"Below the Line": The tobacco industry and youth smoking

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REVIEW

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Abstract

Background

This paper provides a comprehensive account of how the tobacco industry, over time, has promoted its products to young people.

Method

A comprehensive search of tobacco industry documents relating to youth smoking was conducted using documents available on the World Wide Web through the Master Settlement Agreement.

Results

The documents provide evidence that the industry invested great time and resources in developing strategies to attract young people through Youth Smoking Prevention strategies (including education strategies) and marketing to youth. The results include information from published literature and direct excerpts from the tobacco industry documents.

Conclusion

The tobacco industry documents confirm that the tobacco industry has promoted and supported strategies that are ineffective in reducing smoking by youth, and opposed strategies that have proven to be effective. It is clear from the documents reviewed that the industry values the youth market and through a number of measures continues to promote its products to young people.

Background

There is a wealth of published literature that provides evidence of the tobacco industry targeting young people through the development and delivery of education and retail access programmes[1-5] and advertising and marketing strategies.[6-12] With increasing restrictions being placed on tobacco products, the tobacco industry has persisted in its development of innovative measures to keep its products in sight.[9] Young people are an important target group for tobacco companies as most people who smoke tobacco in adulthood initiated their use before 18 years of age.[13,14] The evidence demonstrates that if smoking behaviour does not commence in the teenage years it is unlikely to occur later in life.[15, 16]

Tobacco use is the leading cause of preventable premature death in the world.[17] Globally, tobacco is responsible for 5.4 million deaths per year[18] and over 15,500 deaths per year in Australia.[19] The 2007 National Drug Strategy Household Survey found that 7.3% of Australian adolescents aged 14–19 years smoked daily.[20]

Young people who smoke are at risk of experiencing immediate health effects,[21] and are at an increased risk of suffering chronic tobacco-related diseases in adulthood.[15] The 1994 Report of the US Surgeon General: 'Preventing Tobacco Use among Young People' has identified a number of health problems experienced by adolescents who smoke[15]:

"Cigarette smoking during adolescence appears to reduce the rate of lung growth and the level of maximum lung function that can be achieved. Young smokers are likely to be less physically fit than young nonsmokers; fitness levels are inversely related to the duration and the intensity of smoking. Adolescent smokers report that they are significantly more likely than their nonsmoking peers to experience shortness of breath, coughing spells, phlegm production, wheezing, and overall diminished physical health" (p. 6).

If individuals continue to smoke later in life, about 50% of those who smoke for a prolonged period will die prematurely, with about half dying in middle age.[22] The cost to the healthcare system of tobacco-related diseases is great. The social costs of smoking in 2004/05 were approximately $2.4 billion.[23] It is important that continued efforts in tobacco control, including prevention messages and cessation support for youth, are sustained to reduce the amount of death and suffering, as well as financial costs caused by tobacco use.

Method

Millions of once internal tobacco industry documents are available to the public as a result of the 1998 Master Settlement Agreement (MSA). A lawsuit between US States and major US tobacco companies.[24] Tobacco industry documents include letters, emails, memoranda, research reports, testimonials, advertising, marketing, media and public relations materials.[24] The documents mainly relate to tobacco industry business in the US, although many are a reflection of international activities and communications.[24]

A comprehensive search of tobacco industry documents relating to youth smoking was conducted. Tobacco document research guides were consulted to inform the document searching procedure.[24-27] The Legacy Tobacco Documents Library (LTDL) online archive is a tobacco control site and was the primary source of tobacco document information for this report.

Key search terms included variations of the terms: 'Australia', 'Youth', 'Smoking Prevention', 'Education', 'Retailers', 'Advertising', 'Marketing', 'Music', and 'Fashion'. A full list of the search terms used in the document searching is provided in the Appendix. All retrieved documents were read and reviewed for relevance. A total of 56 tobacco documents dating from 1963 to 2001 were retained and have been included in this report. The search conducted is not an exhaustive one; and there may potentially be further relevant documents that have not been included.

Background information relevant to the tobacco industry and youth smoking was sourced from journal databases, reports from authoritative health organisations and online information.

Results

Youth Smoking Prevention (YSP)

The public image of the tobacco industry suffered significantly from evidence showing that it explicitly marketed its products to youth.[7] Consequently, the industry foresaw that it would have less sway with policy makers and the public, resulting in increased health policy regulation and industry restrictions,

and reduced social acceptance of tobacco.[1] The tobacco industry sought to improve its public image and to avoid government regulation in the area through voluntary self-regulation and youth smoking prevention (YSP) programmes.[1] The YSP strategy also worked to marginalise public health advocacy groups, deflect opposition from parents and educators, and develop allies within policymaking and regulatory areas.[1]

A search of internal tobacco industry documents relating to Australia found two tobacco industry youth smoking prevention campaigns, the school-based education programme "I've Got The Power"[28] and retail-based access programme "It's the Law".[29] Measures of programme effectiveness focused on how widely the materials were distributed, awareness among the public, and the number of media hits with neglect to actual reduction in youth smoking rates.[1, 2] These initiatives have been found to be ineffective and at times counteractive in reducing youth smoking.[1, 2]

Public relations strategy

The tobacco documents provide evidence that the tobacco industry has used voluntary self-regulation and YSP programmes as strategies to counter tobacco control legislation and to promote an image of corporate social responsibility.

A section of a Philip Morris issued report titled "Youth: A corporate strategy that applies to food, tobacco and beer"[30]:

"Self-regulation efforts are already in place. Our companies are self-policing, responsible marketers, often implementing voluntary codes without government mandates, and promoting responsible programs.

We need to get the word out on these initiatives and extend our public-private partnerships.

There is a need for internal and external education and communication. Internal: employees, cross-functional disciplines -- marketing and corporate affairs teams, distributors and retailers. External: media, third parties, parents, teachers, law enforcement, community leaders, legislators, regulators.

Emphasis should be placed on individual responsibility on the part of all stakeholders. Industries are self-policing; government is clamping down, but we need to help communicate that people need to take responsibility for their own actions."

A Philip Morris memo from 1994 documents tobacco industry discussions at a meeting in London. People attended the meeting from the legal/corporate affairs and scientific divisions of the British American Tobacco, Rothmans and Philip Morris tobacco companies[31]:

"An industry code will be written...so that it can be used as both a lobbying lever and an argument against not introducing formal legislation."

