# **Tobacco Industry Youth Smoking Prevention Programs: Protecting the Industry and Hurting Tobacco Control**

Anne Landman, BA, Pamela M. Ling, MD, MPH, and Stanton A. Glantz, PhD

The tobacco industry is aggressively promoting its "youth smoking education and prevention" programs worldwide, modeled on ones it introduced in the United States in the 1980s, 1-3 nominally to reduce youth smoking. 4-9 R.J. Reynolds Tobacco (RJR) reported that by 1999 it had distributed materials to millions of young Americans through amusement parks, video arcades, theaters, schools, Boys and Girls Clubs, and baseball camps.9 In 2001, Philip Morris announced that it was "actively involved in more than 130 [youth smoking prevention] programs in more than 70 countries."8 The few studies that have compared industry programs with public health campaigns found that industry programs were less appealing and convincing to youths 10-14 and that industry programs neglected the health effects of tobacco use and subtly promoted smoking.15 Public health advocates have questioned the appropriateness of industry-sponsored youth smoking prevention programs. 16-19

Previously-secret tobacco industry documents provide an important source of information on industry activities.20 Academic studies of industry documents and youths have focused on proving that the tobacco industry targeted youths in its advertising.21-24 We analyzed tobacco industry documents to determine why the industry developed youth programs, to describe the themes that were pursued and how these programs were used, and to find evidence of whether these programs reduce youth smoking. The purpose of the industry's youth smoking prevention programs is not to reduce youth smoking but rather to serve the industry's political needs by preventing effective tobacco control legislation, marginalizing public health advocates, preserving the industry's access to youths, creating allies within policymaking and regulatory bodies, defusing opposition from parents and educators, bolstering industry credibil*Objectives.* This report describes the history, true goals, and effects of tobacco industry–sponsored youth smoking prevention programs.

Methods. We analyzed previously-secret tobacco industry documents.

Results. The industry started these programs in the 1980s to forestall legislation that would restrict industry activities. Industry programs portray smoking as an adult choice and fail to discuss how tobacco advertising promotes smoking or the health dangers of smoking. The industry has used these programs to fight taxes, clean-indoorair laws, and marketing restrictions worldwide. There is no evidence that these programs decrease smoking among youths.

Conclusions. Tobacco industry youth programs do more harm than good for tobacco control. The tobacco industry should not be allowed to run or directly fund youth smoking prevention programs. (*Am J Public Health*. 2002;92:917–930)

ity, and preserving the industry's influence with policymakers.

#### **METHODS**

We searched the following tobacco industry document archives made available by tobacco litigation during the 1990s: the University of California-San Francisco's Mangini collection of RJR and British American Tobacco marketing documents (http://www. library.ucsf.edu/tobacco), tobacco industry document Web sites (Philip Morris: http:// www.pmdocs.com; Brown and Williamson: http://www.brownandwilliamson.com; RJR: www.rjrtdocs.com; Lorillard: http://www. lorillarddocs.com; Tobacco Institute: www. tobaccoinstitute.com), Tobacco Documents Online (http://www.tobaccodocuments.org), and the Minnesota Select Set (outside.cdc.gov: 8080/BASIS/ncctld/web/mnimages). Search terms included the following: "youth," "youth smoking prevention," "YSP," "prevention," "access," "youth programs," "evaluation," "tracking," and the names of individual youth programs, such as Action Against Access and Helping Youth Decide. We extended the searches by using the names of key organizations and individuals identified in relevant documents, their office locations, project dates, and reference (Bates) numbers. Searches were conducted between June and

December 2001. Initial searches yielded thousands of documents; these were read, and those relevant to tobacco industry—sponsored youth smoking prevention efforts were selected, yielding a collection of 496 documents, which were analyzed in detail. We sought to be exhaustive in our searching to ensure that, to the best of our ability, the documents discussed in this report fairly and accurately represent the material we located.

#### **RESULTS**

## Origins and Goals of the Tobacco Industry's Programs

The tobacco industry implements 4 types of youth smoking prevention programs (Table 1): programs that speak directly to youths, programs that speak to parents, programs directed toward retailers, and programs that fund mainstream youth organizations. These programs stress several common themes: (1) smoking is an "adult choice," (2) children start smoking because of peer pressure and a lack of proper role modeling and guidance from their parents, and (3) an emphasis of "the law" as the reason not to smoke. Each type of program offers unique benefits for the industry. None discusses the fact that nicotine is addictive, that smoking or passive smoking causes disease, or that tobacco marketing has a role in promoting

