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1 **Understanding the long-term policy**  
2 **influence strategies of the tobacco industry:**  
3 **two contemporary case studies**

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16

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18

19 **Abstract:**

20 **Objective** This paper explores trans-national tobacco companies' (TTCs) long-term policy  
21 influence strategies using two case studies, harm reduction and illicit tobacco, to identify  
22 lessons for the tobacco control movement and wider efforts to address the commercial  
23 determinants of health.

24 **Methods** Evidence from a broad combination of sources including leaked documents and  
25 findings from over two decades of TTC monitoring were reviewed for each case study and  
26 categorised using the Policy Dystopia Model, focusing on the primary discursive strategy and  
27 key instrumental (action-based) strategies used.

28 **Results** In both case studies TTCs seek to advance their interests by engaging primarily in  
29 reputation management, coalition management and information management strategies over  
30 the long-term to propagate their over-riding discursive strategy –“we've changed, we are part  
31 of the solution” - despite clear evidence from both case studies that this is not the case. These  
32 strategies are globally coordinated and attempt primarily to reshape norms towards TTC  
33 involvement in tobacco control policy and delivery. Findings also suggest that industry  
34 denormalisation and the advent of Article 5.3 have led to the TTCs growing use of  
35 increasingly complex and opaque 'webs of influence'.

36 **Conclusions** The tobacco control community must develop its own pro-active long-term  
37 strategies which should include industry denormalisation, new ways to fund research that  
38 reduce industry control, and improved transparency measures for research and policy. The  
39 findings, including TTC adaptations to Article 5.3, also indicate the need for more structural  
40 solutions, addressing corporate power and the underlying political and economic system.  
41 These lessons can be applied to other unhealthy commodity industries.

42

43 **What this paper adds:**

- 44 • To date most literature on tobacco industry policy influence focuses on the TTC's  
45 reactive efforts to oppose tobacco control policy, but TTCs also engage in long-term,  
46 proactive policy influence strategies to promote their corporate interests and goals.  
47 This paper sought to examine TTCs long-term influence strategies using two case  
48 studies.
- 49 • In both case studies we found the industry draws on its immense material and  
50 ideational power to commission and publish misleading evidence, reports,  
51 advertorials and other outputs that serve its interests (information management), to  
52 establish and fund organisations that promote the industry's messaging while often  
53 purporting to be independent or are meant to hold industry to account (coalition  
54 management), and to host events and secure media coverage that promote its  
55 messaging to key audiences (reputation management).
- 56 • These long-term strategies serve to redefine key concepts and dominant narratives,  
57 reframe the parameters of debate and reshape norms to the TI. Collectively they serve  
58 to position the tobacco industry as part of the solution to tobacco control and tobacco  
59 smuggling, to create confusion and division, and to undermine Article 5.3.
- 60 • These actions are globally coordinated and set the stage on which national policies are  
61 negotiated, thereby widely stymying progress.
- 62 • The tobacco control community needs to pay greater attention to these efforts.  
63 Countering them will require a global focus which must include awareness raising and  
64 tobacco industry denormalisation, new ways to fund research, better requirements for  
65 transparency in research and policy, and innovative research to identify industry third  
66 parties. Above all, these ongoing problems despite decades of progress in tobacco  
67 control should serve as a lesson for efforts to address the commercial determinants of  
68 health and indicate the need for structural solutions to address corporate power.

69  
70

71 **Introduction**

72 Thirty years of research and analysis in *Tobacco Control* provide the opportunity to step back  
73 and critically appraise the advances made in understanding and addressing the tobacco  
74 industry as the primary vector of the global tobacco epidemic.<sup>1 2</sup> This is particularly timely  
75 given that, responding to the success of tobacco control activities, trans-national tobacco  
76 companies (TTCs) are redoubling their aggression and remain a crucial barrier to further  
77 progress (Box 1).<sup>3-6</sup> Perhaps as a result, declines in smoking prevalence appear to be stalling  
78 and most countries have not had sufficient decreases to offset population growth,<sup>7</sup> resulting in  
79 all-time high of 1.1 billion smokers in 2019, over three-quarters of whom live in low- and  
80 middle-income countries (LMICs).<sup>5 7</sup>

81  
82 Great advances have been made in understanding the TTCs short-term *reactive* corporate  
83 political activity (CPA) to prevent, delay or divert tobacco control policies,<sup>8</sup> with the  
84 accumulation of thousands of case studies enabling a sophisticated understanding of these  
85 tactics.<sup>9-11</sup> These insights have been operationalised to good effect in protecting and  
86 advancing diverse policies across multiple jurisdictional levels.<sup>9 10 12 13</sup> There has, however,  
87 been comparatively little work on the *proactive* long-term policy influence strategies, despite  
88 leaked documents showing TTCs plan for the long term.<sup>14-16</sup> There is, therefore, an urgent  
89 need address this gap.

90  
91 This paper aims to explore the TTCs long-term influence strategies using two case studies:  
92 harm reduction and the illicit tobacco trade, two key policy areas in which TTCs have a long  
93 history of engagement and have in recent years redoubled their influence efforts. In this way  
94 we aim to identify lessons for the tobacco control movement and the commercial  
95 determinants of health more broadly.

