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The 2018 public consultation on standardized packaging in Singapore: Analysis of policy actors' submissions

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After a public consultation in 2018, Singapore implemented standardized tobacco packaging as part of its portfolio of tobacco control policies in 2020, in compliance with Article 11 guidelines for implementing the World Health Organization Framework Convention on Tobacco Control. This study analyzed policy actors in opposition to standardized packaging in Singapore and their submissions to the public consultation. Policy actors were profiled, and their arguments were then coded and compared across submissions. Descriptive results were then summarized in a narrative synthesis. In total, 79 submissions were considered for final analysis that opposed plain packaging in Singapore. Thematic analysis shows that transnational tobacco companies and their subsidiaries in Singapore, along with a variety of policy actors opposed to the standardized packaging policy, have significant similarities in arguments, often with identical statements. Industry tactics included framing tobacco as a trade and investment issue; utilizing trade barriers, intellectual property, and investment rights; pursuing litigation or threat of litigation; mobilizing third-party support and citing policy failure. This study provides evidence that further contributes to the growing literature on commercial determinants of health particularly industry tactics and, in this case, where the tobacco industry and its local and global allies, utilize to counter evidence-based tobacco control measures.

KEYWORDS

standardized tobacco packaging, tobacco industry, Singapore, illicit trade, public consultation, commercial determinants of health

Introduction

The World Health Organization Framework Convention on Tobacco Control Guidelines for implementation of Article 11 encourages parties to the FCTC to consider standardized packaging by eliminating the effect of advertising or promotion on the packaging (WHO FCTC Conference of Parties, 2008). After Australia's success in defending its 2012 plain packaging law that was legally challenged by the tobacco industry, several countries followed suit, including France and the United Kingdom in 2017; New Zealand, Norway, and Ireland in 2018; Turkey and Thailand in 2019 and Singapore in 2020.

Singapore proposed to implement standardized tobacco packaging and launched a public consultation on the proposed measure in 2018 (Ministry of Health Singapore, 2018b). In February 2019, the Singapore Parliament passed the amendments to the Tobacco Act with the enabling regulations for standardized packaging to take effect after 1 year. On 1 July 2020, the Tobacco (Control of Advertisements and Sale) (Appearance, Packaging, and Labeling) Regulations 2019 was implemented after a 12-month transition since the standardized packaging regulations were announced in July 2019. The policy process leading to the announcement of the policy in July 2019 and enforcement in July 2020 is shown in Supplementary Figure 1. Buttressed by a public health goal to move toward a tobacco-free society, Singapore implemented strict tobacco control policies that have been lauded globally, from its high tobacco taxes, smoke-free environment measures, comprehensive ban on tobacco advertising, promotion, sponsorship, and display to its progressive raising of minimum legal age to 21 (Amul and Pang, 2018a). Singapore has already made substantive progress in reducing smoking prevalence from 18.3% in 1992 to 12% in 2017, the lowest in Southeast Asia (Amul and Pang, 2018b). The last decade, however, has shown stagnation in smoking rates, hovering between 12 and 14% (Amul and Pang, 2018a).

The tobacco industry has opposed plain packaging based on the key argument that it will increase the illicit tobacco trade (Lie et al., 2018; Crosbie et al., 2019; Gallagher et al., 2019). However, research evidence does not substantiate this argument (Joossens, 2012; Evans-Reeves et al., 2015; Scollo et al., 2015b; Haighton et al., 2017). Additionally, post-implementation studies in countries that have implemented plain packaging have shown that it has contributed to the reduction of smoking prevalence and facilitated the easier identification of illicit cigarettes from other countries (Brennan et al., 2015; Durkin et al., 2015; Scollo et al., 2015a; Wakefield et al., 2015). Moreover, analysis of the framing of the tobacco industry's public relations campaigns and public consultation submissions in various countries against plain packaging point to a strategic coordinated approach—with similarities in structure and content, lack of transparency, and quality of evidence—toward delaying the adoption of plain packaging (Hatchard et al., 2014; Evans-Reeves et al., 2015; Lie et al., 2018; MacKenzie et al., 2018). This analysis of policy actors' submissions to the public consultation on plain packaging in Singapore aims to contribute to this literature.

To examine the potential challenges from the tobacco industry to Singapore's implementation of standardized tobacco packaging in 2020, the study involves a systematic content analysis of documents submitted by policy actors to the 2018 public consultation process that Singapore's Ministry of Health conducted on its proposed plain packaging measures. It aims to answer the question: what strategies did the tobacco industry use to influence the policy on plain packaging in Singapore? The study contributes to strengthening the evidence base not only on

industry framing of plain packaging and illicit tobacco trade but also on industry interference in Southeast Asia, with a focus on the case of Singapore.

