



May 28th, 2026

Dr. Kerstin Schotte,
Department of Health Promotion,
World Health Organization,
Geneva, Switzerland

Dear Dr. Schotte,

I registered for the WHO webinar "*Exposing industry tactics behind nicotine pouch expansion and the regulatory implications*" to listen, understand the discussion, and engage constructively. My registration was canceled ahead of the session. I recognize the World Health Organization's obligations under the Framework Convention on Tobacco Control to protect public health policy from the vested interests of the tobacco industry. But those obligations do not require excluding industry data, experience, and evidence from every public discussion. Effective public health policy is built by testing evidence and experience wherever they exist, not screening them out in advance.

Around the world, clinicians, researchers, regulators, and people who smoke are confronting the same question: how to reduce the harm caused by cigarettes. Policy equal to that task must withstand challenge, incorporate diverse perspectives, and adapt to real-world outcomes. Excluding uncomfortable views at the outset may feel principled, but it narrows the evidence base at the moment when policy choices carry the greatest consequences.

I would have welcomed the opportunity to participate in the webinar discussion in that spirit—not to dilute public health objectives, but to strengthen them through rigorous debate. As I was invited to send questions to you after the cancellation of my registration, I have five based on my review of the WHO report "*Exposing marketing tactics and strategies driving the global growth of nicotine pouches.*"

- **What level of evidence justifies restricting legal age adults' access to lower-risk alternatives, given the well-established harm of continued smoking?**
- **At what point does restricting lower-risk alternatives stop protecting public health and start doing harm by perpetuating smoking?**
- **When products like nicotine pouches are banned, is there evidence that tobacco and nicotine use falls, or does it just move into illicit markets?**
- **What is the minimum regulation needed to stop underage-appealing marketing without penalizing responsible manufacturers alongside rogue sellers?**
- **If cross-border social media marketing is a key problem, what enforcement tools work, and who would be responsible for enforcing them?**

These are not narrow or personal concerns; they are questions that many serious stakeholders would reasonably ask, and they merit a substantive response.

Kind regards,

Dr. Moira Gilchrist
Chief Global Communications Officer
Philip Morris International

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