



PHILIP MORRIS PRODUCTS S.A.

The Editors and Legal Department  
The Week C/O Future Publishing Limited  
Quay House, The Ambury,  
Bath BA1 1UA

21 June 2025

By email to: [REDACTED]

**Complaint: [The Week Unwrapped: Why can children buy synthetic nicotine pouches?- 20 June 2025 \(the “Podcast”\)](#)**

On behalf of Philip Morris International and its family of companies (“PMI”), we write to submit an urgent complaint regarding the Podcast. PMI is a leading international consumer goods company and its affiliates own and market the ZYN brand of nicotine pouches referred to in the Podcast.

We require that the segment of the Podcast relating to “snus” and ZYN (along with the image) is immediately removed from publication and not republished. We note from your website that you [‘abide by the Editors’ Code of Practice and are committed to upholding the highest standards of journalism.’](#) The segment breaches clause 1 of the IPSO Editors Code by publishing inaccurate, misleading and distorted information and images about ZYN and PMI.

Specifically, clause 1 of IPSO’s Editor’ Code states (our emphasis):

- i. *The Press must take care not to publish **inaccurate, misleading or distorted information** or images, including headlines not supported by the text.*
- ii. *A significant inaccuracy, misleading statement or distortion **must be corrected, promptly** and with due prominence, and — where appropriate — an apology published. In cases involving IPSO, due prominence should be as required by the regulator.*
- iii. ***A fair opportunity to reply to significant inaccuracies should be given, when reasonably called for.***
- iv. *The Press, while free to editorialise and campaign, **must distinguish clearly between comment, conjecture and fact.***

Philip Morris International’s press office was not contacted before this story was published or allowed to respond to any of the allegations or offered a right to reply to the significant inaccuracies.

The Week’s News Editor, Jamie Timson; The Week Unwrapped Editor, Felicity Capon; and writer Harriet Marsden, appear to have undertaken research prior to production and broadcast, and yet frequently present inaccurate information as fact. This is irresponsible journalism.

Within the segment, only one nicotine pouch brand or company is mentioned — *ZYN*, including:

- An image of *ZYN* products
- At the beginning of the segment, your journalist states that “they are sold in lots of places under the brand name “*ZYN*”
- Frequent use of the word “*ZYN*”
- “The *ZYN* website says it is for adult smokers.”
- “The online subculture is known as the “*ZYN*ternet”
- “Philip Morris” is referenced in the TV show “*MadMen*”

The focus on *ZYN* and lack of any other brands being mentioned leads any reasonable listener to draw the incorrect conclusion that *ZYN* is market dominant in the UK, and that all or the vast majority of the allegations discussed during the segment relate to *ZYN*.

The basic facts are that *ZYN*, which is the market leader among nicotine pouches in the U.S., only has a single digit share of the UK nicotine pouch market and that none of the critical allegations are practices undertaken by affiliates of PMI.

In the interests of time and brevity, we have not commented on each of the false, inaccurate and misleading statements mentioned in the Podcast, but reserve the right to do so.

### **Context**

We have no issue per se in discussing nicotine pouches generally, and we understand that Action on Smoking and Health (ASH) [published a survey](#) this week on use of nicotine pouches and is calling for regulation of nicotine pouches in the UK’s proposed Tobacco and Vapes Bill. We assume the Podcast was referring to this ASH survey.

PMI supports the appropriate regulation of nicotine pouches, and this was made clear in our response to the consultation on the bill which is publicly available. We also agree that those below the legal age<sup>1</sup> should not have access to or use any tobacco or nicotine products and welcome moves to legally apply age of sale restrictions in the UK, a measure we already take in our own channels such as our website and event kiosks, and something most responsible retailers like the UK multiple grocery stores already do.

However, the Podcast is fundamentally flawed in its editorial approach to accuracy by using the name *ZYN* (and to a lesser extent “Philip Morris” (PMI)) to describe the entire category and falsely attributes actions of others to *ZYN* and PMI. *ZYN* is a specific brand name; it is not an appropriate shorthand for the entire category, and the repeated use of the *ZYN* brand image gives the false impression that everything discussed during the segment relates to *ZYN*. Had the editors chosen to speak broadly about the category and make the statements without any reference to *ZYN*, that may have been fair and accurate, as there are certainly irresponsible actors at both the producer and retailer levels. However, the failure to separate the bad actors from responsible ones creates false claims that are now attributed to *ZYN* and PMI.