96

**Box 1 : Background: the existential threat driving TTCs strategies**

TTCs business models involve manufacturing tobacco products at a very low cost and maintaining their sale at relatively high prices, resulting in massive profit margins. In 2020, Philip Morris International's (PMI) profit margin was 40.8%, British American Tobacco's (BAT) was 38.6%, Japan Tobacco International's (JTI) was 22.4% and Imperial Brands' was 41.2%, with combined profits of just under 33 bn USD.<sup>17 18</sup> These margins enable both huge reinvestment, for example in marketing or lobbying budgets, and the promise of ever increasing shareholder dividends. However, as a result of advances in tobacco control, cigarette sales have been falling since 2013.<sup>5 6</sup> TTCs were initially able to maintain and even increase profits by exploiting their market power and overshifting taxes such that their price increases more than offset the decline in cigarette sales volumes.<sup>6</sup> However, more recently, continued tax increases and implementation of tobacco control measures appear to have precipitated a tipping point where declining sales are no longer offset by over-shifting, and profitability is falling.<sup>16 19 20</sup>

This fundamental, existential threat for TTCs has driven: aggressive responses to prevent rises in tobacco taxes around the world; involvement in tobacco smuggling as a means of tax avoidance (discussed in Case Study 2); undermining the impact of tax increases on consumption and prevalence;<sup>20 21</sup> and heavy investment in 'product innovation' in heated tobacco products (HTPs) and e-cigarettes. This investment arguably provides the best opportunity to replicate the oligopoly control they benefit from in the cigarette market and, if they remain untaxed or taxed at low level, provides a new route to profits whilst also allowing them to attempt a hostile takeover of the harm reduction narrative (discussed in Case Study 1);<sup>16 22 23</sup>

98

99 **Methods**

100 We selected harm reduction and illicit tobacco as our two case studies. We drew on multiple  
 101 sources of evidence including previous research, recently leaked TTC documents and  
 102 material obtained through established routine monitoring of TTC activities. The latter  
 103 involves established Google alerts on all TTCs and on key areas of their activity and brands,  
 104 regular searches of tobacco industry and retail journals and information provided from a wide  
 105 network of informants.

106

107 We analysed these sources to identify industry strategies which we categorised using the  
108 Policy Dystopia Model (PDM) as our conceptual framework. The PDM is an evidence-based  
109 taxonomy of tobacco industry political activity derived from systematic reviews of industry  
110 influence on policy.<sup>10</sup> The PDM has been shown to capture key elements of TTC influence  
111 strategies in a range of settings, dividing these into discursive (argument-based) and  
112 instrumental (action-based) strategies (see online supplemental tables 1 and 2). Whilst the  
113 PDM defines illicit trade as an instrumental strategy, here we focus on the TTC's narrative  
114 around illicit trade.<sup>23-25</sup> We sought to identify the primary discursive and key instrumental  
115 strategies that best captured the long-term influence strategies in both case studies.  
116 Triangulation, prolonged engagement, persistent observation and discussion among authors  
117 were used to test the validity of our findings.<sup>26 27</sup>

118

### 119 **CASE STUDY 1: TTCs use of harm reduction as a long-term 'pathway to profit'** 120 **strategy (1950s-2021)**

121

122 Since the 1950s when the links between smoking and lung cancer became known,<sup>28</sup> TTCs  
123 have attempted to ward off the denormalisation of the industry and threats to their cigarette  
124 sales by professing a commitment to harm reduction, and actions such as introducing  
125 cigarette filters (1950s), 'light' cigarettes (1970s), and investing in smokeless tobacco options  
126 such as snus and nicotine pouches (2000s). These actions were supported by broader  
127 communication strategies and activities (Table 1).<sup>29-33</sup> Now, TTCs have once again returned  
128 to harm reduction. Seen with the context of previous actions this is most likely the latest  
129 manifestation of the long term strategy of seeking to rebuild credibility to secure policy  
130 influence and boost declining sales and profits.<sup>34</sup>

131

132 Whilst recognising that other TTCs have developed similar 'transformational' narratives,<sup>35-38</sup>  
133 in this case study we focus on PMI.<sup>34</sup> PMI has led the latest iteration of this historic tactic and  
134 recently leaked documents give a unique insight into its long term strategies around harm  
135 reduction.<sup>16 34</sup> Our analysis identified PMI's utilisation of three main and inter-linked  
136 instrumental strategies – reputation management, information management, and coalition  
137 management – to convince the world of its commitment to harm reduction both historically  
138 (Table 1) and currently. Below we consider each in turn.