"In association with the above, it was proposed that we look at developing a minor's programme that would show the industry to be willing to work cooperatively with the authorities in at least one area in which we have a mutual objective."

A Philip Morris International memo regarding a youth smoking prevention commercial[32]:

"Taking into consideration the emerging adverse legislative climate in the region, we have an opportunity to create good will for the tobacco 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."

A 1993 document from the Philip Morris archives discusses a strategy for Australia[33]:

"Develop youth 'non-smoking' campaign and potential political supporters. Make PM [Philip Morris] the 'responsible' tobacco company."

A 1994 RJ Reynolds public relations report looking at youth initiatives[34]:

"RJR Tobacco International has a unique opportunity to proactively address this issue and get ahead of the curve in what we see as an obvious trend toward stiffer and more punitive regulations. If we don't do it the government will do it for us by totally restricting our ability to advertise, through exhorbitant [sic] taxes, and by imposing increasingly restrictive smoking bans. All in the name of youth."

Why would we want to actively tell kids that we don't want them to smoke? In the first place, we can further shape public opinion -- thereby influencing government decisions… demonstrate that we support the laws and are responsible corporate citizens. In the second, it is because we are the ones who are blamed when kids smoke – not the trade, not parents,

not peer influence… if we don't take a stand, we are the ones who will be hurt in the long run."

Consumer and Regulatory Affairs (CORA) 'Tool-kit' for developing YSP programmes[35], why the industry should address under-age smoking:

"Good corporate citizenship; Corporate reputation; An international company operating in a global context; Protecting the right to market out product; Under-age smoking – a topical issue.

"Herdles" to building partnerships with government and opinion formers on the issue of underage smoking included: *"Skepticism towards the company's initiatives; Most of the NGOs would not accept the tobacco company as a partner."* Strategies for overcoming these problems included: *"Create an atmosphere of understanding and trust; Avoid the idea that the company is seeking a PR opportunity."*

A Tobacco Institute memo discussing youth programme development[36]:

"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 on-going 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 centre and forcing the anti-smokers to an extreme."*

"The strategy is fairly simple:
1. *Heavily promote industry opposition to youth smoking.*
2. *Align 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 attention on the antis' extremism. Anticipate and blunt antis' strongest points."*

"Promotional -- for positioning purposes:
1. *Broad-based advertising -- whether it offers the booklet or simply outlines the industry's five part program -- has the important effect of making the*

public aware that the industry says *it is trying to do the right thing.*

2. *Third party communications adds the message that knowledgeable experts agree that the industry is doing the right things."*

"The booklet series and spin-offs have been well accepted by educators and other experts. The large quantities distributed add to the credibility of this project."

Speech presented at Philip Morris Invitational in 1995[37]:

"Today, restrictions on point of purchase, advertising and sampling are at the early development stages where vending machines were five years ago. But, if we don't take positive, proactive actions now, five years from now we will begin to see the profitability of your business and ours stifled under a suffocating, crazy-quilt blanket of local and state marketing regulations.

Fortunately, we have a unique opportunity to take action on the one issue where our industry is, at present, the most vulnerable. The issue is Youth Access to Tobacco Products.

We begin from the non-debatable position that minors should not smoke. I know each of us here truly believes this. And because we do, there is every reason for us to come together and and [sic] find solutions to the problem of underage smoking and the relatively easy access minors sometimes seem to have to cigarettes.

Taking action on this issue allows us to seize a moment in time when the general political environment is amenable to industry leadership on this issue.

Acting in a manner that draws the clearest, sharpest possible line between who should and who should not have access to cigarettes will reinforce the right of adults to obtain and enjoy a legal product, and thus prevent marketing bans down the road that are driven by the youth access issue.

Most important, taking action on the youth access issue is simply the right thing to do. It is what you believe in, what I believe in and what our industry believes in.

We have always believed in it, we abide by a voluntary code that spells out our commitment, and we – manufacturers and retailers -- are out there with our "It's the Law" program and other similar programs that are helping to raise awareness of the issue and reduce youth access to tobacco.

Yes, we're doing something. But we must do more. We have to become proactive advocates of change. We must reach a consensus among ourselves on concrete objectives, and then we must act vigorously as an industry to slam the door on youth access to cigarettes. It's that simple.

We can and must seize the moral high ground on this issue. If we don't the government and the anti-smoking activists, who are already beginning to use the youth access issue to drive new legislation and restrications [sic], will take the initiative away from us and make it their issue. They can only do this if we let them. WE MUST NOT LET THEM."

Roper Organization (a consumer market research and trends consultant company) report pitched to Philip Morris in 2001[38]:

"Overall PM21 Objective: Create a more positive image of PMC [Philip Morris Company]. Objective for this effort: Get audiences to believe that PM is a responsible manufacturer and marketer of its tobacco products.
The key hurdle: Credibility."
"What do we want this advertising to do? Cultivate a more favorable image of PM."

"What's the single most important thing we want them to take out of this advertising? I believe PM is trying to be responsible about its tobacco business. How can we make this credible? Youth Smoking Prevention Program; International efforts to curb youth smoking; Retail and marketing initiatives that go above and beyond what's required per the MSA."

"Such a message mix is supported by research analysis done by Roper-Starch and by Strategy One as to how to build and sustain a positive image, particularly in an environment of advertising attacks, where we believe we would benefit from a more explicit tobacco issue approach."

"The work will be evaluated both qualitatively and quantitatively on its ability to impact a more favorable view *of Philip Morris, as well as against several other measures that are currently part of an ongoing image tracking study. Specifically, in addition to favorability, does the proposed advertising increase perceptions among target audiences that:*

▪ *Philip Morris is becoming a more responsible corporate citizen,*
▪ *Philip Morris is changing for the better,*

- *Philip Morris is becoming more open,*
- *Philip Morris is offering solutions to issues related to its products,*
- *I have a more favorable image of Philip Morris than I used to."*

Philip Morris interoffice correspondence on tobacco industry youth initiative[39]:

"As we discussed, the ultimate means for determining the success of this program will be:
1) A reduction in legislation introduced and passed restricting or banning our sales and marketing activities; 2) Passage of legislation favorable to the industry; 3) greater support from business, parent and teacher groups."