| Program Characteristics   | Benefits Sought by Tobacco Industry   | Examples   | How Program Has Been Used by Industry  |
|---|---|--|--|
|   | Programs That   | Speak Directly to Youth  |  |
| Spread through media campaigns. Portray smoking as an "adult choice" and an "adult decision." Sample themes:  "Kids Don't Smoke"  "Smoking Isn't Cool"  "Wait Until You're Older" | Marginalize opposition to make it appear extreme.  Reinforce smoking as an adult choice.  Undermine campaigns: weaker messages, target inappropriately young teens.  Gain credibility by working with educators.  Maintain access to youth. | "Right Decisions, Right Now" (RJR, 1991).  Can I Do It? (Czech).  "Juveniles Should Not Smoke" (Finnish, 1992).  "Smoking Can Wait" (Russian, 1994–95).  MTV campaign in Europe. | Promoted weakly "antismoking" messages. Generated good PR. Built alliances with educators. Used to fight legislation in lowa, California, New Hampshire, Wisconsin, and other states (arguing it's not necessary). Successfully fought restrictive legislation overseas. |
|   |   |  | Used to collect marketing data on youth.   |
|   | Programs T  | hat Speak to Parents   | 5 ,  |
| Spread through brochures, booths at festivals, and public gatherings.  Sample themes:  "Talk to your kids"  Assist youth with decisionmaking.                                     | Marginalize opposition.  Blame parents and society (not marketing) for youth smoking.  Gain credibility by working with parent groups.  | "Responsible Living Program" (TI), which included<br>"Helping Youth Decide" (TI, 1984) and "Helping<br>Youth Say No" (TI, 1990; PM, 1994).                                       | Program promoted to legislators in many<br>states.<br>Generated good PR outreach to minority<br>community parents.   |
| Parental empowerment.   | Dragrame for Datailage to   | Nominally Decrease Youth Access  |  |
| Spread through stickers and posters in  | Marginalize opposition.   | "Action Against Access" (PM, 1995).  | Implemented in ASSIST states to fight  |
| retail shops and visits by cigarette representatives.   | Imply age is the only reason not to smoke.  Keep industry abreast of local legislative  | "We Card" (Coalition for Responsible Tobacco<br>Retailing).  | legislation and used retailers to alert industry about local ordinance efforts.  |
| Sample themes: Check identification. Smoking is for adults only. Retailer has responsibility for youth access in stores.  | activity.  Build alliances with retailers.  Shift attention away from industry's contribution to, and responsibility for, youth smoking.  | "It's the Law" (TI, 1990; PM, 1994).<br>"Support the Law" (RJR, 1992).   | Got Tobacco Industry representation on Nevada governor's youth smoking grou Undermined attempts by FDA to regulate tobacco. Used to fight strict access legislation in Iowa.   |
|   | Direct Funding  | g of Youth Organizations   |  |
| Spread through reputable, credible youth organizations, often with the promise that programs were designed or executed independently of tobacco companies.                        | Gain credibility, attain aura of legitimacy. Build alliances with reputable youth groups.   | NASBE. 4-H "Health Rocks." US Junior Chamber of Commerce. Seeking alliances with Scouts, YMCA/YWCA, Boys and Girls Clubs, Junior Achievement.                                    | Built alliances, attempted to use NASBE as mouthpiece for industry rhetoric.  NASBE president used for extensive media tours.  Undermined first anti-tobacco media campaign in Minnesota.  |

Note. TI = Tobacco Institute; PM = Philip Morris; RJR = R. J. Reynolds; NASBE = National Association of State Boards of Education; ASSIST = American Stop Smoking Intervention Study; FDA = Food and Drug Administration; PR = public relations.

smoking. The tobacco industry first introduced programs aimed at youths and their parents (such as Helping Youth Decide) in the mid-1980s, programs aimed at retailers in the early 1990s, and funding of mainstream youth organizations and worldwide expansion of these programs in the late 1990s.<sup>25,26</sup>

Youth programs were developed as a response to 2 major industry concerns: public scrutiny of industry marketing practices and

the threat of legislation or regulation. In 1978, US Secretary of Health, Education, and Welfare Joseph Califano accused the tobacco industry of marketing to children, 27,28 the nonsmokers' rights movement emerged, and the Federal Trade Commission considered the regulation of tobacco advertising. In 1982, the industry failed to defeat a federal excise tax bill, generating concern about its eroding public position and lobbying power. In a December 9, 1982, speech to the Tobacco Institute Exec-

utive Committee's annual meeting, institute President Samuel Chilcote observed that the industry's "image as an unbeatable lobby has been punctured." A confidential Tobacco Institute presentation, "The Development of Tobacco Industry Strategy" (probably written around 1982–1983), suggests:

The potential positive outcomes of adopting programs of this nature [socially responsible programs] may be . . . a more sophisticated understanding by government regulators of the

needs/behaviors of industry. For example, a program to discourage teens from smoking (an adult decision) might prevent or delay further regulation of the tobacco industry.<sup>30</sup> [italics added]

A youth smoking prevention program might help the industry deflect meaningful regulation of its marketing practices.

The purpose of the industry's youth programs was, from the beginning, to serve the industry's political needs. A November 27, 1984, memo from Tobacco Institute Vice President Anne Duffin to Dave Henderson and Roger Mozingo (also of the Tobacco Institute) shows that the institute promoted its youth prevention programs to legislative audiences with the expectation that doing so would help "to discourage [restrictions on free] sampling and other legislation and to solicit quotable comment from community leaders."31 A 1986 "Presentation to the Communications Committee" about the institute's Helping Youth Decide program, probably written by Duffin, puts the new youth program in the broadest political context:

Note I say "project" because that is exactly what "Helping Youth Decide"-HYD for shortis. What it should be . . . is a legislative program . . . and it is now ready to be that. The need for this legislative resource is greater than it ever has been. The cigarette advertising issue has been right smack at center state [sic] now since late spring . . . on Capitol Hill . . . and, increasingly, in states and cities.<sup>32</sup> [italics added]

Likewise, in 1991 Philip Morris restated that the success of the "youth initiatives" would be determined by whether they led to a "reduction in legislation introduced and passed restricting or banning our sales and marketing activities" as well as "passage of legislation favorable to the industry" and "greater support from business, parent and teacher groups."33

The youth strategy repeatedly played a key role in the industry's efforts to undermine state tobacco control initiatives. A 1985 progress report for the Tobacco Institute reported that its Responsible Living program (which included Helping Youth Decide and Helping Youth Say No) was used to defeat legislation in New Hampshire, Maryland, Wisconsin, and California. The program also won the industry endorsements from state legislators in California, Illinois, Michigan, New Hampshire,

and Missouri.34 In addition, the industry used youth programs as part of its unsuccessful 1988 bid to defeat a California initiative to increase the tobacco tax to fund a tobacco control program (Proposition 99), arguing that because it had its own youth programs, the tax was "unnecessary." 35 Youth programs played a part in the industry's attempts to defeat a 1991 Iowa ban on cigarette vending machines and free samples,36 a 1996 ingredients disclosure bill in Vermont,37 and other state efforts to regulate tobacco.38

#### **Industry Programs Directed at Youths** and Parents Complement Tobacco **Advertising**

In designing its youth campaigns, the industry took care not to contradict or interfere with tobacco advertising. 39,40 In 1985, Duffin wrote John Rupp and Lee Stafford of the industry's law firm Covington & Burling, seeking advice on how to draft a brochure on Helping Youth Decide to avoid mentioning the health consequences of smoking:

Because of criticism from the antis [anti-smokers] on HYD [Helping Youth Decide], I'd like to get our own scenario in on cigarettes-not touching on any health implications, but positing that youngsters don't need to smoke to look "grown up," needn't blindly follow the examples of others, etc.