The Week has, according to your advertising sales pack, an international audience and readership. This exacerbates the impact of your outlet's incorrect and improperly contextualized statements, and our understanding is that you have made false claims across multiple jurisdictions.

### **Examples of False (Inaccurate) Statements**

*A false claim that tobacco companies have deliberately swapped out tobacco with synthetic nicotine to create an unregulated product that can be sold to children.*

This is categorically false and is not based on any fact. The development of ZYN originates in highly regulated markets, including Sweden and the US, which have strict rules about youth using nicotine. The products were developed by Swedish Match, which PMI acquired in 2022.

The tobacco leaf-containing predecessor to nicotine pouches, snus, has been on the market outside the EU for decades. ZYN was first introduced in the U.S. over 10 years ago and is an evolution of snus, without tobacco leaf. The nicotine in ZYN is not, however, synthetic, as incorrectly stated in the Podcast. It is currently derived from tobacco. Many countries such as the U.S. already regulate nicotine pouches. The U.K. lags behind, but we welcome appropriate regulation which sets clear standards for the safety and quality of these products, as well as age restrictions. [PMI has a strict marketing code](#) which requires a minimum age of sale of 18 if the law does not specify an age or a higher age. For all these reasons, it is baseless and false to suggest that PMI removed tobacco from ZYN to bypass legislation and market ZYN to children.

*Numerous statements that ZYN contains more nicotine than cigarettes, such as 150mg pouches containing 100 x more nicotine*

It is not true that PMI sells ZYN pouches containing 150mg of nicotine and several statements are false and distort the truth by wrongly attributing other manufacturer's high strength pouches to ZYN. [The biggest market for ZYN is the U.S. where ZYN holds around 60%-70% market share based on volume or value](#)<sup>2</sup>. ZYN is marketed in the U.S. in 3mg and 6mg nicotine strengths and became the first nicotine pouch to receive [authorization from the FDA earlier this year](#) for all 20 variants currently on the market.

Following PMI's acquisition of Swedish Match in 2022, ZYN was relaunched in the UK, has a single digit market share and is [available in strengths of 1.5mg up to 13.5mg](#). PMI affiliates do not sell ZYN pouches at the levels suggested in the Podcast, and this should have been obvious to your producers as the commentators on the Podcast claimed to have visited the ZYN website.

Even leaving aside the extreme example given of a 150mg pouch, the commentators confused two different measurements to arrive at a false comparison. The amount of nicotine in a product (*nicotine content*) – whether that be a cigarette or a nicotine pouch – differs from the amount of nicotine a person is exposed to (*nicotine yield*), and that differs from the amount of nicotine absorbed into the blood (*nicotine exposure*). The Podcast makes the error of comparing the nicotine content of some hypothetical nicotine pouch with the nicotine yield of a cigarette i.e. these are not like for like measurements.

Cigarettes typically contain around 12-14mg of nicotine, but it is correct that the nicotine yield or amount a person inhales from a cigarette will be in the range of 1-2mg because much of it is lost in side-stream smoke. The third measurement is how much nicotine a person absorbs. This can only be measured in a clinical setting. It will depend on a number of individual usage factors including but not limited to whether the nicotine is inhaled (quicker absorption) or an oral product (slower), the nicotine content or strength, how long the person uses the product, how many products they use, how often they use them, other factors such as whether the pouch is moist or dry and an individual's metabolism. Addiction is a complex issue, and other factors are involved such as ritual, taste and sensory experience.

PMI does not advocate for nicotine pouches to be higher than 16mg- 20mg but it is worth noting that even nicotine replacement patches which are considered safe and effective for treating smoking, are available at levels above 20mg. It is also worth noting that the FDA concluded <sup>3</sup>in authorizing the ZYN products marketed in the U.S. that the addictive potential of ZYN was less than a cigarette and similar to other oral tobacco products available on the market.

*Numerous unsubstantiated allegations that ZYN is marketed to children including free sampling*

As part of the editorial conflation of referring to all pouches as “ZYN”, the Podcast suggests that ZYN is marketed to children including free samples given to them at festivals and Formula One. This is false.

