e da Coreia do Sul, para citar alguns, juntamente com as estratégias de redução de danos defendidas por reguladores como a FDA, a Public Health England (agora o Office for Health Improvement and Disparities do Reino Unido) e o Ministério da Saúde na Nova Zelândia são contributos muito relevante e encorajadores para todos os países em todo o mundo, e que chamam a atenção para a necessidade de desenvolver abordagens complementares para abordar as limitações das medidas de prevenção e cessação tabágicas na redução da prevalência do tabagismo.

³⁷ EP Report 2020/2267(INI) No. 12

³⁸ 2021 Special Eurobarometer 506: Attitudes of Europeans towards tobacco and electronic cigarettes available [here](#).

Com o objetivo de reduzir o risco de danos aos milhões de fumadores adultos que, de outra forma, continuariam a fumar, a Philip Morris International investiu, desde 2008, mais de 9 mil milhões de dólares em Ciência e na Investigação e Desenvolvimento de produtos sem fumo, e conta com uma equipa de mais de 930 cientistas, engenheiros e técnicos para desenvolver estes produtos. Todo este trabalho desenvolvido, ao longo destes últimos anos, tem-nos permitido concluir que estes produtos podem desempenhar um papel fundamental para que os fumadores adultos deixem completamente de fumar cigarros.

O foco do nosso trabalho tem sido desenvolver, consubstanciar cientificamente e comercializar, de forma responsável, produtos sem combustão e fumo, menos nocivos do que os cigarros, com o objetivo de os substituir completamente, e o mais rápido possível.

Por conseguinte, acreditamos que, através do diálogo e em conjunto com o Governo português, as autoridades de saúde portuguesas e a sociedade em geral, podem ser criadas as condições regulamentares adequadas que permitam a Portugal tornar-se um país livre de fumo no médio prazo.

A indústria, que tem vindo a investir em ciência para desenvolver um conjunto de novos produtos menos nocivos, em substituição dos cigarros, poderá ter um papel a desempenhar na aceleração desta transição para uma sociedade sem fumo, o que não poderá ser feito sem o enquadramento regulamentar adequado, por forma a incentivar e fomentar esta mudança.

Estamos totalmente disponíveis para contribuir para uma estratégia de redução de riscos para o tabaco em Portugal, incluindo um enquadramento regulamentar ainda mais restritivo dos produtos mais nocivos - cigarros e outros produtos de combustão -, assegurando simultaneamente que os fumadores adultos, que continuam a fumar, possam aceder e receber informação factual e cientificamente fundamentada sobre as alternativas menos nocivas aos produtos de combustão já existentes no mercado.

Ao mesmo tempo, defendemos a existência de um equilíbrio entre a maximização do potencial de uma mudança positiva graças à disponibilidade de alternativas menos nocivas aos cigarros para os fumadores adultos, e a minimização do risco das consequências que não são intencionais, onde se inclui o risco de acesso a estes produtos por parte dos jovens.

No que diz respeito aos novos produtos e aos cigarros eletrónicos, a situação atual na União Europeia é encorajadora para os legisladores. De acordo com os dados do Eurobarómetro, praticamente não se regista início do consumo de nicotina através destes produtos e apenas um registo muito reduzido através de cigarros eletrónicos. Para os produtos de tabaco aquecido, estes dados são comprovados pelo mais recente relatório da Comissão Europeia relativa a uma mudança substancial de circunstâncias para os produtos de tabaco aquecido, que “não identificou um aumento do nível de prevalência de uso no consumidor com menos de 25 anos de idade grupo em, pelo menos, cinco pontos percentuais em, pelo menos, cinco Estados-Membros para produtos de tabaco aquecido”. Isso demonstra que as alternativas ao cigarro são mais utilizadas por fumadores adultos e não por menores ou por não fumadores.

É também da maior importância a existência de estudos de mercado de pós-comercialização que monitorizem, de forma precisa, a prevalência da utilização de todos os produtos de tabaco e de nicotina, a fim de medir o progresso versus os objetivos para intervir em caso de necessidade. Esta abordagem tem sido já implementada em diferentes países, sobretudo nos Estados Unidos, sob a liderança da FDA³⁹, que

³⁹ <https://www.fda.gov/news-events/press-announcements/fda-announces-comprehensive-regulatory-plan-shift-trajectory-tobacco-related-disease-death>

reconheceu, por um lado, que se deve aumentar as restrições à venda de cigarros, enquanto, por outro, se deve fomentar a inovação relativamente ao desenvolvimento de alternativas anti-tabágicas.

Estamos convictos que a redução de riscos pode e deve desempenhar um papel fundamental e complementar às políticas de prevenção e cessação tabágicas, por forma a alcançar a ambição da Direção Geral de Saúde (DGS) estabelecida no Plano Nacional de Saúde.

Acreditamos que, com o enquadramento regulamentar adequado para os produtos sem combustão, e com o apoio de todos os intervenientes políticos, incluindo o governo e a comunidade científica, a sociedade civil e a indústria, as vendas de cigarros podem acabar dentro de 10 a 15 anos em muitos países⁴⁰.

Continuamos disponíveis para estabelecer um diálogo aberto e transparente sobre o futuro da regulação do tabaco em Portugal com o Governo português, os reguladores e os demais parceiros. Considerando a recente jurisprudência europeia, estamos convictos de que este trabalho conjunto sobre o estabelecimento e a implementação de regras de controlo do tabaco está em consonância com os requisitos do art. 5.3 da Convenção Quadro da OMS para o Controlo do Tabaco.

Acreditamos que este é um objetivo exequível, e a nossa ambição é que possamos contribuir ativamente com as autoridades de saúde nacionais para a concretização de uma política de redução de riscos em saúde pública para o controlo do tabagismo em Portugal.

Por fim, juntamos um documento em inglês com um breve sumário de toda a evidência científica do IQOS, o produto de tabaco aquecido desenvolvido e comercializado pela PMI.

