



STOPPING TOBACCO
ORGANIZATIONS & PRODUCTS

Concealing Decades of Smokescreens

A Briefing Paper on PMI's Unsmoke Campaign

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Stopping Tobacco Organizations and Products (STOP) is a global tobacco industry watchdog whose mission is to expose the tobacco industry strategies and tactics that undermine public health. STOP is funded by **Bloomberg Philanthropies** and is a partnership between **The Global Center for Good Governance in Tobacco Control, The Tobacco Control Research Group at the University of Bath, The Union** and **Vital Strategies**.

This brief was prepared for STOP by The Global Center for Good Governance in Tobacco Control (GGTC), Thammasat University, Thailand, with contributions from the Tobacco Control Research Group at the University of Bath and The Union. It was edited and published by Vital Strategies.

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BACKGROUND

On April 8, 2019, Philip Morris International (PMI) launched its most recent attempt to re-cast itself as a company that cares about health. “The Year of Unsmoke,” is a duplicitous marketing campaign. Its key message to consumers: “If you don’t smoke, don’t start. If you smoke, quit. If you don’t quit, change.”¹ Meanwhile, the company continues to make billions of dollars from cigarettes.

The Unsmoke campaign is targeted to the public, not just to stockholders, and complements the aggressive marketing of the tobacco company’s new (but still harmful) products.

On 21 May 2019, PMI launched “It’s Time to Unsmoke” at Wall Street’s Future of Everything annual event. The initiative calls for authorities and regulators to “have an open conversation and come up with a meaningful solution on how we can Unsmoke the world.”²

PMI, along with other tobacco transnationals, has been aggressively lobbying to introduce electronic nicotine delivery systems (ENDS) and heated tobacco products (HTPs) in various countries. PMI’s lead brand for HTP is IQOS, while its leading e-cigarette brand is Solaris. In September 2017, PMI announced its funding for the Foundation for a Smoke-Free World as part of the company’s corporate affairs strategy³ to shift from combustible cigarettes to its new, so-called “less harmful” product line.⁴ The self-professed “socially responsible” Unsmoke campaign⁵ is targeted to the public, not just to stockholders,⁶ and complements the aggressive marketing of the tobacco company’s new (but still harmful) products.⁷

The tobacco industry’s longstanding reputation for luring kids to smoking remains true in developing countries. Reports show that PMI’s cigarettes continue to be heavily marketed in ways that attract children⁸ and undermine public health policy. In the United States, Altria, which sells Philip Morris’ brands, invested heavily in Juul, a company⁹ that has been accused of using the tobacco industry playbook to market vaping to high school children and of being responsible for the teen vaping epidemic.¹⁰

The long-term safety of ENDS¹¹ and HTPs¹² remains unknown and the evidence on their effectiveness to induce quitting is mixed.¹³ However, there is strong evidence of teen experimentation with nicotine devices and subsequent addiction.^{14,15} One in five high school students in the U.S. currently uses e-cigarettes and the epidemic has skyrocketed in the course of five years.^{16,17} This demonstrates the vulnerability of school-age children to be lured into using these harmful devices. In response, the U.S. FDA announced in November 2018 additional steps to protect youth from flavored e-cigarettes (e.g., cherry, vanilla, crème, tropical, melon)—reported to have caused the rise in teenage use—by limiting their access to such products in certain retail locations and by enhancing age verification for products sold online.¹⁸ In addition, in September 2019, U.S. Health and Human Services Secretary Alex Azar announced that the government was prepared to ban flavored cigarettes in the emergence of a mysterious lung diseases linked to vaping, which sickened and killed several young people.¹⁹ Despite studies showing that secondhand emissions from vaping are harmful,²⁰ the industry has exploited definitional loopholes, made use of lobbying tactics, and leveraged pro e-cigarette advocacy networks to oppose inclusion of e-cigarettes in smoke-free laws during policy debates.²¹

The Unsmoke campaign: A Distraction From What Really Reduces Smoking

The message of PMI's Unsmoke campaign, "If you cannot quit, change," creates an impression that "changing" is as safe as quitting. It's not.

