

- ISSUE BRIEF -
**DENORMALIZATION OF TOBACCO INDUSTRY
CORPORATE SOCIAL RESPONSIBILITY INITIATIVES**

This issue brief provides guidance on how countermarketing and tobacco control activism can denormalize the very corporate social responsibility programs that the tobacco companies rely upon to enhance their standing in society to continue to market and sell their lethal products.

THE ISSUE

The tobacco industry has used corporate social responsibility rhetoric and tactics as a tool to transform its defensive position on issues such as addiction, youth smoking, secondhand smoke, and smoking cessation into an offensive campaign of persuasion and public relations. Tobacco control and public health advocates must use countermarketing and activism to denormalize the tobacco industry by shining a light on the cynical, disingenuous nature of its corporate social responsibility programs.

THE EVIDENCE

CORPORATE SOCIAL RESPONSIBILITY

Corporate Social Responsibility (CSR) has become a potential path to legitimacy and improved public relations for both companies that produce mainstream products¹ and those that sell vice, such as the tobacco industry.² Since the early 1990s,³ the tobacco industry in particular has sought to bridge the gap between the perception it has earned as a merchant of death and its goal of gaining corporate legitimacy and normality by promoting programs, positions and policies it hopes the general public will believe are aimed at preventing or mitigating some of the societal ills that smoking causes, such as youth smoking.⁴ The tobacco industry's corporate responsibility efforts are contradicted by its continued use of personal responsibility rhetoric which aims to shift responsibility away from the corporations and back onto the public.

TOBACCO INDUSTRY DENORMALIZATION

* There have been calls for a countervailing effort on the part of tobacco control and public health advocates to expose the fraudulent and insidious nature of the tobacco industry's corporate social responsibility efforts, and to defuse any benefits it may be gaining as a result of such activity through denormalization of the industry.^{5,6,7} Tobacco industry denormalization shifts the focus from individual smokers' judgment to corporate misbehavior, showing how the industry has "operated outside the boundaries of civilized corporate behavior," by marketing a deadly product.⁸

- The main purpose of tobacco industry denormalization is to inform the public of the tobacco industry's role as a disease vector.^{9,10}
- Tobacco industry denormalization prevents the tobacco industry from arguing that it's just like any other legitimate industry.^{11,12}
- Research shows that cultivating an anti-industry attitude helps deter and reduce adolescent,¹³ young adult,¹⁴ and adult smoking.^{15,16} A further benefit of tobacco industry denormalization is it garners support for the advancement of a strong legislative or regulatory reform agenda.¹⁷ One study has found that tobacco industry denormalization efforts ultimately could so marginalize the tobacco industry as to "destabilize, reduce or even eventually eliminate the industrial production of tobacco."¹⁸

SECONDHAND SMOKE ACCOMMODATION STRATEGY

* The issue of secondhand smoke is a particularly vulnerable area for the tobacco industry, and ripe for tobacco industry denormalization activities.

- Using tobacco industry denormalization counter-marketing messages that include information about the tobacco industry's deceptive marketing, manipulation of science, and the dangers of secondhand smoke can help crystallize negative attitudes about the tobacco industry.^{19,20,21}
- For instance, debunking the industry's use of "junk science"²² can incite indignation among those targeted by the tobacco industry.^{23,24}
- Another important goal of tobacco industry denormalization is to educate the public about the dangers of secondhand smoke.^{25,26,27} Making it clear to the public that they are involuntarily breathing the dangerous and deadly smoke of others removes the "personal choice" argument from the tobacco industry's public relations arsenal.^{28,29} This argument is effective for use with both smokers and nonsmokers.³⁰

Philip Morris's Options Ventilation Program

- On June 2, 2000, Philip Morris established the "Options" ventilation support program which encouraged the hospitality industry to install supposedly improved ventilation systems to address the secondhand smoke issue. The program reassured business owners that ventilation technology existed that could adequately combat the adverse effects of secondhand smoke. Philip Morris offered ventilation as a "magic bullet" solution "to provide comfort and balance for both non-smokers and smokers in public."³¹ The Options program strategy was to avoid regulation by focusing on eliminating the "annoyance" of secondhand smoke via improved ventilation.³²
- Literature for the Options program touted Philip Morris's corporate responsibility, stating "At Philip Morris USA, we are working to find constructive alternatives that respect everyone's choices and preferences. It is one part of our role as a responsible company in a changing world."³³ The Options program allowed Philip Morris to appear as if it were taking positive action to address secondhand smoke concerns, but in point of fact it continued the tobacco industry's strategy of deflecting responsibility away from itself. With the focus on improved ventilation, it was merchants and restaurant owners who would bear the costs of the proposed solution, not the tobacco corporations.
- Citing internal tobacco industry documents, scientific reports, statements of public health authorities and statements by tobacco industry executives, public health advocates such as Americans For Nonsmokers' Rights (ANR) and the Campaign For Tobacco-Free Kids (CTFK) pushed back against Philip Morris's attempt at using a corporate social responsibility program to improve its image and prevent further regulation of public smoking. Since the inception of the Options program, ANR and CTFK used issue briefs^{34,35} and information on their websites^{36,37} to scrutinize, criticize and debunk the validity of the program's assertion that ventilation could be a "magic bullet" to solve the issue of secondhand smoke exposure.
- A scientific study published the same month the Options program was launched stated unequivocally that ventilation cannot adequately address the dangers of secondhand smoke exposure, and refuted the industry's "vague claims about the efficacy of ventilation."³⁸
- It's likely that these denormalization efforts were effective and caused Philip Morris to terminate its Options program. Nevertheless, Philip Morris still advocates accommodation on its corporate website.³⁹