Com os nossos melhores cumprimentos,

A Tabaqueira

⁴⁰ PMI, Integrated Report 2020 (published in 2021): <https://www.pmi.com/docs/default-source/pmi-sustainability/pmi-integrated-report-2020.pdf>

The Totality of Evidence on IQOS Heated Tobacco Product

Approach – to design heated tobacco products to deliver a nicotine-containing aerosol with a lower number and levels of harmful constituents, compared to cigarette smoke for adults who would otherwise continue to smoke. With earlier products, a lack of consumer uptake reinforced that in addition to needing a product with risk reduction potential that is scientifically substantiated, there is also a need to ensure that the products are appealing and satisfying to adult smokers so that they can completely transition away from cigarettes. Our scientific assessment program takes into consideration the guidance outlined in by the Institute of Medicine⁴¹ and the FDA⁴².

The best thing a smoker can do for their health is to quit tobacco and nicotine altogether, but for those who continue to smoke switching to a product that has the potential to reduce the risk of smoking-related diseases is better than continuing to smoke cigarettes. That is why our scientific assessment incorporates smoking abstinence as the benchmark for risk reduction. To fully understand the impact of switching from cigarettes to the Tobacco Heating System (THS) we include continued smoking as the comparator (to see how much better THS is to cigarettes), but also include smoking abstinence to contextual the degree of change (to see how close THS is to smoking abstinence).

The approach is comparable to that adopted for pharmaceutical product assessment with some additions, for example, we also assess the impact on the population as a whole by considering the impact on non-users of the product. Wherever possible we follow already established international standards (e.g., OECD test guideline methods, Good Laboratory Practice (GLP), Good Clinical Practice (GCP), Good Epidemiological Practice (GEP), European Society for Opinion and Market Research (ESOMAR) Code). We also consider data transparency fundamental therefore all of our clinical studies are registered on <https://www.clinicaltrials.gov/> prior to initiation and results are reported at study closeout.

The premarket scientific assessment of THS was, not surprisingly, predominantly sponsored and conducted by PMI but since the product has been marketed there have been a lot of studies and research on THS conducted by independent scientists and government agencies. Similar to the pharmaceutical and medical device industry we proactively and systematically review the literature to collect and utilize and product-related information on our products. And as part of the post-market requirements for the Modified Risk Order with Reduced Exposure Claims authorized by the US Food and Drug Administration (FDA) we submit an annual summary of the literature on THS to demonstrate that THS remains ‘appropriate for the protection of public health’⁴³.

There are many publications on reviews of our data and a growing number of independent studies that report on original data or data analyses. Of course, not all conclusions of such reviews and studies are supportive but, in general, independent new data do not challenge the fundamentals of the existing totality of the evidence — for adult smokers switching completely to THS results in reduced exposure to

⁴¹ Institute of Medicine (2012) Scientific Standards for Studies on Modified Risk Tobacco Products, Washington, DC: The National Academic Press. <https://nap.nationalacademies.org/read/13294/chapter/2>

⁴² US-FDA 2012 Guidance document: Modified Risk Tobacco Product Applications: *Draft Guidance for Industry*. <https://www.fda.gov/regulatoryinformation/search-fda-guidance-documents/modified-risk-tobacco-product-applications>

⁴³ <https://www.fda.gov/news-events/press-announcements/fda-authorizes-marketing-iqos-tobacco-heating-system-reduced-exposure-information>

the harmful chemicals found in cigarette smoke which is likely to lead to a reduction in risk of smoking-related disease.

A more detailed summary of PMI's Scientific Evidence of THS (see Annex A) and a summary of independent assessment of THS (see Annex B) are attached.

Aerosol Chemistry and Physics – the characterization of the aerosol to which THS users are exposed is fundamental to determine that the number and level of harmful compounds (HPHCs) emitted in THS aerosol are reduced on average by 90-95% compared to cigarette smoke (3R4F reference cigarette). There are a number of lists of harmful constituents in cigarette smoke that have been published by health authorities such as:

- WHO — list of 39 toxicants prioritized for testing, and list of 9 toxicants recommended for mandated lowering by TobReg;
- U.S. FDA — list of 18 harmful and potentially harmful constituents in cigarette smoke required for reporting, and the full list of 93 harmful and potentially harmful constituents in cigarette smoke;
- Health Canada — list of 44 toxicants in cigarette smoke required for reporting;
- International Agency for Research on Cancer (IARC) — list of 12 Group 1 carcinogens.

In addition to the targeted assessment of known toxicants in cigarette smoke, we conducted a comprehensive characterization of the aerosol that consists of an untargeted screening and untargeted differential screening from which 99.7% of the total aerosol mass present at ≥ 100 ng/stick have been characterized. We identified some compounds that were more abundant in THS aerosol than 3R4F cigarette smoke. However, their presence was at low levels and needs to be evaluated in the context of the overall reduction in chemical constituents, including known harmful and potentially harmful constituents. The FDA⁴⁴ came to the same conclusion *“Despite the increase in some constituents of concern, the substantial reduction across constituents on FDA’s HPHC list demonstrates that, on the whole, the process used to heat tobacco in the IQOS system significantly reduces the production of harmful and potentially harmful chemicals compared to cigarette smoke.”*

Analysis of the THS aerosol demonstrates the presence of liquid droplets in the aerosol but no detectable levels of solid particles above background levels. This finding is important evidence that THS aerosol formation does not involve combustion, but also important evidence for the risk reduction potential of THS because the solid particles that are generated through combustion, inhaled in cigarette smoke, and accumulate in the lungs of smokers are causally linked to the smoking-related disease are not present in THS aerosol.

Indoor Air Quality – the impact of the THS use on indoor air quality has been evaluated based on a comprehensive list of 31 airborne constituents and a targeted screening of the gas-vapor and particulate phases of the environmental aerosol. The assessments were conducted at three different ventilation rates (mimicking residential, office, and restaurant conditions). Indoor use of THS increased the levels of nicotine, acetaldehyde, and glycerin measured in the low $\mu\text{g}/\text{m}^3$ range and below the existing guideline limits set forth in international guidelines for air quality. By comparing the airborne constituent levels during (1) indoor use of THS, (2) indoor cigarette smoking, and (3) common everyday activities (including

⁴⁴ <https://www.fda.gov/media/139796/download>

some activities that involve combustion such as candles and incense) revealed that THS use has a substantially lower impact on the indoor environment under the study conditions.

in vitro and in vivo Toxicological Assessment – the toxicological activity of THS aerosol is substantially reduced compared to cigarette smoke (3R4F reference cigarette) confirming that we would not be exposing healthy smokers in our clinical studies to additional hazards compared to continued smoking. An 18-month chronic inhalation carcinogenesis study was conducted in A/J mice to compare the effects of THS aerosol and cigarette smoke on lung tumor incidence and multiplicity⁴⁵. This study shows that at the end of the life-long exposure period, a larger number (incidence) of mice exposed to cigarette smoke had lung adenomas and carcinomas than mice exposed to air. In contrast, mice exposed to THS aerosol did not show an increase in tumor incidence compared to those exposed to air. Furthermore, mice exposed to cigarette smoke had more lesions and tumors per mouse than those exposed to air (multiplicity). In contrast, mice exposed to PMI's HTP aerosol did not show an increase in tumor multiplicity compared to those exposed to air.

