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

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ABSTRACT

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

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

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

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

INTRODUCTION

Thirty years of research and analysis in *Tobacco Control* provide the opportunity to step back and critically appraise the advances made in understanding and addressing the tobacco industry as the primary vector of the global tobacco epidemic.^{1 2} This is particularly timely given that, responding to the success of tobacco control activities, transnational tobacco companies (TTCs) are redoubling their aggression and remain a crucial barrier to further progress (box 1).^{3–6} Perhaps as a result,

declines in smoking prevalence appear to be stalling and most countries have not had sufficient decreases to offset population growth,⁷ resulting in all-time high of 1.1 billion smokers in 2019, over three-quarters of whom live in low-income and middle-income countries.^{5 7}

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

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

METHODS

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

We analysed these sources to identify industry strategies which we categorised using the Policy Dystopia Model (PDM) as our conceptual framework. The PDM is an evidence-based taxonomy of tobacco industry political activity derived from systematic reviews of industry influence on policy.¹⁰ The PDM has been shown to capture key elements of TTC influence strategies in a range of settings, dividing these into discursive (argument-based) and instrumental (action-based) strategies (see online supplemental tables 1 and 2). While the PDM

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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, PMI's profit margin was 40.8%, BAT's was 38.6%, JTI's was 22.4% and Imperial Brands' was 41.2%, with combined profits of just under US\$33 bn.^{50 109} 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.^{5 6} 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.⁶ 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 overshifting, and profitability is falling.^{16 110 111}

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^{111 112} and heavy investment in 'product innovation' in 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 while also allowing them to attempt a hostile takeover of the harm reduction narrative (discussed in Case Study 1).^{16 17 113}

BAT, British American Tobacco; HTP, heated tobacco product; JTI, Japan Tobacco International; PMI, Philip Morris International; TTC, transnational tobacco companies.

defines illicit trade as an instrumental strategy, here we focus on the TTC's narrative around illicit trade.^{17–19} We sought to identify the primary discursive and key instrumental strategies that best captured the long-term influence strategies in both case studies. Triangulation, prolonged engagement, persistent observation and discussion among authors were used to test the validity of our findings.^{20 21}

Case study 1: TTCs use of harm reduction as a long-term 'pathway to profit' strategy (1950s–2021)

Since the 1950s when the links between smoking and lung cancer became known,²² TTCs have attempted to ward off the denormalisation of the industry and threats to their cigarette sales by professing a commitment to harm reduction, and actions such as introducing cigarette filters (1950s), 'light' cigarettes (1970s) and investing in smokeless tobacco options such as snus and nicotine pouches (2000s). These actions were supported by broader communication strategies and activities (table 1).^{23–27} Now, TTCs have once again returned to harm reduction. Seen with the context of previous actions, this is most likely the latest manifestation of the long-term strategy of seeking to rebuild credibility to secure policy influence and boost declining sales and profits.²⁸

While recognising that other TTCs have developed similar 'transformational' narratives,^{29–32} in this case study we focus on Philip Morris International (PMI).²⁸ PMI has led the latest

iteration of this historic tactic and recently leaked documents give a unique insight into its long term strategies around harm reduction.^{16 28} Our analysis identified PMI's utilisation of three main and inter-linked instrumental strategies—reputation management, information management and coalition management—to convince the world of its commitment to harm reduction both historically (table 1) and currently. Below, we consider each in turn.

Reputation management

In 2018, PMI announced it was 'giving up cigarettes' as part of a slew of transformation rhetoric around its supposed reincarnation into a disruptive technology company.³³ PMI pledged to 'unsmoke' the world by promoting a 'switch' to its heated tobacco product, iQOS,^{34 35} despite simultaneously claiming that heated tobacco products (HTPs) are not intended to help quitting,³⁶ and a lack of independent evidence that they reduce health harms compared with cigarettes.³⁷ Furthermore, the true motivation appears to be maximise sales and profits rather than to improve population health. Evidence for this includes the high price (and even greater profitability relative to cigarettes) of iQOS and PMI's targeting of iQOS mostly at high-income countries with relatively strong tobacco control policies (ie, where smoking was already declining) while continuing to invest in and market cigarettes elsewhere.^{16 38}

