

Tobacco industry tactics: advertising, promotion and sponsorship

The tobacco industry's key strategy to challenge anti-tobacco advertising, promotion and sponsorship (TAPS) policy is arguing against comprehensive bans. This aims to ensure sufficient loopholes to allow continued marketing of tobacco products through points of sale, targeted promotions and sponsorship. The tobacco industry uses corporate social responsibility (CSR) activities to access policy-makers, and utilizes its advertising budget to entice the entertainment and media sector to support voluntary codes or self-regulation.

Introduction

Tobacco advertising, promotion and sponsorship (TAPS) are the primary marketing activities used by tobacco companies to boost sales and expand their market. The industry spends billions of dollars every year on TAPS as a proven means to increase tobacco consumption, including among youth (1). To counteract this tactic, Article 13 of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) mandates a comprehensive ban on all forms of TAPS. Comprehensive TAPS bans are proven to substantially reduce tobacco consumption (by 7–16%), protect youth from smoking initiation and prevent the industry from attracting new users (2–4). Comprehensive TAPS bans, based on Article 13 and the guidelines for its implementation, are strongly resisted by tobacco companies. The industry has been particularly aggressive in its attempts to interfere with or to circumvent comprehensive bans (4), including through introducing novel tobacco products or by using new media and communications technologies. If anti-TAPS policy does not include a comprehensive ban, the tobacco industry will merely redirect its marketing efforts to the types of communication that are not regulated or banned.

Examples of TAPS

- Sports sponsorships, music and cultural events, pop culture, competitions
- Games, apps/technology
- Brand stretching
- Point-of-sale display, retailer incentives
- Packaging and product design features
- Giveaways, promotional products
- CSR

The tobacco industry has a long history of misleading yet effective advertising that targets women, children and minority groups and results in addiction (4, 5). The tobacco companies' ability to advertise has been restricted due to progressively stricter regulations around the world (6), including those resulting from court orders, and the adoption of the WHO FCTC. As of 2018, over 70% of Parties to the WHO FCTC have a ban on traditional modes of advertising (radio, TV, print, promotions) (6). Some of these bans include sponsorship, so-called CSR activities (see Box 1), product placement, cross-border advertising, internet advertising, brand stretching and points of sale. However, in low- and middle-income countries where regulation is weak, tobacco companies continue to promote their products, creating an illusion that they are like any other products, and marketing them in a way that normalizes smoking and attracts children (7). In the WHO Eastern Mediterranean Region, a rise in the use and placement of tobacco products on-screen in TV and movie scenes has been noted (8), prompting a call for stronger monitoring of depiction of tobacco in entertainment media and cross-border advertising (9).

Box 1. Banning so-called CSR activities

The importance of a ban on so-called CSR activities cannot be overemphasized in the context of a TAPS ban. The tobacco industry uses CSR to give a positive impression about a company and their products, including to youth, by portraying the "positive" elements of their business practices (such as good employee–employer relations or environmental stewardship) and providing "financial or in-kind contributions to organizations, such as community, health, welfare or environmental organizations, either directly or through other entities". Promotion of these activities should be prohibited because "the aim, effect or likely effect of such a contribution is to promote a tobacco product or tobacco use either directly or indirectly" (10). So-called CSR is also used to access policy-makers to influence tobacco control policy. In 2017, Philip Morris International reportedly used so-called CSR to access high-level officials in Egypt, Jordan, Lebanon, Morocco, Pakistan, Tunisia and the United Arab Emirates (11).

Tobacco industry marketing plans: new products and normalization

WHO has recommended extending the scope of advertising bans to include waterpipes, electronic nicotine delivery systems (ENDS) such as e-cigarettes, and novel tobacco products.¹ Parties to the WHO FCTC have decided to consider such recommendations (12–14). Ramped-up ENDS marketing uses diverse channels, including points of sale, audiovisuals and online platforms. Some advertising involves promoting deceptive health claims, including to youth, and inciting rebellion against smoke-free policies. Concerns have also been raised that such advertisements could, advertently or unintentionally, promote smoking. Studies have shown that users of e-cigarettes are more likely to start smoking cigarettes or using other traditional tobacco products (13). Novel tobacco products also create a new opportunity for tobacco companies to engage with and influence policy-makers to undermine tobacco control policy.

