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Loi sur le tabac

Compilation of Selected Evidence Regarding the Impact of Tobacco Advertising and Promotion

A Submission to Parliamentarians
for Use During Consideration of Bill C-42,
An Act to amend the Tobacco Act

Revised December 1998

Volume 2

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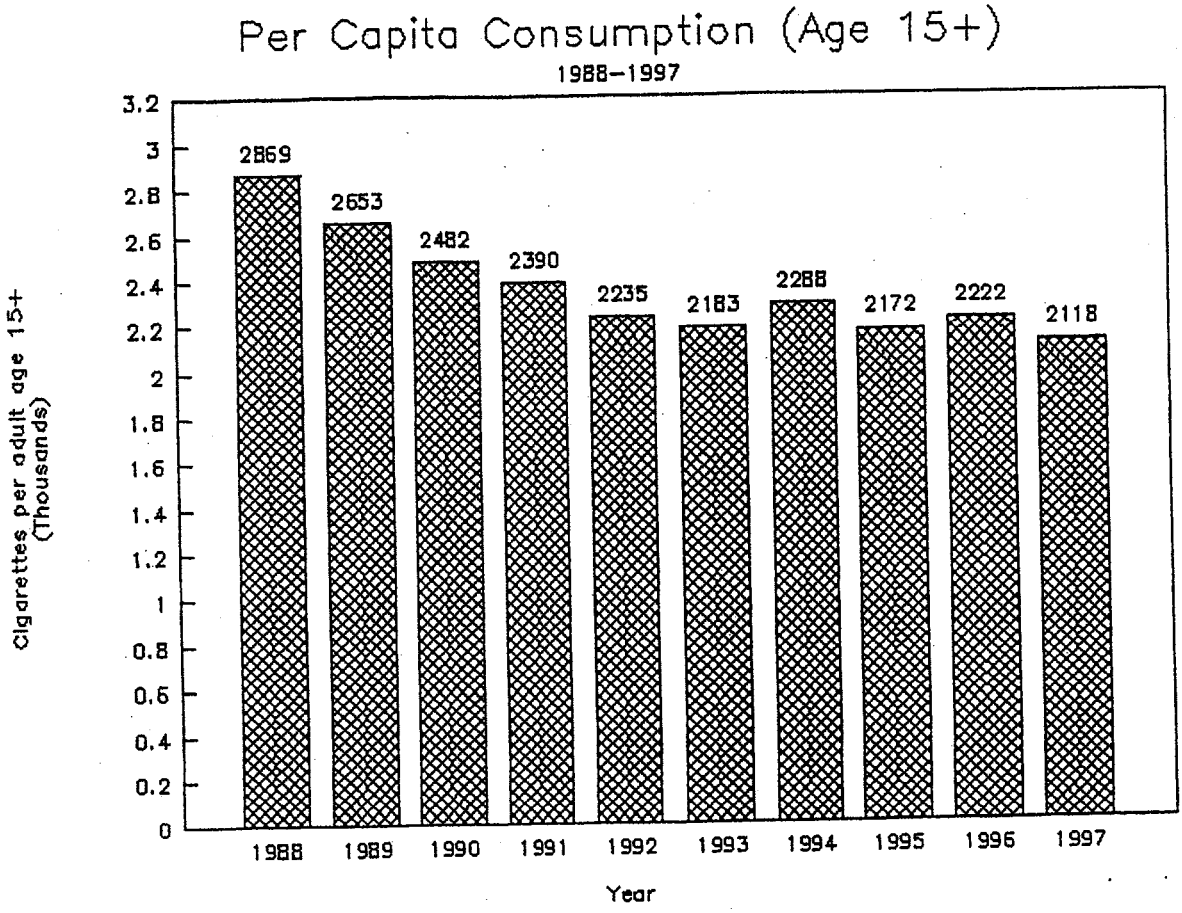
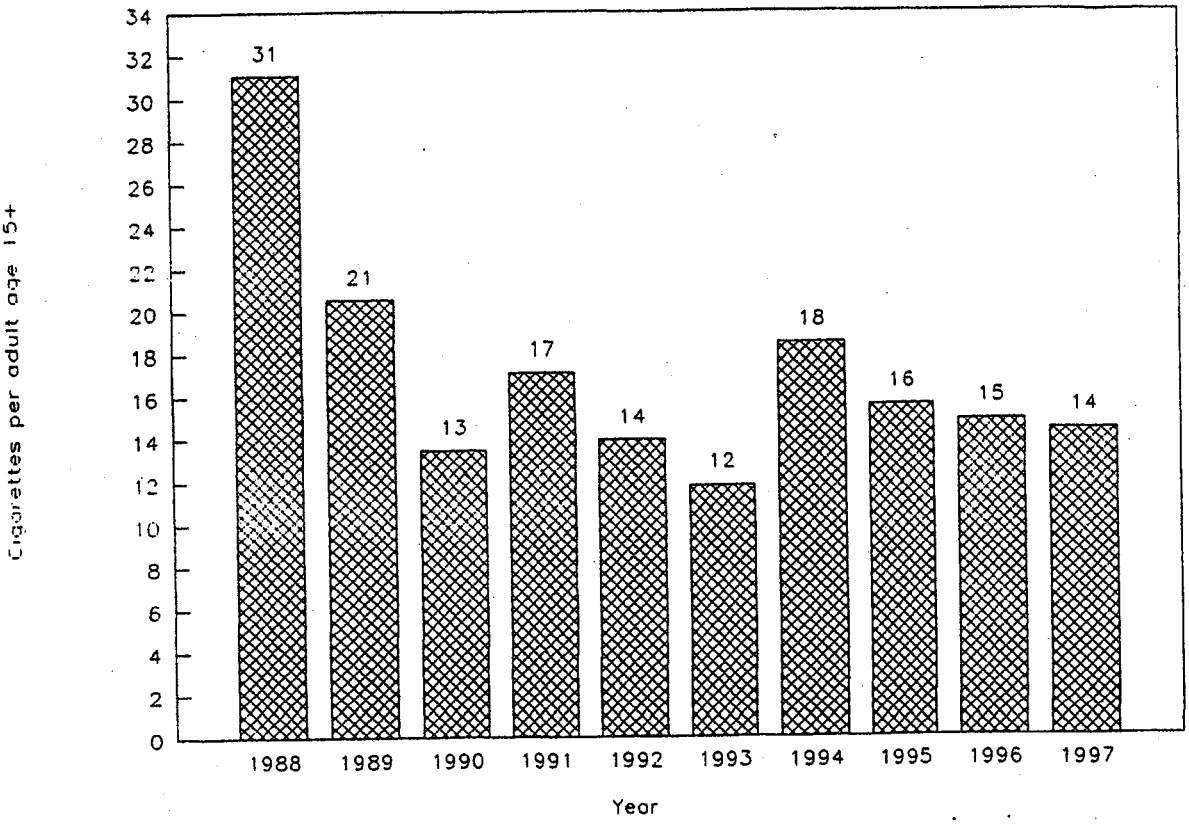

Per Capita Consumption (Age 15+)
1988-1997
Cigarettes per adult age 15+
(Thousands)
3.2
3
2.8
2.6
2.4
2.2
2
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
2869
2653
2482
2390
2235
2183
2288
2172
2222
2118
1988
1989
1990
1991
1992
1993
1994
1995
1996
1997
Year

Cigarette Imports Per Capita

1988–1997



Year	Cigs	Fine Cut	Contra-band	Cig Import	smok t Import	Total Sales	Per Capita	Pop 15+
1988	51.05	8.03	0.56	0.66	0.80	61.11	2869	21,298
1989	47.60	7.75	1.06	0.45	0.70	57.56	2653	21,696
1990	45.92	6.66	1.27	0.30	0.54	54.68	2482	22,027
1991	39.36	6.42	6.43	0.38	0.71	53.30	2390	22,299
1992	35.06	5.08	8.20	0.31	1.75	50.40	2235	22,556
1993	30.22	3.83	14.50	0.27	1.41	50.23	2183	23,009
1994	45.74	3.96	2.50	0.43	0.64	53.27	2288	23,284
1995	45.58	3.83	0.80	0.37	0.75	51.33	2172	23,631
1996	47.12	4.05	0.50	0.36	1.26	53.29	2222	23,981
1997	45.52	3.97	0.50	0.35	1.11	51.45	2118	24,294

Year	Cig Import	smok t Import	Total Imports	Cig imp Per cap	Tot imp per cap	Pop 15+
1988	0.66	0.80	1.46	31	69	21,298
1989	0.45	0.70	1.15	21	53	21,696
1990	0.30	0.54	0.83	13	38	22,027
1991	0.38	0.71	1.09	17	49	22,299
1992	0.31	1.75	2.06	14	91	22,556
1993	0.27	1.41	1.68	12	73	23,009
1994	0.43	0.64	1.07	18	46	23,284
1995	0.37	0.75	1.12	16	47	23,631
1996	0.36	1.26	1.62	15	67	23,981
1997	0.35	1.11	1.46	14	60	24,294

The data in these tables represent

- domestic sales of manufactured cigarettes and fine cut are taken from Statistics Canada, *Production and disposition of tobacco products*, Catalogue 32-022, December issues, 1988-1997.
- figures for contraband are taken from industry sources for 1988-1994: Canadian Tobacco Manufacturers' Council, 1993, untitled (summary of Canadian and American tobacco sales, including sales of Canadian contraband); Lindquist Avey Macdonald Baskerville Inc., "1992 contraband estimate - an update" September 27, 1993; Lindquist Avey Macdonald Baskerville Inc., "The impact of reducing tobacco taxes on the contraband market" June 27, 1994; Lindquist Avey Macdonald Baskerville Inc., "Cigarette smuggling in the United States" August 15, 1994; Imasco Ltd., Annual Report 1995. Lindquist Avey Macdonald Baskerville Inc. was a consulting firm hired by the industry. Estimates are provided for 1995-1997, derived in part by industry statements that international smuggling into Canada has been virtually eliminated following the 1994 rollback.
- imports of manufactured cigarettes and smoking tobacco (including fine cut and presumably pipe tobacco) are taken from Statistics Canada, *Imports by Commodity*, Catalogue 65-007, December issues, 1988-1997;
- in calculating total sales, each gram of fine cut and smoking tobacco is treated as one cigarette; Statistics Canada includes tobacco sticks in the fine cut category by weight
- population data are taken from Statistics Canada, *Revised Intercensal Population and Family Estimates, July 1, 1971-1991*, Catalogue 91-537. Statistics Canada, *Annual Demographic Statistics*, annual issues 1993-1997, Catalogue No. 91-213.
- all data in the tables are expressed in billions, except population data (expressed in millions) and per capita data (expressed as is)

Catalogue 32-022-XPB Monthly – Mensuel / ISSN 0708-336X Vol. 26, No. 12

Production and Disposition of Tobacco Products
December 1997

Production et disposition des produits du tabac
Décembre 1997

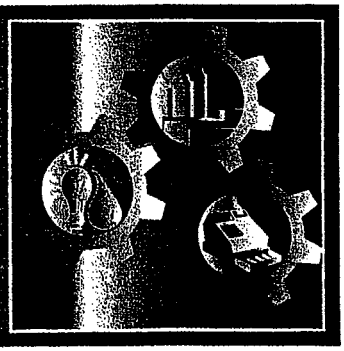


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TABLE 1. Summary 1997

TABLEAU 1. Sommaire 1997

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1997 - Décembre					
Opening inventory - Inventaire d'ouverture	5,450,980	21,483 r	671 252 r	x	x
Total production - Production totale	**2,768,899**	**5,141**	**211 447**	x	x
Total sales[3] - Ventes totales[3]	**4,719,273**	**12,415**	**447 421**	x	4 937
Domestic[4] - Au Canada[4]	4,534,186	12,036	433 018	x	4 937
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	67,993	365	1 604	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	117,094	14	12 799	–	–
Adjustments[6] - Ajustements[6]	-79,117	6,221	28 215	–	–
Closing inventory[7] - Inventaire de fermeture[7]	3,421,489	20,430	463 493	x	x

See footnote(s) at end of table 3.