Leaked documents from 2014 reveal PMI's long-term strategy to appropriate harm reduction to renormalise its image as a 'trusted and indispensable partner, leading its sector and bringing solutions to the table'.^{28 39} Using the guise of transformation, PMI has harnessed the media and piggybacked on global platforms such as the World Economic Forum, G20 summit and UN General Assembly, to give the impression that it is a trusted partner of the global political and public health communities.^{16 40–43} At a national level, PMI is attempting to operationalise its newly constructed reputation as a public health partner and vast resource to leverage political influence. For example, it offered the NHS (National Health Service) one billion pounds to help smokers switch to alternatives if the UK relaxed European Union (EU) regulations on e-cigarettes and heated tobacco products post-Brexit, a proposal known as the Tobacco Transition Fund (which the UK government rejected).⁴⁴

Most recently, PMI capitalised on the COVID-19 pandemic to propagate its transformation narrative.⁴⁵ Efforts ranged from a global rollout of corporate social responsibility activities, focused on donations to hospitals and crisis centres, to investing in COVID-19 vaccine development through PMI's part-ownership of biopharmaceutical company Medicago.^{46 47} PMI's chairman described the investment as 'part of our new course, based on science, technology and innovation'.⁴⁸ Medicago went on to secure a partnership with the Government of Canada,⁴⁷ contravening Article 5.3 of the Framework Convention on Tobacco Control (FCTC). PMI also used messaging around the pandemic to boost sales, through offers of free HTPs, free contactless home delivery with waived ID validation and matched COVID-19 donations based on points accumulated iQOS purchases.⁴⁹

Information management

As part of its 2014 10-year corporate affairs plan,²⁸ PMI set out to 'establish the concept of harm reduction as legitimate public policy in tobacco regulation' and 'establish the legitimacy of tobacco companies to be a part of the regulatory debate [part of the solution]' (figure 1).

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

Date	Action	Instrumental strategy
1953	Philip Morris-funded TIRC launched. TIRC promises to provide 'aid and assistance to the research effort into all phases of tobacco use and health', ¹¹⁴ 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'. ¹¹⁵	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. ¹¹⁶	IM
1972	Tobacco Institute VP of Public Relations calls for proffering new explanations for ill health among smokers, including heredity and stress. ¹¹⁷	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 organisation for the tobacco industry's 'efforts to fraudulently mislead the American public about the health effects of environmental tobacco smoke exposure'. ¹¹⁸	IM
1994	Industry executives testify before US Congress that nicotine is not addictive despite having evidence it was since the 1960s. ¹¹⁶	RM, IM
1995	Philip Morris initiates Project Sunrise to form relationships with 'moderate' TC groups. ⁷⁰	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. ¹¹⁹	RM
2000s	PMI starts to fund diverse media groups and attempts to participate in world events, including the World Economic Forum and G20 summit. ⁶¹	CM, RM
2010s	TTCs launch own e-cigarette brands or acquire existing producers. ^{16 120}	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'). ⁷⁴	IM, CM
2017	PMI launches Foundation for a Smoke-Free World. ¹⁶	IM, CM
2018	PMI announces its goal is to achieve a 'smoke-free future'. ¹⁶	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. ¹²¹	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. ^{45 61 122 123}	IM, RM, CM

This timeline presents a sample of key developments and does not aim to be comprehensive.

CM, Coalition Management; IM, Information Management; PMI, Philip Morris International; RM, Reputation Management; TC, Tobacco Control; TIRC, Tobacco Industry Research Committee; TTC, transnational tobacco companies; VP, Vice-President.

This plan has been operationalised in a multifaceted information management campaign, part of over \$50 million spent over the past 6 years in marketing and research costs.⁵⁰ Three key strategies have emerged in which PMI attempts to control everything from the science on HTPs, to the media discourse about harm reduction.