I'm toying with consulting with the likes of Dan Horn [a psychologist who had been a leader in smoking research in the federal government until he retired in 1978], if he could be persuaded of our good intentions and give us the psychologist's view of how to approach this without mentioning health.<sup>41</sup> [italics added]

Presenting smoking as an "adult choice," a "forbidden fruit," and an act of rebellion are common industry marketing themes. 42-45 A 1977 Imperial Tobacco marketing research report from Canada, "Subject: Project 16 English Youth," typifies how the industry uses "forbidden fruit" messages to interest youth:

Of course, one of the very things that are attractive is [the] mere fact that cigarettes are forbidden fruit. Everywhere they [Canadian teenagers] turn are admonitions to stay away from it. School lectures and teachers may [sic] not to smoke. Parents (even smoking ones) say not to smoke. Therefore, when the adolescent is looking for something that at the same time makes them feel different and also makes them feel that they are old enough to ignore this weight of authority so as to feel that they have

made their own choice, what better could be found than a cigarette? It is not just a smoke. It is a statement, a naughty adventure, a milestone episode. 45 [italics added]

These themes send mixed messages when used in "smoking prevention." 15,46 Philip Morris ran literal "forbidden fruit" messages in a 1999 series of full-page advertisements in news magazines aimed at parents that featured a bowl of fruit (or a glass of milk with cookies) and the questions, "What else are you leaving out for your kids?" and "What else is within your kids' reach?"47-49

One of the motivations behind the Tobacco Institute's youth programs was to displace educational programs developed by public health groups because these "almost all consist of wrongful 'scare' tactics" and "present smoking as repugnant and unhealthy." 40,50 A 1991 Tobacco Institute "Discussion Paper" shows how youth programs helped place responsibility for youth smoking on parents' inability to control peer pressure, a strategy that allowed the industry to shift the focus away from its advertising practices while portraying tobacco control advocates as "extremist":

The youth program and its individual parts support The Institute's objective of discouraging unfair and counterproductive federal, state and local restrictions on cigarette advertising, by:

- · Providing ongoing and persuasive evidence that the industry is actively discouraging youth smoking and independent verification that the industry's efforts are valid.
- · Reinforcing the belief that peer pressure-not advertising-is the cause of youth smoking.
- · Seizing the political center and forcing the anti-smokers to an extreme.

The strategy is fairly simple:

- 1. Heavily promote industry opposition to youth smoking.
- 2. Align the industry with broader, more sophisticated view of the problem, i.e., parental inability to offset peer pressure.
- 3. Work with and through credible child welfare professionals and educators to tackle the "problem."
- 4. Bait anti-tobacco forces to criticize industry efforts. Focus media on anti's extremism. Anticipate and blunt antis strongest points . . . for positioning purposes. Broad-based advertising . . has the important effect of making the public aware that the industry says it is trying to do the right thing."51 [italics in original]

Whereas the industry was aggressive in saying that it was doing the "right thing," we were not able to locate any "persuasive evidence" verifying that the industry's youth

smoking prevention programs actually reduced youth smoking.

#### Tobacco Industry Retailer Programs Help Fight Tobacco Control

In 1990, the Tobacco Institute launched the "It's the Law" program, which urged retailers to post signs and stickers and to wear lapel buttons stating that they did not sell tobacco to persons under 18.52 Philip Morris took over management of the "It's the Law" program in 1994<sup>26</sup> and made it part of its Action Against Access program in 1995. The retailer portion, named "Ask First-It's the Law," included training to ask for proof of age. 53 A series of e-mails in 1996 between high-level Philip Morris executives reveal that Philip Morris heavily advertised the Action Against Access campaign in locations where legislators, not children, would be sure to see them.<sup>54</sup> Philip Morris used the presence of these programs to argue against the government's funding further tobacco control efforts.55

In addition, the industry has used its youth access programs to recruit a network of retailers as an "early warning system" to detect and defeat local tobacco control ordinances. <sup>56–58</sup> The tobacco industry funded its retail allies to perform these actions, and the retailer training program "It's the Law" helped facilitate the contact. A confidential 1992 report by Kurt Malmgren, senior vice president of state activities at the Tobacco Institute, to Chilcote makes this clear:

For monitoring purposes, we fund our allies in the convenience store groups to regularly report on ordinance introductions and assist in campaigns to stop unreasonable measures. Promotion of the Institute's "It's the Law" program and other industry programs play a helpful role as well. <sup>57</sup>

A 1994 speech by Ellen Merlo, senior vice president of corporate affairs at Philip Morris, reveals that Philip Morris also enlisted the assistance of retailers to help defeat local ordinance efforts:

... with ... local activity rampant, we realized we had to have some way to control the bleeding. We needed an effective system to let us know when and where local laws were being proposed, either at town meetings, in the local city councils or by Boards of Health. Working with the New England Convenience Store Association and other tobacco companies, we developed a network whereby local retailers

could assist us by providing information on legislative activities in every Massachusetts Community. We've discovered that if we have enough advance notice  $\ldots$  and get somebody there for the public hearing, we can make a difference.  $^{56}$ 

The industry used this network to detect and fight not only youth access measures and advertising restrictions but also clean-indoorair laws.  $^{59-63}$ 

In 1994, the US Food and Drug Administration (FDA) announced its intent to pursue regulations to protect children from tobacco promotion and nicotine addiction. The regulations would have ended tobacco advertisements within 1000 feet of schools, eliminated self-service tobacco displays, and required "tombstone" advertising for tobacco products (advertisements that consist only of black print on a white background, without pictures).<sup>64</sup> Philip Morris used its Action Against Access youth program as part of its argument that the FDA's proposal was unnecessary. 65 A 1996 RJR press release argued that the FDA regulation was unnecessary because the industry's We Card program was "now making a measurable difference."66 The release gave no details about the relative size of this claimed "difference" or how it was measured, nor any verification that it was measured at all.

