



PHILIP MORRIS  
PRODUCTS S.A.

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August 06, 2020

Lillian Ortega  
Director, Division of Enforcement and Manufacturing  
Food and Drug Administration  
Center for Tobacco Products  
Document Control Center (DCC)  
Building 71, Room G335  
10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002

Submitted via CTP Portal

**Subject: Postmarket Surveillance and Studies (PMSS) Protocols for IQOS System; MRTPA Submission Tracking Numbers (STNs): MR0000059-MR000061 and MR0000133**

Dear Ms. Ortega,

In accordance with Section 911(g)(2)(C)(ii) of the Food, Drug and Cosmetic (FD&C) Act, Philip Morris Products S.A. (PMP S.A.), the holder of the MRTP Orders authorizing the marketing of the *IQOS* System<sup>1</sup> as modified risk tobacco products<sup>2</sup>, hereby confirms its agreement to conduct the required PMSS as described in the “Modified Risk Granted Orders - Exposure Modification” issued on July 7, 2020.

The PMSS Program for the *IQOS* System has been jointly developed by PMP S.A. and Altria Client Services LLC (ALCS).<sup>3</sup> The PMSS Program will be jointly conducted with ALCS and an ALCS affiliate licensed to distribute and sell the product in the United States, on behalf of PMP S.A. The ALCS affiliate that distributes and sells the product in the U.S. is Philip Morris USA Inc. (PM USA)<sup>4</sup>.

As outlined in the MRTP Orders, under Section 911(g)(2) of the FD&C Act, issuance of an exposure modification order is conditioned on the applicant’s agreement to conduct PMSS to “*determine the*

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<sup>1</sup> The MRTP Order for the *IQOS* System applies to Marlboro *HeatSticks* (MR0000059), Marlboro Smooth Menthol *HeatSticks* (MR0000060), Marlboro Fresh Menthol *HeatSticks* (MR0000061) and *IQOS* System Holder and Charger (MR0000133).

<sup>2</sup> The *IQOS* System with three variants of *HeatSticks* has been granted the exposure modification orders under 911(g)(2) of the FD&C Act

<sup>3</sup> Altria Client Services LLC (ALCS) is a wholly owned subsidiary of Altria Group, Inc. ALCS provides certain services to the Altria family of companies.

<sup>4</sup> PMP S.A.’s parent, Philip Morris International Management S.A. (PMI), has entered into a distribution agreement with ALCS by which ALCS and its affiliates, including PM USA, are licensed to sell and distribute *IQOS* in the United States after FDA authorization.

*impact of the order on consumer perception, behavior, and health, and to enable the Agency to review the accuracy of the determinations upon which the order was based in accordance with a protocol approved by the FDA.”* The protocols and study plans for the PMSS Program hereby provided demonstrate PMP S.A.’s commitment to ensure that the products subject to the Orders remain appropriate to promote the public health and continue to benefit the health of the population as a whole.

The Orders mandated the PMSS Program to respond to the following:

- (1) MRTP Use Behavior and Consumer Understanding and Perception,
- (2) MRTP Use and Health Risk - Serious and Unexpected Adverse Experiences,
- (3) Surveillance of New Research Study Findings on the MRTP and Consumer Perception, Behavior, or Health.

The PMSS Program Overview and the individual study-specific documents will further explain how the PMSS Program is responsive to all requirements of the Orders.

In addition to the above studies and analyses, and as requested in the “Modified Risk Granted Orders - Exposure Modification” we will model the impact of the *IQOS* System on the population health, and include a description of the computational modeling to this end.

Furthermore, to address the MRTP Use and Health Risk (Toxicology), we also provide a description of methodology for computational toxicology assessment of *HeatStick* aerosols that will be applied to assess the cancer risk from exposure to compounds increased in *IQOS* System aerosol compared to the 3R4F cigarette smoke.

Upon agreement regarding the PMSS Program, the studies in progress will be reported on an annual basis, by April 30 of each year in a PMSS Report<sup>5</sup>. This PMSS Report will include the MRTP specific sections of the joint PMTA/MRTPA annual report that will be submitted by April 30 of each year. Once a study is completed, the PMSS Report will include the final study report.

We appreciate FDA’s consideration of our proposed PMSS Program for the *IQOS* System and look forward to working with the Agency to review it further.

Sincerely,

(b) (6)

Daniel Verstappen  
Vice President Regulatory, Quality & Standards  
Philip Morris Products S.A.