INDUSTRY SPONSORED YOUTH SMOKING PREVENTION PROGRAMS

* The tobacco industry's "youth smoking prevention" programs focus largely on assigning blame to parents and peer pressure for youth smoking. This frames the issue around parenting and youth self-esteem instead of recognizing that one of the most significant factors in youth smoking is tobacco industry target marketing of youth. Moreover, by sponsoring youth smoking prevention programs, the tobacco companies attempt to claim credit for being better corporate citizens than in the past, even though the industry is still conducting business as usual by marketing its

products in a way that makes them attractive to youth. Recent studies have shown that kids thought that the new smokeless tobacco products packages looked like candy.⁴⁰⁴¹

- In the late 1990s, the tobacco industry began to recognize the power tobacco control advocates wielded with their focus on the tobacco industry's targeting of its marketing and products towards youth. Regulators and legislators took notice and a generally anti-tobacco sentiment began to build. This threatened the industry's viability, so in an effort to improve its corporate image and to preserve its status as a legitimate and barely-regulated industry, it decided to try to co-opt the message that youth should not smoke. Even so, the industry followed its tradition of gearing its message towards personal responsibility and choice.
- The tobacco industry recognized that the issue of youth smoking left it vulnerable to regulation,⁴² particularly when, in 1995, David Kessler, the Commissioner of the Food and Drug Administration, calling smoking prevalence and the harm it causes a "pediatric disease,"⁴³ attempted to claim authority for regulating cigarettes as drug delivery devices.⁴⁴ Indeed, R.J. Reynolds's Chairman/CEO called Dr. Kessler's move "tactical brilliance."⁴⁵
- A 1995 draft of a speech by a British American Tobacco Company solicitor asserted that the company needed to "seize the moral high ground on this issue" and preempt public health advocates and governmental agencies and legislators by instituting policies and programs to prevent youth smoking.⁴⁶ He stated: "The bottom line . . . is . . . if we don't do something fast to project that sense of industry responsibility regarding the youth access issue, we are going to be looking at severe marketing restrictions . . . [which would] pave the way for equally severe legislation or regulation on where adults are allowed to smoke."⁴⁷

THE PUBLIC REJECTS TOBACCO INDUSTRY YOUTH SMOKING PROGRAMS

Lorillard's Youth Smoking Prevention Program -- Tobacco Is Whacko If You're a Teen

- Lorillard Tobacco Company's youth smoking prevention program's slogan was "Tobacco Is Whacko If You're a Teen," which the company continued to use even after receiving feedback from teens that the slogan served as a further inducement to smoke.⁴⁸ The campaign included television and print advertisements, as well as sponsorship of various events that attracted youth.
- In a 2000 survey Lorillard conducted to measure the efficacy of its "Tobacco is Whacko If You're a Teen" youth smoking prevention commercials, the youths interviewed expressed the view that the commercials did not give them adequate reasons to choose not to smoke, since they did not explain the adverse health consequences of smoking.⁴⁹ Moreover, some teens felt that by using a slogan that singled out teens as the target of the "don't smoke" message, "it implie[d] permission to all non-teens" and they felt that "it weakened the power of the message."⁵⁰
- Under cross-examination in the U.S. Department of Justice's racketeering case against the tobacco industry, Ronald Milstein, Lorillard's Vice President, General Counsel and Secretary admitted that the company had allowed its senior brand manager for Newport cigarettes to access and review the information gathered in a survey of youth who were providing feedback on the company's "Tobacco Is Whacko If You're a Teen" youth smoking prevention program, and that the company also enlisted his help in developing the program's media campaign.⁵¹ The survey information included "both quantitative and qualitative research on teen attitudes and behaviors."⁵² In his sworn testimony, Milstein admitted that Newport was the second leading brand of cigarettes smoked by youth aged 12 to 17.⁵³
- Lorillard pulled its sponsorship of the NBA's "Hoop It Up" event because it claimed that criticism by public health advocates "became a detraction to the sponsorship."⁵⁴
- Lorillard withdrew its "Tobacco Is Whacko If You're a Teen" program because of "negative publicity" which the company "felt [] was interfering with the message we were trying to get."⁵⁵

Philip Morris's Youth Smoking Prevention Program -- Think. Don't Smoke.