Clinical Studies – the clinical assessment included three components (1) nicotine pharmacokinetics (PK), pharmacodynamics (PD), and exposure, (2) reduced exposure to HPHCs, and (3) the impacts of exposure on biomarkers of potential harm (BoPH). We observed that the nicotine PK profile for THS was comparable to cigarettes and that following a short adjustment period smokers who switched to THS had nicotine exposure, product use, and smoking satisfaction (including craving and withdrawal symptoms) were similar to when they smoked cigarettes. In the reduced exposure studies, we measured biomarkers of exposure (BoExp) to different classes of known harmful compounds present in cigarette smoke and saw that smokers who completely switched to THS had significant reductions in each of the 15 BoExp measured compared to continued cigarette smoking with the reductions approaching those seen in the smokers who abstained from smoking for the duration of the study. In fact, smokers who switched to THS achieved 95% of the reduction in exposure that was achieved by smokers who abstained from smoking altogether.

The results of a 6-month (with 6-month extension) study measuring 8 co-primary BoPH associated with smoking-related diseases, that are negatively impacted by smoking and can reverse upon cessation, confirmed that in smokers who switched to THS, all of the BoPH shifted in the same direction as smoking cessation and improved in comparison to continued smoking with five out of the eight reaching statistical significance compared to smoking. This confirms that switching to THS has the potential to reduce risk compared to continued smoking. A mechanistic approach to assess the potential for reducing the risk of lung cancer for adult smokers switching to IQOS is provided in Appendix B (below).

The U.S. FDA did not consider this evidence sufficient for authorization of THS under a reduced risk order, but concluded “The scientific evidence that is available without conducting long-term epidemiological studies demonstrates that a measurable and substantial reduction in morbidity or mortality among individual tobacco users is reasonably likely in subsequent studies.”

Perception and Behavior – the extensive pre-market perception and behavior assessment was conducted in the U.S. and submitted to the U.S. FDA as part of the scientific dossier. In their 2019 marketing

⁴⁵ Wong, E.T., et al., 2020 Reduced Chronic Toxicity and Carcinogenicity in A/J Mice in Response to Life-Time Exposure to Aerosol from a Heated Tobacco Product Compared with Cigarette Smoke. *Toxicological Sciences*, 178, (1), Pages 44–70,

authorization, they concluded *“Although the data for IQOS uptake by never smokers, former smokers, and youth is limited, there are some data from countries where IQOS is sold - Italy and Japan - which show low uptake by youth and current non-smokers. In these countries, the likelihood of uptake is slightly higher in former smokers, but still low. Appropriately, the population most likely to use IQOS are current CC [combustible cigarette] smokers”*.

Since that time further studies, conducted by PMI, independent scientists, and government surveys from Japan and other countries where THS is marketed have confirmed that smokers are switching to THS, with the majority abandoning cigarettes altogether, and low uptake of THS by non-smokers (including never smokers and youth).

We are also collecting real world clinical evidence on usage and potential benefits or risks following IQOS introduction in Japan derived from real world data. This data relates to patient health status collected from a variety of sources (e.g. electronic health records, product and disease registries. The results of a study assessing hospitalization rates in Japan following the marketing of IQOS are referred to in Appendix D.

In addition long-term assessment studies are being performed on product usage patterns for example using cross-sectional studies on the adult population from Japan, PMI’s most advanced market for IQOS. These were conducted in four waves per year, with the first two years’ results currently available. Around 70% of IQOS users are using the product either exclusively or in combination with other smoke-free products; the rates of initiation in never smokers and relapse of former smokers are in low single digits.

Ongoing Research – the Medical Research Plan looking at the impact of THS use on health and disease is in development with some clinical and epidemiological studies underway, and additional studies being planned. We are actively working to design and conduct these studies to provide the evidence on the long-term impacts of THS use and support a reduced risk authorization by the U.S. FDA. As the clinical studies are finalized and approved they will be registered and shared on <https://www.clinicaltrials.gov/> and when completed the results will be published in peer-reviewed journals.

ANNEX A –

SUMMARY OF GOVERNMENT AGENCY REPORTS ON OUR HEATED TOBACCO PRODUCTS

Overview

The scientific evidence on IQOS has been independently reviewed by a number of competent Government Bodies and Agencies around the world. These include:

1. The US Food and Drug Administration (US FDA) in 2018, 2019 and 2020;
2. Superior Health Council of Belgium in 2020;
3. The National Institute for Public Health and the Environment (RIVM) in the Netherlands in 2018 and 2020;
4. The UK's Public Health England in its 2018 evidence review;
5. The German Federal Institute for Risk Assessment (BfR) in 2018;
6. The Korean Ministry of Food and Drug Safety (MFDS) in 2018;
7. The China National Tobacco Quality Supervision and Test Centre (CNTQSTC) in 2018.
8. The Department of Environmental Health, National Institute of Public Health in Japan in 2017; and
9. The UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) in 2017.
10. The Belgium Superior Health Council in 2020

Further details on these are provided below.

1. US Food and Drug Administration (US FDA) (2018/2019/2020): a federal agency of the U.S. Department of Health and Human Services, conducted an assessment of IQOS aerosol and concluded *"The independent testing performed by STL confirmed the lower levels of selected HPHCs in the aerosol from the HeatSticks compared to mainstream cigarette smoke."* These conclusions were included in an FDA Briefing Document for the members of the Tobacco Products Scientific Advisory Committee (TPSAC).