First, building on the industry's earlier tactical co-option of harm reduction terminology,²⁷ PMI is now attempting to redefine the concepts 'smokefree' (away from the complete absence of tobacco products) and 'quitting' (away from ending the use

of tobacco and nicotine products). Its presentation of iQos as 'smokefree' may not be entirely accurate, due to the pyrolysis that occurs when the tobacco is heated.^{51 52} Similarly, PMI publishes estimates of 'quitting' based on the number of people who have 'switched' to iQos, even for a brief period, including dual users alongside cigarettes.¹⁶ PMI's 'harm reduction equation' suggests a broader attempt to redefine harm reduction (figure 2). Although there is no single definition of harm reduction, definitions generally acknowledge the need to reduce harm not only for the individual user but within the community and

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- Establish the concept of harm reduction as legitimate public policy in tobacco regulation
- Establish the legitimacy of tobacco companies to be a part of the regulatory debate on RRP ('part of solution')
- Leverage PMI's innovation and scientific research to establish credibility with stakeholders
- Identify and engage non-traditional 3rd party stakeholders/allies (e-cigarette manufacturers and retailers, adult consumers of RRP products, tobacco harm reduction advocates, scientific community) globally and locally
- Develop compelling messages and materials to support our advocacy on RRP issues
- Amplify and leverage the debate on harm reduction around global events (e.g. COP6)
- Continue to engage with regulators globally

Figure 1 Philip Morris International (2014) corporate affairs objectives and strategies: reduced risk products (p4)²⁸

Figure 2 Philip Morris International harm reduction equation.¹²⁴

society in which they live.^{53–57} PMI's equation instead focuses just on individual smokers using new products to 'switch' (notably not 'quit'), positioned as equivalent to proven population-based tobacco control measures. While moving smokers from a higher to a lower risk product will achieve significant health benefit, this equation overlooks concerns and evidence that, in some jurisdictions, wide availability and promotion of new products will lead to uptake among never smokers.^{58–60}

Second, PMI is increasingly controlling the science through its internally conducted and directly funded science (promoted through the 'PMI Science' website) and that funded by the Foundation for a Smokefree World (FSFW), created by PMI with a billion-dollar pledge in 2017.^{61 62} Reminiscent of the disbanded TIRC (Tobacco Industry Research Committee) and CIAR (Center for Indoor Air Research), FSFW has been accused of operating as little more than a PR arm of the tobacco company.⁶³ PMI and FSFW, operating together, are propagating rhetoric that lies in stark contrast to reality (table 2).

Third, the company is attempting to further control discourse on harm reduction and ensure favourable representation of its transformation and products by influencing the media. It has invited journalists on all-expenses paid trips to attend science tours at its labs, placed large advertorials in broadsheets⁶⁴ and is funding PR and media companies to promote both the company and switching to alternative products.¹⁶ While it promotes this

sympathetic media coverage, it opposes research findings and media coverage that critiques or contradicts its messages.⁶¹

Coalition management

In addition to FSFW and other established industry allies,⁶¹ PMI, with other controversial industries (oil/gas/unhealthy food), has recently formed the Industry Transformation Coalition, a corporate public relations organisation positioning industry as a 'catalyst for good' and lobbying for technological solutions for the world's problems.⁶⁵ FSFW has also funded International Network of Nicotine Consumer Organisations (INNCO), an umbrella organisation with 40 listed members and affiliates (industry-linked and independent) which publicise many of the same harm reduction messages promoted by TTCs.^{66 67} Such networks represent a mobilisation of the company's corporate affairs plan, leveraging 'third party coalition building' to create an 'alliance of credible messengers'.²⁸

PMI has attempted to exploit divisions in the public health community over harm reduction and, along with front groups and allies, is attempting to tarnish the reputation of the global tobacco control community.^{14 16 68 69} PMI's targeting of individuals and organisations within tobacco control has roots in project sunrise, initiated in 1995 (table 1), where PMI questioned the credibility and integrity of some in tobacco control, while

Table 2 Transformation claims made by PMI on harm reduction (the rhetoric vs the reality)