Materials and methods

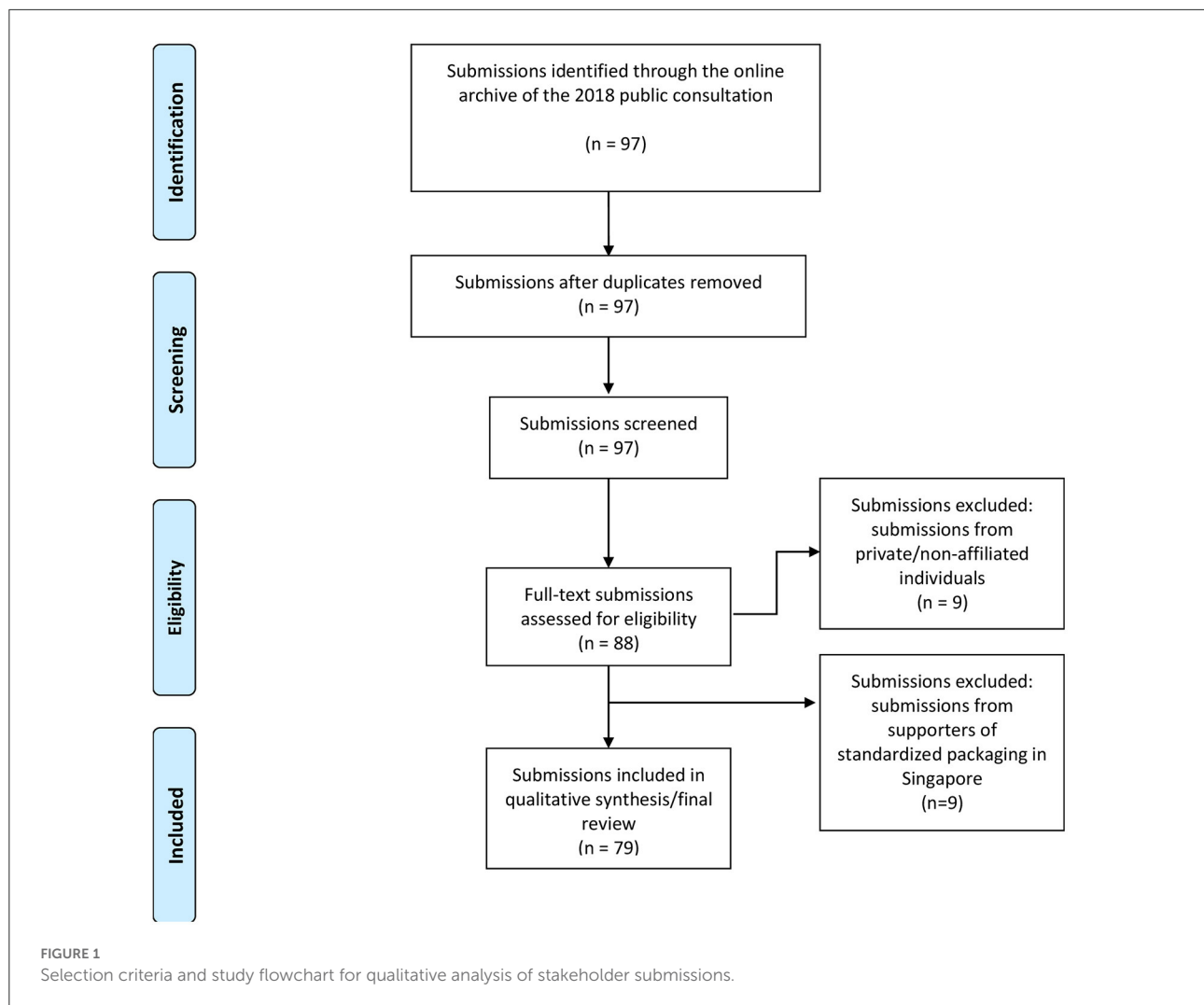
Inclusion and exclusion criteria

Submissions were reviewed according to a systematic screening process. Submissions were screened to only include submissions from policy actors (organizations and their representatives) and exclude submissions from private or non-affiliated individuals (see Figure 1). The submissions analyzed include only those that opposed plain packaging in Singapore. The policy actors were also grouped by their home country and classified by whether these countries have tobacco trade relations with Singapore. The policy actors were then mapped according to the type of entity: (1) whether it is a national or multilateral or civil society organization; and (2) whether it is tobacco industry-related or trade-related. This profiling of policy actors also included cross-checking with existing profiles of third-party lobby groups, astroturf groups, and front groups of the tobacco industry in the existing literature and on the University of Bath-Tobacco Control Research Group's TobaccoTactics.org website.

Thematic analysis

Arguments and policy recommendations were coded (deductive and inductive) and compared across submissions. The arguments that form the basis of the policy actor's position, as interpreted by the researcher, were then compiled, and analyzed according to four sets of known discursive (argument-based) and instrumental (action-based) strategies according to the policy dystopia model that inherently assumes that proposed policies are doomed to fail. These strategies include: framing tobacco—a health issue—as a trade and investment issue; utilizing trade barriers, intellectual property, and investment rights; pursuing litigation (or threat of litigation); and mobilizing third-party support (Crosbie et al., 2019). Other arguments identified through the policy dystopia model but cannot be categorized in the above four sets of tobacco industry strategies were also included in the thematic analysis using an inductive approach (Ulucanlar et al., 2016; Matthes et al., 2021).

The policy dystopia model offers a comparative framework with which to understand elements of the political power of corporations to influence public health policies. For this study, the model helps primarily to identify corporations' discursive power through ideas, norms and arguments (e.g., framing tobacco as a trade and investment issue, and utilizing trade barriers, intellectual property and investment



rights) that not only promote corporate interests (a narrative that proposed policies are undesirable by deeming them costly and by dismissing potential benefits) but also project that these interests are synonymous to the state's interests (Fuchs, 2007; Mikler, 2018; Matthes et al., 2021). Political communication, which includes corporations' submissions to public consultations on public health policies, leads to the increasing perception of corporations as legitimate political actors (Fuchs, 2007).

Additionally, the model also helps to identify corporations' instrumental power through lobbying strategies (e.g., the threat of litigation, and mobilizing third-party support) that support the construction and dissemination of its narratives to convince policymakers to proceed with policy action or inaction that favor corporations' interests (Fuchs, 2007; Matthes et al., 2021). Instrumental power primarily plays out in state-corporate relations which includes directed and strategic efforts to directly lobby and influence states (Mikler, 2018).

While the model emphasizes discursive and instrumental power, a missing element of the policy dystopia model is the structural power of corporations. Such power is exercised by corporations through capital mobility (movement of investments and employment opportunities) and more recently, through self-regulatory mechanisms and public-private partnerships (Fuchs, 2007).

While no intercoder reliability analysis was performed as the researcher is the only coder, the researcher compared the identified strategies with existing studies of tobacco industry strategies globally to ensure the validity of the results (Amul et al., 2021; Matthes et al., 2021). The researcher also benefited from feedback on the identified strategies from three subject matter experts on a working paper that this study is based on.

The descriptive results were then summarized in a narrative synthesis. All submissions included in this study are archived on the Singapore Ministry of Health's website and are publicly available (Ministry of Health Singapore, 2018a). Ethical approval

was not necessary for the study which included only publicly available secondary data for analysis.

Results

The policy process and online submissions to the public consultation

Singapore's Ministry of Health received 97 submissions in total from February to March 2018 and June 2018. Only seven policy actors responded to the second round of consultations in June 2018, six of which had original submissions to the first round of consultations from February to March 2018. In total, 82 unique policy actors responded to the public consultation process. After screening, 79 submissions were considered for final analysis (see [Figure 1](#)).

Local and international policy actors that opposed plain packaging in Singapore

About 16 (22%) of the 73 policy actors that opposed the policy are based in Singapore, including three major transnational tobacco companies and their subsidiaries in Singapore, particularly Philip Morris International, British American Tobacco, and Japan Tobacco International ([Japan Tobacco International, 2018](#)) (see [Supplementary Map](#)). Singapore is the sixth top exporter of cigarettes globally ([Food and Agriculture Organization, 2017a](#)).

Fifty-nine policy actors opposed to standardized packaging are from 22 countries that Singapore has tobacco trade relations with (see [Supplementary Table 1](#)). About 14 policy actors that challenged standardized packaging were from the top 20 tobacco-producing countries, particularly the Philippines, the US, Indonesia, and Italy ([Food and Agriculture Organization, 2018](#)). Nineteen policy actors were from the top 20 tobacco-exporting countries, including the Philippines, the US, Indonesia, Belgium, Italy, the Netherlands, and Bulgaria ([Food and Agriculture Organization, 2017b](#)). Seventeen policy actors were from the top 20 exporters (by quantity) of cigarettes globally, particularly Indonesia, the Netherlands, Russia, South Korea, Switzerland, Ukraine, and the US ([Food and Agriculture Organization, 2017b](#)). Consequently, all these countries have tobacco trade relations with Singapore (see [Supplementary Table 1](#)). The Dominican Republic, one of the four countries (along with Indonesia, Honduras, and Cuba) which disputed Australia's plain packaging to the WTO, was also represented in the public consultations. Belarus, despite having no tobacco trade relations with Singapore, had at least two policy actors that contributed to the public consultations.

Type of policy actors that opposed plain packaging of tobacco products in Singapore

The typology of tobacco industry-related and trade-related policy actors was further expanded to include various subtypes of policy actors that were involved in the public consultation process including (1) foreign government offices; (2) industry associations; (3) manufacturers' and exporters' associations; (4) retailers' associations; (5) intellectual property rights groups; (6) industry interest groups; (7) consumer interest groups; (8) academic institutions; (9) research organizations, and; (10) professional associations (see [Table 1](#)).