From the 2000 Philip Morris CEO Issues Book – contains prepared questions and responses for PM CEO use at Annual General Meetings[40]:

"Isn't this just about improving your company's image and credibility? No, it is about our commitment to helping reduce the incidence of youth smoking. We are deeply committed to making a difference on this issue".

Tobacco industry knowledge of effective tobacco control
The tobacco documents provide evidence that the tobacco industry knew about the effectiveness of tobacco control legislation and advertising bans on reducing youth smoking.

A 1994 RJ Reynolds youth initiatives report[34]:

"Taxation and advertising are viewed as the principal problems to be addressed. But as we have seen, there is a direct correlation between youth smoking and tax increases, advertising bans and smoking restrictions."

Consumer and Regulatory Affairs YSP programme development[35]:

"Key determinants of under-age smoking initiation
- *Peer group influence*
- *The relationship between advertising and underage smoking…*
- *Recognition not key to initiation"*

Philip Morris interoffice correspondence on excise tax increase[41]:

"I have been asked for my views as to how we should pass on the price increase in the event of an increase in the excise tax. My choice is to do what I suggested to Wally McDowell in

1982: Pass on the increase in one fell swoop and make it clear to smokers that the government is solely responsible for the price increase, advertise to that effect, suggest that people stock up to avoid the price increase, and recommend that they refrigerate their cigarettes "to preserve their freshness." (It would be necessary to emphasize that point or we would get a lot of beetle complaints.) Then when people exhaust their supply and go to the store to buy more, they will be less likely to remember what they last paid and will be less likely to suffer from "sticker shock." As a result, they should be less likely to use the price increase as an incentive to stop smoking or reduce their consumption."

"…the 1982-83 round of price increases caused two million adults to quit smoking and prevented 600,000 teenagers from starting to smoke. Those teenagers are now 18-21 years old, and since about 70 percent of 18-21 year-olds and 35 percent of older smokers smoke a PM brand, this means that 700,000 of those adult quitters had been PM smokers and 420,000 of the non-starters would have been PM smokers... We don't need to have that happen again."

"Thus my recommendation is to take the increase all at once; advertise, blaming it on the feds and encouraging smokers to stockpile; increase prices only to the extent of the tax; and make sure that the cigarettes that the retailers stockpile are our brands this time. We might also take the opportunity to again point out the regressive nature of the tax and tell smokers what percent of the price of a pack of cigarettes in their state is due to taxes."

Shifting the blame
To shift the blame away from the tobacco industry, tobacco companies argue that the responsibility for youth smoking remains an issue for society, parents and peers.[1] Promotion of their voluntary self-regulation code and YSP initiatives enabled the tobacco industry to position itself as part of the solution.[2]

This Philip Morris report provides responses to the industry wide issue of juvenile smoking[42]:
"Juvenile smoking is a community problem. As part of the community, Philip Morris and the tobacco industry is doing its part to combat the problem by, for example, our "It's the Law Campaign. However, if the problem is to be solved the whole community needs to be involved. Further restrictions on the tobacco industry such as banning advertising or introducing generic packaging will not solve the problem. The problem will only be solved if its causes are removed – and these include poverty and the feeling

of powerlessness and helplessness experienced by our young."

"Anti-smoking campaigns may have been counterproductive, and the "Quit" slogan could now be a "come on" for the young."

"Numerous studies, Australian and overseas, indicate that the primary determinants of smoking for young people are parents, peers and older siblings. Peer identity, self-image and acquiring powers are also primary motivators. Tobacco advertising does not play a role."

"The most recent Australian studies highlight the importance of peer identify, self-image and acquiring power as primary motivators in young people taking up and continuing to smoke. Clearly these motivational factors are related to the social setting rather than the presence or absence of advertising."

Consumer and Regulatory Affairs 'Tool-kit' for YSP programme development[35]:

"The programs should deal with family influence and peer pressure. Types: Youth-focused; Parent-focused; Integrated."

"Target groups: Schools; Youth groups; Parents associations; Community groups."

Pamphlet circulated by Philip Morris about their responsible marketing practices[43]:

"There is no reliable evidence for the theory, advanced by anti-smoking organizations, that tobacco advertising increases the incidence of smoking among minors. On the contrary, the best research indicates that the dominant factor in under-age smoking is the influence of parents, siblings and peers."

A section of a Philip Morris issues report titled "Youth: A corporate strategy that applies to food, tobacco and beer"[30]:

"A uniform corporate strategy should and can apply across all product segments since the issue of advertising and marketing to youth is equally sensitive and relevant."

"Key Issue: Individual responsibility. Put the onus on: Kids; Parents; Teachers; Retailers; Legislators/regulators."

Sections presented in a Philip Morris report on the 'Juvenile Integrity Initiative'[44]:

"Support of Legal Age Limit for Sales:

Advantages: Opens up for the largest number of alternatives after the law is passed; Signals the ultimate responsibility belongs to parents & society; Unambiguous position by tobacco industry; Eliminates anti-tobacco groups' demands for ad bans because of "protection of youth"."

"Launch of Voluntary Age Limit of Sales
Advantages: Offers solutions for markets where political will for legislation is lacking; Involves the trade in the process; Signals industry's commitment and initiative; Supports industry against anti's demands for ad bans."

"Disadvantages:…Highlights industry's "responsibility" in relation to parents and society."

"Juvenile Integrity Campaign Targeted to Parents & Teachers
Advantages: Targets the groups that have major responsibility for juvenile integrity; Correctly done, involves Government bodies, e.g. Ministry of Education; Show industry responsiveness, responsibility and openness, whilst pointing out where responsibility with children lies; Can form alternative to aggressive anti-tobacco campaigns in schools; Offers parents & teachers a dialogue with minors."

Legitimising research
The tobacco industry has used Youth Smoking Prevention programmes as a legitimate means for continuing to contact youth and gather information on youth smoking behaviour.[1]

A 2000 British American Tobacco report on youth smoking prevention[45]:

"British American tobacco is committed to supporting a wide variety of programmes to reduce and prevent the incidence of under-age smoking. As is the case with most smoking-related issues, we believe that strategies to deal with the problem of youth smoking should be based on a proper assessment of the scientific evidence. We support approaches which first seek to understand the reason why minors start smoking in the first place; and then seek to design and implement youth smoking prevention programmes which address the reasons why minors start smoking. We believe that the effectiveness of all youth smoking prevention programmes should be regularly assessed and subject to modification where necessary."