Philip Morris International's claim	The reality
'We're trying to give up cigarettes' and want to help smokers who are seeking a 'better alternative'. ^{125 126}	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. ^{16 50 127–132}
'We have reduced our global cigarette sales by getting smokers to switch to iqos' ¹⁶	The change in PMI's mean annual absolute decline in cigarette sales indicate that PMI's current claimed reduction and 'aspirational targets' restate existing trends, rather than accelerate them. ⁶⁶
'iqos is a smokefree product' ¹³³	Research suggests that PMI is 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. ^{51 52}
'The FDA authorised our electronically heated tobacco system, iqos, as a modified risk tobacco product'. ¹³⁴	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. ^{135 136}
(We) 'do not, and will not, market or sell our products to youth' ¹³⁷	Marketing expertise suggests that iqosads appeal to youth as does PMI's use of social media influencer marketing. ^{16 138–140}
'We support tobacco control regulations' ⁵⁰	Tobacco companies including PMI are still contesting evidence-based tobacco control policies (eg, standardised packaging, point of sale display bans, flavouring bans) that reduce smoking prevalence, particularly in LMICs. ^{16 141}
'If you don't smoke, don't start. If you smoke, quit. If you can't quit, switch'. ³⁴	These messages do not align with the actions of PMI—its iqosmarketing through social media influencers targets and appeals to youth. It also downplays the phenomenon of dual use when, in reality, most iqosusers continue to smoke cigarettes. ^{16 142–145}

FDA, U.S. Food and Drug Administration; LMIC, low-income and middle-income countries; PMI, Philip Morris International.

working with others to promote favourable policy options.⁷⁰ This strategy was re-emphasised in their 2014 corporate affairs plan which described their aim to ‘amplify and leverage the debate on harm reduction’.²⁸ PMI have since claimed that tobacco control research and advocacy is biased by charitable or philanthropic funding,^{43 71} that they are the victim of misinformation and ‘sham science’,^{72 73} and used social media to criticise people and organisations perceived as opposing its products and harm reduction claims.⁶⁹ These challenges to the tobacco control community aim to fragment the usually unified voice of the tobacco control movement, muddying the waters in policy debates and distracting attention from effective tobacco control measures.^{27 74 75}

Case study 2: TTCs long-term ‘victim and solution’ strategy to define the narrative on illicit tobacco trade (1990s–2021)

In the late 1990s, internal industry documents demonstrated that facilitating the smuggling of their own products had been a core part of TTCs’ global business strategies for decades.^{76–80} This led to a series of investigations and legal action and within a relatively short-time TTCs had been exposed as suppliers of illicit tobacco.^{15 81–84} In response, the Protocol to Eliminate Illicit Trade in Tobacco Products was developed, coming into force in September 2018, aiming to eliminate illicit tobacco trade through a package of measures taken by countries acting cooperatively.

Recognising the threat to profitability from loss of this avenue for sales and profits, tobacco companies began to publicly position themselves as both victims of, and solutions to, the illicit tobacco trade. This despite evidence that tobacco companies continue

to facilitate the illicit trade of their own products.^{15 85} TTC promotion of the inadequate and inefficient industry-developed tracking and tracing system Codentify further serves to ensure that illicit trade continues.^{15 86 87} TTCs have come to dominate the debate around illicit tobacco trade effectively setting the agenda on the topic.¹⁵ This poses a substantial risk to accurate understandings of the illicit tobacco trade and, more broadly, of tobacco industry regulatory capture and neutralisation of effective measures to address tobacco smuggling. Our analysis shows how TTCs have used their vast resources to reach key stakeholders at global level with subsequent policy impacts at regional and national levels, using three main and inter-linked instrumental strategies over two decades (table 3). Below, we consider each in turn.

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 and 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.^{15 88} 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

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. ^{146 147} 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). ^{147–150}	RM
2010	PMI licenses its track and trace technology Codentify for free to its main competitors (BAT, JTI, Imperial). ^{15 86}	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. ^{151 152} They were shown to serve the interests of the TTCs. ¹⁵³	IM
2011	The industry front group, the DCTA is registered in Zurich. ^{15 154} Further, PMI donates €15 million to Interpol—this is one of several examples of PMI funding an organisation involved in addressing illicit trade. ^{86 155 156}	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. ^{157 158}	IM
2014	KPMG & GS1 UK release a DCTA-funded report promoting Codentify and the DCTA is the major sponsor of World Customs Organisation conference on illicit tobacco. ^{15 159}	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. ^{15 96 160}	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. ^{15 161}	IM
2017	PMI, BAT and JTI-sponsored TRACIT is launched. ^{15 162}	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. ⁸⁹	RM
2020	The Government of Gibraltar/HM Customs Gibraltar signs a MOU on illicit tobacco trade with JTI. ¹⁶³ 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. ¹⁶⁴	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. ¹⁶⁵	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. ⁹⁷ This decision, though later revoked, shows Inexto is still involved in track and trace bids.	CM

This timeline presents a sample of key developments and does not aim to be comprehensive.