- In the spring of 2000, Philip Morris distributed 15 million book covers to children ages nine through fourteen years of age as part of its "Think. Don't Smoke" campaign.⁵⁶ To design the book covers, Philip Morris used the same advertising agency -- Young & Rubicam -- that it used to help study and promote its cigarettes to

“young adult smokers”^{57,58} (an industry euphemism for underage and teenage smokers⁵⁹), and which also helped RJR to promote the notoriously youth-oriented Joe Camel cartoon advertising campaign.⁶⁰ On the outside front of the book covers, there was a boy riding a snow board and the words “Don’t Wipe Out.” School officials denounced the book covers, asserting that they and their students detected subliminal images that resembled cigarettes, tobacco leaves and smoke clouds.^{61,62} They called the program a “marketing ploy to get the Philip Morris name in front of kids in grade school [and] the middle schools”⁶³ intended to improve the company’s image rather than curb youth smoking.⁶⁴

- Rhode Island Lt. Gov. Charles J. Fogarty rallied with students, principals, and anti-smoking activists against the book covers.⁶⁵ They asserted that the book covers constituted a violation of the 1998 Master Settlement Agreement between the states and the major tobacco companies, which contained a provision barring cigarette companies from marketing to children.⁶⁶
- California Superintendent of Public Instruction, Delaine Eastin, wrote to school districts and county education offices to warn them about the book covers, which she called a “promotional endeavor.”⁶⁷
- California Attorney General Bill Lockyer wrote to Philip Morris to object to its book covers and ask for a recall, stating that:

*Your company's name and the Surgeon General's warning, which appear on each book cover, also only serve to familiarize children with the Philip Morris name and reinforce the message that Philip Morris is a good corporate citizen . . . despite the fact that tens of thousands of Marlboro smokers die prematurely each year from smoking-induced diseases. This is especially troubling, given that Philip Morris' top-selling cigarettes, Marlboro, is by far the number one brand among children.*⁶⁸

Philip Morris responded by discontinuing distribution of the book covers,⁶⁹ although it refused to recall them,⁷⁰ as Lockyer had requested.⁷¹ Attorney General Lockyer eventually issued a press release in cooperation with the State Superintendent of Public Instruction, warning schools about the book covers, and accusing them of diluting the state’s efforts to deter youth smoking.⁷²

- Mark Green, New York City’s Public Advocate, held a press conference objecting to Philip Morris’s book covers.⁷³
- Then Arizona Attorney General, Janet Napolitano, wrote to Philip Morris about the book covers with concerns that “[s]ome of the students have been troubled by what they perceived as images in the depictions” on the book covers, and asking for more information about the book covers’ creation and distribution, as well as reassurance that they did not violate the Master Settlement Agreement.⁷⁴ Philip Morris was already fully aware that its book cover campaign had adverse MSA implications. An internal email between Philip Morris executives about a news account of the book cover uproar, predicted “Looks like we may have our first MSA issue for 2001.”⁷⁵
- Michael P. Eriksen, Director of the Office on Smoking and Health, National Center for Chronic Disease Prevention and Health Promotion, which is part of the Centers for Disease Control and Prevention, met with Philip Morris executives about the “Think. Don’t Smoke.” program and recommended that “the single greatest action Philip Morris could take to prevent teen smoking is to modify its current advertising and promotion efforts . . . so as to minimize their effect on teenagers.”⁷⁶
- In January 2001, a coalition of tobacco control advocates, state attorneys general, public health officials and scholars sent a letter to the National Association of Attorneys General requesting an investigation into Philip Morris’s book covers.⁷⁷
- The Campaign for Tobacco-Free Kids issued a press release in April of 1999 announcing the findings of a three-state study, which concluded that the “Think. Don’t Smoke.” campaign was not only ineffective, but might increase youth interest in smoking in the near future.⁷⁸ Another CTFK press release used the industry’s internal documents to call attention to Philip Morris’s efforts to build credibility for its “Think. Don’t Smoke.” program by collaborating with respected third parties such as the U.S. Junior Chamber of Commerce “Jaycees.” The press release stated that these documents “demonstrate that the motivation

The “Think. Don’t Smoke.” campaign was not only ineffective, but might increase youth interest in smoking in the near future . . .

behind these programs has not been to reduce tobacco use among kids, but rather to gain the industry positive publicity and create the appearance of action.”⁷⁹

- After the American Legacy Foundation released a study that the “Think. Don’t Smoke.” program was ineffective and a distraction from Legacy’s more effective truth© countermarketing campaign, Philip Morris pulled its ads within two months of a press conference Legacy held to announce the study’s release.^{80,81}

SMOKING CESSATION PROGRAMS

PHILIP MORRIS’S SMOKING CESSATION PROGRAM

* In 1999, Philip Morris decided to extend its corporate social responsibility efforts to include a program that would provide resources and information to its customers who wanted to quit smoking.⁸² This effort included distributing a guide on smoking cessation, and funding more research on the topic.