The tobacco industry is playing into the desire of smokers to quit in order to hook them into using ENDS/HTPs. As part of the tobacco companies' "corporate transformation" playbook, ENDS products are marketed as a valid public health solution,²² and ENDS' safety is contrasted with the well-known harms of cigarettes,²³ thus, creating an impression that ENDS are safe and that the tobacco industry is offering public health a way to eliminate harmful tobacco use.

Consistent with this marketing ploy, the message of PMI's Unsmoke campaign, "If you cannot quit, change" creates an impression that "changing" is as safe as quitting. While conveying "benefits," it fails to communicate the risks associated with the use of novel products, such as dual use,²⁴ increased addiction,²⁵ and the threat of developing pulmonary diseases, cardiovascular diseases, cancer and other diseases over the long term.²⁶

Despite the uncertainties about the societal impacts of ENDS and their long-term health effects, there is consensus that children should be protected from them.²⁷ Messages such as "Unsmoke," which suggest that ENDS are safe, could mislead the public into thinking that using vaping devices is safe and that the secondhand emissions are also safe. Even without this perception, mere passive exposure to the use of e-cigarettes already triggers strong smoking urges in young adults.²⁸ Particularly vulnerable to being misled are young people, who may have no knowledge of the public deception employed by the tobacco industry.

The option of "switching" also distracts the public from the tobacco industry's real intent, which is to make profits at the expense of people's health and lives.

The fresh focus on Unsmoke or the option of "switching" also distracts the public from the tobacco industry's real intent, which is to make profits,²⁹ and from the fact that the single most effective means of reducing smoking prevalence lies not with e-cigarettes or other novel tobacco products, but with the effective implementation of the measures outlined in the World Health Organization Framework Convention on Tobacco Control (WHO FCTC). Research has shown that tobacco control measures are most effective when they align with the WHO FCTC and its Guidelines, including strengthening smoke-free laws, restricting marketing, denouncing tobacco industry tactics, and making the industry accountable.

Significant tax increases serve as the most effective deterrent to smoking, especially for low-income people and where health care systems are strapped for resources,³⁰ and yet, tobacco companies like PMI continue to resist tax increases and to keep prices low while their products continue to be marketed in ways that appeal to children.³¹

Tobacco-related deaths are at 8 million annually; far more people are killed by tobacco than weapons, natural disasters, and road crashes combined.

TOBACCO CONTROL TREATY

Cigarettes are the only consumer product that, if used as intended, kill half of their consumers.³² Tobacco-related deaths are at 8 million annually; far more people are killed by tobacco than by weapons,³³ natural disasters,³⁴ and road crashes³⁵ combined. The global community's policy solution to the scourge is the WHO FCTC, a treaty ratified by 181 states³⁶ which lays out standards on smoke-free environments, smoking cessation, advertising bans, packaging, tobacco taxation, and tobacco industry liability.

An important provision of the treaty is Article 5.3, which requires the parties to protect public health measures from the commercial interests of the tobacco industry.³⁷ Article 5.3 Guidelines recommend that parties should: reject partnerships and avoid conflicts of interest with the tobacco industry; prevent the industry from interfering in the development and implementation of tobacco control policies; require it to provide information; de-normalize, and regulate activities it describes as "socially responsible"; and not to give it any privileges or benefits to run its business.³⁸

CONSENSUS ON EXCLUSION OF TOBACCO INDUSTRY

The treaty requires the tobacco industry to be strictly monitored, regulated, and held accountable with clear recommendations on how this can be done.³⁹ The public health community and WHO have already rejected the offers of partnership by PMI funded Foundation for a Smoke-Free World.⁴⁰ Public health experts point to the fact that for as long as the tobacco industry continues to sell its lethal products, it remains a vector for the world's largest health epidemic.⁴¹ In 2011, the United Nations General Assembly acknowledged the fundamental conflict of interest between the tobacco industry and public health.⁴²