BAT, British American Tobacco; CM, Coalition Management; DCTA, Digital Coding and Tracking Association; EU, European Union; GS1, Global Standards 1; IM, Information Management; JTI, Japan Tobacco International; MoU, Memorandum of Understanding; RM, Reputation Management; TRACIT, Transnational Alliance to Combat Illicit Trade.

Table 4 Claims made by TTCs on illicit trade (the rhetoric vs the reality)

TTC claims	The reality
Counterfeits and cheap/illicit whites make up much of the illicit cigarette market. ^{166 167}	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. ¹⁵
Tax and other tobacco control policies are key drivers of illicit trade. ¹⁶⁸	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. ^{169 170}
Governments should form partnerships with the TTCs to stop illicit trade. ¹⁷¹	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. ¹⁶⁴

TTC, transnational tobacco companies.

providing anti-illicit trade training events for law enforcement officials in various countries (table 4).^{15 89}

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.^{90–92} These reports have often criticised been for lacking transparency and inadequate methodologies, producing inflated estimates of illicit tobacco trade and downplaying or concealing the presence of tobacco companies' product on the illicit market.⁹¹ These reports—often regional and well-publicised—allow TTCs to define the problem of illicit tobacco trade (eg, its nature, scale and drivers) and to garner media interest, ensuring the industry's 'victim and solution' messaging dominates media coverage of illicit from global to local levels (table 4). Similarly, by funding international conferences and reports on track and trace technology, TTCs have promoted their own track and trace system, Codentify, seeking to have this implemented over other systems without industry links.^{15 93 94} These efforts ultimately increase TTCs access to regulators and policy makers.

Coalition management

Tobacco companies use of front groups to perpetuate arguments that tobacco control policies drive illicit trade is well documented.⁹⁵ However, over the past decade, we have seen increasingly covert and deceptive strategies to try and undermine measures to address illicit trade.^{15 96} This includes TTCs collaborative, long-term strategy to promote their industry-controlled and ineffective Codentify system to governments¹⁵ (table 3). While coordinated efforts to influence tracking and tracing implementation at national level used global TTC messaging around illicit trade, often through a complex system of third parties, front groups and media spokespeople (including ex-law enforcement).^{15 96–98} Such groups also present TTCs positions in policy consultations and elsewhere, often without disclosing their links to these companies.^{15 98}

DISCUSSION

This paper set out to examine TTCs' long-term policy influence strategies which the literature hitherto has rarely examined in detail. It shows that in addition to their reactive efforts to oppose almost every effective tobacco control policy country by country, TTCs engage in long-term, proactive strategies to promote their corporate interests and goals. Using two case studies, we show that three mutually reinforcing instrumental strategies dominate in the longer-term—reputation management, coalition management and information management. These instrumental

strategies work synergistically to propagate one over-riding discursive strategy—'we've changed, we are part of the solution'—despite clear evidence in both case studies that this is not the case. In this way, tobacco companies attempt to redefine the dominant narrative away from a 'pariah' industry which should be systematically excluded from decision making (as per FCTC Article 5.3) towards one central to solving the tobacco epidemic.