As stated above, we have a strict marketing code for all our products, including ZYN, and that includes age restrictions across our channels including entering kiosks at festivals, no use of social media influencers (any “ZYNfluencers” mentioned in the Podcast are third party user generated content that have no relationship with PMI), and any models featured in our advertising must be over 25 years old (35+ in the U.S). If the Podcast wanted to discuss concerns on marketing at a general level, it should not have associated the Podcast with ZYN specifically, unless it was making a substantiated allegation about ZYN. The editors had clearly done some research as they claimed to have visited the ZYN website and acknowledged the statements that ZYN is for legal age adults looking for an alternative to smoking. This makes it even more surprising that they did not appear to see that there are both age restrictions and no 150mg versions of ZYN available as wrongly claimed.

Our own data shows that the consumer demographic for ZYN over-indexes to the range of [30- 49 year olds with higher income](#) (page 45). Furthermore, in authorizing ZYN products marketed in the US, while the FDA requires continued monitoring and vigilance, [it recognized that ZYN met the standard](#) required of “being appropriate to protect public health” as:

*“...these nicotine pouch products have the potential to provide a benefit to adults who smoke cigarettes and/or use other smokeless tobacco products that is sufficient to outweigh the risks of the products, including to youth. As part of its evaluation, **the FDA reviewed data regarding youth risk and found that youth use of nicotine pouches remains low despite growing sales in recent years.** For example, the 2024 National*

*Youth Tobacco Survey showed that 1.8% of U.S. middle and high school students reported currently using nicotine pouches.” [emphasis added]*

While youth use of nicotine products is unacceptable, bearing in mind that nearly 600 million cans of ZYN were sold in the U.S. in 2024<sup>4</sup>, and given the significantly smaller market share and volume of ZYN currently sold in the U.K, as well as ZYN’s responsible marketing practices, it is inconceivable that the higher ASH figures mentioned in the Podcast for youth usage of nicotine pouches in the UK can be attributed to ZYN. We are not able to comment on the veracity or otherwise of the ASH figures, but taken at face value, they underly ASH’s broader recommendation that nicotine pouches need to be appropriately regulated with age restrictions and safety and quality requirements including nicotine levels to prevent unscrupulous producers and retailers from selling high strength nicotine pouches to minors.

Therefore, it is entirely inaccurate to suggest that ZYN is being marketed by PMI to minors in the UK or elsewhere.

*Speculative and misleading statements on science and health benefits/harms including statements that nicotine pouch use increases the risk of mouth cancer or mouth ulcers*

The commentators make several unsubstantiated, anecdotal claims about the health effects of ZYN. Such selective reporting is highly partial and provides a distorted view to the reader.

ZYN contains nicotine, so it is addictive and not risk-free, but the overall profile of ZYN (in terms of ingredients and mode of use (not inhaled)) makes it significantly less harmful than smoking, and closer to nicotine replacement therapies. Nicotine does have transient effects on the body such as releasing dopamine and increasing heart rate and blood pressure, which is true of all nicotine products including cigarettes and nicotine replacement therapies (the latter of which are considered “safe and effective” to aid smoking cessation).

Anecdotal reference is made to a dentistry study on oral health. We presume your author is referring to this systematic review from 2024 “[What is the impact of nicotine pouches on oral health: a systematic review - PMC](#)”. If so, the Podcast failed to provide a crucial caveat from the review, namely:

*“This systematic review aimed to describe the effects of NP on oral health, including clinical oral manifestation from the users. Since the NP products are relatively new, the findings from this systematic review indicate **limited evidence to confirm the effects of NP on oral health due to the low number of studies and high risk of bias.***

*“**Several limitations of this study include data availability, study quality, and participant and outcome heterogeneity.** Additionally, individual usage patterns, such as nicotine concentration, percentage of unprotonated nicotine, number of pouches used, duration, and frequency, also influence nicotine release in NP. Therefore, assessing these variables is necessary to compare oral health outcomes and accurately measure the effects of NP.*

*“**Research on the use of NP and its effect on oral health are currently limited.** The use of NP should take into consideration the short-and-long-term effects, especially on oral*

health. **Further studies are crucial** to understand oral health implications associated with NP usage.” [emphasis added].

In summary, the authors of this study found that a lack of research, small sample sizes (some around 400 people), a high risk of bias from the research authors of the 3 studies reviewed, and other confounding factors had not been taken into account such as whether the observed symptoms were caused by the participants general health and dental hygiene or the use of nicotine pouches. More studies were called for before any conclusions can be reached.