TOBACCO INDUSTRY DECEPTION AND ADVERTISING BANS

Because of the tobacco industry's history of deceptive marketing practices, and false and misleading advertisements,⁴³ countries around the world have adopted stringent marketing restrictions for tobacco companies.⁴⁴ FCTC Article 13 obliges parties to ban all forms of tobacco marketing even at points of sale, and tobacco sponsorship, including the tobacco industry's so-called "corporate social responsibility" activities.⁴⁵

TOBACCO INDUSTRY COMPLICITY AND LIABILITY

WHO FCTC Article 19 calls for international cooperation and describes best practices in dealing with the tobacco industry's civil and criminal liability, including compensation.⁴⁶ Overall, civil suits for damages suffered by victims and their families are disproportionate to the damages caused and have varying results in different jurisdictions.^{47,48,49} For instance, Philip Morris, along with other tobacco companies, was implicated for being complicit in illicit trade in the European Union,⁵⁰ and PM affiliates were found guilty of misleading consumers with the use of "light" and "mild" descriptors under the U.S. Racketeer Influenced and Corrupt Organizations Act, known as RICO.⁵¹

The public health community and WHO have rejected PMI's offer for partnership recognizing that the tobacco industry remains a vector for the world's largest epidemic.

CONFLICT WITH SUSTAINABLE DEVELOPMENT GOALS

The marketing of lethal products is antithetical to development, hinders FCTC implementation, and hampers the attainment of the United Nations Sustainable Development Goals (UN SDGs). Implementation of the WHO FCTC is now embedded in the UN SDGs,⁵² as a key goal to ensuring healthy lives⁵³ as well as in accelerating achievement of SDGs for education, gender, labor, environment, agriculture/food, equity and justice, among others.⁵⁴ The United Nations Global Compact, which calls on companies to align with global commitments toward sustainability principles and partnerships in support of UN goals, announced the delisting of tobacco companies in line with its policy of excluding companies involved in certain high-risk sectors.⁵⁵

On its website, PMI makes it appear that it contributes to SDGs⁵⁶ despite the fact that its contribution is negligible compared with the damage it has caused to development. PMI, whose brands hold 14% of global cigarette market shares, has yet to take full responsibility for lives lost and damage to the environment; it is estimated that the world collects US\$270B in excise taxes and loses US\$1.4 trillion a year in health costs and productivity losses caused by cigarettes.⁵⁷

TOBACCO INDUSTRY MARKETING AND DECEPTION

“The messaging in Unsmoke could mislead the public into thinking that tobacco or nicotine devices are just as safe as quitting. Because color is a visual marketing element that communicates through associated meanings,⁵⁸ Unsmoke’s pointed use of yellow and black, coupled with its name, is designed to resemble a safety warning, similar to most health warnings - to dissuade consumers from combustible cigarettes and steer them to “safer” alternatives.

Unsmoke also serves as a marketing tool for IQOS and ENDS products. PMI’s white IQOS conveys an impression of being clean and fresh,⁵⁹ similar to the way its white pack of Marlboro Gold Lights cigarette conveys an impression of being less harmful than other cigarettes.⁶⁰ Even PMI’s own scientists recently pointed out that describing IQOS as a “less harm” product is inaccurate because PMI studies concluded that HTPs/IQOS produced less toxins, but that does not prove that HTP/IQOS is less harmful to health.⁶¹ Recent studies indicate that IQOS is no less harmful than conventional cigarettes.⁶² Furthermore, PMI’s own studies suggest that the introduction of IQOS could lead to adolescent and young non-users initiating tobacco use with IQOS.”⁶³

Marketing e-cigarettes as “safer” without warning about the risks of teen addiction and long-term harms can be compared to an era when the public was led to believe that “light” and “mild” cigarettes were safer and were a genuine alternative to quitting.^{64,65}

Unsmoke and similar campaigns could undermine tobacco advertising, promotion, and sponsorship bans that are in place in many countries. Governments need to prevent any misleading information directed to consumers, consistent with FCTC Article 13, and must be prepared to hold the tobacco industry accountable for harms caused by any misleading information. In accordance with Article 5.3 Guidelines, the so-called socially responsible activity of asking people to “switch” must be exposed as a tobacco industry tactic and be de-normalized.⁶⁶

PMI’s own scientists recently pointed out that describing IQOS as a “less harm” product is inaccurate because PMI’s studies concluded that HTPs such as IQOS produced less toxins, but that does not prove that they are less harmful to health.