Subsequently, on April 30, 2019, the U.S. Food and Drug Administration's (FDA) Center of Tobacco Products (CTP) issued a market order letter for the Tobacco Heating Device (THD) and the Electrically Heated Tobacco Product (EHTP) to allow the introduction of the THD and EHTP into the U.S. market. The decision of the U.S. FDA followed "[...] a rigorous science-based review through the premarket tobacco product application (PMTA) pathway" based on which, "[...] the agency determined that authorizing these products for the U.S. market is appropriate for the protection of the public health [...]"⁴⁶

In their scientific review the U.S. FDA *"found that the aerosol produced by the IQOS Tobacco Heating System"* [EHTP with THD] *"contains fewer toxic chemicals than cigarette smoke, and many of the toxins identified are present at lower levels than in cigarette smoke."*

⁴⁶ <https://www.fda.gov/news-events/press-announcements/fda-permits-sale-igqs-tobacco-heating-system-throughpremarket-tobacco-product-application-pathway>

For example, the carbon monoxide exposure from IQOS aerosol is comparable to environmental exposure, and levels of acrolein and formaldehyde are 89% to 95% and 66% to 91% lower than from combustible cigarettes, respectively.”⁴⁷

Furthermore, the Agency concluded that “[...] *IQOS delivers nicotine in levels close to combustible cigarettes suggesting a likelihood that IQOS users may be able to completely transition away from combustible cigarettes and use IQOS exclusively.*”

Importantly, the US FDA found that “*Available data, while limited, also indicate that few non-tobacco users would be likely to choose to start using IQOS, including youth*”.

Moreover, on July 7, 2020, the U.S. FDA issued a decision on the Modified Risk Tobacco Product (MRTP) applications for *IQOS* and the three *HeatSticks* variants submitted by PMI in December 2016.

Following a thorough review of the extensive scientific evidence package PMI submitted to the FDA to support the *IQOS* MRTP applications the Agency found that “*the available scientific evidence demonstrates that the issuance of an exposure modification order for IQOS would be appropriate to promote the public health and is expected to benefit the health of the population as a whole, taking into account both users of tobacco products and persons who do not currently use tobacco products.*”⁴⁸

Important to note is that the regulatory framework in the U.S. allows the FDA to issue two types of modified risk orders: a “risk modification” order or an “exposure modification” order. PMI had requested both types of orders for the *IQOS* system. The FDA determined that “*although the non-clinical and clinical studies included in these applications were not sufficient to demonstrate that switching completely lowers the risk of disease compared to combusted cigarette smoking and failed to meet the threshold for issuance of a risk modification order at this time, the totality of evidence presented suggests that a measurable and substantial reduction in morbidity or mortality among individual tobacco users is reasonably likely in subsequent studies. This determination predominantly stems from the substantial reduction in HPHCs relative to combusted cigarette smoke. Although some chemicals of potential concern (not on FDA’s HPHC list) may be higher in IQOS users, the increase in these constituents does not impact the conclusion that the substantial reductions in HPHCs and findings from the toxicological evidence are reasonably likely to translate to lower risk of tobacco-related morbidity and mortality.*”⁴⁹

This decision follows a stringent process which included:

- A review of the extensive scientific evidence package PMI submitted to the FDA in December 2016 to support its MRTP applications, which included a regular dialogue with PMI scientists to better understand the data submitted and to answer specific questions from the FDA;
- Inspections from FDA officials at multiple PMI and study sites in various countries, including our factory and research facilities in Switzerland in 2017;
- A comprehensive review of the independent data and publications around *IQOS* to date;

⁴⁷ Abrams et al. Submission to Tobacco Products Scientific Advisory Committee on Modified Risk Tobacco Product Applications for *IQOS* System (December 14, 2017). Available at: <https://www.fda.gov/media/110535/download>

⁴⁸ FDA News Release “*FDA Authorizes Marketing of IQOS Tobacco Heating System with ‘Reduced Exposure’ Information*” July 07, 2020, available at: <https://www.fda.gov/news-events/press-announcements/fda-authorizesmarketing-iqos-tobacco-heating-system-reduced-exposure-information>

⁴⁹ The MRTP Technical Project Lead (TPL) Report (page 9), available at: <https://www.fda.gov/media/139796/download>

- A comprehensive review of comments, data, and information submitted to FDA by interested persons (section 911(g)(4) of the FD&C Act).

The modified exposure order granted by the U.S. FDA for 4 years will authorize the communication of the following information to consumers with regards to the IQOS system in the United States:

AVAILABLE EVIDENCE TO DATE:

- *The IQOS system heats tobacco but does not burn it.*
- *This significantly reduces the production of harmful and potentially harmful chemicals.*
- *Scientific studies have shown that switching completely from conventional cigarettes to the IQOS system significantly reduces your body's exposure to harmful or potentially harmful chemicals.*

2. The Superior Health Council of Belgium (2020)⁵⁰: issued a scientific advisory report on New Tobacco Products: Heated Tobacco Products, in which it provided a risk assessment for heated tobacco products for smokers and non-smokers and guidance to public health policy-makers.

The Council concluded that: *"In clinical studies, following a switch from conventional cigarettes to heated tobacco products (IQOS or GLO), significant decreases in biomarker levels of exposure to harmful and potentially harmful constituents have been observed, although they are not considered to be completely safe. Favourable changes have also been noted in several biomarkers with biological impact, suggesting that there is potential for a decreased risk of disease if smokers switch from conventional cigarettes to heated tobacco products."*

3. National Institute for Public Health and the Environment (RIVM) (2018, 2020)⁵¹: an agency of the Dutch Ministry of Health, Welfare, and Sport published its preliminary assessment of IQOS. The assessment, which is presented as a Factsheet, is based on RIVM's aerosol chemistry testing of IQOS, as well as published literature.