Of the 73 policy actors that opposed standardized packaging in Singapore ([Table 1](#) and [Supplementary Map](#)), only eighteen policy actors have previously been profiled in TobaccoTactics.org as third-party lobby groups, astroturf groups, and front groups of the tobacco industry, most of which are either funded by the tobacco industry or have ties to transnational tobacco companies as their listed members (see [Table 2](#)).

Policy actors' strategies to oppose plain packaging

Applying the classification of tobacco industry strategies against plain packaging by Crosbie et al., thematic analysis shows that transnational tobacco companies and their subsidiaries in Singapore, along with a variety of policy actors that submitted their opposition to the standardized packaging policy, have significant similarities in arguments, often with identical statements across different submissions ([Crosbie et al., 2019](#)). These rubber-stamped submissions often bear the same references, with signatories as the only difference across several submissions. [Figure 2](#) shows the breakdown of the number of policy actors citing identical arguments.

Framing tobacco as a trade and investment issue

As a strategy to exercise discursive power, framing tobacco as a trade and investment issue is one of the most common arguments from the policy actors that opposed Singapore's standardized packaging proposals. The most prominent was that plain packaging will increase illicit trade, particularly smuggling contraband tobacco products, bootlegging, and the proliferation of counterfeit tobacco products. Illicit trade was cited by 64 policy actors, with about 88% of all policy actors against plain packaging. [Figure 3](#) shows the various sectors and specific policy actors framing tobacco as an illicit trade issue.

TABLE 1 Policy actors opposed to standardized packaging in Singapore.

Type of policy actor	Name of policy actor (home country)
Foreign government: government institution/legislators	<ul style="list-style-type: none"> • Committee on Agriculture and Food, House of Representatives (Philippines) • Members of Congress (Philippines) • National Standardization of Indonesia (Indonesia) • Government of Indonesia, Directorate General of International Trade Negotiation • National Free Zones Council of the Dominican Republic (Dominican Republic)
Industry associations/chambers of commerce	<ul style="list-style-type: none"> • Singapore International Chamber of Commerce (Singapore) • Spanish Chamber of Commerce in the Dominican Republic (Dominican Republic) • International Chamber of Commerce Georgia (EU-Georgia Business Council) • International Chamber of Commerce Switzerland (Switzerland) • European Chamber of Commerce, Intellectual Property Rights Committee (Singapore) (2 submissions) • International Chamber of Commerce Malaysia (Malaysia) • International Chamber of Commerce, Business Action to Stop Counterfeiting and Piracy (France) • Malaysian International Chamber of Commerce and Industry (Malaysia)
Industry associations/business councils/business federations	<ul style="list-style-type: none"> • EU-ASEAN Business Council (Singapore) • EU-Georgia Business Council (Belgium/Georgia) • The Federation of Philippine Industries (Philippines) • Japan Business Federation (KEIDANREN) (Japan) • Association of European Businesses (Russia) • Economiesuisse (Switzerland) • Association of European Business (Belarus)
Manufacturers' associations/exporters' associations (external)	<ul style="list-style-type: none"> • Association RusBrand (Association of Branded Goods Manufacturers) (Russia) • Asociacion Dominicana de Exportadores Inc (ADOEXPO) (Dominican Republic)
Intellectual property rights groups (external)	<ul style="list-style-type: none"> • ASEAN Intellectual Property Association (Philippines) • ANDEMA (Spanish Trademarks Association) (Spain) • UNIFAB (Union des Fabricantes) (France) • Trade-related IPR Protection Association (TIPA) (South Korea) • International Trademark Association (US) (2 submissions) • Istituto di Centromarca per la lotta alla contraffazione (Bergonzi) (Italy) • Japan Intellectual Property Association (Japan) • Property Rights Alliance (US) • Romanian Scientific Association for Intellectual Property (The Romanian Scientific Association for Intellectual Property) • Association for Intellectual Property Protection (BelBrand) (Belarus)
Advocacy group/consumer interest groups (external)	<ul style="list-style-type: none"> • Hibernia Forum (Ireland) • Taxpayers Protection Alliance (US) (2 submissions) • Forest EU – Freedom Organization for the Right to Enjoy Smoking Tobacco in the European Union (Belgium) • Australian Taxpayers' Alliance/MyChoice Australia (Australia) • Ukrainian Economic Freedoms Foundation (Ukraine) • Consumer Choice Center (US)
National organization/retailer associations (external)	<ul style="list-style-type: none"> • European Travel Retail Confederation (Joossens, 2012) • Malaysia-Singapore Coffee Shop Proprietors General Association (Malaysia) • Australasian Association of Convenience Stores (Australia) • Spanish National Tobacco Retailers Association (Spain) • Federation of Sundry Goods Merchants Associations of Malaysia (Malaysia) • UK Tobacco Retailers Alliance (Joossens, 2012) (2 submissions) • Scottish Grocers' Federation (SGF) (Joossens, 2012) • Australian Retailers Association (Australia)

(Continued)

TABLE 1 (Continued)

Type of policy actor	Name of policy actor (home country)
Local organization/retailers/retailer associations	<ul style="list-style-type: none"> • Singapore Retailers Association (Singapore) • DFS Venture Singapore (Singapore) • Asia Pacific Travel Retail Association (Singapore)
Tobacco industry-related/licensed tobacco retailers (local)	<ul style="list-style-type: none"> • Group of licensed tobacco retailers (no formal association) (Singapore) • Group of licensed tobacco retailers (no formal association) (Singapore)
Aviation industry	<ul style="list-style-type: none"> • Changi Airport Group (Singapore)
Research organization (external)	<ul style="list-style-type: none"> • Minimal Government Thinkers (Philippines) • Institute of Economic Affairs (IEA) (Joossens, 2012) • Institute for Democracy and Economic Affairs (Malaysia) • Institute of Public Affairs (Australia) • Institute for Market Economics (Bulgaria)
Tobacco industry (local)	<ul style="list-style-type: none"> • Seng Lee Tobacco Factory (Singapore) • Japan Tobacco International (Singapore) (2 submissions) • Philip Morris Singapore Pte Ltd (Stanley Lai of Allen and Gledhill) (Singapore) • British American Tobacco Sales & Marketing Singapore Pte Ltd (Singapore) (2 submissions)
Tobacco industry (external)	<ul style="list-style-type: none"> • Japan Tobacco Inc (Japan)
Tobacco industry/tobacco manufacturers' associations (external)	<ul style="list-style-type: none"> • Mesa del Tabaco (Spain) • Adelta (Spanish National Manufacturers of Tobacco Products Association) (Spain) • Gabungan Produsen Rokok Putih Indonesia (Indonesian White Cigarette Manufacturers Association) (Indonesia) • PROCIGAR (Dominican Association of Cigar Manufacturers) (Dominican Republic)
Tobacco industry-related/packaging industry	<ul style="list-style-type: none"> • Amcor Specialty Cartons (of Amcor Group) (Singapore/Switzerland) • GD Machinery Southeast Asia Pte Ltd (a COEASIA company) (Singapore) • European Carton Makers Association (Netherlands) • Consumer Packaging Manufacturers Alliance (Joossens, 2012)
Tobacco industry-related/design/advertising agency	<ul style="list-style-type: none"> • Design Bridge (Singapore) • International Advertising Association (US)
Tobacco industry-related/non-profit organization	<ul style="list-style-type: none"> • Tobacco Institute of the Republic of China (Taiwan)

These policy actors cited reports of counterfeit plain packs in the UK and France, the increase of confiscated counterfeit tobacco, and the increasing proportion of illicit tobacco in Australia. The International Trademark Association, for example, noted that:

“Standardized packaging will benefit the trade in counterfeit products. By making packaging simple and uniform, the currently complex techniques of packaging will be cheaper to produce, lowering the barriers of entry for criminals to enter this market, while at the same time increasing profit margins for these actors (de Acedo, 2018b).”