139

140 **Table 1: Timeline of key political activity in harm reduction involving the company**  
141 **currently known as Philip Morris International (including when working alongside**  
142 **other TTCs).**

Date	Action	Instrumental strategy
1953	Philip Morris- funded Tobacco Industry Research Committee (TIRC) launched. TIRC promises to provide “aid and assistance to the research effort into all phases of tobacco use and health”, <sup>39</sup> but was in practice first of a string of organisations created for PR purposes, “to convince the public that the hazards of smoking had not been proven.” <sup>40</sup>	IM
1958	Tobacco Institute launched as a tobacco industry tool for political lobbying following the concern among company CEOs that TIRC is not responding vigorously enough to the “attacks” on their products. <sup>41</sup>	IM
1972	Tobacco Institute VP of Public Relations calls for proffering new explanations for ill health among smokers, including heredity and stress. <sup>42</sup>	IM
1988	Philip Morris- funded Center for Indoor Air Research launched. In 2003 the US Department of Justice states in court documents that the CIAR acted as a coordinating organization for the tobacco industry’s “efforts to fraudulently mislead the American public about the health effects of environmental tobacco smoke exposure.” <sup>43</sup>	IM
1994	Industry executives testify before US Congress that nicotine is not addictive despite having evidence it was since the 1960s. <sup>41</sup>	RM, IM
1995	Philip Morris initiates Project Sunrise to form relationships with ‘moderate’ TC groups. <sup>44</sup>	CM
By 2000	Several major tobacco companies acknowledge on their websites that smoking can be addictive and harmful, presenting their carefully worded statements to suggest higher standards of corporate responsibility. <sup>45</sup>	RM
2000s	PMI starts to fund diverse media groups and attempts to participate in world events, including the World Economic Forum and G20 summit. <sup>46</sup>	CM, RM
2010s	TTCs launch own e-cigarette brands or acquire existing producers. <sup>16 47</sup>	RM, CM
2014	PMI sets out to establish the legitimacy of tobacco companies to be a part of the regulatory debate on RRP [reduced risk products] [‘part of solution’]. <sup>48</sup>	IM, CM
2017	PMI launches Foundation for a Smoke-Free World. <sup>16</sup>	IM, CM
2018	PMI announces its goal is to achieve a ‘smoke-free future’. <sup>16</sup>	RM
2019	PMI offers 1 billion pounds to NHS as part of its ‘tobacco transition fund’ in exchange for the lifting of restrictions on advertising and marketing of IQOS and e-cigarettes. <sup>49</sup>	CM



2019-21	PMI publishes ‘White Papers’ on public health science and trust and holds events on public trust in science in conjunction with Industry Transformation Coalition. <sup>46 50-52</sup>	IM, RM, CM
---------	--	------------

143 This timeline presents a sample of key developments and does not aim to be comprehensive. RM: Reputation  
 144 Management; IM: Information Management; CM: Coalition Management. VP: Vice-President; TC: Tobacco  
 145 Control; PMI: Philip Morris International; US: United States.

146

147 **Reputation Management**

148 In 2018, PMI announced it was ‘giving up cigarettes’ as part of a slew of transformation  
 149 rhetoric around its supposed reincarnation into a disruptive technology company.<sup>53</sup> PMI  
 150 pledged to ‘unsmoke’ the world by promoting a ‘switch’ to its heated tobacco product,  
 151 IQOS,<sup>54 55</sup> despite simultaneously claiming that HTPs are not intended to help quitting,<sup>56</sup> and  
 152 a lack of independent evidence that they reduce health harms compared with cigarettes.<sup>57</sup>  
 153 Furthermore, the true motivation appears to be maximise sales and profits rather than to  
 154 improve population health. Evidence for this includes the high price (and even greater  
 155 profitability relative to cigarettes) of IQOS and PMI’s targeting of IQOS mostly at high  
 156 income countries with relatively strong tobacco control policies (i.e. where smoking was  
 157 already declining), while continuing to invest in and market cigarettes elsewhere.<sup>16 58</sup>

158

159 Leaked documents from 2014 reveal PMI’s long-term strategy to appropriate harm reduction  
 160 to renormalise its image as a ‘*trusted and indispensable partner, leading its sector and*  
 161 *bringing solutions to the table.*’<sup>34 59</sup> Using the guise of transformation, PMI has harnessed the  
 162 media and piggybacked on global platforms such as the World Economic Forum, G20  
 163 summit, and UN (United Nations) General Assembly, to give the impression that it is a  
 164 trusted partner of the global political and public health communities.<sup>16 60-63</sup> At a national  
 165 level, PMI is attempting to operationalise its newly constructed reputation as a public health  
 166 partner and vast resource to leverage political influence. For example, it offered the NHS  
 167 (National Health Service) one billion pounds to help smokers switch to alternatives if the UK  
 168 relaxed European Union (EU) regulations on e-cigarettes and heated tobacco products post-  
 169 Brexit, a proposal known as the Tobacco Transition Fund (which the UK government  
 170 rejected).<sup>64</sup>

171

172 Most recently, PMI capitalised on the COVID-19 pandemic to propagate its transformation  
 173 narrative.<sup>52</sup> Efforts ranged from a global roll out of corporate social responsibility activities,  
 174 focused on donations to hospitals and crisis centres, to investing in COVID vaccine