RIVM concluded that *"The use of heatsticks with the iQOS is harmful to health, but probably less harmful than smoking tobacco cigarettes,"* based on their aerosol chemistry measurements, which are *"of the same order of magnitude as in the data of Philip Morris."*

The more recent publication from RIVM (Slob et al., 2020)⁵² *"A Method for Comparing the Impact on Carcinogenicity of Tobacco Products: A Case Study on Heated Tobacco Versus Cigarettes"* compared the carcinogenicity of heated tobacco aerosol versus cigarette smoke. The methodology applied focused on the change in cumulative exposure (CCE) to compare two tobacco/nicotine products instead of performing risk assessments of individual compounds to allow a better understanding on if and how the health impact may differ between the products. The authors concluded that *"[t]he CCE was estimated to be 10- to 25- fold lower when using HTPs instead of cigarettes. Such a change indicates a substantially smaller reduction in expected life span, based on available dose-response information in smokers. However, this is a preliminary*

⁵⁰ Superior Health Council of Belgium, April 2020, available at: [201026_shc-9538_new_tobacco_products_vweb.pdf](https://www.shc.be/201026_shc-9538_new_tobacco_products_vweb.pdf) (belgium.be)

⁵¹ National Institute for Public Health and the Environment (2018, 2020): <https://www.rivm.nl/publicaties?objectid=e1ce3c72-1436-444f-a4d0-e9f93dc30da6&type=pdf&disposition=inline> or (English summary): <https://www.rivm.nl/en/news/addictive-nicotine-and-harmful-substances-also-present-in-heated-tobacco>

⁵² Slob, W. et al., 2020 A Method for comparing the Impact on carcinogenicity of tobacco products: A Case Study on Heated Tobacco Versus Cigarettes, Risk Analysis <https://onlinelibrary.wiley.com/doi/epdf/10.1111/risa.13482>

conclusion, as only eight carcinogens were considered so far. Furthermore, an unfavorable health impact related to HTPs remains as compared to complete abstinence.”

Even the lower bound of this uncertainty range would be associated with a substantial health impact in favour of the HTP. Assuming that the 8 carcinogens used in this analysis are a representative sample of all carcinogens in smoke, then increasing the number of compounds in the analysis would make the CCE estimate more reliable but would most likely not dramatically change it.

Overall, consuming a HTP such as the one studied instead of cigarettes will be associated with a substantial increase in life expectancy compared to continued smoking, for the subgroup of smokers who would die from cancer. Moreover, the authors also suggest, that the health impact will be greatest for habitual smokers who switch at a young age. It is also important to highlight that the authors make it clear that HTPs, are not risk-free and that there is a negative health impact expected to remain from consuming HTPs as compared to total abstinence from tobacco products.

4. Public Health England (PHE) (2018)⁵³: released a report on the evidence behind cigarette alternatives, the fourth such review on e-cigarettes and the first time it included heated tobacco products. PHE’s analysis of independent evidence on heated tobacco products, which was heavily focused on IQOS, considered eight independent studies in its review.

Amongst the report’s findings on heated tobacco products are a likely reduction in user’s exposure to harmful chemicals compared to cigarettes, and that: *“The available evidence suggests that heated tobacco products may be considerably less harmful than tobacco cigarettes and more harmful than [e-cigarettes]. With a diverse and mature e-cigarette market in the UK, it is currently not clear whether heated tobacco products provide any advantage as an additional potential harm reduction product.”* As reported above since the time of the report there is now an increasing growth trajectory for IQOS in the UK supporting its contribution as potential harm reduction product.

5. German Federal Institute for Risk assessment (BfR) (2018)⁵⁴, a branch of the Federal Ministry for Food and Agriculture, is responsible for the assessment of issues related to consumer protection. BfR analyzed IQOS aerosol and found reductions in selected toxicants (80-99%) compared to cigarette smoke, which was in line with PMI’s own research. The study states that while further studies are required to address the magnitude of exposure reduction *“the herein confirmed reductions of relevant toxicants by about 80–99% are substantial, leading to the relevant questions of putatively reduced health risks.*
6. Korean Ministry of Food and Drug safety (MFDS) (2018)⁵⁵: issued a statement on products that heat rather than burn tobacco, based on measurements performed in their own laboratories of three HNB products including IQOS. They measured the nine Harmful and Potentially Harmful Constituents (HPHCs) defined by the WHO as a priority list for mandatory reduction, as well as nicotine and “tar”.

⁵³ Public Health England, E-cigarettes and heated tobacco products: evidence review (2018): <https://www.gov.uk/government/publications/e-cigarettes-and-heated-tobacco-products-evidence-review>

⁵⁴ German Federal Institute for Risk assessment (2018): <https://link.springer.com/article/10.1007/s00204-018-2215-y>

⁵⁵ Korean Ministry of Food and Drug safety: (Korean) http://www.mohw.go.kr/react/al/sal0301vw.jsp?PAR_MENU_ID=04&MENU_ID=0403&page=1&CONT_SEQ=345119

MFDS results confirm significant reductions of HPHCs in HNB products compared to cigarettes – but omit to discuss them. In their discussion, MFDS mention that HNB products also contain carcinogens, like benzopyrene and benzene. What they fail to mention is that the levels measured are more than 10 times lower compared to the levels present in cigarette smoke. In fact, their own data show that these 2 carcinogens are reduced by more than 95 % (for benzopyrene) and more than 99 % (for benzene) when comparing the levels of HNB products to the top 5 most sold cigarette brands in Korea. When considering the 9 measured HPHCs, the average reduction of HNB products compared to Korean cigarettes (top 5 most sold brands) is more than 90%.

Our public comment on the MFDS statement is available here: <https://www.pmiscience.com/whats-new/pmi-assessment-of-the-kfda-statement>

7. The China National Tobacco Quality Supervision and Test Centre (“CNTQSTC”) (2018): a member of the WHO Tobacco Laboratory Network (TobLabNet): published on January 8, 2018 an independent study in Nicotine & Tobacco Research comparing the HPHCs present in IQOS aerosol and 3R4F reference cigarette smoke.