"British American Tobacco is committed to providing support for independent research into teenage behaviour.

The objectives of such research would be to understand the incidence and identify the key factors contributing to the use of adult products, including tobacco, by youth in a particular country."

A Philip Morris document outlines marketing research areas for young adult male smokers[46]:

"Profiling the Young Adult Male Smoker Examination of the lifestyles and attitudes of the young smoker helps to explain brand choice:

- *General Attitudes*
- *Objectives and Concerns For the Future*
- *Leisure Time Activities*
- *Social Circles*
- *General Attitudes*
- *Aspirations and Objectives*
- *Brand Image*
- *Attitudes About Smoking."*

"Reasons for First Buying Regular Brand: Marlboro smokers cite the brand's popularity and availability as factor driving their initial choice of a regular brand."

Research question areas to develop the youth initiative are explained. The format contains the same information that tobacco marketers need to market products to young people[47]:

"Lifestyle:…What's the best age to be, and why?
…How would you most like others to describe you?

Popular Culture:…If you could go to the prom with anyone in the world who would it be?"

"Dating: What's the first thing you notice about your date?
…What's the most romantic date you can think of?
…Who's your favorite heartthrob and why?
What makes you actually go out with a person, not just check her/him out?"

"Aspirations: What does the future hold for you?
…What qualities do you most admire in people?
Who do you admire most?"

"Not smoking: What are the biggest concerns facing teens today?
[Why] do you believe that teenagers should make up their own minds about not smoking?
…Is smoking cigarettes an activity that's for you?"

"DEVELOPMENTAL RESEARCH: Research was conducted with New York City teens to understand the dynamics of how youths aged 12-17 resist or succumb to social pressures, particularly as it relates to the decision not to smoke."

Education initiatives

Tobacco industry education initiatives are presented as encouraging young people to take responsibility for their own actions, to resist peer pressure, and promoting smoking as being a risky adult activity.[1] The tobacco industry has engaged third parties to give programmes legitimacy as the industry lacks credibility with the public and policymakers.[1,3] The tobacco documents show that tobacco companies develop YSP programmes to appear responsible and to persuade officials against effective tobacco control legislation.

British American Tobacco publication of programmes prevent/reduce underage smoking[48]:

"British American Tobacco Group is actively involved in promoting programmes around the world to reduce and prevent smoking by those under-age…British American Tobacco group companies also participate with others in programmes designed to educate under-age people to exercise responsibility and independence by rejecting peer pressure to smoke."

Philip Morris submission to the Queensland government regarding tobacco control plans[49]:

"Philip Morris has funded the development, by a well-known and eminently qualified educational consultant, of a school-based education program known as "I've Got The Power". This program is designed to empower students to take responsibility for their own choices in relation to a range of activities and behaviours that adults believe are inappropriate for children, including the consumption of alcohol, the use of illicit drugs and the use of tobacco products. This program is based on intensive research and extensive trialling [sic] among practicing [sic] teachers. To date over 1400 secondary schools across Australia have requested copies of the "I've Got The Power" program."

Worldwide Regulatory Affairs interoffice correspondence advised not to put the Philip Morris logo on the *"I've Got The Power"* material[50]:

"PM Australia has, through an academic consultant, presented its proposed youth education program to senior educational bureaucrats in various states of the Australian

federation. Although reaction to the program itself was favourable, the view among bureaucrats was that, if the materials contained attribution to Philip Morris, the program would not be accepted by educators… state officials felt that attribution in the materials would be viewed as an inappropriate attempt by PM Australia to gain favourable publicity and would lead to rejection of the program."

"…it is important to communicate to appropriate government officials that Philip Morris is the sponsor of the program."

Access initiatives

Retailer education programmes are promoted to control access to tobacco products by young people.[4] Measures of programme effectiveness have included: number of kits distributed; level media attention; and public awareness of the programme being funded by the industry. Access initiatives provided opposition to proposals for tobacco control and restrictions imposed on the industry, arguing there is already enough being done in YSP.[2]

Philip Morris memo regarding the "It's the Law" project[51]:

"…if we wish to commit additional expenditure to this issue there may [be] other more cost effective means of achieving the political acceptance of and kudos for our stance on juvenile smoking."

Philip Morris report providing a response to the juvenile smoking issue[42]:

"Philip Morris has voluntarily adopted a number of policies regarding responsible and reasonable marketing… For example Philip Morris devised "It's the Law" Campaign to remind retailers of the law and their obligation not to sell cigarettes to juveniles."

British American Tobacco publication on its international "It's the Law" programs to prevent/reduce underage smoking[48]:

"The campaign advised retailers that it is illegal to sell tobacco products to any person under-18 years of age… 'It's the Law' retailer kits were distributed by sales representatives. These included badges for retail staff; a booklet explaining new legislation (including steps to help ensure that retailers comply) and a number of stickers for display at the point of sale indicating that it is illegal to sell cigarettes to under-age persons… Promotional kits were sent to politicians, the media and trade bodies."

Presentation on Philip Morris youth access initiative 'Access Philip Morris International'[52]:

"Strategy: To formally position the PMI commitment to preventing youth access to cigarettes as a global brand."

"PM USA has been committed to many access-related initiatives for many years. Examples are long standing efforts in helping get minimum age laws passed in all states, and the "It's The Law," program directed at minimum age signage and retailer assistance/education. Now PM USA has a new theme for the access initiative: "The best way to keep kids away from cigarettes is to keep cigarettes away from kids. Under this theme Philip Morris USA has built an integrated program - Action Against Access - directed at preventing youth access to cigarettes."

"Rationale: Puts the import of this issue at the level it deserves – along with the key global brands – as a key global program that is central to ensuring the long term growth of the company."

"Promotion: Pro-active communication with legislators, regulators regarding PMI efforts; Pro-active communication with opinion leaders, including media, regarding PMI efforts; Utilize public relations tools and vehicles, and advertising and promotional ideas, where warranted and useful; Merchandise the successes."

Philip Morris corporate affairs 'weekly highlights' provide media coverage of "It's the Law" in Australia[53]:

"Media reports of the launch of the industry's new retail access campaign were very positive. Radio was particularly active and canvassed the views of both industry spokespeople and tobacco retailers."