175 development through PMI’s part-ownership of biopharmaceutical company Medicago.<sup>65 66</sup>  
176 PMI’s chairman described the investment as “part of our new course, based on science,  
177 technology, and innovation”.<sup>67</sup> Medicago went on to secure a partnership with the  
178 Government of Canada,<sup>66</sup> contravening Article 5.3 of the Framework Convention on Tobacco  
179 Control (FCTC). PMI also used messaging around the pandemic to boost sales, through  
180 offers of free HTPs, free contactless home delivery with waived ID validation, and matched  
181 COVID-19 donations based on points accumulated IQOS purchases.<sup>68</sup>

182

### 183 **Information management**

184 As part of its 2014 ten-year corporate affairs plan,<sup>34</sup> PMI set out to ‘establish the concept of  
185 harm reduction as legitimate public policy in tobacco regulation’ and ‘establish the  
186 legitimacy of tobacco companies to be a part of the regulatory debate [‘part of the solution’]  
187 (Figure 1).

188

### 189 **Figure 1: Philip Morris International (2014) corporate affairs objectives and strategies: 190 reduced risk products (p4)<sup>34</sup>**

191

192 This plan has been operationalised in a multi-faceted information management campaign,  
193 part of over \$50 million spent over the past six years in marketing and research costs.<sup>18</sup> Three  
194 key strategies have emerged in which PMI attempts to control everything from the science on  
195 HTPs, to the media discourse about harm reduction.

196

197 First, building on the industry’s earlier tactical co-option of harm reduction terminology,<sup>33</sup>  
198 PMI is now attempting to redefine the concepts ‘smokefree’ (away from the complete  
199 absence of tobacco products) and ‘quitting’ (away from ending the use of tobacco and  
200 nicotine products). Its presentation of IQOS as ‘smokefree’ may not be entirely accurate, due  
201 to the pyrolysis that occurs when the tobacco is heated.<sup>69 70</sup> Similarly, PMI publishes  
202 estimates of ‘quitting’ based on the number of people who have ‘switched’ to IQOS, even for  
203 a brief period, including dual users alongside cigarettes.<sup>16</sup> PMI’s “harm reduction equation”  
204 suggests a broader attempt to redefine harm reduction (Figure 2). Although there is no single  
205 definition of harm reduction, definitions generally acknowledge the need to reduce harm not  
206 only for the individual user but within the community and society in which they live<sup>71-75</sup>.  
207 PMI’s equation instead focuses just on individual smokers using new products to ‘switch’  
208 (notably not ‘quit’), positioned as equivalent to proven population-based tobacco control

209 measures. While moving smokers from a higher to a lower risk product will achieve  
 210 significant health benefit, this equation overlooks concerns and evidence that, in some  
 211 jurisdictions, wide availability and promotion of new products will lead to uptake among  
 212 never smokers.<sup>76-78</sup>

213

214 **Figure 2: Philip Morris International harm reduction equation<sup>79</sup>**

215

216 Second, PMI is increasingly controlling the science through its internally conducted and  
 217 directly funded science (promoted through the ‘PMI Science’ website) and that funded by the  
 218 Foundation for a Smokefree World (FSFW), created by PMI with a billion-dollar pledge in  
 219 2017.<sup>46 80</sup> Reminiscent of the disbanded TIRC (Tobacco Industry Research Committee) and  
 220 CIAR (Center for Indoor Air Research), FSFW has been accused of operating as little more  
 221 than a PR arm of the tobacco company.<sup>81</sup> PMI and FSFW, operating together are propagating  
 222 rhetoric that lies in stark contrast to reality (Table 2).

223

224 Third, the company is attempting to further control discourse on harm reduction and ensure  
 225 favourable representation of its transformation and products by influencing the media. It has  
 226 invited journalists on all-expenses paid trips to attend science tours at its labs, placed large  
 227 advertorials in broadsheets,<sup>82</sup> and is funding PR and media companies to promote both the  
 228 company and switching to alternative products.<sup>16</sup> While it promotes this sympathetic media  
 229 coverage it opposes research findings and media coverage that critiques or contradicts its  
 230 messages.<sup>46</sup>

231 **Table 2: Transformation claims made by PMI on harm reduction. The rhetoric versus**  
 232 **the reality.**

<b>Philip Morris International’s claim</b>	<b>The reality</b>
‘We’re trying to give up cigarettes’ and want to help smokers who are seeking a ‘better alternative’. <sup>83 84</sup>	PMI is still marketing cigarettes, redesigning pre-existing cigarette brands, and introducing new ones, and, in 2020, made US\$19 bn in gross profit from cigarette sales. <sup>16 18 85-90</sup>
‘We have reduced our global cigarette sales by getting smokers to switch to IQOS’ <sup>16</sup>	The change in PMI’s mean annual absolute decline in cigarette sales indicate that PMI’s current claimed reduction and ‘aspirational targets’ re-state existing trends, rather than accelerate them. <sup>91</sup>
‘IQOS is a smokefree product’ <sup>92</sup>	Research suggests that PMI are playing on terminology in making such claims and that IQOS may in fact give off smoke and exposes users to higher levels of toxins than vaping products. <sup>69 70</sup>