This peer reviewed publication by Li et al (2018)⁵⁶ *“Chemical Analysis and Simulated Pyrolysis of Tobacco Heating System 2.2 Compared to Conventional Cigarettes”* includes % reduction results of carbon monoxide and 25 Harmful and Potentially Harmful Constituents (HPHCs) in IQOS aerosol versus 3R4F reference cigarette smoke using the ISO and Health Canada intense testing regime. The authors stated *“The majority of mainstream constituents of THS 2.2 were reduced compared to 3R4F [reference cigarette].”* Specifically, they found that compared to the 3R4F reference cigarette, IQOS produced *“more than 90% [lower levels of] HPHCs, except for carbonyls, ammonia, and NAB, which were about 50–80% lower.”* The authors cautioned *“that reduction of harmful constituent emissions cannot be interpreted as equivalent to a proportionate harm/risk reduction for smokers.”*

8. The Department of Environmental Health, National Institute of Public Health in Japan (2017)⁵⁷: one the WHO Tobacco Laboratory Network (TobLabNet) laboratories analysed nicotine, tar, carbon monoxide (CO) and tobacco-specific nitrosamines (TSNAs) in the mainstream aerosol and tobacco fillers of IQOS regular and IQOS menthol, and compared their concentrations with those from reference cigarettes (3R4F and 1R5F) using WHO TobLabNet methods. The authors conclude *“In this study we could provide important information showing that the concentration levels of hazardous compounds in the mainstream smoke of IQOS are much lower than those in conventional combustion cigarettes. Although it is low concentration, toxic compounds are definitely included in the mainstream smoke of IQOS.”*
9. UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT) (2017)⁵⁸: reviewed evidence on two heated tobacco products, IQOS (PMI) and iFUSE (BAT) as part of their work to assess the risk of heated tobacco products relative to cigarette smoking. The assessment concluded that, while still harmful to health, heated tobacco products *“are likely*

⁵⁶ Li, X. et al 2019 Chemical Analysis and Simulated Pyrolysis of THS 2_2 compared to conventional cigarettes, Nicotine Tob Res 21(1):111-118. doi: 10.1093/ntr/nty005. PMID: 29319815

⁵⁷ Bekki, K. et al., 2017 Comparison of Chemicals in Mainstream Smoke in Heat-not-burn Tobacco and Combustion Cigarettes, J. UOEH 39(3) 201-2017

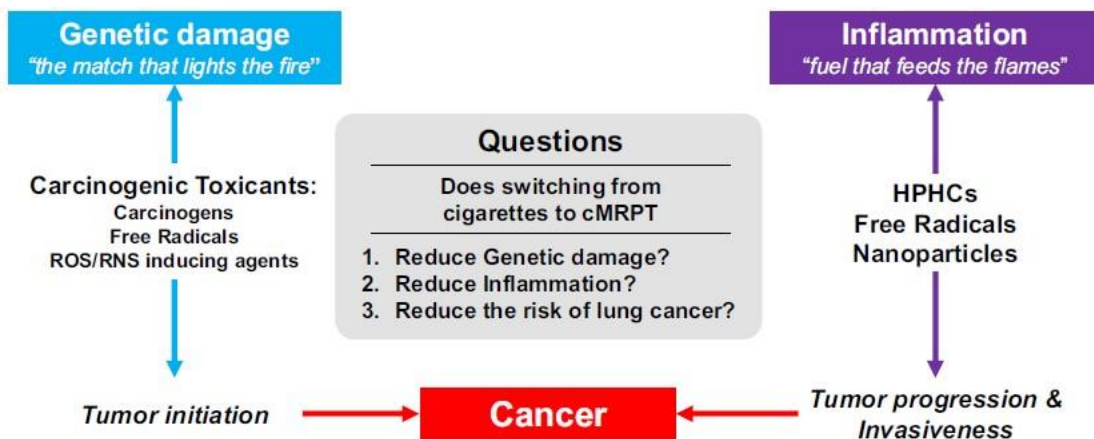
⁵⁸UK Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment (COT), Statement on the toxicological evaluation of novel heat-not-burn tobacco products (2017): https://cot.food.gov.uk/sites/default/files/heat_not_burn_tobacco_statement.pdf

to be less risky than smoking conventional cigarettes.” COT also stated that “There would likely be a reduction in risk for conventional smokers deciding to use heat-not-burn tobacco products instead of smoking cigarettes.

10.

ANNEX B – CANCER MODELS

In the area of lung cancer, a PMI publication described an approach supporting lung cancer risk reduction potential of a candidate Modified Risk Tobacco Product (cMRTP)⁵⁹, based on the hypothesis of Balkwill and Mantonvani: “if genetic damage is the match that lights the fire of cancer, some types of inflammation may provide the fuel that feeds the flames”.



This approach⁶⁰ is based on three important questions that can be answered prior to cMRTP market introduction using a combination of nonclinical and clinical studies:

1. Does switching from cigarettes to the cMRTP reduce genetic damage?
 - a. Different types of studies – clinical, in vivo, in vitro and aerosol chemistry – have demonstrated a reduced genetic damage.
2. Does switching from cigarettes to the cMRTP reduce inflammation?
 - a. Reduced Emission of HPHCs and FreeRadicals; No exposure to carbon-based nanoparticles⁶¹ reduces inflammation⁶²
3. Does switching from cigarettes to the cMRTP reduce the risk of lung cancer?

⁵⁹ <https://link.springer.com/article/10.1007/s11739-019-02045-z>

⁶⁰ Hoeng, J. et al., 2019 Assessing the lung cancer risk reduction potential of candidate modified risk tobacco products. <https://pubmed.ncbi.nlm.nih.gov/30767158/>

⁶¹ Pratte, P. et al., 2017 Investigation of solid particles in the mainstream of the Tobacco Heating System THS2.2 and mainstream smoke of a 3R4F reference cigarette. Human and Experimental Toxicology <https://journals.sagepub.com/doi/full/10.1177/0960327116681653>

⁶² Ludicke, F. et al., 2019 Effects of Switching to a Heat-Not-Burn Tobacco Product on Biologically Relevant Biomarkers to Assess a Candidate Modified Risk Tobacco Product: A Randomized Trial. Cancer Epidemiol Biomarkers Prev; 28(11) 1934-43 doi:10.1158/1055-9965.EPI-18-0915

A significant reduction in carcinogenesis endpoints in vitro and tumor formation in vivo would demonstrate that a cMRTP aerosol is less tumorigenic than cigarette smoke. In addition to the positive answer to both the first and the second question, this would indicate that smokers who switch from cigarette smoking to cMRTP use are likely to reduce their risk of lung cancer. The approach provides a good initial evaluation of the risk reduction potential of a cMRTP and should be complemented with studies conducted in living systems.