Contradictory tobacco industry arguments

Tobacco industry opposition to proposals for stricter legislation argue that it would make tobacco products more attractive to youth, yet the industry push YSP initiatives that may inspire rebellion (e.g. large "It's the Law 18+" stickers and signage).[1, 2, 5, 54]

1975 marketing report from the Brown & Williamson archives[55]:

"How we can introduce starters and switchers to our brand… For them a cigarette, and the whole smoking process, is part of the illicit pleasure category. This illicit pleasure will lose its illicitness once they grow older and are fully accepted into the adult society… For the young smoker, the cigarette is a clean/socially acceptable, (to a degree at least), communication symbol of maturity,

sophistication and adulthood. The cigarette is the entrance ticket to the hall of the adult society… Thus, an attempt to reach young smokers, starters should be based, among others, on the following major parameters:

- *Present the cigarette as one of a few initiations in to the adult world.*
- *Present the cigarette as a part of the illicit pleasure category of products and activities…*
- *To the best of your ability, (considering some legal constraints), relate the cigarette to "pot", wine, beer, sex, etc…*
- *Don't communicate health or health-related points."*

Tobacco Institute of Australia submission providing reasons why youth smoke[56]:

"The statement 'only grown-ups are allowed to smoke' provokes them. They want to know why parents, older brothers and sisters or acquaintances smoke whereas they themselves cannot, and receive evasive answers to questions or simply hear that 'smoking is not for little children'. In this way children may acquire an early interest in smoking with the desire to try it themselves."

Tobacco Institute of Australia CEO, Brendan Brady quoted in TIA media release arguing against policy changes recommended in the Senate Committee report 1995[57]:

"Juveniles smoke to look and act rebellious according to government sponsored research, so the more restrictions, the more rebellious they will look."

Tobacco retailers as allies

Access initiatives have allowed the tobacco industry to develop strategic ties with allied industries and legislators for lobbying purposes.[5] Documents show tobacco retailers' groups press to make youth smoking illegal and impose fines on youth rather than the retailer or supplier of cigarettes.

China-America Cigarette Company presentation, 1994[58]:

"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."

A media release by Bob Stanton, Chairman of the WA Tobacco Retailers' Association (also Head of the Independent Retailers Organisation of Western Australia, and Chairman of the Council of Small Business Organisations of Australia) in

opposition to restrictions on the retail distribution of tobacco products[59]:

"Mr Stanton said that community-wide prohibitions were expensive to enforce and were not the way to achieve a reduction in juvenile smoking… The way to tackle this issue is to firstly discourage retailers and adults from selling or supplying juveniles with tobacco products. In this respect there are already education campaigns as well as fines up to $20,000… Secondly, deterrents aimed at juveniles need to be put in place."

A Philip Morris media surveillance article titled "Get Tough on Under-age Smokers: Tobacco Retailers"[60]:

"The WA Retailers' Assn [Association] wants under-age smokers forced into community service and quit smoking programs. Assn chairman Bob Stanton said it was time for tough new laws that forced child and teenage smokers to take responsibility for their actions… Mr Stanton called for the law changes during the launch of Aust-wide campaign encouraging customers to carry ID cards. The campaign is financed by the WA Tobacco Retailers' Assn, the TIA and the tobacco industry. Mr Stanton criticised the WA Health Dept for refusing to back the ID card campaign."

Marketing strategies

There is substantial evidence that the tobacco industry has directly targeted its products to the youth market, to encourage smoking uptake and continued use among young people.[11,61] Market research has been conducted by tobacco companies to determine what influences youth smoking.[11]

The promotion and marketing of tobacco products to youth has included flavoured tobacco products[12]; point-of-sale displays at retail outlets; sponsorship of music and fashion events; through product placement in movies and on television; and through internet promotion and sales.[6, 9, 61]

A 1973 RJ Reynolds market research report refers to the "Youth Market"[62]:

"…a brand's ability to gain acceptance among younger smokers is an indication of its potential for future success." The report also acknowledges *"the size of the [youth] market is also large."*

A report from the British American Tobacco archives[63]:

"Cigarettes are purchased by brand. The consumer asks

the retailer for the brand of his choice. Cigarettes are purchased frequently, almost daily by many consumers. There is a need to constantly remind consumers about brands because of the high frequency of the buying decision. Research and statistics in the USA and other countries have indicated that almost 50% of all smokers, once having adopted a regular brand remain loyal to that brand indefinitely (10 years or more)."

"A cigarette manufacturer will succeed in a competitive market if it can: Retain the brand loyalty of its existing smokers; Obtain with its existing and new brands a greater than present share of new, younger, smokers before they establish their regular brand loyalty."

"To summarise, therefore, we spend money on advertising in order to:…To attract (both with existing and new brands) new, younger smokers before they determine regular brand choice and loyalty."

A Report from the RJ Reynolds archives entitled 'The importance of younger adults'[64]:

"Younger adults are the only source of replacement smokers. Repeated government studies (Appendix B) have shown that: Less than one-third of smokers (31%) start after age 18. Only 5% of smokers start after age 24. Thus, today's younger adult smoking behavior will largely determine the trend of Industry volume over the next several decades. If younger adults turn away from smoking, the Industry must decline."

A marketing report regarding price sensitivity by age and gender[65]:

"Teenagers and younger adult males are highly price sensitive."

"The loss of young adult males and teenagers is more important to the long term, drying up the supply of new smokers to replace the old. This is not a fixed loss to the industry: its importance increases with time. In ten years, increased rate per day would have been expected to raise this group's consumption by more than 50%."

A section of a marketing report from the Brown & Williamson archives titled 'How we can introduce starters and switchers to our brand'[55]:

"For them a cigarette, and the whole smoking process, is part of the illicit pleasure category. This illicit pleasure will lose its illicitness once they grow older and are fully accepted into the adult society."

"For the young smoker, the cigarette is a clean/socially acceptable, (to a degree at least), communication symbol of maturity, sophistication and adulthood. The cigarette is the entrance ticket to the hall of the adult society."

"Thus, an attempt to reach young smokers, starters should be based, among others, on the following major parameters:

Present the cigarette as one of a few initiations in to the adult world. Present the cigarette as a part of the illicit pleasure category of products and activities…To the best of your ability, (considering some legal constraints), relate the cigarette to "pot", wine, beer, sex, etc… Don't communicate health or health-related points."