Selected series available on **CANSIM**, matrix 46.

Manufacturing, Construction and Energy Division

February 1998

Voir note(s) à la fin du tableau 3.

Certaines séries sont disponibles dans la matrice 46 de **CANSIM**.

Division de la fabrication, de la construction, et de l'énergie

Février 1998

Note of Appreciation
Canada owes the success of its statistical system to a long-standing co-operation involving Statistics Canada, the citizens of Canada, its businesses, governments and other institutions. Accurate and timely statistical information could not be produced without their continued co-operation and goodwill.

Note de reconnaissance
Le succès du système statistique du Canada repose sur un partenariat bien établi entre Statistique Canada et la population, les entreprises, les administrations canadiennes et les autres organismes. Sans cette collaboration et cette bonne volonté, il serait impossible de produire des statistiques précises et actuelles.

TABLE 1. Summary 1997

TABLEAU 1. Sommaire 1997

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	48,085,721	139,577 r	3 958 456 r	x	x
Total Sales[3] - Ventes totales[3]	47,792,719	141,549 r	4 177 690 r	x	55 423 r
Domestic[4] - Au Canada[4]	45,520,274	130,311 r	3 969 216 r	x	55 423 r
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	636,292	5,529 r	31 218	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	1,636,153	5,709	177 256	–	–
Adjustments[6] - Ajustements[6]	-861,102	7,163	-45 083	–	x

See footnote(s) at end of table 3.

Voir note(s) à la fin du tableau 3.

TABLE 2. Summary 1996

TABLEAU 2. Sommaire 1996

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriques
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - Code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1996 - Décembre					
Opening inventory - Inventaires d'ouverture	5,588,825	17,245	873 586	x	291
Total production - Production totale	3,193,710	7,855	272 152	x	2 895
Total Sales[3] - Ventes totales[3]	4,707,633	11,543	441 207	x	2 765
Domestic[4] - Au Canada[4]	4,446,875	11,180	417 136	x	2 765
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	49,040	351	3 016	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	211,718	12	21 055	–	–
Adjustments[6] - Ajustements[6]	-86,251	1,682	22 784	–	–
Closing inventory[7] - Inventaire de fermeture[7]	3,988,651	15,239	727 315	x	421

See footnote(s) at end of table 3.

Voir note(s) à la fin du tableau 3.

TABLE 2. Summary 1996 — TABLEAU 2. Sommaire 1996

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	**50,185,909**	**142,863**	**4 524 254**	**x**	**32 439**
Total Sales[3] - Ventes totales[3]	**50,222,776**	**139,753**	**4 369 165**	**x**	**32 446**
Domestic[4] - Au Canada[4]	47,117,904	132,580	4 050 144	x	32 446
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	627,871	4,701	57 141	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	2,477,001	2,472	261 880	–	–
Adjustments[6] - Ajustements[6]	-143,561	-5,074	5 111	–	–

TABLE 3a. Production and Disposition of Cigarettes, Seasonally Adjusted[8] — TABLEAU 3a. Production et disposition des cigarettes, désaisonnalisées[8]

	Dec Déc 97	Nov Nov 97	Oct Oct 97	Sep Sep 97	Aug Août 97	July Juil 97	June Juin 97	May Mai 97	Apr Avr 97	Mar Mar 97	Feb Fév 97	Jan Jan 97	Dec Déc 96
	Millions of cigarettes - Millions de cigarettes												
Opening inventory - Inventaire d'ouverture	5 188	5 121	5 291	6 022	6 665	6 347	6 402	5 808	6 025	6 083	5 756	4 930	5 224
Total production - Production totale	3 308	4 139	3 802	3 669	3 554	4 327	4 053	4 234	4 214	4 305	4 392	4 088	3 830
Total sales[3] - Ventes totales[3]	4 013	3 853	3 831	4 235	3 833	4 421	4 098	3 033	4 439	4 448	3 849	3 738	4 140
Domestic[4] - Au Canada[4]	3 890	3 667	3 640	4 043	3 620	4 151	3 832	2 845	4 275	4 280	3 660	3 615	3 974
Tax-free sales[5] - Ventes sans taxes[5]	46	65	52	51	54	54	51	53	52	54	56	49	34
Exports[5] - Exportations[5]	78	121	139	141	158	215	216	135	112	114	133	74	133
Closing inventory[7] - Inventaire de fermeture[7]	4 301	5 070	5 056	5 700	5 735	6 429	6 129	6 987	5 807	6 005	6 323	5 526	4 698

TABLE 3b. Month to Month Percentage Change in Seasonally Adjusted Data[8]

TABLEAU 3b. Variation en pourcentage de mois en mois des données désaisonnalisées[8]

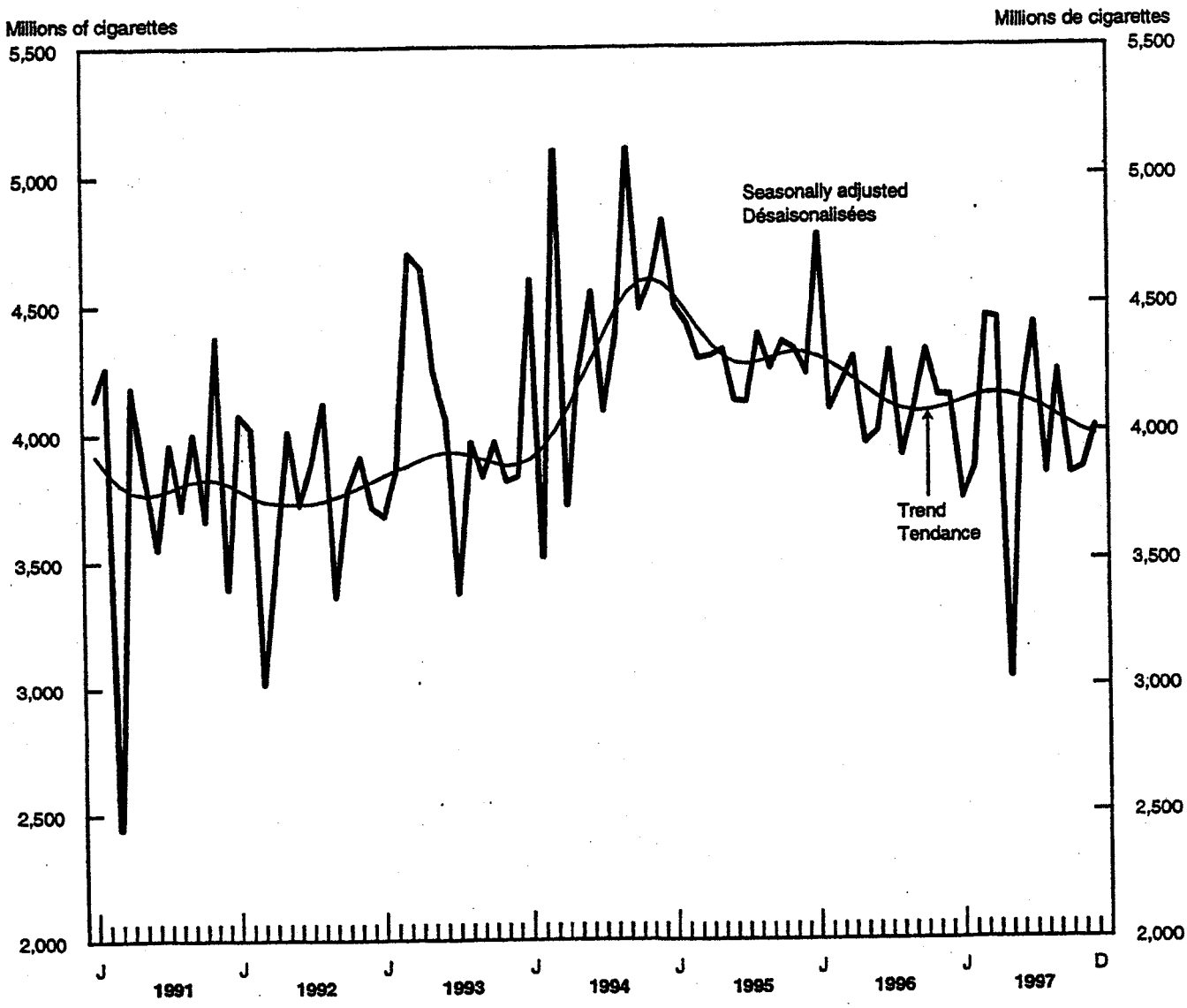
	Dec Déc 97	Nov Nov 97	Oct Oct 97	Sep Sep 97	Aug Août 97	July Juil 97	June Juin 97	May Mai 97	Apr Avr 97	Mar Mar 97	Feb Fév 97	Jan Jan 97	Dec Déc 96
	Per cent - Pourcentage												
Opening inventory - Inventaire d'ouverture	1.3	-3.2	-12.1	-9.6	5.0	-0.9	10.2	-3.6	-0.9	5.7	16.8	-5.6	-0.7
Total production - Production totale	-20.1	8.9	3.6	3.3	-17.9	6.8	-4.3	0.5	-2.1	-2.0	7.4	6.8	-11.4
Total sales[3] - Ventes totales[3]	4.2	0.6	-9.5	10.5	-13.3	7.9	35.1	-31.7	-0.2	15.6	3.0	-9.7	0.0
Domestic[4] - Au Canada[4]	6.1	0.7	-10.0	11.7	-12.8	8.3	34.7	-33.4	-0.1	16.9	1.3	-9.0	-0.3
Tax-free sales[5] - Ventes sans taxes[5]	-29.6	25.6	1.5	-5.6	0.0	6.9	-4.1	2.4	-4.1	-3.6	13.3	46.1	-38.6
Exports[5] - Exportations[5]	-35.7	-13.4	-1.4	-10.9	-26.4	-0.1	59.7	20.0	-1.7	-13.8	79.6	-44.4	33.0
Closing inventory[7] - Inventaire de fermeture[7]	-15.2	0.3	-11.3	-0.6	-10.8	4.9	-12.3	20.3	-3.3	-5.0	14.4	17.6	-7.1

1 Tobacco: fine cut; intended for cigarettes.
2 Non-manufactured tobacco - Leaf (packaged for retail consumption).
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 Sales from stocks held outside Canada are excluded. Transfers into stocks held outside Canada are included. For total exports see Catalogue 65-004-XPB, Exports by Commodity.
6 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
7 Inventory: stocks held outside Canada are excluded.
8 Seasonal Adjustment: Seasonal adjustment of a monthly series tries to eliminate seasonality, defined as intra-year fluctuations that occur on a regular basis year after year. These fluctuations are a result of seasonal changes in weather, statutory holidays, industry practices and other events. Removing seasonality from a series leaves the data easier to analyse for short-term trend movements.
The seasonal adjustment applied to the series in this publication is a ratio-to-moving average method, called X11ARIMA. This is the officially adopted method for all Statistics Canada publications.
The "Adjustments" series is very erratic and therefore we do not provide a seasonally adjusted version for it. Seasonally adjusted total sales are obtained as the sum of the seasonally adjusted detailed sales series and seasonally adjusted closing inventory is the sum of opening inventory plus production minus sales plus or minus adjustments, all seasonally adjusted.
– nil or zero.
r revised figures.
x confidential, suppressed to meet the requirements of the Statistics Act.
.. figures not available.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac non-fabriqué - Feuilles (en paquet pour ventes au détail).
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Les échantillons sont également inclus.
5 Les ventes des stocks détenus à l'étranger sont exclues. Les transferts aux stocks détenus à l'étranger sont inclus. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004-XPB au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
7 Inventaire: les stocks détenus à l'étranger sont exclus.
8 Désaisonnalisation: en désaisonnalisant une série de données mensuelles, on s'efforce de supprimer la périodicité, c'est-à-dire les fluctuations qui surviennent à intervalles réguliers durant l'année après l'autre. Ces variations sont attribuables à divers facteurs, par exemple les conditions climatiques, les jours fériés, les pratiques de l'industrie et le reste. La désaisonnalisation facilite l'analyse des données, car elle dégage les tendances à court terme.
La méthode de désaisonnalisation appliquée à la présente série est celle de la moyenne mobile X11ARMMI, méthode officielle adoptée pour toutes les publications de Statistique Canada.
La série "ajustements" étant très irrégulière, nous ne publions pas de version désaisonnalisée. Les ventes totales désaisonnalisées correspondent à la somme des ventes détaillées désaisonnalisées, tandis que les stocks de clôture désaisonnalisés correspondent aux stocks d'ouverture plus la production, moins les ventes et plus ou moins les rajustements, tous après désaisonnalisation.
– néant ou zéro;
r nombres rectifiés;
x confidentiel, supprimé en vertu des dispositions de la Loi sur la statistique;
.. nombres non disponibles.