## Working Through Third Parties: The National Association of State Boards of Education

The tobacco companies recognize that they lack credibility with the public and policy-makers. <sup>67,68</sup> This situation makes representation by credible third parties an indispensable tool for the tobacco industry to achieve its goals, particularly in dealing with politicians. <sup>69</sup> A speaker in a 1984 Philip Morris Corporate Affairs World Conference explained this bluntly: "So the whole question of . . . enlisting this whole third-party concept in our defense structure is to give us clout, to give us power, to give us credibility, to give us leverage, to give us access where we don't ordinarily have access ourselves."

In 1984, the Tobacco Institute recruited a credible third party on youth by formalizing an alliance with the National Association of State Boards of Education (NASBE). The Tobacco Institute solicited NASBE to disseminate its Helping Youth Decide program, a

component of the institute's Responsible Living youth program (Table 1). The Tobacco Institute carefully considered the political value of NASBE's partnership. An April 12, 1984, Tobacco Institute memorandum from Tom Humber, chair of the Tobacco Institute's Communications Committee, to the institute's Executive Committee about recommendations for the Responsible Living program summarizes the "distinct advantages to working with NASBE":

- NASBE will provide us with an established, clear link to all levels of government: federal, state and local.
- NASBE's members tend not to be educators, but members of the business—political community elected or appointed to serve on their respective State Boards of Education. They are not "cause" oriented and are, for the most part, politically savvy and supportive of business perspectives. There is no evidence of anti-tobacco bias at NASBE. . . . potential critics within the educational establishment will be cautious about raising objections to this program. . . . At the direction of the Executive Committee, exploratory discussions have been held with NASBE. <sup>70</sup>

The Tobacco Institute hired NASBE's past president, Jolly Ann Davidson, to tour the country with Walker Merryman, the institute's vice president for communication, to promote the program to the media and legislators. <sup>71–73</sup> The first places the institute planned to send Davidson and Walker were states considering legislation that would limit or ban promotions that offered free samples of cigarettes. <sup>74,75</sup>

Shortly after joining with the Tobacco Institute, NASBE found itself criticized by health advocates. <sup>76–79</sup> James A. Swomley, managing director of the American Lung Association, wrote to NASBE, pointing out that the institute was using NASBE as a legislative tool. <sup>80–82</sup> Tobacco Institute Vice President Anne Duffin noted NASBE's troubles in her 1986 memorandums and presentation to the institute's Communications Committee <sup>32,83</sup> and assisted in drafting NASBE's responses to critics <sup>84</sup>

Conflict emerged between NASBE and the Tobacco Institute as they tried to find common acceptable wording for their joint public statements. For example, Duffin questioned some of the objections that Phyllis Blaunstein, executive director of NASBE, had to claims in a draft brochure promoting Helping Youth Decide. Blaunstein wanted to remove a state-

ment that "both organizations believe that postponing a decision is in itself making a decision," saying that the phrase was "inconsistent with our [the Tobacco Institute's] claim that we don't want kids to smoke."85 Blaunstein also pushed the institute to remove the claim that "cigarette makers have received little credit for their efforts to avoid the youth market" from the brochure. 85 Mutual frustration with wording continued to be a persistent problem between NASBE and the institute<sup>32,86-88</sup>; in April 1985, after several exchanges, Lana Muraskin, director of the Helping Youth Decide program at NASBE, wrote a short letter to Duffin withdrawing permission for the institute to use NASBE's logo on a brochure touting the success of Helping Youth Decide.89

Soon, the institute started holding money over NASBE's head to try to force the organization to cooperate with its public relations goals. In a May 30, 1986, memorandum, Duffin stated her intent to remind a NASBE official that:

(1) we have not got our money's worth in planned projects in any year so far (2) we certainly have not had the full time attention of the three staffers whose time we reportedly have been paying and (3) we will set up our 1986 payment based on completed projects delivered, not drafts, as has been our downfall.

A handwritten February 2, 1987, memorandum by a NASBE employee reflects growing ill will between the 2 organizations, particularly Duffin's references to people "at T.I. who question whether they are getting their money's worth from our past and current efforts." <sup>91</sup>

In 1988, NASBE terminated its relationship with the institute by withdrawing its sponsorship of the youth programs. <sup>92,93</sup>

The Tobacco Institute then created its own "independent foundation" to replace NASBE. This foundation, the Family COURSE Consortium, was presented as a "not-for-profit organization comprised of educators, youth organization professionals and other interested parties." The "single goal" of the Family COURSE Consortium was to promote youth programs in a manner responsive to the institute. <sup>92</sup> Early in 1989, the Tobacco Institute redirected the Responsible Living Program to focus solely on the distribution and promo-

tion of the Helping Youth Decide booklet, noting that the institute's "Federal Relations Division feels that the legislative benefits of the HYD [Helping Youth Decide] program are great and have expressed their desire that the promotion of these booklets continue." 95

### Use of Third Parties in the Late 1990s: Philip Morris and 4-H

A 1999 Philip Morris internal presentation about youth programs states Philip Morris's intent to pursue "strategic partnership outreach" to 4-H Clubs, Boys and Girls Clubs, the Junior Achievement, Kids Café, the YMCA, and the YWCA with a youth nonsmoking program. <sup>96</sup> However, Philip Morris sought more pervasive influence in these organizations than simply making presentations to their members. Philip Morris intended to place its own representatives on the boards of these organizations and to provide money in the form of grants of \$10 000 to \$100 000. <sup>96</sup>

The national 4-H program is the youth education branch of the US Department of Agriculture's Cooperative Extension Service, an agricultural information service that maintains offices in counties throughout the United States. (4-H stands for "Head, Heart, Hands, and Health.") 4-H Club participants range in age from 5 to 21. The program has a long-standing reputation as a respected youth service organization and emphasizes "learning-by-doing."

In 1998, Philip Morris approached representatives of 4-H and offered a \$4.3 million grant to design and implement a youth antismoking program. 4-H, which previously had not dealt with cigarette manufacturers to any significant extent, agreed to move forward with "planning the new Philip Morris USA initiative." On March 18, 1999, Philip Morris sent the national 4-H office the first installment check for \$1.7 million, 98 and on March 24, the National 4-H Council publicly announced its new alliance with Philip Morris.

