

Mr. Mark Zuckerberg, CEO Facebook/Instagram  
Ms. Vanessa Pappas, CEO Tik Tok  
Mr. Jack Dorsey, CEO Twitter

October 26, 2021

Dear Mr. Zuckerberg, Ms. Pappas, and Mr. Dorsey,

We represent tobacco control, public health, corporate accountability, and consumer protection organizations fighting to reduce tobacco use and its deadly toll around the world. We are writing to you because we have observed an alarming increase in tobacco companies using social media platforms to advertise nicotine pouches to young people. While Facebook/Instagram, TikTok and Twitter all have policies designed to protect users from the predatory marketing tactics of tobacco and e-cigarette companies, current policies do not adequately address the marketing of nicotine pouches. The result has been the rampant marketing of addictive nicotine pouches to young social media users across all of your platforms.

**We are calling on you all to prohibit the marketing of non-pharmaceutical oral nicotine products on your platforms – comprehensively updating existing policies to add these addictive and largely unregulated products to paid marketing and influencer marketing prohibitions on tobacco products and e-cigarettes.**

Some of the world's largest cigarette companies including Altria, British American Tobacco, Imperial Brands, and Japan Tobacco International have recently introduced their own nicotine pouch brands. These products are part of tobacco companies' plan to both keep and addict new customers to nicotine.

Because your platforms do not explicitly prohibit non-pharmaceutical oral nicotine product marketing, recent monitoring has found cigarette companies are not only using influencers to promote nicotine pouches<sup>1</sup>, they are also using paid ad platforms to serve ads for nicotine pouch brands such as Velo, Lyft and Zyn. On Instagram alone, 77 influencers paid to share content promoting Velo have posted thousands of images advertising the nicotine pouch to an audience of more than 537 million people around the world. According to Klear, more than 40 percent of the audience viewing this influencer content promoting Velo is under the age of 24.

Allowing the marketing of recreational products like nicotine pouches on social media platforms presents several public health and child safety concerns:

1. **Nicotine is addictive and its use has several known risks and adverse health consequences** including: (a) Exposure to nicotine during adolescence can have lasting negative consequences for brain development<sup>2</sup> and (b) There is substantial evidence that using nicotine in adolescence can increase the likelihood of nicotine addiction in adulthood, as well as future addiction to other drugs<sup>3</sup>.
2. **Marketing campaigns for nicotine pouches target young audiences and feature misleading product information.** Nicotine pouch marketing is currently leveraging established strategies the same companies have used to market cigarettes, e-cigarettes, and heated cigarettes including youth-friendly flavors, youthful imagery, and colorful packaging. The most visible nicotine pouch brands

seen on social media are British American Tobacco's "Lyft" and "Velo." Marketing campaigns for these brands appear to target young audiences in low- and middle-income countries. Marketing content – both through paid advertising and influencers – often features young, high-profile influencers engaged in sports activities suggesting product use is compatible with a healthy, active lifestyle. In several instances, influencers are facilitating the sale of nicotine pouches on social media platforms by offering "promo codes" and other incentives toward the purchase of nicotine pouches.

3. **Marketing campaigns for nicotine pouches encourage using the product along with the use of other tobacco and nicotine products, the promotion of which are prohibited on all social media platforms.** British American Tobacco, currently one of the most prolific users of social media to market their nicotine pouch brands, often uses language promoting poly-use of these products with content like: "*Stuck by the socket? Waiting for your nicotine device to charge? VELO pouches are charge-free, so they won't keep you waiting.*"<sup>4</sup> British American Tobacco's own internal research shows at least half of the users of their oral nicotine products were not prior smokers<sup>5</sup> and investor reports suggest the company is targeting new users.<sup>6</sup> British American Tobacco's Velo is marketed on social media through paid influencer posts to **promote the sensory effects of nicotine** using slogans like "*feeling the tingles!*"<sup>7</sup> and "*[T]here will be a tingling sensation at first, which is normal: it means the nicotine is working.*"<sup>8</sup>
4. **Many governments around the world seeking to protecting youth and reduce nicotine addiction are regulating nicotine pouches.** Governments are taking a variety of steps to regulate or ban these products including banning the sale or import of nicotine pouches<sup>9</sup> (Germany<sup>10</sup>, Kazakhstan, Lithuania, New Zealand, Russia and Singapore), regulating nicotine pouches as a poisonous substance (Australia, Hong Kong, Malaysia), regulating as tobacco products subject to tobacco control laws (South Korea, Uzbekistan), and regulating these products as pharmaceutical products requiring the relevant medical/therapeutic authorization for sale (Chile, Canada<sup>11</sup>, Finland<sup>12</sup>, Japan, Malaysia, South Africa and Taiwan.)