Total Cigarette Shipments
Seasonally Adjusted and Trend

Livraisons totales de cigarettes
Désaisonnalisées et tendance



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Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures.

Note: This report reflects the activity of the respondent firms operating in 1997.

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers est basé sur l'enquête annuelle des manufactures la plus récente.

Nota: Cette publication reflète l'activité des compagnies répondantes qui opèrent en 1997.

For further information, contact: Peter Zylstra, Manufacturing, Construction and Energy Division, Statistics Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511 or internet: zylstpet@statcan.ca

Pour plus de renseignements, communiquer avec: Peter Zylstra, Division de la fabrication, de la construction, et de l'énergie, Statistique Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511 ou par internet: zylstpet@statcan.ca

List of Respondent Firms, 1997

Liste de firmes répondantes, 1997

Name / Nom		Plant Location / Localisation de l'usine
Prince Edward Island - L'Île du Prince Edouard		
Choice Tobacco Inc.		Montague
New Brunswick - Nouveau Brunswick		
Maritime Tobacco Corporation		Fredericton
Quebec - Québec		
Bastos du Canada Limitée		Louiseville
Compagnie de Tabac Dynasty Inc.		Montreal
General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
Les Produits de Tabac Tremblay Inc.		Québec
RJR MacDonald Inc.		Montréal
Rothmans, Benson & Hedges Inc.		Québec
Tabac A.D.L.. Inc.		Pointe Blue
Ontario		
Frank Correnti Cigars Ltd.		Toronto
House of Horvath Inc.		Toronto
Imperial Tobacco Ltd./Ltée.	(Division of Imasco)	Guelph

This survey measures the production and sales of tobacco products. Data collected from this survey are important because they measure production of this industrial sector, providing an indication of its well being and its contribution to the Canadian economy. This survey is conducted under the secrecy provisions of the Statistics Act, which prohibit the publication of information, which can be related to any individual person, business or organization. The target population includes all major manufacturers. The survey frame is based mainly on the annual survey of manufactures (ASM). Since the ASM lags behind this commodity survey, there is a risk of undercoverage but this should be minimal because of advance information from the ASM frame and feedback from the monthly survey of manufacturing (MSM). The last break in these series occurred in 1988 with the introduction of the harmonized system (HS) coding system.

All survey data, from whatever source, are subject to error. The main sources of error are coverage error, response error, processing error and non-response error. Based on the 1995 ASM (Products shipped by Canadian Manufacturers, Catalogue 31-211-XPB), production published in this survey account for 100% of the total production of tobacco products. For the twelve month period in 1997, the degree of estimation for non-response was 0.1%. On a monthly basis, late responses are imputed using a variety of methods, the most common being trend analysis. More detailed information is available in Cat. 31-203-XPB (Manufacturing Industries of Canada: National and Provincial Areas) and in Cat. 31-211-XPB (Products shipped by Canadian Manufacturers).

Cette enquête mesure la production et les ventes des produits du tabac. Les résultats de cette enquête sont importants parce qu'ils permettent de mesurer la production de ce secteur manufacturier et par la même occasion, nous donne une indication de son état général et de sa contribution à l'économie canadienne. Cette enquête est soumise aux limitations prescrites dans la Loi Statistique qui interdit la diffusion de données qui pourraient servir a identifier toute personne, entreprise ou organisation. La population cible est formée de tous les plus importants fabricants. La base de sondage de cette enquête sur les produits est principalement tirée de l'Enquête annuelle sur les manufactures (EAM). Compte tenu du retard de l'EAM, par rapport à cette enquête mensuelle, il y a risque d'un faible sous-dénombrement, compensé toutefois par des renseignements anticipés de la base de sondage de l'EAM et de la rétroaction de l'Enquête mensuelle sur les manufactures (EMM). Le dernier bris dans la comparabilité de ces séries est survenu en 1988 lors de l'introduction du système de codage du Système harmonisé (SH). Les données d'enquêtes, quelles qu'elles soient, sont susceptibles d'être erronées.

Les principales sources d'erreurs sont les erreurs de couverture, les erreurs du répondant, les erreurs de traitement et les erreurs de non-réponse. D'après l'EAM de 1995 (Produits livrés par les fabricants canadiens, # 31-211-XPB au catalogue), la production publiée dans cette enquête représente 100% du volume total de la production des produits du tabac. Pour la période de 12 mois de 1997, le pourcentage d'imputation de la non-réponse est de 0.1%. Diverses méthodes permettent d'imputer, chaque mois, les réponses en retard, la plus courante étant l'analyse de la tendance. Des informations additionnelles sont disponibles dans les publication # 31-203-XPB (Industries manufacturières du Canada: niveaux national et provincial) et # 31-211-XPB (Produits livrés par les frabricants canadiens).

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CATALOGUE 32-022-XPB Monthly – Mensuel / ISSN 0708-336X

Vol. 25, No. 12

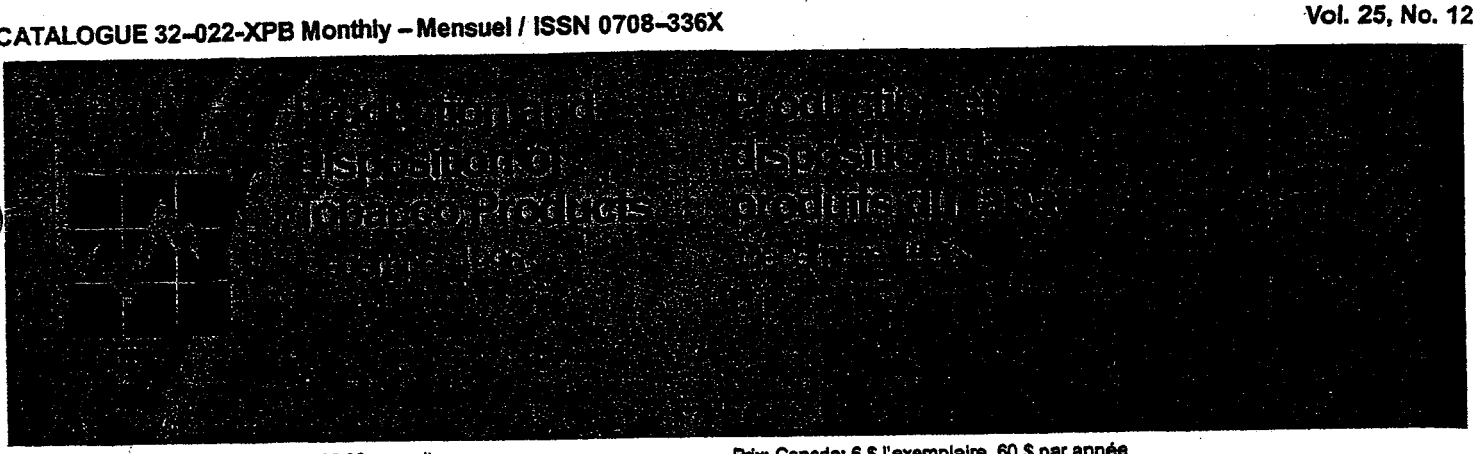

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TABLE 1. Summary 1996

TABLEAU 1. Sommaire 1996

	Cigarettes	Cigars Cigares	Manufactured tobacco Tabac fabriqué		Non-manufactured Tobacco Tabac non-fabriqué
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Leaf[2] Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1996 - Décembre					
Opening inventory - Inventaires d'ouverture	5,588,825	17,245	873 586	x	291
Total production - Production totale	**3,193,710**	**7,855**	**272 152**	**x**	**2 895**
Total Sales[3] - Ventes totales[3]	**4,707,633**	**11,543**	**441 207**	**x**	**2 765**
Domestic[4] - Au Canada[4]	4,446,875	11,180	417 136	x	2 765
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	49,040	351	3 016	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, incluire les livraisons aux diplomates à l'extérieur du Canada[5]	211,718	12	21 055	–	–
Adjustments[6] - Ajustements[6]	-86,251	1,682	22 784	–	–
Closing inventory[7] - Inventaire de fermeture[7]	3,988,651	15,239	727 315	x	421

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

Selected series available on **CANSIM**, matrix 46.

Certaines séries sont disponibles dans la matrice 46 de **CANSIM**.

Industry Division

January 1997

Division de l'industrie

Janvier 1997

Note of Appreciation

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Note de reconnaissance

Le succès du système statistique du Canada repose sur un partenariat bien établi entre Statistique Canada et la population, les entreprises, les administrations canadiennes et les autres organismes. Sans cette collaboration et cette bonne volonté, il serait impossible de produire des statistiques précises et actuelles.

TABLE 1. Summary 1996

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			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	**50,185,909**	**142,863**	**4 524 254**	x	**32 439**
Total Sales[3] - Ventes totales[3]	**50,222,776**	**139,753**	**4 369 165**	x	**32 446**
Domestic[4] - Au Canada[4]	47,117,904	132,580	4 050 144	x	32 446
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	627,871	4,701	57 141	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	2,477,001	2,472	261 880	–	–
Adjustments[6] - Ajustements[6]	-143,561	-5,074	5 111	–	–

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1995

TABLEAU 2. Sommaire 1995

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriques
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - Code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1995 - Décembre					
Opening inventory - Inventaires d'ouverture	5,693,167	24,274 r	675 964	x	752
Total production - Production totale	**4,112,747**	**4,275 r**	**324 928**	x	**3 521**
Total Sales[3] - Ventes totales[3]	**4,821,640**	**10,724 r**	**424 052**	x	**3 845**
Domestic[4] - Au Canada[4]	4,169,977	10,390 r	397 212	x	3 845
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	47,638	230 r	3 658	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	604,025	104	23 182	–	–
Adjustments[6] - Ajustements[6]	-815,195 r	-622	-9 724	–	–
Closing inventory[7] - Inventaire de fermeture[7]	4,169,079 r	17,203 r	567 116	x	428

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1995 / TABLEAU 2. Sommaire 1995

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE - TOTAL CUMULATIF					
Total production - Production totale	**51,494,004**	**141,313 r**	**4 044 583**	**x**	**40 807**
Total Sales[3] - Ventes totales[3]	**51,523,793**	**139,552 r**	**4 218 579**	**x**	**40 962**
Domestic[4] - Au Canada[4]	45,581,675	132,976 r	3 833 467	x	40 962
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	555,719	4,258 r	59 785	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	5,386,399	2,318 r	325 327	–	–
Adjustments[6] - Ajustements[6]	-642,516 r	2,769	-24 414	-9	–

Note: **Beginning with the January 1997 issue, this publication will contain seasonally adjusted data on the production and disposition (domestic shipments, exports and changes in inventories) of cigarettes.**
This report reflects the activity of the respondent firms operating in 1996. The list of respondents is published annually in the December issue.