'The FDA authorized our electronically heated tobacco system, IQOS, as a modified risk tobacco product.' <sup>93</sup>	FDA ruling said that PMI could say that IQOS is a reduced exposure product but not reduced risk as reduced exposure does not necessarily translate into reduced risk. <sup>94 95</sup>
[We] 'do not, and will not, market or sell our products to youth' <sup>96</sup>	Marketing expertise suggests that IQOS ads appeal to youth as does PMI's use of social media influencer marketing. <sup>16 97-99</sup>
'We support tobacco control regulations' <sup>18</sup>	Tobacco companies including PMI are still contesting evidence-based tobacco control policies (e.g. standardised packaging, point of sale display bans, flavouring bans) that reduce smoking prevalence, particularly in LMICs. <sup>16 100</sup>
'If you don't smoke, don't start. If you smoke, quit. If you can't quit, switch.' <sup>54</sup>	These messages do not align with the actions of PMI – its IQOS marketing through social media influencers targets and appeals to youth. It also downplays the phenomenon of dual use when, in reality, most IQOS users continue to smoke cigarettes. <sup>16 101-104</sup>

233 PMI: Philip Morris International; US: United States; FDA: U.S. Food and Drug Administration; LMIC: low-  
234 and middle-income countries.

235

236 **Coalition management**

237 In addition to FSFW and other established industry allies,<sup>46</sup> PMI, with other controversial  
238 industries (oil/gas/unhealthy food), has recently formed the Industry Transformation  
239 Coalition, a corporate public relations organisation positioning industry as a 'catalyst for  
240 good' and lobbying for technological solutions for the world's problems.<sup>105</sup> FSFW has also  
241 funded International Network of Nicotine Consumer Organisations (INNCO), an umbrella  
242 organisation with 40 listed members and affiliates (industry-linked and independent) which  
243 publicise many of the same harm reduction messages promoted by TTCs.<sup>91 106</sup> Such networks  
244 represent a mobilisation of the company's corporate affairs plan; leveraging 'third party  
245 coalition building' to create an 'alliance of credible messengers'.<sup>34</sup>

246

247 PMI has attempted to exploit divisions in the public health community over harm reduction  
248 and, along with front groups and allies, is attempting to tarnish the reputation of the global  
249 tobacco control community.<sup>14 16 107 108</sup> PMI's targeting of individuals and organisations within  
250 tobacco control has roots in project sunrise, initiated in 1995 (Table 1), where PMI  
251 questioned the credibility and integrity of some in tobacco control, whilst working with  
252 others to promote favourable policy options.<sup>44</sup> This strategy was reemphasised in their 2014  
253 corporate affairs plan which described their aim to 'amplify and leverage the debate on harm  
254 reduction'.<sup>34</sup> PMI have since claimed that tobacco control research and advocacy is biased by  
255 charitable or philanthropic funding,<sup>63 109</sup> that they are the victim of misinformation and 'sham

256 science’,<sup>110 111</sup> and used social media to criticise people and organisations perceived as  
 257 opposing its products and harm reduction claims.<sup>108</sup> These challenges to the tobacco control  
 258 community aim to fragment the usually unified voice of the tobacco control movement,  
 259 muddying the waters in policy debates and distracting attention from effective tobacco  
 260 control measures.<sup>33 48 112</sup>

261

262 **CASE STUDY 2: TTCs long-term ‘victim and solution’ strategy to define the narrative**  
 263 **on illicit tobacco trade (1990s-2021)**

264

265 In the late 1990s, internal industry documents demonstrated that facilitating the smuggling of  
 266 their own products had been a core part of TTCs’ global business strategies for decades.<sup>113-117</sup>  
 267 This led to a series of investigations and legal action and within a relatively short-time TTCs  
 268 had been exposed as suppliers of illicit tobacco.<sup>15 118-121</sup> In response, the Protocol to  
 269 Eliminate Illicit Trade in Tobacco Products was developed, coming into force in September  
 270 2018, aiming to eliminate illicit tobacco trade through a package of measures taken by  
 271 countries acting cooperatively.

272

273 Recognising the threat to profitability from loss of this avenue for sales and profits, tobacco  
 274 companies began to publicly position themselves as both victims of, and solutions to, the  
 275 illicit tobacco trade. This despite evidence that tobacco companies continue to facilitate the  
 276 illicit trade of their own products.<sup>15 122</sup> TTC promotion of the inadequate and inefficient  
 277 industry-developed tracking and tracing system Codentify further serves to ensure that illicit  
 278 trade continues.<sup>15 123 124</sup> TTCs have come to dominate the debate around illicit tobacco trade  
 279 effectively setting the agenda on the topic.<sup>15</sup> This poses a substantial risk to accurate  
 280 understandings of the illicit tobacco trade and, more broadly, of tobacco industry regulatory  
 281 capture and neutralisation of effective measures to address tobacco smuggling. Our analysis  
 282 shows how TTCs have used their vast resources to reach key stakeholders at global level with  
 283 subsequent policy impacts at regional and national levels, utilising three main and inter-  
 284 linked instrumental strategies over two decades (Table 3). Below we consider each in turn.