Without swift action to close this loophole in your existing policies, tobacco companies will continue to undermine the progress you have made to ensure your platform is free of tobacco company marketing that exposes your most vulnerable community members to ads for addictive and toxic products. Your urgent assistance in addressing this public health threat is requested. Please contact Debra Rosen ([drosen@tobaccofreekids.org](mailto:drosen@tobaccofreekids.org); +1 202 296-5469) at the Campaign for Tobacco-Free Kids with questions or for further assistance.

Sincerely,  
Abtab Khan Shawon, Bangladesh  
ACT Health Promotion, Brazil  
Action on Smoking and Health (UK), UK  
African Tobacco Control Alliance - ATCA, Togo  
Airspace Action on Smoking and Health, Canada  
Alianza Bolivia Libre Sin Tabaco, Bolivia  
American Heart Association, United States  
American Lung Association, United States  
ASH (US), United States

ASH Canada, Canada  
ASH Finland, Finland  
ASH Thailand, Thailand  
Association "Health Mission", Belgrade, Serbia, Serbia  
Association for the Treatment of Tobacco Use and Dependence (ATTUD), United States  
Austrian Council on Smoking and Health, Austria  
Campaign for Tobacco-Free Kids, United States  
Cancer Society of Finland, Finland  
Center for Economics and Community Development, Vietnam  
Center for public health & environment education, India  
Centre for Combating Tobacco, Sri Lanka  
Centre for Health and Gender Equality, India  
Centre for Multi Disciplinary Development Research, India  
Chromatic, Pakistan  
CIET, Uruguay  
Coalition "Tamekisz Kyrgyzstan", Kyrgyzstan  
Coalition for a Tobacco Free Palau, Palau  
Coalition for Tobacco Free Odisha, India  
Comision Nacional Permanente de Lucha Antitabaquica -COLAT, Peru  
Comité National Contre le Tabagisme, CNCT, France  
Corporate Accountability, United States  
Danish Cancer Society, Denmark  
Development and Policies Research Center (DEPOCEN) - Vietnam, Vietnam  
Development Organisation of the Rural Poor, Bangladesh  
Dhaka Ahsania Mission, Bangladesh  
DNF (Demain sera Non-Fumeur), France  
European Network for Smoking and Tobacco Prevention - ENSP, Belgium  
Focus NGO, Mongolia  
Foundation "Smart Health - Health in 3D", Poland  
Fund "Saluat Astana", Kazakstan  
Fundación Anáas, Colombia  
FUNDACION BOLIVIA SALUDABLE/ALIANZA POR LA SALUD, Bolivia  
Gracias No Fumo SC, México  
Healthy Romania Generation 2035 Association, Romania  
Indonesian Youth Council for Tobacco Control (IYCTC), Indonesia  
Institute of Public Health , Republic of North Macedonia, North Macedonia  
InterAmerican Heart Foundation, United States  
InterAmerican Heart Foundation Argentina, Argentina  
International Institute for Legislative Affairs, Kenya  
Irish Heart Foundation, Ireland  
JAMAICA COALITION FOR TOBACCO CONTROL, Jamaica  
Kenya tobacco control alliance, Kenya  
Kosovo Advocacy and Development Centre - KADC, Kosovo  
Lentera Anak Foundation, Indonesia  
Lithuanian Tobacco and Alcohol Control Coalition, Lithuania  
México Salud-Hable Coalition, México  
National Alliance for Tobacco Control, Pakistan  
National Council Against Smoking, South Africa  
National Health Association, Norway, Norway  
National Heart Foundation of Bangladesh, Bangladesh