1 Tobacco: fine cut; intended for cigarettes.
2 Non-manufactured tobacco - Leaf (packaged for retail consumption).
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 Sales from stocks held outside Canada are excluded. Transfers into stocks held outside Canada are included. For total exports see Catalogue 65-004-XPB, Exports by Commodity.
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Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures.

For further information, contact: Peter Zylstra, Industry Division, Statistics Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511 or internet: zylstra@statcan.ca

Nota: **A compter de janvier 1997, cette publication contiendra des données désaisonnalisées sur la production et la disposition (livraisons au Canada, exportations, et la variation des inventaires) des cigarettes.**

Cette publication reflète l'activité des compagnies répondantes qui opèrent en 1996. La liste des répondants est publiée annuellement dans la publication de décembre.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac non-fabriqué - Feuilles (en paquet pour ventes au détail).
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Les échantillons sont également inclus.
5 Les ventes des stocks détenus à l'étranger sont exclues. Les transferts aux stocks détenus à l'étranger sont inclus. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004-XPB au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
7 Inventaire: les stocks détenus à l'étranger sont exclus.
– néant ou zéro;
r nombres rectifiés;
x confidentiel, supprimé en vertu des dispositions de la Loi sur la statistique;
.. nombres non disponibles.

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers est basé sur l'enquête annuelle des manufactures la plus récente.

Pour plus de renseignements, communiquer avec: Peter Zylstra, Division de l'industrie, Statistique Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511 ou par internet: zylstra@statcan.ca

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Le papier utilisé dans la présente publication répond aux exigences minimales de l'"American National Standard for Information Sciences" – "Permanence of Paper for Printed Library Materials", ANSI Z39.48 – 1984.

List of Respondent Firms, 1996

Liste de firmes répondantes, 1996

Name / Nom		Plant Location / Localisation de l'usine
Prince Edward Island - L'île du Prince Edouard		
Choice Tobacco Inc.		Montague
Quebec - Québec		
Bastos du Canada Limitée		Louiseville
General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
Les Produits de Tabac Tremblay Inc.		Québec
RJR MacDonald Inc.		Montréal
Rothmans, Benson & Hedges Inc.		Québec
Ontario		
Frank Correnti Cigars Ltd..		Toronto
House of Horvath Inc.		Toronto
Imperial Tobacco Ltd./Ltée.	(Division of Imasco)	Guelph

This survey measures, on a monthly basis, the production and sales of tobacco products. The target population is all known manufacturers of cigarettes, cigars, fine cut and pipe tobacco. The frame for this commodity survey is based mainly on the annual survey of manufacturers (ASM). Since the ASM lags behind this commodity survey, there is a risk of undercoverage but this should be minimal because of advanced information from the ASM frame, feedback from the monthly survey of manufacturers (MSM) and market information which are all used to update this commodity survey's frame on a current basis. The last break in these series occurred in 1988 with the introduction of the harmonized system (HS) coding system. Based on the 1993 ASM ("Tobacco Products Industries, Catalogue 32-251) the reporting firms in this survey account for approximately 100% of the total volume of cigarettes, cigars and fine cut produced. For the twelve month period in 1995, the degree of estimation for non-response was 0%. On a monthly basis, late responses are imputed using a variety of methods, the most common being a trend analysis.

Cette enquête mesure, sur une base mensuelle, la production et les ventes des produits du tabac. La population cible est formée de tous les fabricants connus de cigarettes, cigares et de tabac fabriqué haché fin et pour la pipe. La base de sondage de cette enquête sur les produits est principalement tirée de l'Enquête annuelle sur les manufactures (EAM). Compte tenu du retard de l'EAM sur cette enquête, il y a risque de sous-dénombrement, minime toutefois, en raison des renseignements anticipés de la base de sondage de l'EAM, de la rétroaction de l'Enquête mensuelle sur les manufactures (EMM) et des renseignements ayant trait au marché qui servent tous à mettre à jour la base de sondage de cette enquête sur les produits. La dernière solution de continuité de ces séries est survenue en 1988 et est attribuable à l'introduction du système de codage du Système harmonisé (SH). D'après l'EAM 1993 (Industrie des produits du tabac, n° 32-251 au catalogue), les entreprises déclarantes qui participent à cette enquête représentent environ 100% du volume total de cigarettes, de cigares et de tabac haché fin fabriqué. Pour la période de douze mois en 1995, le degré d'estimation de la non-réponse est de 0%. Diverses méthodes permettent d'imputer, chaque mois, les réponses en retard, la plus courante étant l'analyse de la tendance.

ATALOGUE 32-022 Monthly – Mensuel / ISSN 0708-336X Vol. 24, No. 12

Production and Disposition of Tobacco Products

December 1995

Production et disposition des produits du tabac

Décembre 1995

BIBLIOTHÈQUE DU PARLEMENT

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TABLE 1. Summary 1995

TABLEAU 1. Sommaire 1995

JAN
Bibliothèque du

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1995 - Décembre					
Opening inventory - Inventaires d'ouverture	5,693,167	24,013	675 964	x	752
Total production - Production totale	4,112,747	4,255	324 928	x	3 521
Total Sales[3] - Ventes totales[3]	4,821,640	10,761	424 052	x	3 845
Domestic[4] - Au Canada[4]	4,169,977	10,436	397 212	x	3 845
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	47,638	221	3 658	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	604,025	104	23 182	–	–
Adjustments[6] - Ajustements[6]	-624,586	-622	-9 724	–	–
Closing inventory[7] - Inventaire de fermeture[7]	4,359,688	16,885	567 116	x	428

See footnote(s) at end of table 2.

Selected series available on CANSIM, matrix 46.

Industry Division

January 1996

Voir note(s) à la fin du tableau 2.

Certaines séries sont disponibles dans la matrice 46 de CANSIM.

Division de l'industrie

Janvier 1996

Note of Appreciation

Canada owes the success of its statistical system to a long-standing cooperation involving Statistics Canada, the citizens of Canada, its businesses, governments and other institutions. Accurate and timely statistical information could not be produced without their continued cooperation and goodwill.

Note de reconnaissance

Le succès du système statistique du Canada repose sur un partenariat bien établi entre Statistique Canada et la population, les entreprises, les administrations canadiennes et les autres organismes. Sans cette collaboration et cette bonne volonté, il serait impossible de produire des statistiques précises et actuelles.

TABLE 1. Summary 1995 — TABLEAU 1. Sommaire 1995

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	51,494,004	141,024	4 044 583	x	40 807
Total Sales[3] - Ventes totales[3]	51,523,793	139,581	4 218 579	x	40 962
Domestic[4] - Au Canada[4]	45,581,675	133,056	3 833 467	x	40 962
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	555,719	4,210	59 785	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	5,386,399	2,315	325 327	–	–
Adjustments[6] - Ajustements[6]	-451,907	2,769	-24 414	-9	–

See footnote(s) at end of table 2. Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1994 — TABLEAU 2. Sommaire 1994

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriques
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - Code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1994 - Décembre					
Opening inventory - Inventaires d'ouverture	6,432,802	16,885	762 838	x	335
Total production - Production totale	4,367,723	9,052	410 537	x	5 085
Total Sales[3] - Ventes totales[3]	5,502,347	12,557	367 756	x	4 837
Domestic[4] - Au Canada[4]	4,683,996	11,774	370 110	x	4 837
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	49,586	327	5 481	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	768,765	456	-7 836	–	–
Adjustments[6] - Ajustements[6]	-456,794	-1,707	-40 198	–	–
Closing inventory[7] - Inventaire de fermeture[7]	4,841,384	11,673	765 422	x	583

See footnote(s) at end of table 2. Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1994 — TABLEAU 2. Sommaire 1994

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	55,474,765	151,368	4 957 793	x	67 858
Total Sales[3] - Ventes totales[3]	52,306,856	151,885	4 509 314	x	89 824
Domestic[4] - Au Canada[4]	45,743,167	144,943	3 964 233	x	69 824
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	462,627	3,877	54 433	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	6,601,062	3,065	490 648	–	–
Adjustments[6] - Ajustements[6]	-1,146,458	-1,742	-316 508	-9	113

1 Tobacco: fine cut; intended for cigarettes.
2 Non-manufactured tobacco - Leaf (packaged for retail consumption).
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 Sales from stocks held outside Canada are excluded. Transfers into stocks held outside Canada are included. For total exports see Catalogue 65-004, Exports by Commodity.
6 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
7 Inventory: stocks held outside Canada are excluded.
– nil or zero.
r revised figures.
x confidential, suppressed to meet the requirements of the Statistics Act.
.. figures not available.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures.

Note: This report reflects the activity of the respondent firms operating in 1995. The list of respondents is published annually in the December issue.

December issues of this publication contain a statement of the degree of estimation.

For further information, contact: Peter Zylstra, Industry Division, Statistics Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac non-fabriqué - Feuilles (en paquet pour ventes au détail).
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Les échantillons sont également inclus.
5 Les ventes des stocks détenus à l'étranger sont exclues. Les transferts aux stocks détenus à l'étranger sont inclus. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004 au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
7 Inventaire: les stocks détenus à l'étranger sont exclus.
– néant ou zéro;
r nombres rectifiés;
x confidentiel, supprimé en vertu des dispositions de la Loi sur la statistique;
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Il s'agit d'une enquête postale mensuelle avec suivi téléphonique. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers est basé sur l'enquête annuelle des manufactures la plus récente.

Nota: Cette publication reflète l'activité des compagnies répondantes qui opèrent en 1995. La liste des répondants est publiée annuellement dans la publication de décembre.

Les numéros de décembre de cette publication contiennent un énoncé sur le degré d'estimation.