On the one hand PMI claims that it wants to stop selling cigarettes and aims for a “smoke-free world,” but on the other, it continues to fight proven tobacco control policies to continue to sell cigarettes.

TARGETING OF CHILDREN, ESPECIALLY IN DEVELOPING COUNTRIES

Despite the tobacco industry’s insistence that it does not market to children, it has a long history of marketing to youth and of public deception for which it has yet to be held accountable. Internal documents show that the tobacco industry knew that over 90% of smokers started when they were young,⁶⁷ and targeted kids as replacements for the smokers who died from tobacco-related causes.⁶⁸ The tobacco industry’s “youth smoking prevention programs,” done as part of so-called corporate social responsibility, were “ineffective or serve(d) to promote smoking among youth.”⁶⁹ For example, Philip Morris’ “Think. Don’t Smoke,”⁷⁰ a youth anti-smoking campaign in the 1990s, was aimed, not at preventing youth smoking, but to harness “positive feelings” toward the tobacco industry.^{71,72}

Even today, in low- and middle-income countries such as Bangladesh, Indonesia, and the Philippines,^{73,74} cigarettes are advertised and sold near schools, cigarettes are sold in affordable single-stick or “kiddie” packs, and cigarette brands are displayed alongside sweets and candies.⁷⁵ The same pattern can be seen in the marketing of e-cigarettes and similar nicotine devices. Tobacco companies have been shown to targeted teens with candy- and fruit-flavored e-cigarette liquid.⁷⁶ In Southeast Asian countries, e-cigarettes were found to come in candy flavors, and displayed along with novelty products that attract youth.⁷⁷

On the one hand, PMI claims that it wants to stop selling cigarettes and aims for a “smoke-free world,”⁷⁸ but on the other, it continues to fight smoke-free and other tobacco control policies in order to continue to sell cigarettes.⁷⁹ For instance, in Indonesia, a country that has a high smoking prevalence among youth (20.3%), PMI recently launched a new brand of regular cigarettes.⁸⁰ In the Philippines, PMI sued a local government for enacting a pro-youth ordinance adopting a tobacco-free campus town,⁸¹ while in India, the PMI affiliate challenged pack warnings.⁸²

FOR DECADES, THE TOBACCO INDUSTRY HAS DECEIVED THE PUBLIC
FOR PURPOSES OF GAINING MORE PROFIT.

Tobacco Companies' Timeline of Public Deception

1950s

Harms of smoking

Concealed evidence that cigarettes cause cancer while marketing products as safe

1960s

Addictiveness of smoking and nicotine

Concealed evidence that cigarettes are highly addictive and in the 90s, swore under oath to deny it

1970s

Link of smoking to cancer

Spent enormous amount of resources on disinformation campaigns and propaganda to negate and deflect the science clearly linking smoking to cancer

1980s

Harms of secondhand smoke

Hired "independent" scientists to support industry studies and questioned smoke-free policies

1990s

Dangers of tobacco's youth smoking prevention campaigns

Aimed programs not at reducing youth smoking but at harnessing "positive feelings" for tobacco companies

2000s

Benefits of smoking "light" / "mild"

Misled the public that products are safer, used light/mild cigarettes to leverage on smokers' health concern to increase sales, and even designed new products that increase nicotine intake

2000s

Supporting WHO FCTC

Falsely claimed that it is supportive of the WHO FCTC but in its internal documents, called the measures compliant with FCTC as "extreme"

Recommendations

Governments' best defense against tobacco industry tactics is to undertake the evidence-based measures found in the WHO FCTC, with particular focus on strengthening smoke-free laws, enforcing marketing restrictions, denouncing tobacco industry tactics, and making the industry accountable.