The tobacco industry has long used advertising as a way to normalize tobacco use, by associating it with commonplace activities and thereby reassuring users or potential users that it is socially acceptable (15). Tobacco companies continue to use the same strategies, adapted to new media, to highlight their new products (16). In 2018, British American Tobacco and Philip Morris International, under the guise of promoting new/non-cigarette initiatives (for example, Mission Winnow, A Better Tomorrow), renewed its sponsorship of sports races (Formula One, Moto GP); however, such advertising was halted in countries with comprehensive TAPS bans (17). Philip Morris International's "It's Time to Unsmoke" campaign is being promoted on social media, and they have contracted an internet media company, Vice, to create more innovative social media strategies (18). Cigarette brands have created fan pages on Facebook and articles on Wikipedia, while video clips associated with cigarette brands have been found on YouTube (19). The Foundation for a Smoke-Free World, funded by Philip Morris International, has already spent more on public relations than on research (20).

Leaked: the 10-year corporate plan of Philip Morris

Philip Morris International's 2014 leaked 10-year corporate affairs strategy reveals a clear focus on reversing "denormalization" and marketing the company as a "trusted and indispensable partner" to bring "solutions to the table", by fostering relations with "international organizations, politicians, nongovernmental organizations, academics, scientists, researchers and the media, etc." to expand communications and engagement opportunities. It seeks to divide the public health community by amplifying the voices of "harm reduction" supporters against "prohibitionists", and confuse the public by leveraging the noncommunicable disease "debate" (21).

¹ E-cigarettes are banned in 11 countries in the Region as of 2018: Bahrain, Egypt, Islamic Republic of Iran, Jordan, Kuwait, Lebanon, Oman, Qatar, Saudi Arabia, Syrian Arab Republic, United Arab Emirates (https://www.who.int/fctc/cop/sessions/cop8/FCTC_COP_8_10-EN.pdf).

Tobacco industry arguments

The tobacco industry's arguments against TAPS bans are the same in different jurisdictions.

What the tobacco industry says	What studies show
<p>Advertising bans violate the constitutional right to freedom of speech (commercial speech) or curtails their ability to sell products</p>	<p>The right to commercial free speech has been recognized only in a handful of jurisdictions. Even if this right is recognized in a country's constitution, it is not absolute. It would not protect advertising that is misleading or has an adverse effect on the state's ability to protect the right to health. A comprehensive TAPS ban under the WHO FCTC does not necessarily violate a Party's constitution as this can be done "in accordance with its constitution or constitutional principles."</p>
<p>Comprehensive TAPS bans are unnecessary. Advertising to adult smokers must be allowed (to encourage competition)</p>	<p>Over 70% of smokers want to quit, and allowing advertising to adult smokers will reduce the government's ability to help them to quit. Furthermore, partial advertising bans will have limited effect as the tobacco company would shift from one form of advertising to another. The tobacco industry cannot be trusted to limit its communication to certain segments of the population, and adolescents will inadvertently be exposed to advertising if the ban is not comprehensive. Studies show that "even brief exposure can influence adolescents. The more aware and appreciative young people are of tobacco advertising, the more likely they are to smoke or say they intend to" (3). Even so-called CSR activities are used by the tobacco industry to create "positive feelings" from youth.</p>
<p>A voluntary code for the tobacco industry, or self-regulation, is sufficient</p>	<p>Article 5.3 Guidelines provide that "Parties should not accept, support or endorse partnerships and non-binding or non-enforceable agreements as well as any voluntary arrangement with the tobacco industry or any entity or person working to further its interests". Furthermore, the Guidelines provide that Parties should introduce and apply effective, proportionate and dissuasive penalties. Parties should designate a competent independent authority to monitor and enforce the law and entrust it with the necessary powers and resources. Civil society should be involved in monitoring and enforcement of the law and have access to justice.</p>

Tobacco industry tactics

The tobacco industry uses multi-pronged tactics to undermine TAPS bans. The most common forms of these tactics, and related examples, are given below.