Pour plus de renseignements, communiquer avec: Peter Zylstra, Division de l'industrie, Statistique Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

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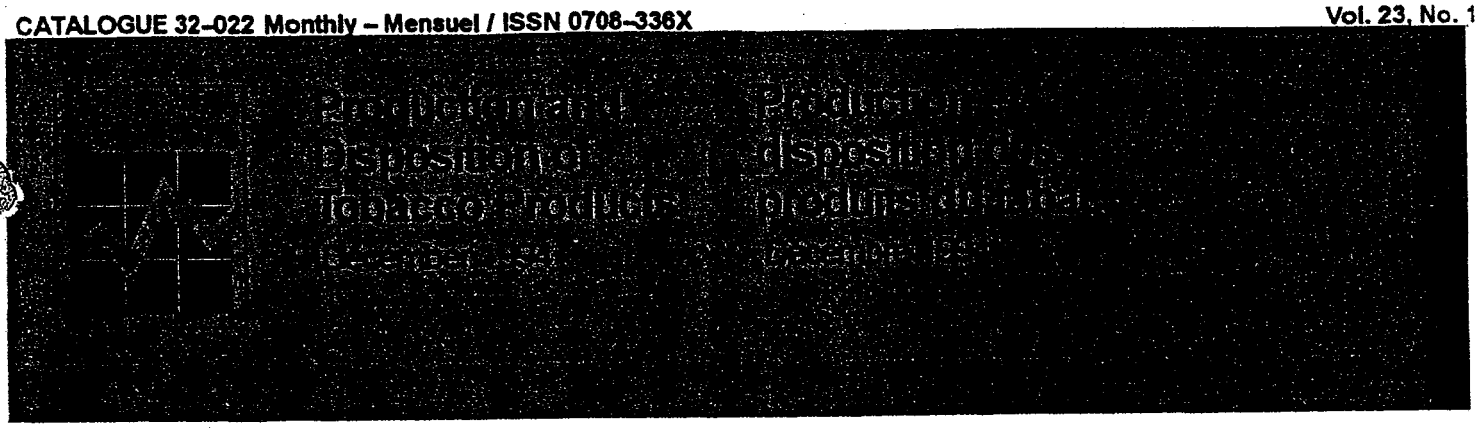

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TABLE 1. Summary 1994

TABLEAU 1. Sommaire 1994

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1994 - Décembre					
Opening inventory - Inventaires d'ouverture	6,432,802	16,885	762 838 r	x	335
Total production - Production totale	4,367,723	9,062	410 537	x	5 085
Total Sales[3] - Ventes totales[3]	5,502,347	12,557	367 755	x	4 837
Domestic[4] - Au Canada[4]	4,683,996	11,774	370 110	x	4 837
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	49,586	327	5 481	-	-
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	768,765	456	-7 836	-	-
Adjustments[6] - Ajustements[6]	-456,794	-1,707	-40 198	-	-
Closing inventory[7] - Inventaire de fermeture[7]	4,841,384	11,673	765 422	x	583

qui explique le - ? car, habituellement, on prend le retour du mois précédent

See footnote(s) at end of table 2.

Selected series available on CANSIM, matrix 46.

Industry Division

January 1995

Voir note(s) à la fin du tableau 2.

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TABLE 1. Summary 1994

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	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	56,474,765	151,868	4 957 793	x	67 858 r
Total Sales[3] - Ventes totales[3]	52,806,856	151,886	4 509 314 r	x	69 824 r
Domestic[4] - Au Canada[4]	45,743,167	144,943	3 964 233 r	x	69 824 r
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	462,827	3,877	54 433	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	6,601,062	3,065	490 648	–	–
Adjustments[6] - Ajustements[6]	-1,146,458	-1,742	-316 506	-9	113

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1993

TABLEAU 2. Sommaire 1993

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriques
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - Code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1993 - Décembre					
Opening inventory - Inventaires d'ouverture	4,144,676	19,619	867 457	x	1 631
Total production - Production totale	3,107,208	9,000	416 161	x	11 906
Total Sales[3] - Ventes totales[3]	4,361,938	13,858	640 899	x	11 128
Domestic[4] - Au Canada[4]	2,780,870	13,461	352 402	x	11 128
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	24,265	71	10 389	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	1,556,803	326	278 108	–	–
Adjustments[6] - Ajustements[6]	429,987	-1,129	-9 390	3	27
Closing inventory[7] - Inventaire de fermeture[7]	3,319,933	13,632	633 329	x	2 436

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1993 / TABLEAU 2. Sommaire 1993

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	46,288,498	151,770	6 203 381	x	202 199
Total Sales[3] - Ventes totales[3]	47,962,106	154,229	6 649 324	x	201 077
Domestic[4] - Au Canada[4]	30,224,722	147,265	3 829 427	x	201 077
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	303,020	1,513	217 256	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, incluse les livraisons aux diplomates à l'extérieur du Canada[5]	17,434,364	5,451	2 602 641	–	–
Adjustments[6] - Ajustements[6]	742,109	-17,461	-468 694	-5 293	-3 866

1 Tobacco: fine cut; intended for cigarettes.
2 Non-manufactured tobacco - Leaf (packaged for retail consumption).
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 Sales from stocks held outside Canada are excluded. Transfers into stocks held outside Canada are included. For total exports see Catalogue 65-004, Exports by Commodity.
6 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
7 Inventory: stocks held outside Canada are excluded.
– nil or zero.
r revised figures.
x confidential, suppressed to meet the requirements of the Statistics Act.
.. figures not available.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac non-fabriqué - Feuilles (en paquet pour ventes au détail).
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Les échantillons sont également inclus.
5 Les ventes des stocks détenus à l'étranger sont exclues. Les transferts aux stocks détenus à l'étranger sont inclus. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004 au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
7 Inventaire: les stocks détenus à l'étranger sont exclus.
– néant ou zéro;
r nombres rectifiés;
x confidentiel, supprimé en vertu des dispositions de la Loi sur la statistique;
.. nombres non disponibles.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures.

For further information, contact: Peter Zylstra, Industry Division, Statistics Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers est basé sur l'enquête annuelle des manufactures la plus récente.

Pour plus de renseignements, communiquer avec: Peter Zylstra, Division de l'industrie, Statistique Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

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List of Respondent Firms, 1994

Liste des firmes répondantes, 1994

Name / Nom		Plant Location / Localisation de l'usine
Prince Edward Island – L'île du Prince Edouard		
Choice Tobacco Inc.		Montague
Quebec – Québec		
Bastos du Canada Limitée		Louiseville
General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
Les Produits de Tabac Tremblay Inc.		Québec
RJR MacDonald Inc.		Montréal
Rothmans, Benson & Hedges Inc.		Québec
Ontario		
Frank Correnti Cigars Ltd.		Toronto
House of Horvath Inc.		Toronto
Imperial Tobacco Ltd./Ltée	(Division of Imasco)	Guelph

This survey measures, on a monthly basis, the production and sales of tobacco products. The target population is all known manufacturers of cigarettes, cigars, fine cut and pipe tobacco. The frame for this commodity survey is based mainly on the annual survey of manufacturers (ASM). Since the ASM lags behind this commodity survey, there is a risk of undercoverage but this should be minimal because of advanced information from the ASM frame, feedback from the monthly survey of manufacturers (MSM) and market information which are all used to update this commodity survey's frame on a current basis. The last break in these series occurred in 1988 with the introduction of the harmonized system (HS) coding system. Based on the 1992 ASM ("Tobacco Products Industries, Catalogue 32-251) the reporting firms in this survey account for approximately 100% of the total volume of cigarettes, cigars and fine cut produced. For the twelve month period in 1994, the degree of estimation for non-response was 0%. On a monthly basis, late responses are imputed using a variety of methods, the most common being a trend analysis.

Cette enquête mesure, sur une base mensuelle, la production et les ventes des produits du tabac. La population cible est formée de tous les fabricants connus de cigarettes, cigares et de tabac fabriqué haché fin et pour la pipe. La base de sondage de cette enquête sur les produits est principalement tirée de l'Enquête annuelle sur les manufactures (EAM). Compte tenu du retard de l'EAM sur cette enquête, il y a risque de sous-dénombrement, minime toutefois, en raison des renseignements anticipés de la base de sondage de l'EAM, de la rétroaction de l'Enquête mensuelle sur les manufactures (EMM) et des renseignements ayant trait au marché qui servent tous à mettre à jour la base de sondage de cette enquête sur les produits. La dernière solution de continuité de ces séries est survenue en 1988 et est attribuable à l'introduction du système de codage du Système harmonisé (SH). D'après l'EAM (Industrie des produits du tabac, n° 32-251 au catalogue), les entreprises déclarantes qui participent à cette enquête représentent environ 100% du volume total de cigarettes, de cigares et de tabac haché fin fabriqué. Pour la période de douze mois en 1994, le degré d'estimation de la non-réponse est de 0%. Diverses méthodes permettent d'imputer, chaque mois, les réponses en retard, la plus courante étant l'analyse de la tendance.

CATALOGUE 32-022 Monthly – Mensuel / ISSN 0708-336X Vol. 22, No. 12

Production and Disposition of Tobacco Products

December 1993

Production et disposition des produits du tabac

Décembre 1993

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TABLE 1. Summary 1993

TABLEAU 1. Sommaire 1993

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1993 - Décembre					
Opening inventory - Inventaires d'ouverture	4,144,676	19,619	867 457	x	1 631
Total production - Production totale	3,107,208	9,000	416 161	x	11 906
Total Sales[3] - Ventes totales[3]	4,361,938	13,858	640 899	x	11 128
Domestic[4] - Au Canada[4]	2,780,870	13,461	352 402	x	11 128
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	24,265	71	10 389	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	1,556,803	326	278 108	–	–
Adjustments[6] - Ajustements[6]	429,987	-1,129	-9 390	3	27
Closing inventory[7] - Inventaire de fermeture[7]	3,319,933	13,632	633 329	x	2 436

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

Selected series available on CANSIM, matrix 46.

Certaines séries sont disponibles dans la matrice 46 de CANSIM.

Industry Division

January 1994

Division de l'industrie

Janvier 1994

Note of Appreciation

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TABLE 1. Summary 1993

TABLEAU 1. Sommaire 1993

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	46,288,498	151,770	6 203 381	x	202 199
Total Sales[3] - Ventes totales[3]	47,962,106	154,229	6 649 324	x	201 077
Domestic[4] - Au Canada[4]	30,224,722	147,265	3 829 427	x	201 077
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	303,020	1,513	217 256	–	–
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	17,434,364	5,451	2 602 641	–	–
Adjustments[6] - Ajustements[6]	742,109	-17,461	-468 694	-5 293	-3 866

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1992

TABLEAU 2. Sommaire 1992

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriques
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
	SCG - Code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
December - 1992 - Décembre					
Opening inventory - Inventaires d'ouverture	5,363,576 r	38,627	1 832 488 r	x	..
Total production - Production totale	2,900,139 r	9,767	397 945	x	..
Total Sales[3] - Ventes totales[3]	3,978,287 r	14,060	560 691	x	..
Domestic[4] - Au Canada[4]	2,941,764	13,526	405 520	x	..
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	79,142	444	14 930	–	..
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	957,381 r	80	140 241	–	..
Adjustments[6] - Ajustements[6]	-33,996 r	-812	-121 776 r	–	..
Closing inventory - Inventaire de fermeture	4,251,432 r	33,552	1 547 966 r	x	..

See footnote(s) at end of table 2.

Voir note(s) à la fin du tableau 2.

TABLE 2. Summary 1992 — TABLEAU 2. Sommaire 1992

	Cigarettes	Cigars / Cigares	Manufactured tobacco / Tabac fabriqué		Non-manufactured Tobacco / Tabac non-fabriqué
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Leaf[2] / Feuilles[2]
			SCG - code - CTB		
	2402.20	2402.10	2403.10.20	2403.10.10	2401
	thousands - milliers		kilograms - kilogrammes		kg.
YEAR-TO-DATE- TOTAL CUMULATIF					
Total production - Production totale	45,485,932 r	166,793	7 399 662	x	..
Total Sales[3] - Ventes totales[3]	45,119,891 r	167,281	7 351 509	x	..
Domestic[4] - Au Canada[4]	35,060,790	156,512	5 079 936	x	..
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	1,012,010	5,405	192 198	x	..
For export, bulk shipments, including shipments to diplomats out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	9,047,091 r	5,364	2 079 375	x	..
Adjustments[6] - Ajustements[6]	-1,069,361 r	-299	451 619 r	3	..

1 Tobacco: fine cut; intended for cigarettes.
2 Non-manufactured tobacco - Leaf (packaged for retail consumption).
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 Sales from stocks held outside Canada are excluded. Transfers into stocks held outside Canada are included. For total exports see Catalogue 65-004, Exports by Commodity.
6 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
7 Inventory: stocks held outside Canada are excluded.
– nil or zero.
r revised figures.
x confidential, suppressed to meet the requirements of the Statistics Act.
.. figures not available.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac non-fabriqué - Feuilles (en paquet pour ventes au détail).
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Les échantillons sont également inclus.
5 Les ventes des stocks détenus à l'étranger sont exclues. Les transferts aux stocks détenus à l'étranger sont inclus. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004 au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
7 Inventaire: les stocks détenus à l'étranger sont exclus.
– néant ou zéro;
r nombres rectifiés;
x confidentiel, supprimé en vertu des dispositions de la Loi sur la statistique;
.. nombres non disponibles.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures.