Moreover, the International Chamber of Commerce's Business Action to Stop Counterfeiting and Piracy alludes to enforcement issues noting the burden on police and customs authorities in dealing with “a growing illicit market and other unintended

consequences” and citing that the authorities will have difficulty in differentiating illicit products from legal and duty-paid products (International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018). Similarly, the UK's Institute of Economic Affairs noted how plain packaging made “branded cigarettes only available on the illicit market” and lowered costs for counterfeiters (Institute of Economic Affairs, 2018). The US Taxpayers Protection Alliance also cited the Oxford Economics and ITIC's reports on increasing illicit tobacco trade in Singapore, despite the methodological issues of the report that have been flagged by tobacco control scholars and despite other sources reporting a decrease in Singapore's illicit tobacco trade (Williams, 2018a). The US Taxpayers Protection Alliance as well as the INDICAM (Italy) cited the KPMG study about the increase of illicit tobacco in Australia, noting that the “absence of branding removes numerous

TABLE 2 Policy actors profiled as third-party lobby groups, astroturf groups and front groups of the tobacco industry.

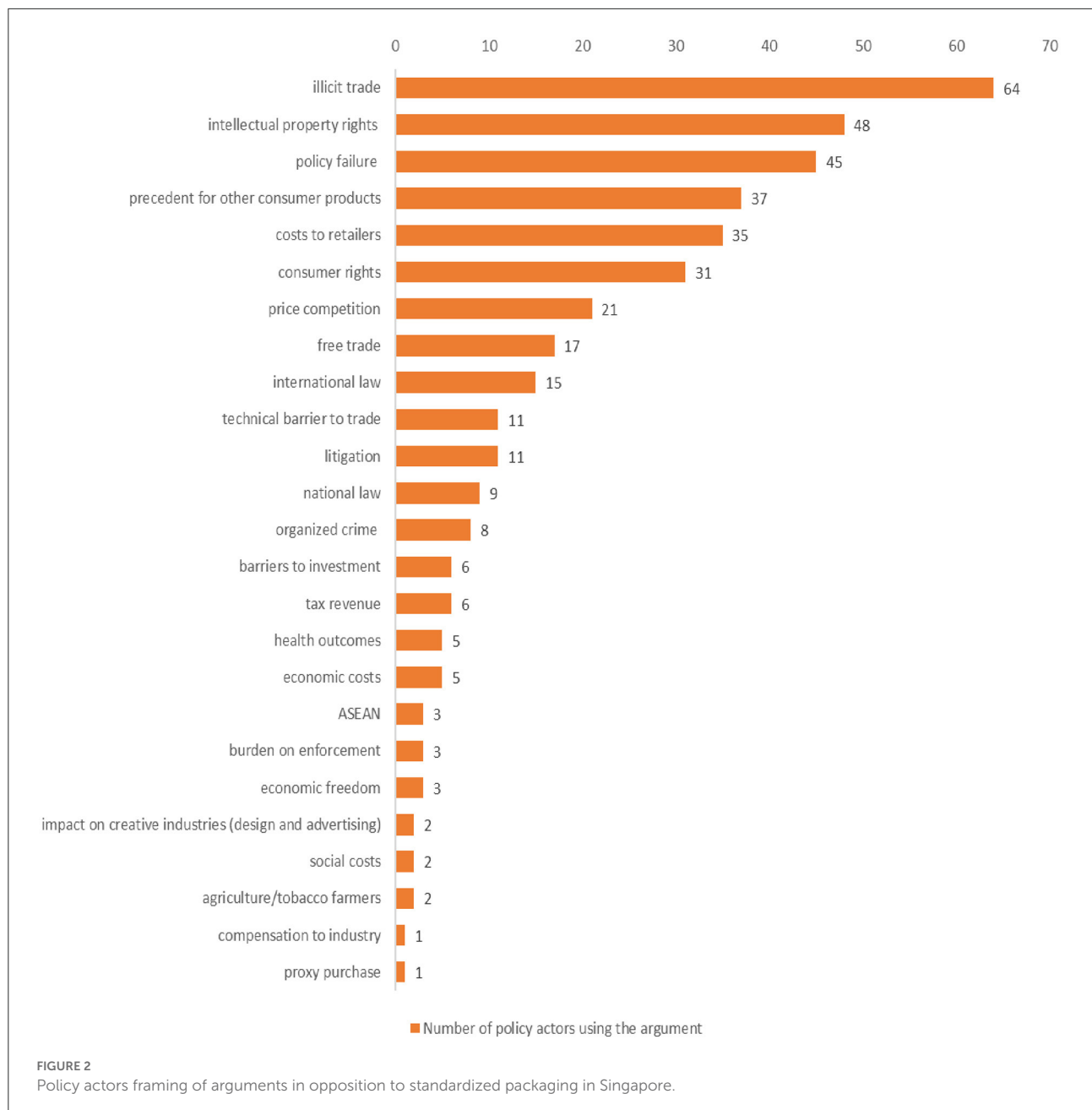
Type of policy actor	Name of policy actor
Tobacco industry-funded organization	Tobacco Institute of the Republic of China (Taiwan) (Eckhardt et al., 2017)
Industry associations	International Chamber of Commerce (Bialous and Corporate Accountability International, 2015)
Retailer associations	European Travel Retail Confederation (Joossens, 2012; Tobacco Control Research Group, 2020d)
Industry interest groups	Tobacco Retailers' Alliance (Joossens, 2012; Tobacco Control Research Group, 2020l)
	Scottish Grocers' Federation (Joossens, 2012; Tobacco Control Research Group, 2020k)
	International Trademark Association (US) (Bialous and Corporate Accountability International, 2015)
	Property Rights Alliance (US) (Tobacco Control Research Group, 2020j)
Consumer interest groups	UNIFAB (France) (Crosbie et al., 2019)
	BelBrand (Belarus) (Tobacco Control Research Group, 2020h)
	Taxpayers Protection Alliance (US) (Tobacco Control Research Group, 2020h)
	Australian Taxpayers' Alliance (Australia) (Tobacco Control Research Group, 2020h)
	Forest EU – Freedom Organization for the Right to Enjoy Smoking Tobacco in the European Union (Belgium) (Tobacco Control Research Group, 2020e)
Research organizations	Consumer Choice Center (US) (Tobacco Control Research Group, 2020a)
	Institute of Economic Affairs (Joossens, 2012; Tobacco Control Research Group, 2020f)
	Institute of Public Affairs (Australia) (Tobacco Control Research Group, 2020g)
Tobacco industry-related groups	Amcor (Singapore/Switzerland) (Tobacco Control Research Group, 2020i)
	European Carton Makers' Association (Netherlands) (Tobacco Control Research Group, 2020c)
	Consumer Packaging Manufacturers' Alliance (Joossens, 2012; Tobacco Control Research Group, 2020b)