285

286 **Table 3: Timeline of key tobacco industry activities relating to the illicit tobacco trade.**

Date	Action	Instrumental strategy

2004	The EU and member states drop smuggling case against PMI in return for enforceable and legally binding agreements. <sup>125 126</sup> Despite being a result of legal action, PMI would go on to promote this agreement as an example of the industry being part of the solution rather than the problem. The EU later reaches similar agreements on illicit trade with JTI (2007) and BAT and Imperial Tobacco (2010). <sup>126-129</sup>	RM
2010	PMI licenses its track and trace technology Codentify for free to its main competitors (BAT, JTI, Imperial). <sup>15 123</sup>	CM
2011	The first Project Star report (which estimates illicit tobacco trade in Europe), commissioned by PMI, is published by KPMG. These annual reports would later be renamed Project SUN and then Project STELLA, with multiple TTCs commissioning such reports. <sup>130 131</sup> They were shown to serve the interests of the TTCs. <sup>132</sup>	IM
2011	The industry front group, the Digital Coding and Tracking Association (DCTA) is registered in Zurich. <sup>15 133</sup> Further, PMI donates €15 million to Interpol- this is one of several examples of PMI funding an organization involved in addressing illicit trade. <sup>123 134 135</sup>	CM
2013	The first Asia Illicit Tobacco indicator report is launched– one of a series of reports on illicit trade in Asia commissioned by Philip Morris Asia. <sup>136 137</sup>	IM
2014	KPMG & GS1 UK release a DCTA-funded report promoting Codentify and the DCTA is the major sponsor of World Customs Organization conference on illicit tobacco. <sup>15 138</sup>	IM, CM
2016	DCTA announces sale of Codentify to a company called Inexto. Despite claims that Inexto is independent, many of its senior figures are former PMI staff. <sup>15 139 140</sup>	CM
2016	PMI launches PMI IMPACT– a \$100 million funding initiative for projects concerning illicit trade. In its first round of funding 32 projects are funded, many of which are led by organisations with previous links to TTCs. PMI IMPACT ‘s second and third funding rounds launched in 2017 and 2021 respectively. <sup>15 141</sup>	IM
2017	PMI, BAT and JTI-sponsored Transnational Alliance to Combat Illicit Trade (TRACIT) is launched. <sup>15 142</sup>	CM
2018	PMI’s sustainability report boasts of cooperation between the company and law enforcement officials in Colombia and Ecuador. PMI claims to have provided training on illicit trade to 735 law enforcement officials in 2018, up from 160 the previous year, demonstrating the company’s growing interest in building connections with law enforcement agencies. <sup>143</sup>	RM
2020	The Government of Gibraltar/HM Customs Gibraltar signs a Memorandum of Understanding (MOU) on illicit tobacco trade with JTI. <sup>144</sup> MOUs are voluntary agreements and are not legally-binding or enforceable. Research from 2019 identified over 100 MOUs signed between governments and tobacco companies since 1999. <sup>145</sup>	RM
2020	TTCs stronghold over data on illicit trade now extends to the Middle East with the release of a report on illicit tobacco trade in the Levant region, commissioned by BAT, JTI and Philip Morris. <sup>146</sup>	IM
2020	A company which procures its track and trace software from Inexto is picked to run Pakistan’s track and trace system for tobacco. <sup>147</sup> This decision, though later revoked, shows Inexto is still involved in track and trace bids.	CM

287 This timeline presents a sample of key developments and does not aim to be comprehensive. RM: Reputation  
288 Management; IM: Information Management; CM: Coalition Management ;BAT: British American Tobacco;  
289 DCTA: Digital Coding & Tracking Association; EU- European Union; GS1: Global Standards 1; JTI: Japan  
290 Tobacco International; MoU: Memorandum of Understanding; TRACIT- Transnational Alliance to Combat  
291 Illicit Trade

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### Reputation management

TTCs have engaged in a global PR campaign to promote their primary discursive strategy - that the industry has changed and is a necessary part of the solution for illicit trade (Table 4). Despite data indicating that approximately two thirds of the global illicit tobacco market between 2007-2016 consisted of product smuggled from the supply chains of tobacco companies, tobacco companies now emphasise the presence of other products (counterfeits and illicit white cigarettes) on the illicit market to portray the illicit tobacco trade as detrimental to their profits.<sup>15 148</sup> Tobacco companies appear to have been successful in presenting themselves as victims, largely through extensive efforts to ingratiate themselves with authorities tasked with addressing illicit trade, including through large donations and providing anti-illicit trade training events for law enforcement officials in various countries (Table 4).<sup>15 143</sup>

305 **Table 4: Claims made by TTCs on illicit trade. The rhetoric versus the reality.**