Research tactics – discrediting proven science, and exaggerating the economic importance of the industry

Tactic	Description/example	Counter-tactics
Commissioning research	Tobacco industry documents from the 1980s and 1990s show that the industry prepared a brief for the Gulf Health Ministers' Council for GCC countries, which included a study on advertising restrictions unlikely to reduce cigarette consumption ("cigarette advertising serves to divide but not expand an already existing market."), in order to detract attention from advertising bans and focus ministers on banning sales to minors (22).	<p>Raise awareness, limit interaction (Article 5.3, recommendations 1 and 2).</p> <p>In addition to raising awareness about the effects of TAPS, and tobacco industry tactics to market deadly products, Parties must adopt codes of conduct that prescribe standards on interacting with the tobacco industry. Interaction should be limited to instances where necessary for regulation, and should such interaction be necessary, it must be transparent and accessible to the public (e.g. through public hearings, public notice of interactions, disclosure of records of such interactions to the public).</p>

Legal tactics – conspiring to hijack the political and legislative process, and intimidating governments with litigation or the threat of litigation

Tactic	Description/example	Counter-tactics
Lobbying directly, or providing legislative drafts	In the Czech Republic, Philip Morris produced a draft voluntary code and brought parliamentarians to a two-day all-expenses paid "briefing trip" to Switzerland (23). In the 1990s, while the European Union (EU) was deliberating the EU Tobacco Advertising Directive, Philip Morris covertly submitted a non-binding code to the European Commission (24).	<p>Reject partnerships (Article 5.3, recommendation 3).</p> <p>Parties should not accept, support or endorse any instrument drafted by the tobacco industry or any offer for assistance or proposed tobacco control legislation or policy drafted by or in collaboration with the tobacco industry.</p>

Tactic	Description/example	Counter-tactics
<p>Challenging policy to delay implementation</p>	<p>In 2010, the tobacco industry launched unfounded legal challenges to undermine comprehensive advertising bans (e.g. point-of-sale product display ban in Norway, and single presentation law of Uruguay). Their arguments included the right to free speech, trademark violations and the limited scope of local authority. Although the majority of such cases are unsuccessful, they cause delays and sow doubt and confusion among policy-makers elsewhere.</p>	<p>Raise awareness; limit interactions; avoid conflicts of interest; denormalize so-called CSR; no preferential treatment (Article 5.3, recommendations 1, 2, 4, 6 and 7).</p> <p>The tobacco industry's strategy is to delay, intimidate and confuse, even if a legal case cannot be won. Governments must raise awareness of such tactics to prevent these cases from sowing confusion.</p> <p>Some tobacco industry cases are grounded on the entitlement the business has as an investor or its rights as an intellectual property owner. Tobacco companies must not be treated like other investors, and must not be granted any incentives, benefits or privileges to run their business.</p> <p>A comprehensive code of conduct that covers disclosure of interests, avoiding unnecessary meetings and rejecting offers/contributions from the tobacco industry will help to ensure that the legal process is not unduly influenced.</p> <p>Banning CSR will help prevent public misinformation and plug a source of "contributions" or "payments" that could influence policy or court decisions.</p>

Public relations tactics – faking support through front groups, and manipulating public opinion to gain the appearance of respectability

Tactic	Description/example	Counter-tactics
<p>Using front groups and third parties to represent its interests</p>	<p>In the Czech Republic, a Council for Advertising was established and funded by Philip Morris to undermine efforts towards a TAPS ban; a non-profit was also funded to frame commercial free-speech arguments (23). Philip Morris International's 2014 leaked plans reveal that utilizing third parties remains a core strategy.</p> <p>In the 1990s, the local chapters of the International Advertisers' Association in the Middle East were mobilized to oppose advertising regulations (22).</p>	<p>Raise awareness; require information from the tobacco industry; denormalize so-called CSR (Article 5.3, recommendations 1, 5 and 6).</p> <p>Governments must raise awareness of the industry's tactic of using front groups and should require information about the marketing activities of the tobacco industry, including its lobbyists as well as entities it funds, and provide a publicly accessible registry of the same. Because so-called CSR is a means to channel funds to front groups, bans and denormalization are key to reducing tobacco industry influence.</p>

Tactic	Description/example	Counter-tactics
<p>Using media to promote misinformation</p>	<p>In 2013, British American Tobacco employed a multi-year national media campaign deriding plain packaging legislation as part of a “nanny state” (25). Elsewhere, the media have been given free trips to tobacco facilities, and encouraged to join tobacco-funded competitions, grants and awards (26).</p>	<p>Require information from the tobacco industry; denormalize so-called CSR (Article 5.3, recommendations 5 and 6).</p> <p>In order to regulate media activities by the tobacco industry, governments must require information about companies’ marketing expenses and media activities, including those that are not yet banned. Sponsorships, competitions and related activities by the industry targeting media should also be denormalized/banned. The tobacco industry must be held accountable for the misleading information it produces. For instance, in the case of plain packaging in the United Kingdom, the Advertising Standards Authority found, in 2014, the British American Tobacco advertising campaign to be misleading, and prohibited it from being republished.</p>
<p>Using so-called CSR to advance its agenda</p>	<p>Internal documents show that in Lebanon in 2000, tobacco companies played on the health ministry’s concerns about youth smoking by proposing a partnership towards a youth smoking prevention programme, accompanied by minor access restriction legislation, while at the same time resisting advertising bans (22).</p>	<p>Denormalize so-called CSR; reject partnerships (Article 5.3, recommendations 6 and 3).</p> <p>Parties should denormalize and, to the extent possible, regulate tobacco industry activities described as “socially responsible”. Parties should not accept, support or endorse the tobacco industry organizing, promoting or participating in youth, public education or any initiatives that are directly or indirectly related to tobacco control.</p>