protections in place to prevent counterfeiting and makes illicit products relatively less unattractive compared to legal products (Bergonzi, 2018; Williams, 2018a).” Additionally, Malaysia’s Institute for Democracy and Economic Affairs argued that plain packaging will lead to an increase in the consumption of illicit tobacco and “forces consumers to make uninformed decisions and forces them to enter the illicit black market in search of goods (Salman, 2018).” Furthermore, the International Advertising Association also claimed that Australia’s plain packaging facilitated counterfeits and bootlegging without any decrease in smoking rates (Szulce, 2018). The Australasian Association of Convenience Stores grossly exaggerated how the market for illicit tobacco has “spiraled out of control” and “coincided directly with the increase in the regulation governing the sale of legal tobacco products (Spanish National Tobacco Retailers Association, 2018).” This was also cited by Amcor Specialty Cartons, noting how plain packaging can lead to “misinformation of customers by removing the ability of consumers to authenticate and differentiate between legitimate and illicit tobacco products (Czubak, 2018).”

Six policy actors linked illicit trade to tax evasion and the “tax gap” from the related losses in government revenue from excise and customs duties due to price competition and down trading (Heng, 2018a; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018; Japan Tobacco, 2018; Japan Tobacco International, 2018; The

Romanian Scientifically Association for Intellectual Property, 2018; van Schaik, 2018; Zimmerman and Michael, 2018). For example, the UK Tobacco Retailers Alliance noted how plain packaging will “exacerbate the tax gap,” which they estimated to be at GBP 3.1 billion in lost revenue (Khonat, 2018a). Moreover, the Taxpayers Protection Alliance (US) cited AUD 1.5 billion in lost revenue due to illicit tobacco trade in Australia that they attributed to plain packaging measures (Williams, 2018a). Five policy actors—including the International Trademark Association, Consumer Choice Center, France’s Union des Fabricants (UNIFAB), and the Institute of Public Affairs further pointed out the economic costs of illicit trade mostly for governments and businesses (Davidson, 2018; de Acedo, 2018b; Roeder, 2018; Sarfati-Sobreira, 2018).

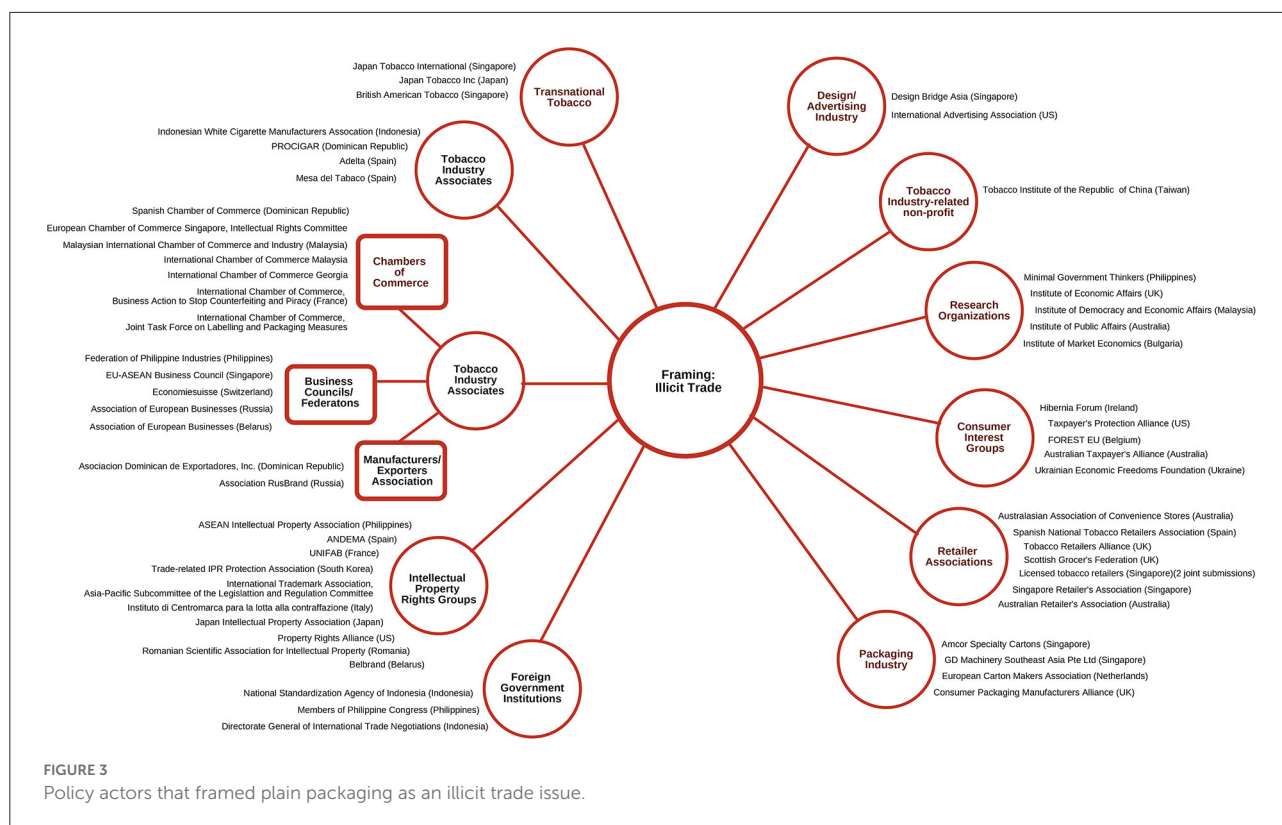
Eight policy actors—including Japan Tobacco, the European Chamber of Commerce in Singapore and the International Chamber of Commerce, and associations of licensed tobacco retailers in Singapore—linked illicit tobacco trade, purportedly fueled by plain packaging, with a growth in organized crime, including human trafficking, drug trafficking, money laundering, and terrorism financing (Hin et al., 2018; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018; Japan Tobacco International, 2018; Khonat, 2018a,b; Roeder, 2018; Seah, 2018a,b; Zimmerman and Michael, 2018). For example, the Taxpayers Protection Alliance (US) specifically highlighted smuggling as an issue, citing



the US State Department and US House of Representatives Homeland Security Committee Report on how illicit tobacco trade provides a source of financing for international terrorist networks, narcotics, and human trafficking (Williams, 2018a). At the local level, licensed tobacco retailers in Singapore also saw plain packaging as a “security threat” with the rise of gangs involved in smuggling cigarettes (Hin et al., 2018; Licensed Tobacco Retailers, 2018).

Moreover, six policy actors, particularly Japan Tobacco International and its parent company Japan Tobacco, the Japan Business Federation, the International Chamber of Commerce

Switzerland and the International Chamber of Commerce Joint Task Force on Labeling and Packaging Measures, BelBrand, the Association of Dominican Cigar Manufacturers (PROCIGAR) also framed plain packaging around Singapore’s investment potential, citing Singapore’s reduced appeal for investment and innovation, which in turn “undermine a country’s international reputation as a good place to do business (Gough, 2018; Hara, 2018; Japan Tobacco, 2018; Japan Tobacco International, 2018; Kelner, 2018; Pletscher, 2018; Taipov, 2018).” Citing reputational damage through alleged violations of investment rights is a known discursive strategy that has been used by



the tobacco industry and its coalition of allies to block plain packaging measures in other countries (Crosbie et al., 2019). It also alludes to the structural power of corporations with reference to the “ease of doing business index” where the World Bank ranks states according to the context for conducting business and is now being reformulated as the “business enabling environment.”