TTC claims	The reality
Counterfeits and cheap/illicit whites make up much of the illicit cigarette market. <sup>149 150</sup>	Approximately two thirds of the global illicit tobacco market between 2007-2016 consisted of product smuggled from the supply chains of tobacco companies, while only 2-7% were counterfeits. <sup>15</sup>
Tax and other tobacco control policies are key drivers of illicit trade. <sup>151</sup>	Taxes only play a minor role in illicit tobacco trade, with evidence indicating that illicit trade tends to be larger in countries with lower cigarette prices than those with higher prices and that strength of monitoring, enforcement, and governance having greater influence. <sup>152 153</sup>
Governments should form partnerships with the TTCs to stop illicit trade. <sup>154</sup>	Partnerships between government bodies and tobacco companies most often take the form of memorandums of understanding which are neither enforceable nor legally-binding. Nor have they been shown to reduce illicit trade. <sup>145</sup>

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### Information management

Such efforts are supported by a well-funded information management strategy where TTCs have positioned themselves as a major provider of data on illicit trade. Over the past two decades TTC-commissioned reports have become the primary source of data on illicit tobacco throughout most of the world.<sup>155-157</sup> These reports have often criticised for lacking transparency and inadequate methodologies, producing inflated estimates of illicit tobacco

313 trade and downplaying or concealing the presence of tobacco companies' product on the  
314 illicit market.<sup>156</sup> These reports - often regional and well-publicised – allow TTCs to define  
315 the problem of illicit tobacco trade (e.g. its nature, scale, and drivers) and to garner media  
316 interest, ensuring the industry's 'victim and solution' messaging dominates media coverage  
317 of illicit from global to local levels (Table 4). Similarly, by funding international conferences  
318 and reports on track and trace technology, TTCs have promoted their own track and trace  
319 system, Codentify, seeking to have this implemented over other systems without industry  
320 links <sup>15 158 159</sup> These efforts ultimately increase TTCs access to regulators and policy makers.

321

### 322 **Coalition management**

323 Tobacco companies use of front groups to perpetuate arguments that tobacco control policies  
324 drive illicit trade is well-documented.<sup>160</sup> However, over the past decade we have seen an  
325 increasingly covert and deceptive strategies to try and undermine measures to address illicit  
326 trade.<sup>15 140</sup> This includes TTCs collaborative, long-term strategy to promote their industry-  
327 controlled and ineffective Codentify system to governments.<sup>15</sup> (Table 3) While coordinated  
328 efforts to influence tracking and tracing implementation at national level utilised global TTC  
329 messaging around illicit trade, often through a complex system of third parties, front groups  
330 and media spokespeople (including ex-law enforcement).<sup>15 140 147 161</sup> Such groups also present  
331 TTCs positions in policy consultations and elsewhere, often without disclosing their links to  
332 these companies.<sup>15 161</sup>

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### 334 **Discussion**

335 This paper set out to examine TTCs long-term policy influence strategies which the literature  
336 hitherto has rarely examined in detail. It shows that in addition to their reactive efforts to  
337 oppose almost every effective tobacco control policy country by country, TTCs engage in  
338 long-term, proactive strategies to promote their corporate interests and goals. Using two case  
339 studies, we show that three mutually reinforcing instrumental strategies dominate in the  
340 longer-term – reputation management, coalition management and information management.  
341 These instrumental strategies work synergistically to propagate one over-riding discursive  
342 strategy –“we've changed, we are part of the solution” – despite clear evidence in both case  
343 studies that this is not the case. In this way tobacco companies attempt to redefine the  
344 dominant narrative away from a 'pariah' industry which should be systematically excluded  
345 from decision making (as per FCTC Article 5.3) towards one central to solving the tobacco  
346 epidemic.



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348 We also note that in redefining the dominant narrative, TTCs are also attempting to re-define  
349 key concepts and shape the language of the debate and responsibilities for action. This  
350 includes redefining harm reduction, ‘smokefree’, and ‘quitting’. Similarly, the illicit case  
351 study suggests that TTCs have attempted to redefine illicit tobacco as largely a problem of  
352 created by other actors - counterfeit or illicit whites produced by criminal enterprises, rather  
353 than the TTCs own product.<sup>15</sup> In both cases the TTCs’ resource advantage enables them to do  
354 this –to monopolise data, to publish extensive advertorials and ‘white papers’ and host  
355 events– all of which secure extensive media coverage, enabling TTCs to dominate debates  
356 and reach key audiences. In short, these longer-term strategies exert covert power by framing  
357 the parameters of debate, reshaping norms and beliefs around the tobacco industry and  
358 tobacco control, legitimising TTC positions, and ultimately seeking to make TTCs’ agendas  
359 appear desirable to policymakers and the tobacco control community seem misguided.

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361 It is notable that the dominant long-term instrumental strategies identified are indirect (and  
362 covert) rather than direct (and overt). This likely reflects the success of tobacco control and of  
363 Article 5.3 in ‘demonizing’ the industry and explains TTCs significant focus on reputation  
364 management and coalition management in both case studies. Coalition management strategies  
365 have always been a means to exert hidden power, but these webs of influence have become  
366 increasingly complex and opaque. For example, through the umbrella organisation INNCO,  
367 TTC-funded third parties and independents are emmeshed, serving both to camouflage TTC  
368 influence where it occurs and increase exposure to their messaging. Similarly, Codentify,  
369 initially being promoted through one front group, has now been sold to another company  
370 (with multiple ex-PMI employees) which licenses software to other companies, which in turn  
371 apply for national track-and-trace tenders, making it hard to trace industry links.<sup>140 162</sup> Our  
372 findings also suggest that these long-term strategies primarily operate at global level and are  
373 then leveraged at the national level, with the TTCs global efforts setting the stage on which  
374 national policies are negotiated. This may prove particularly problematic in countries where  
375 the tobacco industry is not yet delegitimised, and civil society is less well-resourced and  
376 hence less able to counter the TTCs and their narrative. Overall, our findings demonstrate the  
377 need to critically review TTCs current actions and claims in the context of evidence for  
378 extensive engagement in strategies aimed to build credibility, secure policy influence, and re-  
379 boost declining sales and profits, generally at the expense of population health.