Other tactics

Based on Philip Morris International’s leaked internal documents (2014) that focus on its corporate strategy for “reduced risk products” (ENDS and novel tobacco products), the company aims to “overturn existing bans” and promote regulatory frameworks that secure the “ability to buy and enjoy the products.” Philip Morris also aims to establish itself as “part of the solution” and engage third-party allies (consumers, harm reduction advocates, scientific community) globally and locally, and “continue to engage with regulators globally”. Because it is unclear to many governments whether advertising, promotion and sponsorship restrictions apply to these products, tobacco companies have started marketing ENDS and novel tobacco products in a manner that undermines TAPS bans, causing misinformation and sowing public confusion. To prevent this, governments need to prepare to protect their policies from the tactics of the tobacco industry.

Countries must have a clear policy of rejecting any research and policies drafted or commissioned by the tobacco industry or those representing its interests. Governments should also require the tobacco industry to provide information on all its marketing activities, including for new products. The Guidelines for implementation of Article 13 of the

WHO FCTC provide guidance on comprehensive TAPS bans and, in the absence of a ban, provides guidance on the restrictions and the types of information that should be legally required from the tobacco industry at regular intervals (27). According to the Guidelines, these should include detailed information about:

- the type advertising, promotion or sponsorship, including its content, form and type of media;
- the placement and extent or frequency of the advertising, promotion or sponsorship;
- the identity of all entities involved in the advertising, promotion and sponsorship, including advertising and production companies;
- in the case of cross-border advertising, promotion or sponsorship originating from a Party's territory, the territory or territories in which it is intended to be, or may be, received;
- the amount of financial or other resources used for the advertising, promotion or sponsorship.

Recommendations

The Guidelines for implementation of Article 5.3 of the WHO FCTC provide clear ways to counter tobacco industry tactics. For instance, banning so-called CSR activities by the tobacco industry reduces the industry's opportunity to access policy-makers and potential "allies" or front groups. Requiring information from the tobacco industry, including its political contributions, helps to identify and expose its tactics. Furthermore, raising awareness about tobacco industry tactics helps to address the industry's interference in tobacco control policies. To prevent undue influence on policy-makers, governments should adopt a code of conduct that prescribes measures to avoid conflicts of interest and unnecessary interactions with the tobacco industry, as well as to ensure transparency of interactions that occur. Underpinning these measures is raising awareness about the nature of tobacco products themselves, and the true purpose of "socially responsible" activities performed by the tobacco industry.

Guidelines for implementation of Article 5.3 of the WHO FCTC

Recommendations

- 1. Raise awareness** about the addictive and harmful nature of tobacco products and about tobacco industry interference with Parties' tobacco control policies.
- Establish **measures to limit interactions** with the tobacco industry and **ensure the transparency** of those interactions that occur.
- 3. Reject partnerships** and non-binding or non-enforceable agreements with the tobacco industry.
- 4. Avoid conflicts of interest for government officials and employees.**
- 5. Require that information collected** from the tobacco industry **be transparent and accurate.**
- 6. Denormalize** and to the extent possible, regulate **activities described as "socially responsible"** by the tobacco industry, including but not limited to activities described as "corporate social responsibility".
- 7. Do not give privileged treatment to tobacco companies.**
- 8. Treat State-owned tobacco companies** in the same way as any other tobacco industry.

Enforcement

Parties should put in place enforcement mechanisms or, to the extent possible, use existing enforcement mechanisms to meet their obligations under Article 5.3 of the Convention and these guidelines.

Monitoring implementation of Article 5.3 and of the Guidelines

Nongovernmental organizations and other members of **civil society not affiliated with the tobacco industry could play an essential role** in monitoring the activities of the tobacco industry.

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