In addition, another study “Cancer potencies and margin of exposure used for comparative risk assessment of heated tobacco products and electronic cigarettes aerosols with cigarette smoke”⁶³ concluded that:

“.....HTPs and ECs are commercially available alternatives to cigarettes. While the cancer and the non-cancer risk associated with cigarette smoke is well characterized, this is not the case for the aerosol from HTPs or ECs. No long-term epidemiological data currently exist to determine potential health risks associated with the use of such products. Due to the observed growing numbers of smokers who adopt these non-combusted alternatives, surrogates need to be developed to estimate the health risk associated with the use of these reduced exposure products. Our approach was based on the use of emission yields to determine mean lifetime cancer risk index and combined margin of exposure (MOE_T). Indicators obtained from HTPs and ECs were compared to those from cigarettes, and a quantitative product risk assessment was performed. This methodology has some limitations, mainly the selection of specific HPHCs and the availability of IURs or IELs for the considered HPHCs, as well as the criteria developed for their selection. The chemical characterization of HTP and EC aerosols is still an ongoing activity. Compounds with potential toxicological concern may have been ignored, because the current analytical technology did not allow their detection. Even if they should not be considered as risk-free products, however, HTPs and ECs lead to an appreciable risk reduction in comparison to cigarettes, both for cancer and non-cancer diseases. According to the current knowledge, and more specifically to the data presented here, HTPs and ECs might be considered as an acceptable reduced risk substitute for cigarettes for legal-age smokers who would otherwise continue smoking cigarettes.”

Moreover, scientists from the Dutch Risk Assessment Institute - RIVM - proposes a method that can be used to compare the health impact of two different tobacco products and illustrates how this method can be applied to understand the health effects of HTPs as compared to combustible cigarettes⁶⁴.

“The CCE- change in cumulative exposure- was estimated to be 10- to 25-fold lower when using HTPs instead of cigarettes. Such a change indicates a substantially smaller reduction in expected life span, based

⁶³ [Cancer potencies and margin of exposure used for comparative risk assessment of heated tobacco products and electronic cigarettes aerosols with cigarette smoke | SpringerLink](#), by G Rodrigo, G Jaccard, D Tabin Djoko, A Korneliou, M Esposito, *Belushkin*, published in *Archives of Toxicology*

⁶⁴ Slob W, Soeteman-Hernandez LG, Bil W, Staal YCM, Stephens WE, Talhout R. A Method for Comparing the Impact on Carcinogenicity of Tob A Method for Comparing the Impact on Carcinogenicity of Tobacco Products: A Case Study on Heated Tobacco Versus Cigarettes” - Slob - 2020 - Risk Analysis - Wiley Online Library 64

on available dose-response information in smokers. “....Overall, the conclusion seems to be warranted that consuming HTPs instead of cigarettes will be associated with a substantial increase in life expectancy, for the subgroup of smokers who would die from cancer. However, a substantial negative health impact is expected to remain from consuming HTPs as compared to total abstinence from tobacco products.”

ANNEX C – HTP USEAGE AND TRENDS

[Queloz and Etter \(2019\)](#)⁶⁵ published the results of an online survey of users of, what they described as, tobacco vaporizers (or heated tobacco products), assessing their reasons and modes of use, perceived advantages and perceived risks. The online questionnaire collected data from October 2016 to January 2018 in self-selected visitors (aged >18 years) to an anti-addiction website operated in Switzerland. It is worth noting that the survey was conducted independently from product manufacturers and thus the responses to the questions used in the research do not necessarily reflect consumer communication at the time of the survey made by manufacturers including Philip Morris Switzerland.

Valid responses were obtained from 170 participants, of whom 104 were using tobacco vaporizers. For homogeneity they included only 102 users of the so called Brand 1 tobacco vaporizer in their analysis as there were only two users of other vaporizers. Brand 1 was identifiable from the product description and references provided, as the Philip Morris International product *IQOS* (THS).

Among these 102 vaporizer users, about half were current cigarette smokers (57%), the rest were former cigarette smokers. The median age was 41 years and the median duration of product use was 9 months. Most used the vaporizer daily (88%), 8% were occasional users and 4% were past users. Among current smokers, 80% were currently trying to reduce their cigarette consumption and 29% were trying to quit. The vaporizer was used mainly to replace cigarettes (94%) because it was perceived to be less toxic than cigarettes (89%), to help to stop smoking or to avoid starting smoking again (72%), or to reduce cigarette consumption (71%). Current smokers who were daily or occasional vaporizer users reported smoking a median of 8.0 cigarettes per day, compared with 20.0 cigarettes per day before they started to use the vaporizer.

Taking account of the limitations the authors considered that this exploratory study contributes valuable information about who uses tobacco vaporizers together with how and why such products are used.

The authors concluded the following “In this online sample of early adopters, Brand 1 was by far the most frequently used tobacco vaporizer. It was used by current or former smokers only, mainly to replace cigarettes, and satisfaction ratings were good. Users considered the tobacco vaporizer to be less toxic than cigarette smoke and perceived it to be helpful for reducing or stopping smoking.”

⁶⁵ Queloz, S. and Etter, J.F. (2019) An online survey of users of tobacco vaporizers, reasons and modes of utilization, perceived advantages and perceived risks. *BMC Public Health* 19:642

The Health Behavior in School-aged Children (HBSC) study (Delgrande et al 2019⁶⁶)

This international HBSC study is conducted every four years in more than 40, mostly European countries. Addiction Switzerland has been conducting the HBSC study in Switzerland since 1986. The aim of the study, conducted for the ninth time in 2018, is to observe the health behaviors of 11-15 year old adolescents and to document the evolution of these over time. The data is collected from all regions of Switzerland to provide national public health and prevention stakeholders with scientific evidence on the emergence, extent and evolution of risk and protective behaviors and on related factors.

In 2018, 805 public school classes were randomly selected to take part in the national survey. The HBSC study is a paper-pencil self-administered standardized question survey with two versions of the survey being used: a short version intended for those typically aged 11 to 13, and a long version intended for those students from 14-15.

The survey questionnaires were sent to the class teachers in early 2018 and the teachers had about 3 months to distribute the questionnaires for completion in the classroom during school time. Participation in the survey was voluntary and anonymous. The dataset for 2018 includes data from 11,121 pupils aged 11 to 15 years. The scientific report describes the national results of the 2018 survey relating to psychoactive substances use among 11-15 year old pupils.