Flavoured tobacco/cigarettes
Flavoured cigarettes are used by the tobacco industry to attract a youth market.[12,66] Tobacco document research conducted by Carpenter and colleagues (2005) uncovered information about how the tobacco industry intentionally developed strategies to add flavours to cigarettes that are known to appeal to youth. The flavour delivery technology included the use of a plastic pellet in the cigarette filter. Candy and liqueur flavoured tobacco products introduced into the US market included "Dark Mint, Cool Myst, Midnight Berry, and Mocha Taboo and seasonal various such as Bayou Blast and Midnight Madness".[12]

Research by Manning and colleagues (2009) confirms that sweet flavoured cigarettes appeal to high sensation seekers by increasing the arousal potential of marketing communication. There is also evidence that high sensation seekers are also more likely to smoke cigarettes.[66]

A transcription from a British American Tobacco handwritten memo, titled 'Project Kestrel'[67]:

The objective of Project Kestrel was to "develop a brand which "breaks the rues', to appeal to a new generation and shock their parents, to make conventional brands look bland and weary."

"Another route would be to use the FLITE technology to inject various flavours into the blend. These flavours would be new and unconventional and probably foul-tasting to the average smoker."

"Two flavours which were discussed as options were Root Beer & Brazilian Fruit Juice, both of which tend to appeal

to the younger generation while being rejected by their parents."

"…an alternative possibility is to have various different flavoured cigarettes, all individually wrapped in different coloured paper, all in the same packet."

A 1984 Brown and Williamson marketing report identifies flavour preferences[68]:

"The four groups by which smokers' taste preferences can be defined are: mint flavors, robust (including hot and spicy) flavors, fruit flavors and bland flavors" and, "Fruit flavors appear to be preferred by smokers who are younger to middle-aged."

Document titled 'Additive Chemicals' held in the British American Tobacco document collection[69]:

"Additives contribute to cigarette characteristics in terms of taste and flavour, and pack aroma."

"For example, a typical Australian Virginia cigarette contains natural sugar, while the air-cured tobaccos of American-type blended cigarettes contain negligible sugar in part of their blend. The addition of sugars (and cocoa, honey, liquorice, and the like) to these American blend tobaccos is necessary to develop the particular character of such cigarettes."

"Despite the very small amounts of individual flavours (parts per million) used, they make a major contribution to taste and appeal which are part of the individual distinctiveness of cigarette brands."

Point of sale

As a result of increased marketing restrictions on tobacco products, the retail environment became the primary communication vehicle for cigarette promotion.[70] Tobacco displays create a perception among young people that tobacco products are readily available, and that using tobacco is the social norm.[71] They undermine the impact of health warnings, and are positioned alongside everyday items making them seem normal and benign.[72] They also offer an opportunity to influence quitters and would-be quitters.[73]

Point of sale displays have a direct impact on young people's smoking, "In 2006, almost half (46%) of UK teenagers were aware of tobacco display at PoS [point of sale] and those professing an intention to smoke were more likely to recall brands that they had seen at the point of sale".[74] Research in Australia[75] and the USA[76] show that point of sale advertising

normalises tobacco use for children and creates a perception that tobacco is easily obtainable.

A Philip Morris document from 1995[77]:

"…as of 1996, the primary point of communication between ourselves and our consumer will be inside a retail outlet… In-store POS material, discounted stock units, on-pack premium offers, strategically located stock displays in-store (as well as in windows and showcases), need to be dominated by PML [Philip Morris Limited]".

Presentation notes of Philip Morris spokesperson[78]:

"…we must now extend below the line programs to encompass the image building role…retail marketing is therefore no longer the support mechanism, [but] the primary communication vehicle."

Tobacco product packaging

Increased marketing and advertising restrictions have resulted in an increase in the importance of tobacco product packaging in cigarette promotion and communicating brand imagery.[8, 79, 80] The brand name and design of a package is particularly appealing to youth as it facilitates the communication of personal characteristics, aspirations and social identity.[81, 82] Without brand imagery tobacco products would lose their appeal among young people[8, 79] and the perception that they are an ordinary consumer item.[81]

Internal tobacco industry documents provide evidence that tobacco companies are aware that brand loyalty is established early in a smoker's life, and that packaging plays a vital role in brand choice by youth.[83]

RJ Reynolds document provides marketing lessons learnt from a "highly legislated market"[84]:

"The most effective means Australia has had to get the consumer to notice something new post restrictions was a new/different packaging configuration."

A US Tobacco Institute report "Development of cigarette packaging"[85]:

"The cigarette market may be broken down into age brackets as follows… 16-21 -- the formative years; smoking starts and brand preferences are developed."

"The primary job of the package is to create a desire to purchase and try."

A British American Tobacco report titled "The vanishing media"[63]:

"If there is no media advertising even a glimpse of a brand in the right context, can have great value."

"we will need to become more creative, more imaginative and more self-sufficient in the skills of image-building, communications and persuasion, through the media still available to us and by unconventional means where necessary."

"Cigarettes have never been a logical product and brand choice has always been determined by images… appealing on an emotional level rather than for rational choice."

"However, one of every two smokers is not able to distinguish in blind (masked) tests between similar cigarettes… for most smokers and for the decisive group of new, younger smokers, the consumer's choice is dictated more by psychological, image factors than by relatively minor differences in smoking characteristics."

A market research document from 1976[86]:

"Causes of initial brand selection relate directly to reason young person smokes… User Image – *Young smokers "wear" their cigarette… Brands whose product characteristics reinforce the desired user image sought are more likely than others to be selected as an initial usual brand"* they go on to state *"Package changes have historically been detrimental to established brands."*

Brown & Williamson advertising objective for package design[87]:

"To communicate effectively that VICEROY is a satisfying, flavorful cigarette which young adult smokers enjoy, by providing them a rationalization for smoking, or, a repression of the health concern they appear to need."

"Brown & Williamson package design and marketing strategy: To communicate a young smoker image; flavorful, satisfying, high quality product image; and a modern attractive pack image."

RJ Reynolds document for Camel filter under the heading "The Youth Market"[62]:

"Judgementally[sic], a brand's ability to gain acceptance among younger smokers is an indication of its potential for future success. The size of the market is also large."

"Test Market Strategy:…Introduce a new package design which will increase young adult appeal."