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381 **Limitations**

382 This paper has several limitations. First, TTCs activities are multiple and are often hidden.  
383 Extensive searches were conducted, but we were restricted to publicly available data and,  
384 whilst this includes detailed leaked industry documents, it likely provides a limited view of  
385 activities in each case study, particularly at national level, in countries without English as an  
386 official language, and across all TTCs. Further case studies are needed to see if the strategies  
387 identified in harm reduction and illicit trade are generalisable across the spectrum of industry  
388 activity.

389

390 **Challenges and recommendations**

391 Our findings have implications for tobacco control. First, they demonstrate the importance of  
392 identifying and addressing the tobacco TTCs long-term influence strategies which are  
393 coordinated at a global level yet which, by reshaping norms and beliefs, can have wider  
394 reaching impacts. The FCTC amply demonstrates the global ambition and reach of tobacco  
395 control. Yet the FCTC, and tobacco control more generally, are largely operationalised at the  
396 national level where, in part due to resource constraints, advocacy efforts to address tobacco  
397 industry interference often focus on short-term policy opportunities. Whilst national and  
398 regional work remain an essential entry point to understand and counter TTC strategies, a  
399 global focus could allow tracking and identification of new patterns of TTC activity or  
400 “norms” that need countering and provide a means of bringing public health messages to, and  
401 countering TTC messages in, specific global settings such as the World Economic Forum.  
402 Such efforts would be closely coordinated with and support regional and national work,  
403 enabling efficiencies to be realised. Second, and closely linked to this, TTCs’ overwhelming  
404 focus on renormalisation through reputation management shows that tobacco  
405 industry denormalisation, for which there is substantial evidence, should be considered  
406 an essential tobacco control measure.<sup>163</sup> The implementation of a global denormalisation  
407 campaign could be one such effort, which could then be leveraged at regional and national  
408 levels. Third, the dominant use of coalition management strategies and the increasing use of  
409 third parties and what can be described as “dark influence webs” suggests we must become  
410 more adept at exposing TTC third parties. This requires new research methods, including  
411 novel digital methods to identify likely front groups. This is, however, complex and time  
412 consuming and we therefore need to shift the onus to others: participation in policy events  
413 and consultations should require full disclosure of funding for participants and submitted  
414 evidence – simply declaring “no COI” or no funding is insufficient. The importance of

415 Article 5.3 cannot be overstated, and effective transparency and lobbying registers remain  
416 essential. Finally, growing TTC control of data and evidence, which enables it to shape  
417 norms, will hinder progress in all areas unless addressed. For example, the potential for novel  
418 products to contribute to tobacco control is hindered by the fact that research on such  
419 products is dominated by TTCs with an appalling history of research misconduct which  
420 emerging evidence suggests may be being repeated, and a vested interest in showing its  
421 products are safe.<sup>164-166</sup> Ways to address this include through a database of authors' and  
422 editors' conflicts of interest which can help overcome the documented failure to declare  
423 interests within specific papers and alternative means of raising research funds from  
424 corporations while protecting that research from vested interests, issues explored  
425 elsewhere.<sup>164 167</sup> Open discussion and trust among the public health community will enable  
426 information on TTC conduct to be considered alongside emerging science on new products  
427 and their potential benefits and harms – only with this combination of evidence can the most  
428 effective policy decisions be made.

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430 More broadly, there are lessons for efforts to address the commercial determinants of health,  
431 given the clear commonalities in underlying drivers and strategies already demonstrated  
432 across unhealthy commodity industries.<sup>168-170</sup> Those working in alcohol and food  
433 policy should seek from the outset to address these global long-term influence strategies and  
434 not just focus on the immediate national level challenges. More broadly, we need to recognise  
435 that until we address underlying system drivers, progress will remain limited.<sup>170 171</sup> The TTCs  
436 growing use of increasingly opaque 'webs of influence' indicates this problem – TTCs have  
437 used their resource advantage to adapt to and counter attempts to increase transparency in  
438 policymaking. The public health community must therefore work collectively to push for  
439 more radical structural and systems change to address the commercial determinants of health.  
440 This might include accountability mechanisms such as ensuring corporations pay for the costs  
441 of the harm caused by the sale of harmful products, amending corporate regulation to reduce  
442 the dominant focus on profit and/or change the rules on limited liability, and wider changes to  
443 the global political and economic system that have increased corporate power and influence.

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