(b) (6)

Jeffrey Walker, M.D.  
U.S. Agent for PMP S.A.  
CEO, Teton Regulatory Sciences

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<sup>5</sup> Similar to the annual report associated with the April 30, 2019 PMTA Order, the cut-off date for data and report generation will be the end of February.

Please note that this submission contains confidential commercial information, and/or trade secret information, and the legal protections provided to such information are hereby claimed under the applicable provisions of United States law, including relevant provisions of the Federal Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 et seq. (specifically, 5 U.S.C. § 552(b)(4)), the Trade Secrets Act (18 U.S.C. § 1905), the Federal Food, Drug, and Cosmetic Act, 21 U.S.C. § 301 et seq., (specifically FD&C Act §§ 301(j) and 906(c), 21 U.S.C. §§ 331(j) and 387f(c)) and FDA’s implementing regulations, 21 C.F.R. Part 20 (specifically 21 C.F.R. §§ 20.47 and 20.61). PMP S.A. understands that FDA will hold this documentation confidential and will refrain from the public disclosure of the information contained in this submission in conformity with such provisions of the law. Accordingly, if FDA tentatively determines that any portion of this submission is disclosable to the public, FDA is required to provide PMP S.A. with notice and an opportunity to object in accordance with 21 C.F.R. §§ 20.47 and 20.61. PMP S.A. reserves all legal rights to protect against public disclosure of its trade secrets and confidential commercial information and to seek legal recourse against anyone who discloses such information without legal authorization.

**Enclosures:** [Annex A](#)

## Annex A

### Index of documents provided for the PMSS Program for *IQOS* System

Attachment [Filename]
PMSS Program Overview for <i>IQOS</i> System in the U.S. [2020-08-06-PMSS-MR0000059-61-MR0000133.pdf]
Appendix A - Principal Investigator Credentials [A-principal-investigator-credentials.pdf]
Appendix B1 - <i>IQOS</i> Cross-Sectional PACS Protocol [B1-iqos-cross-sectional-PACS-protocol.pdf]
Appendix B2 - <i>IQOS</i> Cross-Sectional PACS Questionnaire [B2-iqos-cross-sectional-PACS-questionnaire.pdf]
Appendix B3 - <i>IQOS</i> Cross-Sectional PACS SAP [B3-iqos-cross-sectional-PACS-sap.pdf]
Appendix C1 - <i>IQOS</i> Cohort PACS Protocol [C1-iqos-cohort-PACS-protocol.pdf]
Appendix C2 - <i>IQOS</i> Cohort PACS Baseline Questionnaire [C2-iqos-cohort-PACS-baseline-questionnaire.pdf]
Appendix C3 - <i>IQOS</i> Cohort PACS Follow-up Questionnaire [C3-iqos-cohort-PACS-follow-up-questionnaire.pdf]
Appendix C4 - <i>IQOS</i> Cohort PACS SAP [C4-iqos-cohort-PACS-sap.pdf]
Appendix D - Research Analysis Plan: Estimation of Prevalence of <i>IQOS</i> Use [D-research-ana-plan-iqos-prevalence-of-use.pdf]
Appendix E - Reporting Plan: U.S. <i>IQOS</i> Owners Panel [E-reporting-plan-US-iqos-owners-panel.pdf]
Appendix F - Research Analysis Plan: Estimation of Awareness and Use of <i>IQOS</i> among Underage Individuals 13-20 Years of Age [F-research-ana-plan-awareness-use-underage.pdf]
Appendix G - Reporting Plan: U.S. <i>IQOS</i> Sales & Distribution Data [G-reporting-plan-US-iqos-sales-distribution.pdf]
Appendix H – U.S.-specific Safety Surveillance System [H-postmarket-safety-surveillance-iqos-US.pdf]

Attachment [Filename]
Appendix I - Description of Literature Monitoring [ <a href="#">I-literature-review-process.pdf</a> ]
Appendix J – Development of the Population Health Impact Model (PHIM) v.8 [ <a href="#">J-population-health-impact-model.pdf</a> ]
Computational Approach to Assess the Cancer Risk from Exposure to Chemicals Increased in THS2.2 Aerosol Compared to 3R4F Smoke. Part 1: Methodology [ <a href="#">computational-toxicology-methodology.pdf</a> ]

**Note:** In addition to the above listed documents we also provide copies of all scientific publications referenced in PMSS documents.