The 4-H Clubs of America immediately became the target of intense protest from the public health community. The American Lung Association, American Heart Association, American Cancer Society, Americans for Nonsmokers Rights, American Medical Association, and National Center for Tobacco Free Kids wrote to 4-H, citing the industry's his-

tory of aligning itself with various respectable organizations to polish its public image and shore up its legislative clout. (4-H shared the resulting correspondence with Philip Morris. <sup>100–104</sup>) As a result, 27 of 50 state 4-H organizations rejected involvement in the partnership with Philip Morris. The national 4-H organization, however, continued its partnership with Philip Morris.

The Health Rocks program that evolved out of 4-H's tobacco funding in 2001 has the nominal goal of reducing youth smoking and tobacco use. 105 The program's Web site states, "the [Health Rocks] evaluation also showed a need for the program to focus more on life skills in general-not just tobacco use prevention."105 Like earlier tobacco industry-created programs, the Health Rocks program seeks to broaden and diffuse youth tobacco prevention efforts into a program aimed at "develop[ing] life skills, with a special emphasis on youth smoking prevention" and to "engage youth and adults as partners in developing and implementing community strategies to prepare young people to make healthy lifestyle choices."106

In justifying the alliance, Richard Sauer, head of the National 4-H Council, responded to organizations that had criticized 4-H by repeating the themes of Philip Morris's public relations campaign, stating that Philip Morris was a "new," more responsible company:

We continue to see old references from 20 or more years ago about what Philip Morris is or another tobacco company did or did not do. None of us today can do anything about the past. I believe that Philip Morris, USA, which is under new corporate leadership, has recognized its responsibility to prevent underage smoking and has made a commitment to fulfill that responsibility by funding this program for two years. 107

## Evaluation: The Criterion for "Success" Is Not Preventing Smoking

We searched industry document sites by using an extensive list of terms, including "evaluation," "assessment," "tracking," "outcome," "research," "result," and the names of every youth program we had identified, in an attempt to find any industry research on the effectiveness of tobacco companies' "youth smoking" programs. We did not find any evidence that these programs had been evaluated in terms of effect on the rates of youth

smoking. Instead, tobacco companies studied the reach and effectiveness of these programs as though they were public relations campaigns, tracking the number of "media hits," awareness of the program among adults, and the effect of the program on their corporate image. 108–112

A 1986 evaluation report written by NASBE for the Tobacco Institute's Helping Youth Decide program concentrates on describing the audience, the reasons people request the educational booklet, the circumstances in which the booklet has been used, and users' feedback on the attractiveness, helpfulness, or usefulness of booklet elements. 113,114 The section of the evaluation dealing with the efficacy of the program fails to define any criteria for "success." 114 A 1994 RJR report on youth campaigns states that a retailer program in the United Kingdom was "very successful," simply because 80% of retailers there were using point-of-sale materials provided by the National [tobacco] Manufacturers Association. No mention was made of success related to an actual reduction in youth smoking rates. 115

Although the industry conducted surveys and focus groups while developing its youth smoking prevention programs to select appealing advertisements with clear messages, we did not find any research evaluating the advertising's effect on teen smoking. Most of the formative research focuses on demonstrating teens' ability to identify the main message of the advertisements. Philip Morris's advertising agency, Young & Rubicam, conducted surveys testing youth smoking prevention billboard advertisements with groups of teenagers in New York in 1992.116 Young & Rubicam also tested television advertisements with children aged 10 to 14 and their parents in 1998.117 In both cases, the firm monitored teens' ability to identify the main message of the advertisement and various other responses to the advertising, such as liking, attention, ability to relate, interest, ability to understand, and uniqueness. 116 The main result reported to television stations in 1998 was that nearly all of the children studied could identify the main message of the advertisements to be "Don't smoke/Not to Smoke." 117

Philip Morris's vice president in charge of youth smoking prevention in 2000, Carolyn

Levy, had formerly conducted marketing research, <sup>118</sup> including research on teens. <sup>119,120</sup> As part of its research on reactions to its television advertising campaign, Philip Morris did ask parents how much the commercial would convince their child not to smoke. In responding to a television network's questions about evidence for the effectiveness of the advertisements, Levy combined 3 divergent response categories ("very much," "somewhat," and "very little"), thus counting any response but the most negative as a positive assessment of the effectiveness of the commercials. <sup>117</sup>

Philip Morris complained when the media pointed out the apparent lack of measures of the effectiveness of the company's advertising campaign in actually preventing teen smoking. 121 In an interview with ABC television news in 1999, Levy admitted that Philip Morris did not ask its study group children whether the advertisements would have any influence on their decision of whether to smoke. 122 Continuing this pattern, Philip Morris ran a series of youth antismoking advertisements during the 2000 Super Bowl football games called "My Reasons." The sole basis of Philip Morris's claim of the advertisements' effectiveness apparently was an informal survey asking 400 youths and their parents whether they understood the basic message in the advertisement. Aside from reporting that 97% of parents and 98% of children understood that the message in the advertisements was against smoking, Philip Morris did not indicate whether the advertisements had any effect on the children's intent to smoke. 123 Philip Morris has sophisticated methods of testing cigarette advertisements and assessing relevance, imagery, and intent to purchase the advertised brand, 124,125 but the company did not appear to use these to assess how its youth smoking prevention advertisements would affect purchasing behavior.

In contrast, the industry assessed in great detail the public relations and legislative outcomes associated with its youth smoking prevention programs. In 1986, the Tobacco Institute asked its lobbyists to rate the Helping Youth Decide programs' value to the company as a legislative tool. <sup>108</sup> In 1995, Philip Morris added a module to its consumer track-

ing surveys, which tracked approximately 700 smokers per week, to monitor the effect of its Action Against Access program. 109,111 The module asked smokers whether they were aware that Philip Morris (as opposed to the government or politicians) started the Action Against Access program, whether they had noticed changes in signage and identification checking, and whether and how the program affected their feelings about Philip Morris. 110 Both the reported results of this survey tracking and the original questionnaires neglect any assessment of youth smoking or reduction in youth access to tobacco. Philip Morris's September 1995 National Visibility Study audited 3729 stores for visible signage for the company's "Ask First-It's the Law" program, and also measured the visibility of RJR's underage signage. There was no mention of measurement of actual youth access to cigarettes in the study. 109

A 2001 youth program evaluation plan for Lorillard Tobacco's new youth smoking prevention program states, "Objective: Communicate the news of the launch of Lorillard's new Youth Smoking Prevention Program. Strategy: Build as much 3rd party credibility as possible. Make the story national news..." <sup>126</sup> The evaluation document does not say that an objective is to measurably reduce youth smoking rates. Like all of the other industry youth smoking programs, the outcomes are evaluated not in terms of influencing teen smoking but rather in terms of the effects on adult response and Lorillard Tobacco's corporate image.