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

It is notable that the dominant long-term instrumental strategies identified are indirect (and covert) rather than direct (and overt). This likely reflects the success of tobacco control and of Article 5.3 in 'demonising' the industry and explains TTCs' significant focus on reputation management and coalition management in both case studies. Coalition management strategies have always been a means to exert hidden power, but these webs of influence have become increasingly complex and opaque. For example, through the umbrella organisation INNCO, TTC-funded third parties and independents are enmeshed, serving both to camouflage TTC influence where it occurs and increase exposure to their messaging. Similarly, Codentify, initially being promoted through one front group, has now been sold to another company (with multiple ex-PMI employees) which licenses software to other companies, which in turn apply for national track-and-trace tenders, making it hard to trace industry links.^{96 99} Our findings also suggest that these long-term strategies primarily operate at global level and are then leveraged at the national level, with the TTCs' global efforts setting the stage on which national policies are negotiated. This may prove particularly problematic in countries where the tobacco industry is not yet delegitimised, and civil society is less well-resourced and hence less able to counter the TTCs and their narrative. Overall, our findings demonstrate the need to critically review TTCs' current actions and claims in the context of evidence for extensive

engagement in strategies aimed to build credibility, secure policy influence and reboot declining sales and profits, generally at the expense of population health.

LIMITATIONS

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

Challenges and recommendations

Our findings have implications for tobacco control. First, they demonstrate the importance of identifying and addressing the TTCs' long-term influence strategies which are carefully coordinated at the global level yet which, by reshaping norms and beliefs, can have wider reaching impacts. The FCTC amply demonstrates the global ambition and reach of tobacco control. Yet, the FCTC, and tobacco control more generally, are largely operationalised at the national level where, in part due to resource constraints, advocacy efforts to address tobacco industry interference often focus on short-term policy opportunities. While national and regional work remain an essential entry point to understand and counter TTC strategies, a global focus could allow tracking and identification of new patterns of TTC activity or 'norms' that need countering and provide a means of bringing public health messages to, and countering TTC messages in, specific global settings. Such efforts would be closely coordinated with and support regional and national work, enabling efficiencies to be realised. Second, and closely linked to this, TTCs' overwhelming focus on renormalisation through reputation management shows that tobacco industry denormalisation, for which there is substantial evidence,¹⁰⁰ should be considered an essential tobacco control measure.¹⁰⁰ The implementation of a global denormalisation campaign could be one such effort, which could then be leveraged at regional and national levels. Third, the dominant use of coalition management strategies and the increasing use of third parties and what can be described as 'dark influence webs' suggests we must become more adept at exposing TTC third parties. This requires new research methods, including novel digital methods to identify likely front groups. This is, however, complex and time consuming and we therefore need to shift the onus to others: participation in policy events and consultations should require full disclosure of funding for participants and submitted evidence—simply declaring 'no COI' or no funding is insufficient. The importance of Article 5.3 cannot be overstated, and effective transparency and lobbying registers remain essential. Finally, growing TTC control of data and evidence, which enables it to shape norms, will hinder progress in all areas unless addressed. For example, the potential for novel products to contribute to tobacco control is hindered by the fact that research on such products is dominated by TTCs with an appalling history of research misconduct which emerging evidence suggests may be being repeated, and a vested interest in showing its products are safe.^{101–103} Ways to address this include through a database of authors' and editors' conflicts of interest which can help overcome the documented failure to declare interests within specific papers and alternative means of raising research funds from corporations while protecting that

research from vested interests, issues explored elsewhere.^{101 104} Open discussion and trust among the public health community will enable information on TTC conduct to be considered alongside emerging science on new products and their potential benefits and harms—only with this combination of evidence can the most effective policy decisions be made.

More broadly, there are lessons for efforts to address the commercial determinants of health, given the clear commonalities in underlying drivers and strategies already demonstrated across unhealthy commodity industries.^{105–107} Those working in alcohol and food policy should seek from the outset to address these global long-term influence strategies and not just focus on the immediate national level challenges. More broadly, we need to recognise that until we address underlying system drivers, progress will remain limited.^{107 108} The TTCs' growing use of increasingly opaque 'webs of influence' indicates this problem—TTCs have used their resource advantage to adapt to and counter attempts to increase transparency in policymaking. The public health community must therefore work collectively to push for more radical structural and systems change to address the commercial determinants of health. This might include accountability mechanisms such as ensuring corporations pay for the costs of the harm caused by the sale of harmful products, amending corporate regulation to reduce the dominant focus

What this paper adds

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

on profit and/or change the rules on limited liability, and wider changes to the global political and economic system that have increased corporate power and influence.

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