Thirty-four policy actors – including consumer groups like Consumer Choice Center, Ukrainian Economic Freedoms Foundation, Forest EU and various retailer associations like the Australasian Association of Convenience Stores, Malaysia-Singapore Coffee Shop Proprietors General Association, Spanish National Tobacco Retailers Association, Asia Pacific Travel Retail Association, and European Travel Retail Confederation exerted that standardized packaging negatively affects consumer rights and encroaches upon economic freedom with the deprivation of consumer choice and consumer protection, and increased consumer risks with the increase in illicit trade (Barrett, 2018; Mong, 2018; Périgois, 2018; Roeder, 2018; Rogut, 2018; Spanish National Tobacco Retailers Association, 2018; Spinks, 2018; Zablotzky, 2018).

However, such recommendations around strengthening measures to suppress illicit trade, while worthwhile in themselves, are not necessitated by vulnerabilities specifically created by adopting plain packaging measures, despite the

claims by the tobacco industry and its coalition of third-party groups of allies.

Despite tobacco being a health issue, only five policy actors – including the Tobacco Institute of the Republic of China (Taiwan), Amcor Specialty Cartons, Australasian Association of Convenience Stores, Scottish Grocers' Federation, and Minimal Government Thinkers (Philippines) – opposed to standardized packaging cited health inequalities, health outcomes, and the health risks from illicit tobacco trade (Czubak, 2018; Lee, 2018; Oplas, 2018; Rogut, 2018; The Tobacco Institute of the Republic of China, 2018). The ASEAN Intellectual Property Association even cited the UK Department of Health's findings that “tobacco smuggling exacerbates health inequalities and discourages younger smokers from quitting because of the cheaper price (ASEAN Intellectual Property Association, 2018).”

Utilizing trade barriers, intellectual property, and investment rights

Another discursive strategy that the tobacco industry has utilized is citing trade barriers, intellectual property rights, and investment rights in their arguments. Eleven policy actors – including members of the Philippine Congress, Indonesia's Directorate General of International Trade Negotiation, and various chambers of commerce, argued that plain packaging is

a technical trade barrier that is “more restrictive than necessary,” “excessive,” “unreasonable” and will negatively impact exports of tobacco-producing countries (de Acedo, 2018a,b; Duran, 2018; Heng, 2018a,b,c; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018; Moefitie, 2018; Pambagyo, 2018; Panganiban, 2018; Pletscher, 2018; Rodriguez et al., 2018; Sagala, 2018; Seah, 2018a,b). Seventeen policy actors – all international policy actors from Indonesia, Malaysia, the Philippines, Taiwan, South Korea, Spain, Switzerland, Russia, and Belarus – highlighted Singapore’s status as a supporter of free trade and how plain packaging negates free trade principles (Andreu, 2018; Arranza, 2018; Campos, 2018; Cheng, 2018; Karas, 2018; Katchkatchisvili, 2018; Minsch and Herzog, 2018; Nam-Ki, 2018; Ors, 2018; Pambagyo, 2018; Panganiban, 2018; Pletscher, 2018; Rodriguez et al., 2018; Sagala, 2018; Spanish National Tobacco Retailers Association, 2018; The Tobacco Institute of the Republic of China, 2018).

More importantly, 48 policy actors – about 66 per cent of the policy actors opposed to the measure – also argued that plain packaging constitutes a violation of intellectual property rights, particularly of trademarks and brands, claiming plain packaging’s inconsistency with international law and Singapore’s domestic laws (de Acedo, 2018a,b; Gough, 2018; Japan Tobacco, 2018; Montanari and Thompson, 2018; Pambagyo, 2018; Seah, 2018a; Szulce, 2018). This is in contrast with the World Intellectual Property Rights Organization’s response to British American Tobacco in 1994 that limiting trademarks under national law does not constitute a violation of the Paris Convention (Latham, 1994).

About fifteen policy actors from the tobacco industry, industry associations, intellectual property rights groups, foreign government agencies, and tobacco industry-related sectors (packaging) referred to the conflicts of plain packaging with Singapore’s bilateral trade agreements and bilateral investment treaties, the WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS), the Paris Convention for the Protection of Industrial Property, the General Agreement on Tariffs and Trade (GATT), and the Technical Barriers to Trade Agreement (TBT). At least nine policy actors – only one of which is based in Singapore, the European Chamber of Commerce – referred to Singapore’s domestic laws, including the Trademarks Act and Registered Designs Act (Seah, 2018a). Three policy actors from the Philippines and Indonesia referred to the issues that plain packaging would trigger for regional economic integration in ASEAN, regional frameworks like the ASEAN Framework Agreement on Intellectual Property Cooperation, and the Asia Pacific Economic Cooperation (APEC) (Pambagyo, 2018; Panganiban, 2018; Rodriguez et al., 2018).

The Property Rights Alliance (Montanari and Thompson, 2018) and Taxpayers Protection Alliance also cited Singapore’s ranking in the Intellectual Property Rights Index (which is also published by Property Rights Alliance) where Singapore was ranked seventh in the world and second in the region

(Williams, 2018a). Additionally, the International Chamber of Commerce and its various country offices argued how countries’ standardized packaging regulations will lead to the tobacco industry’s loss of “valuable” trademark rights that merit compensation to the industry (Cheng, 2018; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018; Katchkatchisvili, 2018; Pletscher, 2018).

Furthermore, 13 policy actors including profiled tobacco industry front groups also utilized the “slippery slope” or “policy spillover” argument, particularly how plain tobacco packaging will impact not only health but also trade policies and serve as a precedent for other “unhealthy” consumer products and other industries including “alcohol, meat, sugar-sweetened food, sugary beverages, salty food, junk food, fatty food, cereals, infant formula, cosmetics, clothing, and toys (Andreu, 2018; Arranza, 2018; ASEAN Intellectual Property Association, 2018; Baba, 2018; Bergonzi, 2018; Campos, 2018; de Acedo, 2018a; Delaney, 2018; Ganev, 2018; Hara, 2018; Heng, 2018b,c; Humphrey, 2018; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018; Katchkatchisvili, 2018; Meng, 2018; Minsch and Herzog, 2018; Montanari and Thompson, 2018; Nam-Ki, 2018; Oplas, 2018; Ors, 2018; Pambagyo, 2018; Páramo, 2018; Périgois, 2018; Pletscher, 2018; Popovichev, 2018; Roeder, 2018; Salman, 2018; Sano, 2018; Sarfati-Sobreira, 2018; Schauff, 2018; Seah, 2018a; Spanish National Tobacco Retailers Association, 2018; Szulce, 2018; Taipov, 2018; The Romanian Scientifically Association for Intellectual Property, 2018; Zablotsky, 2018; Zimmerman and Michael, 2018).