NATIONAL INSTITUTE OF HEALTH OF THE MINISTRY OF THE REPUBLIC OF ARMENIA,  
Armenia  
Nava jeevan trust, India  
NGO "Network of Responsible People", Ukraine  
NGO Advocacy Center LIFE, Ukraine  
NGO "CIVIL HOLDING "GROUP OF INFLUENCE", Ukraine  
Norwegian Cancer Society, Norway, Norway  
OxySuisse, Switzerland  
Pakistan National Heart Association (PANA), Pakistan  
Parents Against Vaping e-cigarettes, United States  
PECUC, India  
Population Development, RH and Right's NGO Network, Mongolia  
Pratyasha anti-drug's club, Bangladesh  
PROGGA (Knowledge for Progress), Bangladesh  
Prohealth.id, Indonesia  
Red Nacional Antitabaco de Costa Rica, Costa Rica  
RENATA, Costa Rica  
RURAL RECONSTRUCTION ORGANISATION, India  
Salud Justa MX, México  
SITAB (the Italian Society of Tobaccology), Italy  
Slovenian Coalition for Public Health, Environment and Tobacco Control, Slovenia  
Smoke Free Israel, Israel  
Smoke Free Partnerships, Brussels  
Smoke-free Cities Asia Pacific Network (SCAN), Philippines  
Smokefree Kazakstan Coalition, Kazakstan  
Sociedad uruguaya de tabacologia, Uruguay  
Society for the Protection of the Rights of the Child, Pakistan  
Southeast Asia Tobacco Control Alliance, Thailand  
Stichting tegen Kanker - Fondation contre le Cancer, Brussels  
STOP, Global  
Student Anti Narcotics Division, Pakistan  
Swiss Association for Tobacco Control, Switzerland  
Tamil Nadu Tobacco Control Network, India  
Tanzania Tobacco Control Forum (TTCF), Tanzania  
The Heart Foundation of Jamaica, Jamaica  
The International Union Against Tuberculosis and Lung Disease (The Union), France  
The Standing Committee of European Doctors (CPME), Belgium  
Tobacco Control Alliance in Georgia, Georgia  
Tobacco Endgame - Alleanza per un'Italia senza Tabacco, Italy  
Tobacco Free Association of Zambia, ZAMBIA  
Unfairtobacco, Germany  
University of Bath Tobacco Control Research Group, UK  
Unnayan Shamannay, Bangladesh  
Vital Strategies, United States  
VIVID - Institute for the Prevention of Addiction, Austria  
Voices for Interactive Choice and Empowerment (VOICE), Bangladesh  
Voluntary Health Association of India (VHAI), India  
XQNS Spain, Spain  
Young Professionals' Alliance for Health - YouPAH, Sri Lanka  
Zambia Heart and Stroke Foundation, Zambia

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<sup>1</sup> The Guardian, “Tobacco giant bets £1bn on influencers to boost ‘more lung-friendly’ sales” Feb 20, 2021 <https://bit.ly/3wsy630>

<sup>2</sup> U.S. Department of Health and Human Services. E-cigarette Use Among Youth and Young Adults: A Report of the Surgeon General. Atlanta, GA: US Department of Health and Human Services, CDC; 2016. pages. 104-105; 125.

<sup>3</sup> U.S. Department of Health and Human Services. E-cigarette Use Among Youth and Young Adults: A Report of the Surgeon General. Atlanta, GA: US Department of Health and Human Services, CDC; 2016. p. 104-105.

<sup>4</sup> @Velo.Global. Instagram. <https://www.instagram.com/p/CKrGGGo5o1T0/>. Accessed February 5, 2021.

<sup>5</sup> The Bureau of Investigative Journalism, “New products, old tricks? Concerns big tobacco is targeting youngsters” Feb 21, 2021 <https://bit.ly/3pkIGZP>

<sup>6</sup> The Guardian, “Tobacco giant bets £1bn on influencers to boost ‘more lung-friendly’ sales” Feb 20, 2021 <https://bit.ly/3wsy630>

<sup>7</sup> @mehwishhayatofficial (4.5M followers). Pakistan. Available at: [https://www.instagram.com/p/CD\\_j6jhn5Z9/](https://www.instagram.com/p/CD_j6jhn5Z9/). August 17, 2020 post. Accessed February 5, 2021.

<sup>8</sup> @renattamoeloe (2.2M followers). Indonesia. Available at: <https://www.instagram.com/p/CGhfQX8lOXb/>. October 19, 2020 post. Accessed February 5, 2021.

<sup>9</sup> Country examples of regulatory action are sourced from the Tobacco Intelligence Global Regulatory Tracker (July 2021). Note that the regulatory examples do not represent an exhaustive list of regulatory action globally. Further, global regulatory measures related to oral nicotine pouches and other non-pharmaceutical oral nicotine delivery products are emerging and these country examples are subject to change.

<sup>10</sup> Banned as an unlawful food product

<sup>11</sup> For products delivering 4 mg/dose or more nicotine, products delivering less than 4 mg/dose are considered a natural health product. All oral nicotine pouches require approval from Health Canada to be legally sold in Canada and no brand has been authorized as of date.

<sup>12</sup> For products delivering 4 mg/dose or more nicotine.