### "Youth Smoking Prevention" Legitimizes Tobacco Industry Research on Teens

The tobacco industry has been criticized for directing its marketing efforts at young children. 21-24,127-131 Indeed, evidence that it did so seriously undercut the industry's political and legal position during the 1990s. Practices such as the use of cartoon characters to advertise cigarettes brought the tobacco industry as a whole under closer scrutiny. 132-136 It became dangerous for the industry to even study teenagers, and thus the industry invented code words to avoid explicit mention of teens in its marketing research. 24 The industry's new "teen smoking prevention" programs beginning in the late 1990s have provided cover

TABLE 2—Comparison of Marketing Research for "Youth Smoking Prevention" and "Young Adult Marketing" by Philip Morris

"Youth Smoking Prevention" Research 137 "Young Adult" Marketing Research 140 Key question areas to include Profiling the young adult male smoker ·Lifestyle · Leisure time activities · Pop culture · General attitudes ·Dating Social circles ·Aspirations · Aspirations and objectives · Attitudes about smoking · Not smoking in the context of things that · Brand image most concern teens today

for the industry to begin aggressive studies of teenage attitudes toward smoking.

Although these data nominally are collected as part of a "youth smoking prevention" effort, they contain precisely the same information tobacco marketers need to sell their products to young people. In fact, Philip Morris used the same advertising agency, Young & Rubicam, to develop both its "youth smoking prevention" advertisements 116,137 and its cigarette advertisements. A comparison of the topics of a Philip Morris "youth smoking prevention" study and a "young adult smoker" cigarette marketing study reveals great similarity (Table 2). 137,140

Even if tobacco industry research on teens were legitimately used to deter rather than encourage smoking, the same research could also be used to design programs with little or no impact on smoking initiation. In 1992 and 1993, Young & Rubicam conducted research with teens in New York City schools to "understand the underlying dynamics of how youths aged 12-17 resist or succumb to social pressures, particularly as it [sic] relates to the decision not to smoke." 116,137 Rather than focusing on older teens, who are at the highest risk for smoking initiation and who would be sensitive to messages aimed at young adults, Philip Morris found that it could tailor a smoking prevention advertisement specifically to younger teens. 116

These messages would leave older teens vulnerable to "young adult" cigarette advertising. 141 Indeed, Young & Rubicam's research indicated that New York City "teens think of themselves more as 'young adults' than kids." 137 In 1992, Young & Rubicam's research on New York teenagers revealed that younger and older teens reacted differently to

advertisements and that teens were more responsive to advertisements depicting people their own age. Thus, one could tailor a message to younger teens (12–14 years old in this study) or to older teens (15–17 years old), depending on the age of the actor: "The quantitative study validates the appeal of this campaign. But it also points to the importance of casting younger for younger teens (currently the campaign shows older teens perhaps explaining why this execution is more attention-getting for the older teens)." <sup>116</sup>

The plans appear to involve modifying the campaign to appeal to the younger teens only. By 1998, Philip Morris was targeting even younger children (aged 10-14 years) for its "youth smoking prevention" advertisements. Young & Rubicam also conducted the research for these advertisements, and the firm did not survey older teens as it had in the past. Instead, it tested the advertisements on children aged 10 to 14 years and their parents. 117 Philip Morris's research on teenagers allowed it to develop advertisements that scored well with parents and appeared to target the youngest teens. By not making teenagers aged 15 to 18, who are at a substantially greater risk to start smoking, the intended audience for these messages, the company preserved the primary source of new smokers.

Lorillard Tobacco Company has also enjoyed new legitimate access to teens through its youth smoking prevention programs. Lorillard has been able to place its "Tobacco Is Whacko" advertisements in youth markets to which they would otherwise be denied legal access, including the most popular teen television shows on Warner Brothers Prime Time, ESPN, and MTV; the "Miss Teen USA Pageant" and "Billboard Music Awards"; sports

events such as ESPN's "Summer X-Games"; wrestling shows on USA, UPN, and TNT; and in DC and Marvel comic books, Seventeen magazine, and Teen People. 142,143 Many of these advertisements encourage teens to visit Lorillard's Web site, where they can fill out surveys and enter sweepstakes. Not only does this information allow Lorillard to develop a mailing list of teens, it also allows the company to collect psychographic data (information about activities, interests, and opinions that can be used to develop consumer psychological profiles)144 through inquiries about popular clothing trends, dream vacations, hot music groups, television and movie stars teens admire, computer games, favorite sports events and athletes, superheroes, and what they feel the president's priorities should be. 145 The "Tobacco Is Whacko" program provides Lorillard with cover for continuing to contact and study teens.

#### Tobacco Industry Youth Smoking Prevention Programs Outside the United States

During the 1990s, the tobacco industry repeated its pattern of implementing youth programs to boost its image and deflect public health legislation worldwide (Table 3), just as it has in the United States since the early 1980s. A 1993 memorandum, "Youth Campaigns for Latin America," by Cathy Lieber, Philip Morris's director of corporate affairs for the Latin American region, states that Philip Morris needs to implement youth programs to counteract negative publicity in Latin America:

Increasing pressure from anti-tobacco forces in Latin America has created the need to explore various options to counter negative publicity. One theme that has recently surfaced in several markets is that multinational companies target children in ad campaigns.