Pursuing litigation or threat of litigation

The threat of litigation can be considered as both a discursive and instrumental strategy in this context. For plain packaging measures, the threat of litigation was looming as there was litigation against Australia’s plain packaging measures at the time of the public consultation.

At least 11 policy actors, including known third-party lobby groups for the tobacco industry, alluded to litigation with reference to the recently settled appeal to the WTO Appellate Body on the dispute against Australia’s plain packaging. According to these policy actors, the then-pending appeal in 2018 warrants that Singapore delays the implementation of plain packaging until the WTO Appellate Body releases its report, conducts a hearing and decides on the appeal (Andreu, 2018; Arranza, 2018; Campos, 2018; Duran, 2018; Katchkatchisvili, 2018; Nam-Ki, 2018; Ors, 2018; Popovichev, 2018; Spanish National Tobacco Retailers Association, 2018; The Romanian Scientifically Association for Intellectual Property, 2018; The Tobacco Institute of the Republic of China, 2018). Several of these policy actors are from the Dominican Republic which challenged Australia’s plain packaging laws at the WTO.

Mobilizing third-party support

An instrumental strategy, building a coalition of third-party supporters or allies was vital for building the volume of submissions that Singapore received in the public consultation process for standardized packaging. Table 1 shows the number and types of policy actors opposed to standardized packaging, some of which have disclosed their ties to the tobacco industry along the tobacco supply chain – from tobacco-producing countries, manufacturing and packaging sectors, exporters, designers, and advertisers, to retailers. These interest groups, which mobilized to lobby against standardized packaging policies in Singapore, constitute a wide network of actors acting to reinforce not only their sectoral interests but also the interests of the tobacco industry (see Table 1 and Figure 3). These third parties echoed the majority of the tobacco industry's discursive framing strategies.

Tobacco farmers and manufacturers

Policy actors from tobacco-producing countries, including members of the legislature in the Philippines and government agencies in Indonesia—two of the top 20 tobacco-producing countries – cited standardized packaging's indirect impact on their tobacco farmers (Philippines) and those working in the supply chain industries for tobacco products (Pambagyo, 2018; Panganiban, 2018; Rodriguez et al., 2018; Sagala, 2018). The Dominican Republic's submission also centered on its dependence on the tobacco industry, particularly its tobacco farming and processing, and cigar manufacturing industry (Ors, 2018). Similarly, cigar manufacturers in the Dominican Republic highlighted that cigars are a luxury good and should be treated differently from cigarettes (Kelner, 2018). Notably, 10 policy actors, including manufacturers' associations and industry associations from Russia, Spain, the Philippines, Indonesia, an intellectual property rights group in South Korea, and the International Chamber of Commerce in Georgia submitted almost identical position papers with the primary argument that plain packaging does not work (Andreu, 2018; Arranza, 2018; Katchkatchisvili, 2018; Moeftie, 2018; Nam-Ki, 2018; Popovichev, 2018).

Retailers

Thirty-five policy actors, including industry associations and retailer associations, highlighted how plain packaging will increase costs, risks, and burden to retailers, including the display, labor and training costs, tobacco sales leakage (for duty-free retailers), and security risks to retailers (Hirst, 2018; Khonat, 2018a; Lee, 2018; Licensed Tobacco Retailers, 2018; Meng, 2018; Páramo, 2018; Spanish National Tobacco Retailers Association, 2018). Duty-free retailers, travel retail associations and even Singapore's Changi Airport Group also voiced their opposition to standardized packaging by framing their argument from the narrative of retailers, particularly duty-free retailers

and with specific reference to “tobacco sales leakage” to regional competitors (Changi Airport Group, 2018; Spinks, 2018).

Citing policy failure

Another major argument espoused by at least 45 policy actors against plain packaging is that it is essentially a policy failure in the countries where it has been implemented, citing post-implementation reviews, industry-commissioned reports, and industry-funded market research. A key assumption of the policy dystopia model, citing policy failure is included here as part of the tobacco industry's strategy and exercise of discursive power. According to these policy actors, these reports showed that there has been no decrease in smoking prevalence in Australia, France, and the UK after the implementation of plain packaging, despite evidence to the contrary. These policy actors –including transnational tobacco, various chambers of commerce, and business associations similarly highlighted that there is an increasing number of countries and industry associations rejecting plain packaging as a tobacco control measure (EU-Georgia Business Council, 2018; Gough, 2018; Heng, 2018b,c; Japan Tobacco, 2018; Japan Tobacco International, 2018; Karas, 2018; Katchkatchisvili, 2018; Minsch and Herzog, 2018; Moeftie, 2018; Schauff, 2018; Seah, 2018a).

Citing policy failure, fifteen policy actors proposed that Singapore should review its current tobacco control policies before considering the introduction of plain packaging and conduct a regulatory impact assessment of plain packaging. At least seventeen policy actors also proposed that instead of introducing plain packaging, Singapore should instead conduct public information/awareness campaigns and targeted education programs. Several policy actors recommended youth smoking prevention campaigns, including raising the minimum legal age, negative licensing schemes, imposing stiff penalties for sale to children (which are already being implemented in Singapore), and criminalizing “proxy” purchasing. Moreover, a number of these policy actors, including the tobacco industry, proposed that Singapore should consider implementing larger graphic health warnings only or allowing “minimum” trademarks but with larger graphic health warnings. Eight policy actors suggested that Singapore should delay consideration of plain packaging or delay implementation until the resolution of the trade dispute appeal against Australia at the World Trade Organization. Five policy actors, including British American Tobacco, the Taxpayers Protection Alliance, Australian Taxpayers Alliance, the Institute of Economic Affairs, and Forest EU proposed that Singapore should repeal its ban on electronic cigarettes and vapor products, and increase support for smoking cessation through harm reduction measures (Heng, 2018b,c; Institute of Economic Affairs, 2018; Marar and Andrews, 2018; Périgois, 2018; Williams, 2018a,b). At least five policy actors suggested the exemption of cigars,

other non-cigarette tobacco products, and duty-free tobacco products from standardized packaging. Three policy actors, including the ASEAN Intellectual Property Association, the International Chamber of Commerce, and the Consumer Packaging Manufacturers Alliance encouraged Singapore to engage in stakeholder participation and collaboration in the formulation of plain packaging measures (Joossens, 2012; ASEAN Intellectual Property Association, 2018; International Chamber of Commerce Business Action to Stop Counterfeiting Piracy, 2018).

Discussion

The findings in this study confirm and substantiate previous findings in the literature about the tobacco industry's discursive (framing or argument-based) and instrumental (action-based) strategies to counter plain packaging measures in public consultations globally (Evans-Reeves et al., 2015; Ulucanlar et al., 2016; Lie et al., 2018; MacKenzie et al., 2018; Crosbie et al., 2019; Hawkins et al., 2019). This study offers an additional case from Southeast Asia of how the tobacco industry and its network of associated interest groups – third-party lobby groups, astroturf groups, and front groups – are reusing similar frames of arguments to persuade countries to either delay the implementation of standardized packaging or to drop the policy entirely. This study corroborates previous findings that this network of policy actors supports the position of the tobacco industry by framing plain packaging through trade and investment, particularly illicit trade, intellectual property rights, international and domestic law, the threat of litigation, and the slippery slope argument that plain packaged tobacco will serve as the precedent for plain packaging of other unhealthy consumer products (Evans-Reeves et al., 2015; Lie et al., 2018; MacKenzie et al., 2018; Crosbie et al., 2019). It also contributes to the discourse on policy dystopia or “policy failure” metanarrative built by the tobacco industry to convince and persuade policymakers to adopt the industry's preferred policies over evidence-based public health measures (Ulucanlar et al., 2016). Contrary to the arguments posited by the policy failure metanarrative, there was no evidence of an increase in the use of illicit tobacco, or impact on retailers and small businesses in countries where standardized packaging was implemented (Wesselingh, 2018).