The results for cigarette and other nicotine containing products showed that in 2018 the proportion of pupils reporting having smoked cigarettes at least once in their life increased considerably with age: 5.7% of 11 year-old boys and about 2% of 11 year-old girls have smoked cigarettes and this proportion increased to 35.4% (boys) and 29.8% (girls) respectively, among 15 year-olds. Among 15 year-olds, 9.7% of boys and 7.7% of girls smoked cigarettes at least once per week; respectively 5.6% of boys and 3.5% of girls of this age smoked on a daily basis. About half of the 15 year-old daily smokers smoked up to 5 cigarettes per day and one third smoked 6-10 cigarettes per day. Hence, about one out of six of the 15 year-old daily smokers smoked more than 10 cigarettes a day.

For e-cigarette use among 15 year olds, 50.9% of the boys and 34.8% of the girls have tried e-cigarettes at least once in their life. Consequently, more pupils have tried e-cigarettes than cigarettes. Furthermore, 20.6% of boys and 12.9% of girls aged 15 used e-cigarettes at least once during the 30 days preceding the survey. 3.7% of boys and 1% of girls aged 15 used e-cigarettes at least 10 days over the past 30 days. The most reported reason for e-cigarette use was curiosity and desire to try something new.

For heated tobacco products, the survey showed that few pupils had ever used them, with less than 2% of boys and of girls aged 15.

⁶⁶ Delgrande Jordan, M., Schneider, E., Eichenberger, Y, & Kretschmann, A. (2019). La consommation de substances psychoactives des 11 à 15 ans en Suisse – Situation en 2018 et évolutions depuis 1986 - Résultats de l'étude, Health Behaviour in School-aged Children (HBSC) (rapport de recherche No 100). Lausanne: Addiction Suisse. https://www.hbsc.ch/pdf/hbsc_bibliographie_342.pdf.

The German study on Tobacco Use (DEBRA)⁶⁷ is DEBRA is an ongoing, representative, face-to-face household survey of the population aged 14 years and older and is also collating survey data regarding the prevalence of EC and HNB device use and associated socioeconomic factors and smoking behavior; compare reasons for EC use between adolescents and adults; describe the self-perceived risk of HNB devices. In 2017 when the results for a study wave was reported, among current smokers and recent ex-smokers (<12 months smoke-free), 0.3% (95% CI= 0.09–0.64%) currently used HNB devices, and 6.0% (95% CI= 5.0–7.2%) had ever used them. Consumption of HNB products increased with increasing education and income. The majority perceived HNB products as somewhat (41.0%, *n*= 25) or much (14.8%, *n*= 9) less harmful, and 37.7% (*n*= 23) as equally harmful compared with tobacco cigarettes.

National surveys in the EU confirm this finding.⁶⁸

Evidence from other countries is also promising. For example, in Japan, the available evidence links the launch of IQOS in 2016 to an accelerated decline in cigarette sales and smoking prevalence^{69,70}

A reduction in cigarette sales is not direct evidence of harm reduction in a population. This is why PMI investigated whether the introduction of HTPs was associated with changes in indicators of smoking-related diseases at the population level. We obtained hospitalization rates for selected smoking-related endpoints: chronic obstructive pulmonary disease (COPD), COPD exacerbations and ischemic heart disease (IHD). This data came from two databases: Medical Data Vision (MDV) and Japan Medical Data Center (JMDC). For these endpoints, we compared rates of hospitalizations before and after the introduction of HTPs in Japan. We observed that hospitalization rates started decreasing after the launch of such products at scale. Therefore, launching HTPs was not only the most likely cause for a reduction in cigarette sales, but we also observed potential correlation between the decrease in hospitalization rates due to COPD and IHD⁷¹ and the launch of HTPs. While such type of analysis does not assess causal relationships between exposure and outcomes at the individual level but can provide valuable information of the potential impact of the introduction of HTPs on a population level.

When it comes to health decision-making, several lines of evidence come into play and complement each other: evidence from controlled scientific experiments answers precise, pre-defined questions, while evidence collected from the real-world helps understand health effects of a product in real-life settings.

⁶⁷ Kotz, D 2018 E-cigarettes and heat-not-burn products: representative data on consumer behaviour and associated factors in the German population (the DEBRA study). Bundesgesundheitsbl <https://doi.org/10.1007/s00103-018-2827-7>

⁶⁸ In Germany the rate of use among young people for heated tobacco products is 0.3%, according to figures from the German Federal Center for Health Education (BZgA), available [here](#). For e-cigarettes, this rate is 0.5% in Germany, according to the latest figures of the University of Cologne DEBRA study available [here](#).

⁶⁹ Stoklosa, M. et al., 2019 Effect of IQOS introduction on cigarette sales: evidence of decline and replacement.

Tobacco Control 2020;29:381-387. <https://doi.org/10.1136/TOBACCOCONTROL-2019-054998>

⁷⁰ 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

⁷¹ van der Plas, A. et al 2022 Ischemic Heart Disease and Chronic Obstructive Pulmonary Disease Hospitalizations in Japan Before and After the Introduction of a Heated Tobacco Product. *Front. Public Health* 10:909459. doi: 10.3389/fpubh.2022.909459

Encouragingly, a recent independent publication⁷² from South Korea concluded that ***“Switching to Non-combustible Nicotine or Tobacco Product (i.e. HTPs or e-cigarettes) use among initial Combustible Cigarette smokers was associated with lower CVD risk than continued CC smoking.*** On CC cessation, NNTP use was associated with higher CVD risk than CC quitting without NNTPs. Compared with CC smokers who quit without NNTP use, CC quitters who use NNTPs may be at higher future CVD risk.” In other words, although smoke-free product use was associated with a lower CVD risk compared to continued cigarette smoking, smokers who quit without smoke-free product use was associated with an even lower CVD risk.

⁷² Choi, S., et al., 2021 [Combined Associations of Changes in Noncombustible Nicotine or Tobacco Product and Combustible Cigarette Use Habits With Subsequent Short-Term Cardiovascular Disease Risk Among South Korean Men: A Nationwide Cohort Study - PubMed \(nih.gov\) Circulation. 144:1528–1538. DOI: 10.1161/CIRCULATIONAHA.121.054967](#)