Lorillard developing a new product[88]:

"It recognizes that a cigarette pack is actually an item of apparel, and has a character of honesty, simplicity and timeliness which is unique in the industry". The pack "has been created, named, packaged and produced with the sole objective of achieving an important and profitable share of Lo-fi cigarette sales by appealing – with maximum personal impact – to the more youthfully oriented members of this market segment", the strategy was to offer "this target group a cigarette they can identify with – a cigarette that suggests peer acceptance – a cigarette that reflects changing times and tastes – a cigarette that offers in its name/packe[sic] graphic entity a new and personal alternative to any other brand now available."

Below the line marketing

As a result of advertising and marketing restrictions on tobacco products in Australia, the tobacco industry has developed creative methods for reaching their target audience. The tobacco documents provide evidence of the 'below the line' marketing strategies adopted by tobacco companies. These strategies include: the sponsorship of music and fashion events; product placement in movies and in games; and via the Internet.

In 1995 a document from the marketing intelligence department of British American Tobacco was circulated internationally outlining Philip Morris' approach to marketing their products[89]:

"Typical of PM's communications strategy for Marlboro, Medium's launch has been supported by a high profile package of both Above and Below the Line activities… Full use has been made of promotions, sampling, merchandising and point of sale material, all of which are integrated with both the Medium ATL material and other brand family communication activities including Formula 1 sponsorship, Marlboro Classics TMD and the Marlboro Adventure Team (direct marketing/promotions)."

A British American Tobacco document titled "The Vanishing Media" outlines the reality of the changing market[63]:

The document acknowledges that the company will have to become creative in circulating their brand name and products, by placing a higher emphasis on sponsorship,

product diversification and through cigarette packet design.

"An example of successful natural evolution was the move by MARLBORO into participation and sponsorships of sports and FORMULA 1 car racing. The extension of the tough, outdoor, "cowboy" hero – now on wheels instead of a horse – is credible and authentic."

"Are there opportunities to deploy our brand names selectively on other products, through diversification or under licence. Again, this must be thought out, planned and acted on if at all possible before restrictions are imposed. If this is delayed until after restrictions it may be considered as evasion. Do present pack designs have elements – colours, shapes, symbols, etc. – that are recognizable and lend themselves to exploitation for other products or indirect recognition in a severely restricted situation? Take note of existing symbols of high value (e.g. JPS) and consider redesigning packs now if necessary to include elements that can be used later."

"The challenge of giving added value to cigarette brands even if a total advertising ban is imposed will still be us. New ways of publicizing and enhancing brand images can and will be found."

Product placement: Smoking in movies

Research has found that experimentation with tobacco follows a dose-response relationship with exposure to smoking in movies.[10, 90, 91] Actively smoked tobacco or visible cigarette packages have the potential to appear in any movie regardless of the rating. Between 1988 and 1997 smoking featured in predominately adult restricted films, however now smoking is being more frequently featured in more youth friendly films (i.e. rated G or PG).[92] Exposure to smoking in movies has the potential to increase the acceptability of smoking for youth and creates the perception that smoking is a normative behaviour.[10]

The tobacco industry argue they have not participated in product placement agreements with films since 1990 and was legally re-enforced by the 1998 MSA.[92, 93] However, the MSA provisions do not include films that are made outside of America [92] and it is doubted that the industry adhere to the voluntary codes established in 1990.[93]

Excerpts from a Philip Morris report that outlines the company's policy on paying for product placement in feature films, the reasons for maintaining smoking in films as well as why there is no direct paper trail to the company[42]:

"It is the policy of Philip Morris not to seek out or pay for the placement of its products in movies or on television."

"To extend the law to prohibit the appearance of cigarettes and/or smoking in movies or on television is very dangerous. To eliminate them from historical dramas would be to rewrite history. To eliminate them from contemporary dramas would be to ignore an integral part of the lives of millions of Australians. Smoking has been and is an integral part of Australian society. It is only natural that it is part of Australian art."

"There have been instances of Philip Morris International paying for product placement. However, each occurred before the formal implementation of the above policy."

"When – and only when – approached by filmmakers, Philip Morris USA has occasionally agreed to donate free cigarettes and signs for movies. In such instances, there is no contractual arrangement guaranteeing their use."

"Superman II: Philip Morris International paid £20,000 for Marlboro brand exposure."

"Leo Burnett – Kyodo Company, Philip Morris Japan's advertising agency, paid US$350,000 for Lark exposure and other promotional rights."

A document titled "The Vanishing Media" found within the British American Tobacco archives[63]:

The document outlines the benefits of investing in feature films and acknowledges that there was fierce competition between tobacco companies to obtain exclusive rights.
"CINEMA
- *Colour/moving picture/voice/music.*
- *Can "tell a story" – use people and environment.*
- Generally young audience.
- *Good for new brands.*
- *High cost per 1,000."*

"For reasons that cannot be accidental, MARLBORO is always the brand features in Italian movies, Emmanuelle films and most U.S.A. films (including: Saturday Night Fever"). Can we act now to be sure that it is our brands that will feature in Mexican or Brazilian or Hong-Kong films? Can we not get into U.S.A. productions? It is important to remember that this year's movies will be run on TV in 2/3 years time and then home videos, etc."

A letter written by the US House of Representatives to the CEO of Philip Morris regarding payment for product placement within films in 1989[94]:
"The Winter 1987 issue of Philip Morris Magazine *asserts that "Featuring a particular brand name throughout a film*

is a significant and rapidly growing source of revenue for filmmakers," and you reply, in part, on this fact to oppose the American Medical Association's proposal to ban all tobacco advertising. You argue that this proposal "becomes, in the reality of the filmmaking marketplace, a pervasive ban on scenes in which tobacco products are used."

A reply to the US House of Representatives from Philip Morris in 1989[95]:

"It has been the practice of Philip Morris U.S.A. not to make such payments in connection with the placement of its products or signage. Nor does Philip Morris U.S.A. solicit or enter into contracts with motion picture producers for the use or display of its products or brands in films."

"When products or signage are donated, there is no contractual arrangement guaranteeing their use in the film or affecting the script or filming in any way."

"I am informed that, based upon our review thus far, there were two occasions on which product placement fees were paid in connection with foreign films intended for distribution in markets including the United States."

"In October, 1979, there was an offer from Dovesmead Limited, an English studio, for Marlboro brand exposure in a feature film in England entitled Superman II, and £20,000 (English Pounds) was paid for that exposure pursuant to the offer."