... Taking into consideration the emerging adverse legislative climate in the region, we have an opportunity to create good will for the to-bacco industry by going public with a campaign to discourage juvenile smoking. Our objective is to communicate that the tobacco industry is not interested in having young people smoke and to position the industry as a "concerned corporate citizen" in an effort to ward off further attacks by the anti-tobacco movement. His litalics added

In non-English-speaking countries, the tobacco industry has used translations of its

TABLE 3—Examples of Worldwide Expansion of Tobacco Industry Youth Smoking Prevention Programs

| Year         | Place                       | Slogan/Message  | Media   | Tobacco Company           | Source   |
|--------------|-----------------------------|---|---|---------------------------|--|
| 1981         | UK                          | Campaign for retailers regularly updated until 1989   | Stickers, leaflets                                      | TAC                       | Philip Morris <sup>3</sup>                                 |
| 1983         | Australia                   | "It's the law-cigarettes cannot be sold to those under 18"  | Brochure, stickers                                      | PM Australia              |  |
| 1987         | Australia                   | Campaign on prohibition of cigarette sales to minors  | Signs   | TI Australia              |  |
| 1989         | Canada                      | "We don't sell tobacco products to minors"  | Stickers  | Can Tob Man Council       |  |
| 1989         | Japan                       | "You may not smoke until you are 20 years old"  | Posters   | TI Japan                  |  |
| 1990         | Ecuador                     | "Smoking is an adult decision"  | Television  | Proesa                    |  |
| 1990         | Hong Kong                   | "If you're not old enough to drive, you're not old enough to smoke"                                       | Posters   | TI Hong Kong              |  |
| 1990         | Malta                       | "We don't sell cigarettes to children"  | Stickers, leaflets                                      | Malta TIAC                |  |
| 1990         | Mauritius                   | Campaign to discourage minors from smoking  | Stickers  | BAT                       |  |
| 1990         | Singapore                   | "Children, don't smoke"   | Posters   | Tob Man Importers Assn.   |  |
| 1991         | Canada                      | Information kit update: "We don't sell tobacco products to minors"  | Information kit   | Can Tob Man Council       |  |
| 1992         | Finland                     | "Amer does not want youngsters to smoke"  | Posters, ads  | Amer Group/Amer Tupakka   |  |
| 1992         | Japan                       | Stickers for vending machines updated   | Stickers  | TI Japan                  |  |
| 1992         | Sweden                      | "Advantage smoke free"  | Stickers  | BAT                       |  |
| 1993         | Australia                   | "It's the law" campaign aimed at educating retailers  | Badges, booklet,  | PM Australia              |  |
| 1333         | Australia                   | it's the law campaign aimed at concating retailers  | stickers kit  | i w Australia             |  |
| 1993         | Hong Kong                   | "If you're not old enough to drive"   | Posters   | TI Hong Kong              |  |
| 1993         | GCC                         | Warning of trademark use, particularly regarding goods for children                                       | Ads   | PM Services, PM Europe SA |  |
| 1993         | Mauritius                   | Sticker campaign to discourage minors from smoking  | Stickers  | BAT                       |  |
| 1993         |                             |   |   |                           |  |
|              | Taiwan                      | Campaign for retailers  | Stickers  Partfelia etiekera                            | TI Taiwan                 |  |
| 1994         | Australia                   | Campaign for retailers in South Australia and Victoria  | Portfolio, stickers,<br>brochure                        | USTI                      |  |
| 1994         | EEC                         | PMCS draft campaign   | Posters   | PMCS                      |  |
| 1994         | Japan                       | Leaflet to retailers regarding discouraging smoking among young people                                    | Leaflet   | TI Japan                  |  |
| 1994         | Russia                      | PM Moscow no-smoking campaign, part 1   | Posters, brochure                                       | PM EEMA                   |  |
| 1995         | Puerto Rico                 | "Right Decisions—Right Now"   | Brochure  | RJR and PM Latin America  |  |
| 1996 Finland | Juvenile integrity campaign | Stickers, posters   | Finnish NMA and Daily Goods                             |                           |  |
|              |                             |   |   | Retailers Association     |  |
| 2001         | France                      | "Children under 18 must not smoke; tobacco consumption by children  | Posters   | PM                        | E-mail communication                                       |
|              |                             | is a problem for all of us; smoking must be for adults only"  |   |                           | obtained through<br>GLOBALink                              |
| 2001         | Europe                      | "You can be cool without cigarettes"  | MTV ads   | PM, BAT, Japan Tobacco    |  |
| 2001         | Germany                     | 14-year-old boy saying, "I don't smoke"   | Cinema ads, school                                      | PM                        |  |
| 2001         | definiting                  | 14 year old boy saying, 1 don't smoke   | computers   | I IM                      |  |
| 1999         | France                      | "Minors should not smoke"   | Cigarette pack labels,                                  | PM                        |  |
| 1000         | Trunce                      | minors should not should  | retail signs  | 1 101                     |  |
| 1998-2001    | New Zealand                 | "I've got the power"  | School program  | PM                        |  |
| 2001         | New Zealand                 | "It's the law"  | Retail signs  | PM                        |  |
| 2001         | Romania                     | "It's your choice" (with approval of health, education, and sports ministers)                             | PM, BAT   |                           |  |
| 2001         | Brazil                      | "It's the law"  | Retail signs  | PM                        | S. A. Bialous, written<br>communication,<br>April 18, 2001 |
| 2001         | Mexico                      | "We don't want minors to smoke, and we are avoiding it" (endorsed by<br>Health Ministry)                  | media unknown   | Tobacco companies         | E-mail communication<br>obtained through<br>GLOBALink      |
| 2001         | Romania                     | "Action YSP—youth smoking prevention," "Be cool, be yourself" (Ministry of Health & Family also sponsors) | Video ads, shows, arts<br>events, skateboard<br>contest | JTI (RJR)                 |  |

Note. GCC = Gulf Cooperation Council; EEMA = Eastern Europe, Middle East, and Africa; EEC = European Economic Community; TI = Tobacco Institute; PM = Philip Morris; RJR = R. J. Reynolds; BAT = British American Tobacco; MTV = MusicTelevision Network. Other abbreviations are taken from reference 3.

messages that can be interpreted as ambiguous, sending a "forbidden fruit" message to youngsters, or that focus on decisionmaking rather than on the health effects of smoking. A Philip Morris Russian slogan had the connotation of "feel it, experience it," and a slogan in Hong Kong associated smoking with being old enough to drive.