- In 2009, one of Philip Morris’s research grantees who helped write the smoking cessation guide was called out by public health researchers who claimed that the Philip Morris researcher improperly approached them for their help with an evaluation of Philip Morris’s QuitAssist website. The public health researchers claimed that the tobacco research grantee offered to pay them for their input as consultants while assuring them he would conceal their involvement so that they would not be stigmatized as working for the tobacco industry, which included paying them in a way that could not connect them to the industry. He sent an email to the researchers soliciting their input, which stated: “Your name would not be associated in any way with your commentary, and you would not be mentioned in any way in any correspondence or reports of findings from the study. Once you have been paid, your name would be removed from our records.”⁸³ They exposed the underhanded tactic and exposed Philip Morris’s cynical approach to this issue by publishing their account in a public health journal.

* The tobacco industry’s promotion of cessation has already begun to wane. Coinciding with their acquisition of smokeless tobacco company subsidiaries, the major U.S. cigarette manufacturers are now shifting their emphasis from supporting smoking cessation to advocating for the use of smokeless tobacco products as an alternative to quitting. Public health advocates and officials have spoken out against this bait and switch tactic.

- In June 2003, at a hearing of the U.S. House of Representative’s Subcommittee on Commerce, Trade and Consumer Protection, members of the tobacco industry testified that while smoking cessation was an important goal (and, as they implied, an unrealistic and Utopian goal), the focus should be on encouraging the sale and use of so-called reduced-risk and reduced-exposure tobacco products, such as smokeless tobacco.⁸⁴
- One member of Congress roundly criticized those testifying for the smokeless tobacco industry, telling them that their use of “the guise of concern for public health” qualified them for “a chutzpa award.”⁸⁵ She asserted that this argument “that smokeless tobacco use is a healthier alternative to smoking is analogous to suggesting that one is better off jumping off the fifth floor of the building than the 20th because, of course, both are likely to cost you your life.”⁸⁶ She pointed out that internal industry documents prove that smokeless tobacco manufacturers are pursuing a “dual consumption” strategy, not trying to help people quit smoking.⁸⁷ There is both anecdotal evidence⁸⁸ and scholarly research^{89,90,91,92,93} that affirm this assertion as well as the fact that smokeless tobacco carries its own burden of harm.
- At the same hearing, Surgeon General Richard Carmona testified that there was scientific evidence to support the assertion that smokeless tobacco is harmful and that telling potential customers such as youth that this is a safer product could act as a prelude to their eventually moving on to smoking cigarettes.⁹⁴

THE MESSAGE

- Denormalization of the tobacco industry’s corporate image through countermarketing and activism is the best way for public health and tobacco control advocates to undermine the industry’s attempt at an image makeover.
- The tobacco industry sees the issue of secondhand smoke and social acceptability of smoking as vital to its continued survival. It has used corporate social responsibility programs to promote an image of reasonableness and willingness to cooperate on the issue. It has also placed an emphasis on personal responsibility and improved communication, while promoting improved ventilation as a false “magic bullet” that can adequately address the concerns about exposure to secondhand smoke. The disingenuous nature

of this strategy makes the industry particularly vulnerable to denormalization efforts on the issue of secondhand smoke.

- **The tobacco industry uses “youth smoking prevention” programs to pretend it is concerned about preventing youth smoking, which helps it improve its image in society. But industry “youth smoking prevention” programs really act as a disguise for improving the companies’ image with youth, while allowing them to continue marketing to them as usual. The programs employ a strategy which emphasizes personal rather than corporate responsibility, and shifts the responsibility of eradicating youth smoking onto the children themselves, and their parents and teachers. Shining a light on this deceptive and disingenuous corporate rehabilitation scheme through denormalization activities has proven crucial to dismantling these programs.**
- **The issue of smoking cessation is one that Philip Morris tried to turn to its advantage and burnish its image as a responsible corporation. Public health and tobacco control advocates, as well as public health officials and legislators, have focused the spotlight on yet another cynical ploy to improve the tobacco industry’s corporate image.**

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