The Editors could also have cited the FDA order for ZYN and seen the detailed multi-year review of available evidence. In particular, in granting the order the [FDA noted](#):

*“Among several key considerations, the agency’s evaluation showed that, due to substantially lower amounts of harmful constituents than cigarettes and most smokeless tobacco products, such as moist snuff and snus, **the authorized products pose lower risk of cancer and other serious health conditions** than such products. The applicant also provided evidence from a study showing that a substantial proportion of adults who use cigarette and/or smokeless tobacco products completely switched to the newly authorized nicotine pouch products.” [Emphasis added]*

The editors could also have looked at the modified risk tobacco product order for [General Snus](#), another of PMI’s brands, which was the first and only order granted to any tobacco product to date, enabling it to make the following reduced risk claim:

**“Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.”**<sup>5</sup>

ZYN’s own applications for the same claim are pending before the FDA, and because ZYN does not contain tobacco leaf, the levels of HPHCs are further reduced compared to snus.

As stated above, it is one thing to editorialize general concerns about nicotine pouches, but it is inaccurate to portray as fact that ZYN causes mouth cancers and other serious health effects. Concerns about a category which is unregulated in the UK today, should not be smeared to ZYN which is currently the only nicotine pouch to have achieved the high standards expected by the U.S. FDA to be appropriate to protect public health.

*Accusations that PMI is using synthetic nicotine in Zyn to boost profits*

As mentioned above, PMI does not currently use synthetic nicotine to manufacture ZYN. Allegations that the company’s profits have increased “because they are making a product they don’t need to harvest any more,” and “they got rid of the agriculture and kept the price the same” are false. PMI is still a significant purchaser of tobacco crops as almost all our revenue currently comes from products made of or derived from tobacco. Historically, synthetic nicotine has been significantly more expensive to produce due to the complex production process, which is why most smoke free alternatives (such as e-cigarettes) have used nicotine derived from tobacco. This could change if economies of scale improve but this would be a cost-based decision, rather than one to circumvent regulation as the Podcast wrongly suggests<sup>6</sup>.

PMI presented at the [CAGNY conference in February 2025](#) that its revenues from smoke-free products have steadily grown since 2015, even prior to the acquisition of Swedish Match.

Furthermore, your reporter's statement that "the global value of all these tobacco groups is expected to hit \$18bn by 2026" demonstrates a lack of basic research. PMI acquired Swedish Match, the maker of ZYN for \$15.8bn in 2022. At NYSE market close on 20 June 2025, PMI's market cap was \$283.5bn.

### **Concluding Remarks**

The Week is a news outlet currently broadcasting a false and misleading Podcast which damages the goodwill and reputation of ZYN and PMI. It clearly violates the IPSO Editorial Standards for a range of accuracy issues. The editors of the Podcast could easily have avoided this situation through a general discussion and opinion-based commentary on nicotine pouches, without specifically mentioning ZYN or any other brand.

Given the gravity of the false allegations, we insist that the nicotine pouch segment of the Podcast is withdrawn by 4pm (UK) on June 23, 2025.

In keeping with PMI's commitment to fostering open and transparent dialogue, we reserve our right to make this correspondence available to the public.

All rights reserved.

Yours faithfully,

[Redacted signature block]

### **Endnotes**

<sup>1</sup> 18 years old in the UK for tobacco products but 21 in some countries such as the U.S.

<sup>2</sup> As of March 2025 – see page 16 of linked document.

<sup>3</sup> See page 57: [PMTA\\_TPL\\_PM593-PM612\\_Zyn\\_01\\_13\\_2025\\_Redacted.pdf](#) – "Based on the information provided in the PMTAs, the abuse liability [addictive potential] of the new products [ZYN] is lower than combusted cigarettes and is similar to smokeless tobacco products."

<sup>4</sup> [April\\_2025\\_PMI\\_Investor\\_Information](#) page 16

<sup>5</sup> [Technical Project Lead \(TPL\) Review of MRTPA\(s\): MR0000256.PD1-MR0000256.PD5, MR0000256.PD7-MR0000256.PD9](#)

<sup>6</sup> Note the U.S. FDA already treats synthetic nicotine products the same way as products containing nicotine derived from tobacco, so it is very easy for policy makers to ensure that all nicotine products are covered by applicable laws.