A 1994 planning document for a youth smoking campaign circulated for comments to Philip Morris employees in marketing and legal departments for the Scandinavia, Finland, and Eastern European regions reveals that Philip Morris planned to extend a US-originated "Kids Don't Smoke" campaign into Poland to counter what it called a "very vocal and visible small group of [anti-tobacco] militant extremists" who were "attacking the tobacco industry." how were "attacking the tobacco industry. Philip Morris's campaign was to tell Polish children aged 10 to 15 years that they are not mature or educated enough to decide to smoke, without mentioning the health effects of smoking.

In 2001, the "corporate responsibility" section of Philip Morris's commercial Web site8 described a youth smoking prevention program in the Czech Republic called "Can I Do It?" The Web site states that the program was "piloted in 70 Czech schools and has the support of the Minister of Education" and that it has "the support of other project partners including the Parents Union of the Czech Republic." Philip Morris predicted that by 2004, its "Can I Do It?" program will have spread to more than 90% of the schools in the Czech Republic.8 Philip Morris International's commercial Web site also states that its youth smoking prevention initiatives have won the company the support of international federal, state, and municipal governments, noting that these programs have allowed Philip Morris to forge alliances with government branches that might otherwise stay at arm's length from the tobacco industry: national ministries of health, education, youth and sports, and environment and justice, and commissioners of television and entertainment.8

Beginning in the mid-1990s, Philip Morris began using its Action Against Access program to head off restrictive legislation around the world. Philip Morris's 1995 plan for "Juvenile Integrity Campaign EEMA (Eastern Europe/Middle East/Asia)" shows that the

company was deeply concerned that increased public awareness of the industry practice of marketing to youths was eroding its credibility and possibly leading to advertising bans. 153 The plan's author observed that Philip Morris's 1992 Finnish "Juveniles Should Not Smoke" campaign "successfully halted extreme legislation to pass"153 and that its 1994-1995 Russian "Smoking Can Wait" campaign "significantly added to efforts to create a balanced atmosphere for a tobacco advertising debate in the Russian (Moscow) society." 153 Philip Morris also sought to enact legal age limits for cigarette sales to deflect blame from itself for youth smoking, saying that such age limits "signal [that] the ultimate responsibility [for youth smoking] belongs to parents and society" rather than tobacco companies. As in the United States, Philip Morris also sought to enact legal age limits to "eliminate anti-tobacco groups' demands for ad bans on the basis of "protection of youth." 153

#### **DISCUSSION**

Tobacco industry "youth smoking prevention" programs began to emerge in the 1980s as a political response to increased public scrutiny of industry marketing tactics aimed at youths. After introducing these programs, the industry discovered and began exploiting their utility as effective public relations tools to deflect regulation. During the late 1990s, the industry rapidly expanded these programs worldwide, often with the assistance of educational authorities and governments. This expansion has occurred in the absence of any objective evidence from the tobacco industry or other sources that these programs actually reduce youth smoking and despite the fact that the few studies that do exist in the academic literature suggest that they do not prevent-and may even encourage-youth smoking. 13,15

The tobacco industry's youth smoking prevention programs do not implement the strategies that have been demonstrated to influence youth smoking: aggressive media campaigns that denormalize tobacco use and stress the industry's dishonesty, <sup>154,155</sup> tax (price) increases that reduce the affordability of cigarettes, <sup>156,157</sup> and smoke-free work-places <sup>158,159</sup> and homes <sup>160–162</sup> that reduce the

social acceptability of smoking and reinforce the nonsmoking norm.  $^{163-169}\,$ 

The industry's programs consistently fail to address the health consequences of tobacco use and never mention that nicotine is addictive. 15 In particular, the "truth" youth smoking prevention campaign advertisements that stress industry deception were more memorable and convincing to more teens than the Philip Morris "Think. Don't Smoke." campaign. 10-12 "Think. Don't Smoke." advertisements have also been associated with an increase in the intention to smoke in the next year. 170 Even Philip Morris's own focus groups, created to gauge public opinion regarding its youth campaigns, reveal that tobacco industry-led campaigns are "universally rejected as not credible" and that people believe that these such campaigns are "contradictory to industry interests."171

Although the industry has generally been successful in introducing its programs, there have been some exceptions. Despite substantial financial inducement and the support of the National 4-H Council, 27 state 4-H branch organizations refused to participate in Philip Morris's program. In 2000, when Philip Morris distributed book covers that said "Think. Don't Smoke." to schools in California without prior authorization, the effort was resoundingly rejected on the advice of the California Departments of Education and Justice. 172 The departments distributed a joint memorandum warning schools that Philip Morris was attempting to promote its corporate identity among children by distributing the book covers and asking that Philip Morris stop the campaign and recall the book covers (Rosaedit Villasenor, Pomona Public Schools; Personal communication; January 11, 2000). This statewide rejection represented a significant improvement in the understanding of tobacco industry motives by the Department of Education, which 10 years earlier had been distributing Tobacco Institute programs.38

Citizens and policymakers should reject any "educational" programs by the tobacco industry. If the tobacco industry were sincere in its stated desire to contribute to reducing youth smoking, it would stop opposing policies and programs that have been demonstrated to be effective. Policymakers who

believe that the industry would do anything that would negatively affect recruitment of new smokers are ignoring history and fooling themselves.

#### **About the Authors**

Anne Landman is with the American Lung Association of Colorado, Denver. Pamela M. Ling is with the Traineeships in AIDS Prevention Studies, Center for AIDS Prevention Studies, University of California, San Francisco. Stanton A. Glantz is with the Center for Tobacco Control Research and Education, Institute for Health Policy Studies, Cardiovascular Research Institute, University of California, San Francisco.

Requests for reprints should be sent to Stanton A. Glantz, PhD, Professor of Medicine, Box 0130, University of California, San Francisco, CA 94143 (e-mail: glantz@medicine.ucsf.edu).

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#### **Contributors**

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