Note: The reporting establishments for 1993 are listed on page 4 of this publication.

For further information, contact: Peter Zylstra, Industry Division, Statistics Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers est basé sur l'enquête annuelle des manufactures la plus récente.

Nota: La liste des établissements déclarants pour 1993 figure à la page 4 de cette publication.

Pour plus de renseignements, communiquer avec: Peter Zylstra, Division de l'industrie, Statistique Canada, Ottawa, Ontario. K1A 0T6 (613) 951-3511

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List of Respondent Firms, 1993

Liste des firmes répondantes, 1993

Name Nom		Plant Location Localisation de l'usine
Prince Edward Island – L'île du Prince Edouard		
Choice Inc.		Montague
Quebec – Québec		
Bastos du Canada Limitée		Louiseville
General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
Les Produits de Tabac Tremblay Inc.	(Div. Tabac Nouvelle France Enrg.)	Québec
RJR MacDonald Inc.		Montréal
Rothmans, Benson & Hedges Inc.		Québec
Ontario		
Frank Correnti Cigars Ltd.		Toronto
House of Horvath Inc.		Toronto
Imperial Tobacco Ltd./Ltée	(Division of Imasco)	Guelph

28 -01- 1994

CATALOGUE 32-022 Monthly – Mensuel / ISSN 0708-336X Vol. 21, No. 12

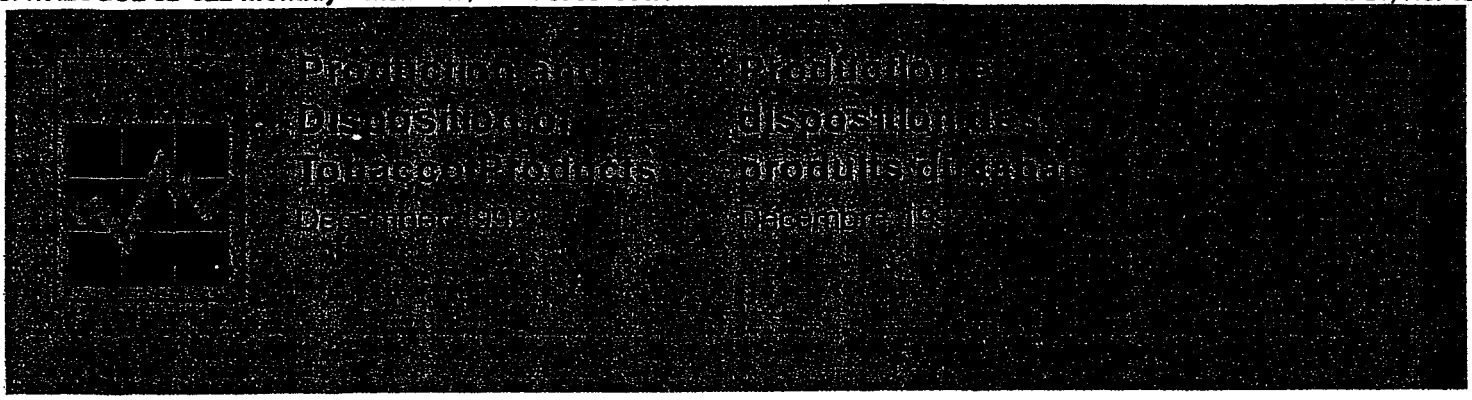

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TABLE 1. Production and Disposition of Tobacco Products

TABLEAU 1. Production et disposition des produits du tabac

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Opening inventory - Inventaires d'ouverture	5,773,929	38,627	1 375 380	x	–
Total production - Production totale	**2,658,702**	**9,787**	**397 945**	**x**	**–**
Total Sales[3] - Ventes totales[3]	**3,870,777**	**14,050**	**560 691**	**x**	**–**
Domestic[4] - Au Canada[4]	2,941,764	13,526	405 520	x	–
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	79,142	444	14 930	–	–
For export, bulk shipments, including shipments to diplomats, out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	849,871	80	140 241	–	–
Adjustments[6] - Ajustements[6]	122,218	-812	-8 009	–	–
Closing inventory - Inventaire de fermeture	4,684,072	33,552	1 204 625	x	–

See footnote(s) at end of table.

Selected series available on CANSIM, matrix 46.

Industry Division

January 1993

Voir note(s) à la fin du tableau.

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Division de l'industrie

Janvier 1993

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TABLE 1. Production and Disposition of Tobacco Products - Concluded

TABLEAU 1. Production et disposition des produits du tabac - fin

	Cigarettes	Cigars / Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] / Haché fin[1]	Pipe tobacco / Pour la pipe	Other[2] / Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
Year-to-date - Total cumulatif	thousands - milliers		kilograms - kilogrammes		
Total production - Production totale	44,303,197	166,793	7 399 662 r	x	–
Total Sales[3] - Ventes totales[3]	45,012,381	167,281	7 351 509 r	x	–
Domestic[4] - Au Canada[4]	35,060,790	156,512	5 079 936 r	x	–
Ships' and air stores, embassies, Canada[5] - Aux magasins des navires et des aéronefs, aux ambassades, Canada[5]	1,012,010	5,405	192 198	x	–
For export, bulk shipments, including shipments to diplomats, out of Canada[5] - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada[5]	8,939,581	5,364	2 079 375	x	–
Adjustments[6] - Ajustements[6]	438,504 r	-299	108 278 r	3	–

1 Tobacco: fine cut; intended for cigarettes.
2 Tobacco: other; plug, snuff, chewing, twist, etc.
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also included.
5 As reported by respondents to this survey. For total exports see Catalogue 65-004, Exports by Commodity.
6 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
– nil or zero.
r revised figures.
x confidential, suppressed to meet the requirements of the Statistics Act.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac: autres; tabac en barre, à priser, à chiquer, mis en corde, etc.
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Inclure aussi les échantillons.
5 Déclarées par les répondants à cette enquête. Pour le total des exportations, consultez Exportations par marchandises, n° 65-004 au catalogue.
6 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de ventes (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
– néant ou zéro.
r nombres rectifiés.
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Nota: La liste des établissements déclarantes pour 1992 figure à la page 3 de cette publication.

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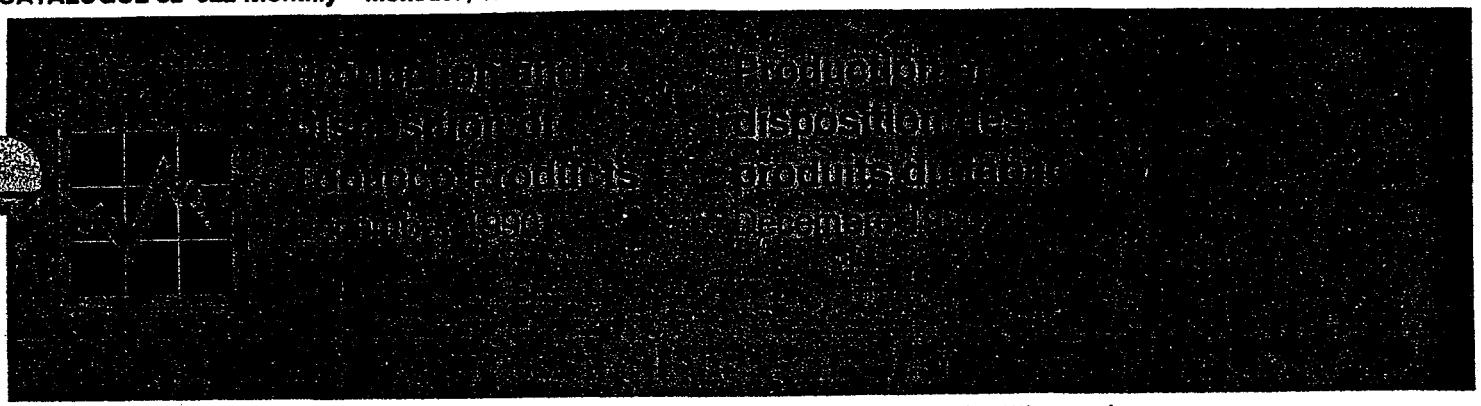
List of Reporting Firms, 1992

Liste des firmes déclarantes, 1992

Name / Nom		Plant Location / Localisation de l'usine
Prince Edward Island – L'île du Prince Edouard		
Choice Inc.		Montague
Quebec – Québec		
Bastos du Canada Limitée		Louiseville
General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
La compagnie de Tabac Mar-co Inc.		St-Laurent
Les Produits de Tabac Tremblay Inc.	(Div. Tabac Nouvelle France Enrg.)	Québec
RJR MacDonald Inc.		Montréal
Rothmans, Benson & Hedges Inc.		Québec
Ontario		
Frank Correnti Cigars Ltd.		Toronto
House of Horvath Inc.		Toronto
Imperial Tobacco Ltd./Ltée	(Division of Imasco)	Guelph

2 -01- 1993

CATALOGUE 32-022 Monthly – Mensuel / ISSN 0708-336X Vol. 19, No. 12



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États-Unis: 6 $ US l'exemplaire, 60 $ US par année
Autres pays: 7 $ US l'exemplaire, 70 $ US par année
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TABLE 1. Production and Disposition of Tobacco Products

TABLEAU 1. Production et disposition des produits du tabac

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Opening inventory - Inventaires d'ouverture	5,541,767	28,888	902 172	x	–
Total production - Production totale	**2,747,585**	**8,950**	**413 793**	**x**	**–**
Total Sales[3] - Ventes totales[3]	**4,575,220**	**17,014**	**668 498**	**803**	**–**
Domestic[4] - Au Canada[4]	4,371,052	16,495	613 124	731	–
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	98,583	405	11 403	–	–
For export, bulk shipments, including diplomats, out of Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	105,585	114	43 971	72	–
Adjustments[5] - Ajustements[5]	52,566	422	16 082	-11	–
Closing inventory - Inventaires de fermeture	3,766,698	21,246	663 549	x	–

See footnote(s) at end of table.

Voir note(s) à la fin du tableau.

Industry Division

January 1991

Division de l'industrie

Janvier 1991

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TABLE 1. Production and Disposition of Tobacco Products - Concluded

TABLEAU 1. Production et disposition des produits du tabac - fin

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
Year-to-date - Total cumulatif	thousands - milliers		kilograms - kilogrammes		
Total production - Production totale	46,110,795	191,615	6 118 765 r	15 587	–
Total Sales[3] - Ventes totales[3]	48,548,009	200,523	7 239 649 r	15 979	–
Domestic[4] - Au Canada[4]	45,917,521	190,196	6 657 578 r	13 963	–
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	1,209,744	6,456	117 685	–	–
For export, bulk shipments, including diplomats, out of Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	1,420,744	3,871	464 386 r	2 016	–
Adjustments[5] - Ajustements[5]	1,855,133	7,389	284 042 r	-1 838	–

1 Tobacco: fine cut; intended for cigarettes.
2 Tobacco: other; plug, snuff, chewing, twist, etc.
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also to be included.
5 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
– nil or zero.
r revised figures.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac: autres; tabac en barre, à priser, à chiquer, mis en corde, etc.
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Inclure aussi les échantillons.
5 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de vente (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
– néant ou zéro.
r nombres rectifiés.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up, conducted on a calendar year basis. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures. The degree of estimation (the percentage estimated by Statistics Canada due to non-response) in the cumulative year-to-date is 0.00% for all items.