"Finally, I would like to emphasis our belief that the ability of an artist to portray smoking in films or any other media is an important right deserving of protection from unwarranted regulation. Government intrusion into artistic decisions which determine whether and how smoking or any other lifestyle activity is to be portrayed is extremely dangerous. Smoking is an integral part of the lives of millions of Americans. It is only natural that it is also an integral part of American art."

Product placement: Video games

Young people are now spending more time gaming than they are watching televised programmes.[96] It is estimated that age restricted substances, such as alcohol, tobacco or illicit drugs constitute approximately 15% of game time.[97]

Letter from the US House of Representatives to Philip Morris CEO Hamish Maxwell[98]:

The document poses questions to Philip Morris in regards to its marketing strategies to ensure that they are targeting an adult audience.

"The Medical Journal of Australia (March 5, 1983) reports that Marlboro billboards were being displayed in a video race car game made by Namco Ltd. of Japan and sold in Australia and that a Marlboro executive said that Marlboro knew about this use of the Marlboro name and logo."

Music events

There is evidence that music events have been supported financially by tobacco companies through both formal and informal sponsorship agreements.[9] These agreements date back to the 1980s when music events were identified as a cost effective method of reaching large numbers.[99] These arrangements have allowed brand names to be prominent on banners, signs and tents selling tobacco merchandise [9][99] and provided an avenue cement smoking and brand names in the culture of young audiences[99].

An excerpt from the 1997 Benson & Hedges Business Review; this document outlines the factors needed to sustain corporate growth, the differences in international markets as well as key learnings that maximise the impact of marketing strategies[100].

"Exploitation of music has been a key factor and has been integral in the planning of live events in… Australia (Horeca events)."

A report on the Golden Tones event by Red 14 Limited:[101]

"Finally, it is worth mentioning how effectively branded the venue was. Wills had worked extremely hard to create a Golden Tones environment by surrounding all areas of the available perimeter with large high quality banners."

Fashion

The tobacco companies have promoted their brands by associating cigarettes with models, creating a false association with beauty, desirability and success.[102] For example, in 2009, the Peter Stuyvesant boutique brand of cigarettes appeared at the Davidoff fashion parades, and in 2007, models with lit cigarettes featured in Dolly and Girlfriend magazine spreads as a part of the Australian based Gripp jean campaign.[103] Evidence from the tobacco documents confirms that the tobacco industry has recognised the value of aligning their products with fashion.

Findings from a research report conducted in the early 1990s to determine the influences of female adult smokers as well as social norms and values:[104]

"As often the case, being stylish implies to hold the weight down and to remain physically fit. Not surprisingly, the people to look up to as models are sexy and self assure people and consists at least of socializing with sophisticated friends."

Excerpt from a Philip Morris report on promotional services at a Virginia Slims fashion programme. This document highlights how Philip Morris attempted to marry fashion and tobacco to appeal to younger women[105]:

"In an effort to gain relevancy among young adult female smokers, Virginia Slims is exploring a new advertising direction. While this new direction has not been specifically defined as of yet, its objective is to make Virginia Slims relevant to young adult female smokers through a proprietary attitude, in the context of female style. While the primary focus will not be fashion, fashion and style will be an integral part of the execution."

"The Virginia Slims Fashion program should dimensionalize [sic] the style and attitude of today's young women smoker."

An excerpt from a WD & HO Wills report that outlines the changing nature of the market and prospects for marketing[106]:

"- Establish closer associations with fashion houses, shops, models and fashion parades and encourage their use openly for our products."

Online

Tobacco companies have a history of developing websites featuring essential elements that appeal to young audiences (such as music, entertainment or fashion).[107] Tobacco companies have used social networking sites including Facebook, MySpace and Twitter to promote tobacco products without advertising in a conventional manner.[6]

The following communication is from Yahoo! Internet Life to the Philip Morris tobacco company in 1997 [108] regarding the Internet as a new avenue of advertising:

"Recently Yahoo! Internet Life has been given clearance to take tobacco advertising."

"Also important is that our reader base is made up of young trendsetters (by definition the first 20% of people to do anything are early adopters)."

Letter from Yahoo! Internet Life confirming business venture with Philip Morris[109]:

"We just got word from the folks at Y& R about the Parliament business and are very excited that we will begin a partnership with the PHILIP MORRIS Company."

"As requested, the percentage of Yahoo! Internet Life's circulation below 21 years of age is 6-7%."

"we look forward to working with you and your colleagues to insure the most advantageous utilization of YIL [Yahoo! Internet Life]."

"Approved for placement of cigarette brand advertisements."

Conclusion

The tobacco industry documents presented in this paper provide insights into the tobacco industry and its approach to youth smoking. The report summarises already published literature about youth smoking as it is well established that the tobacco industry has targeted youth for many years.

It is clear from the documents reviewed, that the tobacco industry is aware that people who smoke, started smoking from a young age, and that choice of cigarette is largely decided upon according to brand image. The documents provide evidence that the industry invested great time and resources in developing strategies to attract youth. Tobacco companies conducted market research with youth; used comprehensive public relations strategies; aligned themselves with retailers; were aware of the effectiveness of branding and positioning of products for their sale to youth; tried to deflect and stall regulation through education initiatives and promotion of individual responsibility. Youth smoking prevention initiatives are used to deflect responsibility away from the tobacco industry and instead hold young people, peers, parents and society accountable. These initiatives are also used by the industry to help build a positive public image.

The published literature and excerpts from tobacco industry documents presented in this report confirm that the tobacco industry promoted and supported strategies that were ineffective in reducing smoking by youth (industry-favoured education strategies, retailer access initiatives), and opposed strategies that have proven to be effective such as advertising bans and point of sale controls.

Over time, with increased controls being placed on the advertising and marketing of tobacco products, the industry has become more creative in its approach.

"Below the line" strategies such as sponsorship of music and fashion events and product placement in movie and video games that appeal to youth have emerged.

The evidence from these documents show that the industry values the youth market and through a number of measures continues to promote its products to young people.

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PEER REVIEW

Not commissioned. Externally peer reviewed.

CONFLICTS OF INTEREST

The authors declare that they have no competing interests.

FUNDING

ETHICS COMMITTEE APPROVAL

The WA Tobacco Document Searching Program was approved by the Curtin University Human Research Ethics Committee.