The resolution of the WTO dispute against Australia's plain packaging offers concrete evidence that the plain packaging of tobacco products is a pragmatic tobacco control measure and justifiable public health agenda. Even with Australia's victory against the appeal to the WTO resolution, this points to the challenge that countries like Singapore that are implementing plain packaging, and other countries considering the implementation of plain packaging, still need to prepare for possible interference (if not litigation) to delay,

amend, or weaken plain packaging measures at the local, regional, bilateral, and multilateral levels. As the case of Australia shows, transnational tobacco corporations with their resources can profusely engage in “forum shopping,” which includes institutional trade and investment regimes such as the WTO Dispute Settlement System and Investor-State Dispute Settlement Mechanisms within bilateral investment treaties to challenge domestic policies (Eckhardt et al., 2016; Hawkins and Holden, 2016).

In the case of Singapore, the sheer number of policy actors that opposed and tried to influence the timeline of Singapore's standardized packaging proposal, compared to those supporting the policy, is stark. As noted above, this strategy of mobilizing third-party groups has already been documented in the literature on tobacco industry interference. The results of the policy process seem to show that the 1-year transition was a generous compromise given by the Singapore government to provide tobacco manufacturers, wholesalers, and retailers time to prepare for the full implementation of the standardized packaging measure. This is relatively a long timeline since Singapore has been considering plain packaging measures since 2015 and included it in wider public consultations on potential tobacco control measures in 2016. Several of the policy actors involved in the 2018 public consultations even attached copies of their submissions to the 2016 public consultations, which formed the basis of their 2018 submission or simple reiterations of those submissions. However, it is encouraging for countries in the region that while Singapore received this barrage of submissions from the tobacco industry and its allies – albeit flawed and often identical – nonetheless proceeded to implement standardized packaging.

It is also interesting to note that the number and types of organizations that oppose tobacco control measures are becoming more diverse. The emergence of new policy actors trying to influence tobacco control policy outside of their sectors and geographic limits can also point to the alliance-building process that the tobacco industry continues to engage in, essentially building a coalition to support its strategies (Matthes et al., 2021). This lends support to the argument in the literature about the political power of corporations, such that the power of the global corporate sector – in this case, the tobacco industry and its network – rests on what Freudenberg termed the “corporate consumption complex” and was described by May as “the work of a complex and extensive network of agents all in their interests seeking to further and reinforce elements of the agendas that favor corporations” which includes financial institutions, trade associations, advertising, public relations firms, law firms, lobbying groups, think tanks and research organizations, astroturf citizen groups, and media platforms (May, 2015; Freudenberg, 2016). This points to the challenge of increased civil society-led monitoring of tobacco industry tactics, including their use of front groups and third parties, and other sectors to lobby against plain packaging measures not only

on tobacco but also on other harmful consumer products, and against other evidence-based public health policies. The history of tobacco industry interference in the region has been widely documented (Amul et al., 2021).

Limitations of the study

A limitation of this study is the lack of access to previous public consultations on standardized tobacco packaging in Singapore. The results of the 2016 public consultations are not publicly available and could not be included in this study for analysis and comparison. While some of the policy actors – particularly transnational tobacco companies – participated in the 2016 public consultation and attached their previous submissions to their 2018 submissions, the author does not have access to the rest of the public consultation submissions from 2016. Due to limited space, this study did not include policy actors' submissions supporting standardized packaging in Singapore (see [Supplementary Table 2](#) and [Supplementary Note](#)).

Conclusions

Identifying the strategies with which corporations, particularly that of the tobacco industry and its allies, exercise their instrumental and discursive power contributes to the increasing literature on the politics of commercial determinants of health. With the tobacco industry's history of political strategies in obstructing and interfering in public health and given that illicit trade remains an argument of the tobacco industry, Singapore needs to be vigilant and stringent in the enforcement of tobacco control measures, and more specifically to prevent and control the illicit tobacco trade in Singapore. This becomes more critical since the tobacco industry uses think tanks and research organizations to overestimate illicit tobacco trade, influence the debate over illicit tobacco trade, and undermine the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products with an industry-developed track and trace system (Evans-Reeves et al., 2015; Gilmore et al., 2015, 2019; Gallagher et al., 2019). The next possible step it can take is, to begin with, a comprehensive evaluation of Singapore's current policies to prevent illicit tobacco trade and consider accession to the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products. As of this writing, there are 65 parties to the Protocol. While none of the ASEAN member states has ratified the Protocol, Singapore can serve as a regional leader in reinforcing measures to control the illicit tobacco trade in the region.

Four critical challenges remain for Singapore in controlling the illicit tobacco trade. First, it needs to prepare for claims from the tobacco industry that standardized packaging is a policy failure and that it contributed to illicit trade. Second, Singapore

should continue to cooperate and share information about the tobacco industry's tactics and its complex network of lobby groups, front groups, and astroturf groups. Third, Singapore needs to continuously monitor the size of illicit trade (beyond seizure statistics) and generate an independent estimate of the size of the problem. Last but not the least, Singapore needs to strictly enforce its current policies to control illicit tobacco trade, but at the same time gradually consider its accession to the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products.

On a global level, parties to the WHO FCTC that are implementing standardized tobacco packaging and other evidence-based tobacco control measures – including high-income and especially low- and middle-income countries – that are considering the implementation of plain packaging, still need to prepare for industry tactics to delay, amend, or weaken other tobacco control measures. Parties to the WHO FCTC should also consider acceding to the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products to contribute to global tobacco control efforts. Policymakers need to recognize tobacco industry tactics that can also be utilized by other health harmful industries (alcohol, sugary beverages) against other evidence-based public health policies.

Civil society organizations and public health advocates, especially those seeking corporate accountability, can utilize the results of this research to counter tobacco industry arguments against plain packaging measures, not only in low- and middle-income countries in the Southeast Asian region but also, globally. Researchers, investigative journalists, and civil society organizations alike can also support policymakers and the public in exposing, identifying, and monitoring policy actors from other health harmful industries (alcohol, sugary beverages) and raising public awareness of the tactics utilized by these industries to prevent effective evidence-based health policies from being proposed or implemented.

Data availability statement

Publicly available datasets were analyzed in this study. This data can be found at: <https://www.moh.gov.sg/proposed-tobacco-control-measures>.

Author contributions

GA conceptualized and designed the study, compiled, analyzed the data, prepared, revised, finalized the manuscript, and is accountable for the content of this article.

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Conflict of interest

The author declares that the research was conducted in the absence of any commercial or financial relationships

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that could be construed as a potential conflict of interest.

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Supplementary material

The Supplementary Material for this article can be found online at: <https://www.frontiersin.org/articles/10.3389/fpos.2022.943120/full#supplementary-material>

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