Note: The reporting establishments for 1990 are listed on page 3 of this publication.

For further information, contact:
Brian Preston,
Industry Division,
Statistics Canada
Ottawa, Ontario.
K1A 0T6
(613) 951-3511

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique, qui est menée suivant le calendrier civil. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers se fonde sur la dernière Enquête annuelle des manufactures. Le degré d'estimation (le pourcentage estimé par Statistique Canada en raison de la non-réponse) dans les données cumulées depuis le début de l'année est 0.00%.

Nota: La liste des établissements déclarantes pour 1990 figure à la page 3 de cette publication.

Pour plus de renseignements, communiquer avec:
Brian Preston,
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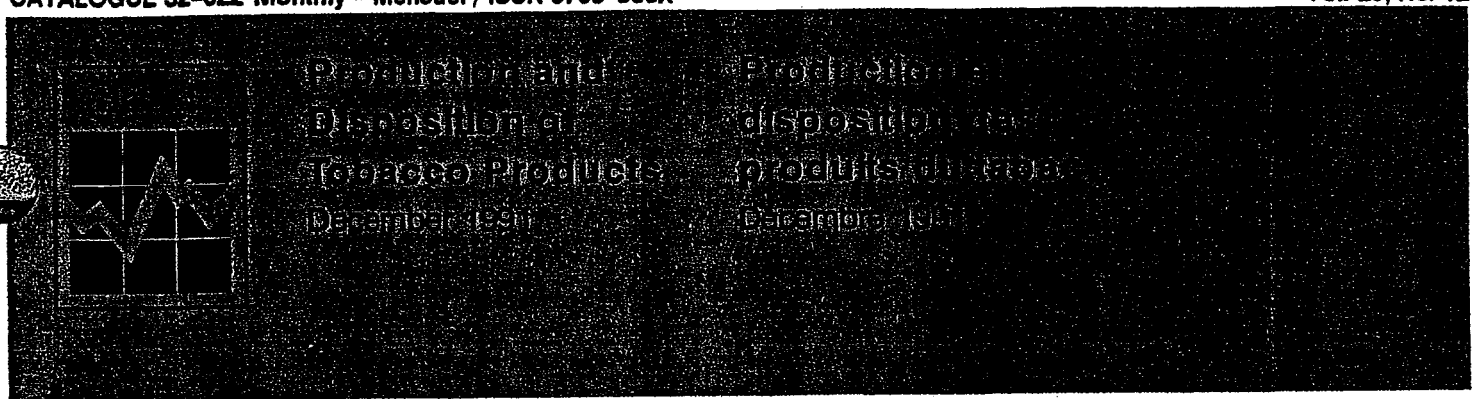

Production and Disposition of Tobacco Products

Production et disposition des produits du tabac

December 1991

Décembre 1991

Price: Canada: $5.00 per issue, $50.00 annually
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TABLE 1. Production and Disposition of Tobacco Products

TABLEAU 1. Production et disposition des produits du tabac

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Opening inventory - Inventaires d'ouverture	5,917,524	39,908	1,172,023	x	-
Total production - Production totale	**2,986,980**	**8,744**	**753,601**	x	-
Total Sales[3] - Ventes totales[3]	**4,214,503**	**14,704**	**857,095**	x	-
Domestic[4] - Au Canada[4]	3,443,097	13,927	531,455	x	-
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	383,664	465	42,777	-	-
For export, bulk shipments, including shipments to diplomats, out of Canada - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada	387,742	312	282,863	-	-
Adjustments[5] - Ajustements[5]	24,511	51	-10,233	x	-
Closing inventory - Inventaire de fermeture	4,714,512	33,999	1,058,296	x	-

See footnote(s) at end of table.

Selected series available on CANSIM, matrix 46.

Industry Division

January 1992

Voir note(s) à la fin du tableau.

Certaines séries sont disponible dans la matrice 46 de CANSIM.

Division de l'industrie

Janvier 1992

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Canada

TABLE 1. Production and Disposition of Tobacco Products - Concluded

TABLEAU 1. Production et disposition des produits du tabac - fin

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
Year-to-date - Total cumulatif	thousands - milliers		kilograms - kilogrammes		
Total production - Production totale	46,814,534 r	364,848 r	9,416,661 r	7,813	–
Total Sales[3] - Ventes totales[3]	46,059,521	349,407	8,916,110	7,702	–
Domestic[4] - Au Canada[4]	39,363,928	338,030	6,423,598	7,630	–
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	3,160,207	7,139	421,494	–	–
For export, bulk shipments, including shipments to diplomats, out of Canada - Pour exportations, livraisons en vrac, inclure les livraisons aux diplomates à l'extérieur du Canada	3,535,386	4,238	2,071,018	72	–
Adjustments[5] - Ajustements[5]	-411,164 r	-6,783 r	-136,504 r	x	—

1 Tobacco: fine cut; intended for cigarettes.
2 Tobacco: other; plug, snuff, chewing, twist, etc.
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also to be included.
5 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
– nil or zero.
r revised figures.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
2 Tabac: autres; tabac en barre, à priser, à chiquer, mis en corde, etc.
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Inclure aussi les échantillons.
5 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de vente (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
– néant ou zéro.
r nombres rectifiés.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up, conducted on a calendar year basis. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest Survey of Manufactures. The degree of estimation (the percentage estimated by Statistics Canada due to non-response) in the cumulative year-to-date data is 0.07% for all items.

Note: The reporting establishments for 1991 are listed on page 3 of this publication.

December year-to-date values include revisions for January 1990 to November 1991.

For further information, contact:
Peter Zylstra,
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Ottawa, Ontario.
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(613) 951-3511

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique, qui est menée suivant le calendrier civil. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers se fonde sur la dernière Enquête annuelle des manufactures. Le degré d'estimation (le pourcentage estimé par Statistique Canada en raison de la non-réponse) dans les données cumulées depuis le début de l'année est 0.07%.

Nota: La liste des établissements déclarantes pour 1991 figure à la page 3 de cette publication.

Le total cumulatif de décembre reflètent les révisions de janvier 1990 à novembre 1991.

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Ottawa, Ontario.
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List of Reporting Firms, 1991

Liste des firmes déclarantes, 1991

Name / Nom		Plant Location / Localisation de l'usine
Prince Edward Island – L'île du Prince Edouard		
① Choice Inc.		Montague
Quebec – Québec		
② Bastos du Canada Limitée		Louiseville
③ General Cigar Co. Ltd./Ltée.	(Division d'Imasco)	Joliette
④ Imperial Tobacco Ltd./Ltée.	(Division d'Imasco)	Montréal
⑤ J.O. Forest et Cie Enrg.		St-Roch-de-L'Achigan
⑥ La compagnie de Tabac Mar-co Inc.		St-Laurent
⑦ Les Produits de Tabac Tremblay Inc.	(Div. Tabac Nouvelle France Enrg.)	Québec
⑧ RJR MacDonald Inc.		Montréal
⑨ Rothmans, Benson & Hedges Inc.		Québec
Ontario		
⑩ Dominion Tobacco Corporation		Lambeth
⑪ Frank Correnti Cigars Ltd.		Toronto
⑫ House of Horvath Inc.		Toronto
⑬ Imperial Tobacco Ltd./Ltée	(Division of Imasco)	Guelph

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CATALOGUE 32-022 Monthly - Mensuel / ISSN 0708-336X Vol. 18, No. 12

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Autres pays, $5.60, $56.00 par année

PRODUCTION AND DISPOSITION OF TOBACCO PRODUCTS

December 1989

PRODUCTION ET DISPOSITION DES PRODUITS DU TABAC

Décembre 1989

TABLE 1. Production and Disposition of Tobacco Products

TABLEAU 1. Production et disposition des produits du tabac

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Opening inventory - Inventaires d'ouverture	5,865,721	31,591	1 362 789	7 237	-
Total production - Production totale	**3,401,327**	**11,593**	**598 057**	**2 474**	**-**
Total Sales[3] - Ventes totales[3]	**4,613,284**	**18,041**	**483 263**	**1 348**	**-**
Domestic[4] - Au Canada[4]	4,317,506	17,205	455 253	1 348	-
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	111,914	579	18 186	-	-
For export, bulk shipments, including diplomats out of Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	183,864	257	9 824	-	-
Adjustments[5] - Ajustements[5]	-304,985	2,378	-9 823	-20	-
Closing inventory - Inventaires de fermeture	4,348,779	22,765	1 467 760	8 343	-

See footnote(s) at end of table.

Industry Division

January 1990

Voir note(s) à la fin du tableau.

Division de l'industrie

Janvier 1990

Canada

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TABLE 1. Production and Disposition of Tobacco Products - Concluded

TABLEAU 1. Production et disposition des produits du tabac - fin

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Year-to-date - Total cumulatif					
Total production - Production totale	48,792,466	226,366	8 113 095	20 513	–
Total Sales[3] - Ventes totales[3]	50,344,162	231,058	7 965 125	18 529	–
Domestic[4] - Au Canada[4]	47,601,965	222,126	7 749 215	18 529	–
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	1,021,838	5,694	84 436	–	–
For export, bulk shipments, including diplomats out of Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	1,720,359	3,238	131 474	–	–
Adjustments[5] - Ajustements[5]	335,963	5,948	–213 493	–793	–

1 Tobacco: fine cut; intended for cigarettes.
2 Tobacco: other; plug, snuff, chewing, twist, etc.
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5 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
– nil or zero.
r revised figures.

1 Tabac: haché fin; destiné à la fabrication de cigarettes.
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4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Inclure aussi les échantillons.
5 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de vente (produits avariés, détruits, volés, recyclés et ajustements d'inventaires).
– néant ou zéro.
r nombres rectifiés.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up, conducted on a calendar year basis. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest (1986) Census of Manufactures. The reporting establishments for 1989 are listed on page 3. The degree of estimation (the percentage estimated by Statistics Canada due to non-response) in the cumulative year-to-date is less than 0.5% for all items.

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique, qui est menée suivant le calendrier civil. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers se fonde sur le plus récent recensement des manufactures (1986).La liste des établissements déclarants pour 1989 figure à la page 3. Le degré d'estimation (le pourcentage estimé par Statistique Canada en raison de la non-réponse) dans les données cumulées depuis le début de l'année est moins que 0.5%.