01

Enforce Marketing Restrictions

Current marketing restrictions on tobacco can be applied to the Unsmoke campaign to prevent confusion among the public, especially youth. In places where there is no advertising ban, countries can prohibit PMI from all forms of advertising of its ENDS, including its "The Year of Unsmoke" campaign, on the basis that it is false, misleading or deceptive, or likely to create an erroneous impression about ENDS'/HTPs' characteristics, health effects, hazards or emissions.⁸³

02

Prevent Tobacco Industry Interference

Governments must take measures to warn government agencies and the public about tobacco industry tactics and to avoid partnerships being offered by the industry under the guise of "corporate transformation" and "Unsmoke," as these are all part of its so-called corporate social responsibility and marketing strategy. To facilitate monitoring and regulation, FCTC parties can require the industry to provide information on its marketing and corporate affairs strategy, including those to be carried out by third parties contracted on behalf of the industry or for its benefit.

Governments must be particularly wary of alternatives espoused by the tobacco industry, in accordance with the treaty obligation to protect health against the tobacco industry's commercial and vested interests. In any new transaction or product to be undertaken, presented or introduced by the tobacco industry or those working to further its interests, the government must determine if this is contrary to public policy or development, and make a comprehensive impact assessment.

03

Strengthen Enforcement of Smoke-Free Laws

Governments must resist the tobacco industry tactic of reversing or weakening smoke-free laws to allow public use of electronic tobacco products. Government must take the opportunity to adopt a gold standard for 100% smoke-free places and/or reinforce the message on the benefits of going 100% smoke-free while reminding the public that smoke-free covers bans on public use of vaping devices.

04

Increase Tobacco Taxes

Governments should use taxation as a key tool to lower smoking prevalence and reduce harms caused by traditional tobacco products, which remain the key public health concern. It is estimated that a 10% increase in cigarette price would decrease prevalence by 4% in high-income countries (HICs) and 5% in low- and middle-income countries (LMICs). In the Philippines, about a four-fold tobacco tax increase decreased smoking prevalence from 29.7% in 2009 to 23.8% in 2015.^{84,85}

Policy makers must avoid being distracted by the tobacco industry's so-called "corporate transformation" rhetoric which entails addressing harm, not by adopting evidence-based tobacco control measures, but by selling another harmful product.

The increase in revenues from tobacco taxes could serve to compensate for harms and to fund tobacco control advocacy which includes funding activities to counter the tobacco industry's continuing efforts to undermine tobacco control.

05

Make the Tobacco Industry Accountable

Governments must fast-track resolution of issues and take account of the work done in other jurisdictions as well as "appropriate international approaches" to liability. Tobacco products result in a net loss for the world economy.⁸⁶ The economic costs of tobacco are determinable and can be collected from the tobacco industry. It is estimated that the tobacco industry creates five times more societal costs than benefits.^{87,88}

While one aspect of accountability is to fully explore litigation to ensure that the tobacco industry pays for past harms, another is to ensure that it will be accountable for future harms. Global health norms require safety standards in consumer products; the presence of risk in nicotine delivery devices like ENDS/HTPs calls for stringent regulation, including product recalls, and other accountability measures under product liability regimes. Governments must consider public health policies to protect consumers against future harms resulting from the tobacco industry's products.

06

Tap Networks and Resources to Counter the Tobacco Industry

Governments can take the opportunity to tap the resources that will be made available under the Bloomberg Philanthropies Stopping Tobacco Organizations and Products (STOP) initiative and take action on reports on tobacco industry behavior that are made under the initiative. Among other resources, the initiative's international partners are committed to providing: online resources for customized profiles of the tobacco industry (Vital Strategies/The Union); investigative reports to expose tobacco industry tactics; an enhanced wiki of tobacco industry persons and strategies (University of Bath's tobaccotactics.org); and a global index of how governments are protected from or vulnerable to tobacco industry interference (Global Center for Good Governance in Tobacco Control's Tobacco Industry Interference Index).

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