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List of Reporting Firms, 1990

Liste des firmes déclarantes, 1990

Name / Nom	Plant Location / Localisation de l'usine
Quebec – Québec	
Bastos du Canada Limitée	Louiseville
J.O. Forest et Cie Enrg.	St-Roch-de-L'Achigan
General Cigar Co. Ltd./Ltée (Division d'Imasco)	Montréal
Imperial Tobacco Ltd./Ltée (Division d'Imasco)	Montréal
RJR MacDonald Inc.	Montréal
Rothmans, Benson & Hedges Inc.	Mont Royal and/et Québec
Les Produits de Tabac Tremblay Inc. (Div. Tabac Nouvelle France Enrg.)	Québec
Ontario	
Dominion Tobacco Corporation	Lambeth
Frank Correnti Cigars Ltd.	Toronto
House of Horvath Inc.	Toronto
Imperial Tobacco Ltd./Ltée (Division of Imasco)	Guelph
Prince Edward Island – L'île du Prince Edouard	
Choice Inc.	Montague

List of Reporting Firms, 1989

Liste des firmes déclarantes, 1989

Name Nom	Plant location Localisation de l'usines
Quebec - Québec	
Bastos du Canada Limitée	Louiseville
Forest, J.O. et Cie Enrg.	St-Roch-de-L'Achigan
General Cigar Co. Ltd./Ltée (Division of Imasco)	Montréal
Imperial Tobacco Ltd./Ltée (Division of Imasco)	Montréal
RJR MacDonald Tobacco Inc.	Montréal
Rothmans, Benson & Hedges Inc.	Mont Royal and/et Québec
Tabac Nouvelle France Enrg.	Québec
Ontario	
Dominion Tobacco Corporation	Lambeth
Frank Correnti Cigars Ltd.	Toronto
House of Horvath Inc.	Toronto
Imperial Tobacco Ltd./Ltée (Division of Imasco)	Guelph

FEB 0 6 1989

CATALOGUE 32-022 Monthly - Mensuel / ISSN 0708-336X Vol. 17, No. 12

Statistics Canada Statistique Canada

TOBACCO PRODUCTS UNIT
MAY 31 1988
UNITE DES PRODUITS DU TABAC

Price: Canada, $4.50, $45.00 a year
Other Countries, $5.50, $55.00 a year

Prix: Canada, $4.50, $45.00 par année
Autres pays, $5.50, $55.00 par année

PRODUCTION AND DISPOSITION OF TOBACCO PRODUCTS

PRODUCTION ET DISPOSITION DES PRODUITS DU TABAC

December 1988

Décembre 1988

TABLE 1. Production and Disposition of Tobacco Products

TABLEAU 1. Production et disposition des produits du tabac

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTB				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Opening inventory - Inventaires d'ouverture	6 986 973	22 119	1 630 139	7 807	-
Total production - Production totale	4 042 105	23 631	646 713	1 275	-
Sales[3] - Ventes[3]					-
Domestic[4] - Au Canada[4]	5 001 479	21 232	703 630	1 731	-
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	60 340	356	2 434	-	-
For export, bulk shipments, including diplomats, ex-Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	93 787	188	896	-	-
Adjustments[5] - Ajustements[5]	- 308 960	- 2 468	- 36 969	161	-
Closing inventory - Inventaires de fermeture	5 564 512	21 506	1 532 923	7 512	-

See footnote(s) at end of table.

Voir note(s) à la fin du tableau

Industry Division

Division de l'industrie

January 1989

Janvier 1989

Published under the authority of the Minister of Supply and Services Canada

Publication autorisée par le ministre des Approvisionnements et Services Canada

December 88

TABLE 1. Production and Disposition of Tobacco Products - Concluded

TABLEAU 1. Production et disposition des produits du tabac - fin

	Cigarettes	Cigars Cigares	Manufactured tobacco - Tabac fabriqué		
			Fine cut[1] Haché fin[1]	Pipe tobacco Pour la pipe	Other[2] Autres[2]
	SCG - code - CTS				
	2402.20	2402.10	2403.10.20	2403.10.10	2403.10.90
	thousands - milliers		kilograms - kilogrammes		
Year-to-date - Total cumulatif					
Total production - Production totale	53,857,964	218,623	9 016 157	26 652	-
Sales[3] - Concluded - Ventes[3] - fin:					
Domestic[4] - Au Canada[4]	51,053,285	239,302	8 026 796	25 826	-
Ships' and air stores, embassies, Canada - Aux magasins des navires et des aéronefs, aux ambassades, Canada	781,545	4,103	22 417	-	-
For export, bulk shipments, including diplomats, ex-Canada - Pour exportations, livraisons en vrac, inclure les diplomates à l'extérieur du Canada	1,264,142	2,458	130 559	-	-
Adjustments[5] - Ajustements[5]	40,659	5,036	- 167 630	- 3 239	-

1 Tobacco, fine cut, intended for cigarettes
2 Tobacco other: plug, snuff, chewing, twist, etc.
3 Sales of goods of own manufacture, does not include goods purchased for resale.
4 Domestic sales: goods invoiced to wholesalers, retailers and institutions which are subject to excise duty, less returned goods credited to same. Samples are also to be included
5 Adjustments: all non-sale transactions (goods damaged, destroyed, stolen, reworked, inventory adjustment).
- nil or zero.
r revised figures.

1 Tabac, haché fin; destiné à la fabrication de cigarettes
2 Tabac autres: tabac en barre, à priser, à chiquer, mis en corde, etc.
3 Ventes de produits de propre fabrication, n'inclut pas les produits achetés pour la revente.
4 Ventes au Canada: produits livrés aux grossistes, aux détaillants et aux institutions qui sont assujettis à la taxe d'accise, moins les produits retournés dont le coût est porté au crédit de ces derniers. Inclure aussi les échantillons.
5 Ajustements: toutes les transactions pour lesquelles il n'y a pas eu de vente (produits avariés, détruits, volés, recyclés et ajustements d'inventaires)
- néant ou zéro.
r nombres rectifiés.

Sources and methods

This survey is a monthly mail-out mail-back survey with telephone follow-up conducted on a calendar year basis. It is intended to cover 100% of the production and factory sales of tobacco products. The universe is based on the latest (1986) Census of Manufactures. The reporting establishments for 1988 are listed on page 3. The degree of estimation (the percentage estimated by Statistics Canada due to non-response) in the cumulative year-to-date data is 0.0% for all items.

For further information, contact:

Brian Preston,
Industry Division,
Statistics Canada,
Ottawa, Ontario.
K1A 0T6
(613) 951-3511

Sources et méthodes

Il s'agit d'une enquête postale mensuelle avec suivi téléphonique qui est menée suivant le calendrier civil. Elle doit couvrir la totalité de la production et ventes de l'usine des produits du tabac. L'univers se fonde sur le plus récent recensement des manufactures (1986). La liste des établissements déclarants pour 1988 figure à la page 3. Le degré d'estimation (le pourcentage estimé par Statistique Canada en raison de la non-réponse) dans les données cumulées depuis le début de l'année est de 0,0% pour tous les items.

Pour plus de renseignements, communiquer avec:

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List of Reporting Firms, 1988

Liste des firmes déclarantes, 1988

Name Nom	Plant location Localisation de l'usines
Quebec – Québec	
Bastos du Canada Limitée	Louiseville
Del Rio Tobacco Inc. (to March 1988 only / jusqu'à mars 1988 seulement)	Montréal
Forest, J.O. et Cie Enrg.	St-Roch-de-L'Achigan
General Cigar Co. Ltd./Ltée (Division of Imasco)	Montréal
Imperial Tobacco Ltd../Ltée (Division of Imasco)	Montréal
RJR-MacDonald Tobacco Inc.	Montréal
Rothmans, Benson & Hedges Inc.	Mont Royal and/et Québec
Tabac Nouvelle France Enrg.	Québec
Ontario	
Dominion Tobacco Corporation	Lambeth
Frank Correnti Cigars Ltd.	Toronto
House of Horvath Inc.	Toronto
Imperial Tobacco Ltd./Ltée (Division of Imasco)	Guelph
Rothmans, Benson & Hedges Inc.	Brampton

Sales for year 46,051,786
5,001,479
51,053,265

Table 3. Imports by Commodity and Country, H.S. Based
Tableau 3. Importations par marchandise et pays, base du S.H.

Commodity/Country	December 1988 Décembre 1988 Quantity Quantité	December 1988 Décembre 1988 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
(Cont'd)					(Suite)
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
Netherlands	179 548	171	532 914	1,056	Pays-Bas
Norway	57 243	29	1 457 805	1,587	Norvège
Switzerland	104 767	255	329 174	2,271	Suisse
Japan	102 882	53	467 151	1,265	Japon
Taiwan	153 857	128	902 381	1,015	Taiwan
Mexico	47 477	24	105 832	348	Mexique
Other countries	173 378	90	1 206 342	1,382	Autres pays
Total	11 587 521	7,203	145 355 055	88,802	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
Other countries	866	2	124 169	403	Autres pays
Total	866	2	124 169	403	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	3 876	16	213 293	1,615	États-Unis
Zimbabwe			511 415	3,061	Zimbabwe
Other countries	1 639	6	75 187	299	Autres pays
Total	5 515	23	799 895	4,976	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
United States	552	25	8 432	301	États-Unis
Netherlands	582	47	9 967	476	Pays-Bas
Cuba	73	4	56 847	884	Cuba
Other countries	1 158	12	20 490	294	Autres pays
Total	2 576	88	95 738	1,957	Total
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac 2402.20
United States	31 242	301	567 307	7,012	États-Unis
United Kingdom			39 722	395	Royaume-Uni
Other countries	11 579	137	54 191	569	Autres pays
Total	42 821	438	661 221	7,977	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries	1 037	6	3 489	21	Autres pays
Total	1 037	6	3 489	21	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	15 932	172	50 320	571	États-Unis
United Kingdom	1 121	10	25 734	402	Royaume-Uni
Denmark	1 454	17	48 071	590	Danemark
Netherlands	27 364	337	386 745	5,182	Pays-Bas
Sweden			71 830	1,053	Suède
Switzerland			154 039	569	Suisse
Other countries	12 000	43	55 478	211	Autres pays
Total	57 871	580	803 218	8,581	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
United States	5 714	69	127 892	1,254	États-Unis
Other countries			228	2	Autres pays
Total	5 714	69	128 120	1,256	Total
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac 2403.99
United States	35 124	244	322 389	2,816	États-Unis
Other countries			10 835	73	Autres pays
Total	35 124	244	333 225	2,889	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	75 892	1,652	828 712	18,344	États-Unis
Spain	8 000	136	39 797	676	Espagne
Chile			73 850	730	Chili
Bahamas			20 337	342	Bahamas
Mexico	37 007	331	309 088	3,313	Mexique
Other countries	45	10	3 876	210	Autres pays
Total	120 944	2,131	1 275 563	23,619	Total
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés 2502.00
Other countries			5 970	53	Autres pays
Total			5 970	53	Total
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés 2503.10
United States	132	33	4 677	861	États-Unis
Total	132	33	4 677	861	Total

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1989 Décembre 1989 Quantity Quantité	December 1989 Décembre 1989 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	4 809 945	4,971	56 439 404	61,851	États-Unis
United Kingdom	49 472	139	447 617	1,432	Royaume-Uni
France	80 986	750	2 248 520	11,958	France
Germany, West	14 091	66	520 660	3,930	Allemagne, ouest
Italy	14 122	63	164 130	626	Italie
Netherlands	18 965	64	227 730	583	Pays-Bas
Norway	10 000	15	273 494	543	Norvège
Switzerland	18 648	355	215 075	2,591	Suisse
Japan	23 921	407	155 401	1,825	Japon
Taiwan	13 416	71	102 729	480	Taiwan
Brazil			45 477	923	Brésil
Chile	19 958	12	115 808	343	Chili
Other countries	18 546	102	289 136	1,305	Autres pays
Total	5 092 072	7,020	61 245 183	88,396	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	6 075	24	92 946	403	États-Unis
Other countries	21 359	182	113 106	417	Autres pays
Total	27 434	206	206 052	820	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	631	3	258 947	2,015	États-Unis
Zimbabwe			220 800	1,333	Zimbabwe
Other countries	19 566	65	97 461	398	Autres pays
Total	20 197	68	577 209	3,747	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
Cuba	606	65	4 377	563	Cuba
Other countries	1 285	58	16 272	739	Autres pays
Total	1 892	124	20 649	1,302	Total
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac 2402.20
United States	1 334	41	392 830	9,071	États-Unis
Other countries	14 490	71	52 605	459	Autres pays
Total	15 824	113	445 435	9,531	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries	434	3	5 634	49	Autres pays
Total	434	3	5 634	49	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	14 641	189	74 681	896	États-Unis
Denmark	864	12	30 159	363	Danemark
Netherlands	27 405	246	275 003	3,678	Pays-Bas
Sweden			24 231	365	Suède
Switzerland	24 720	69	160 705	451	Suisse
Jamaica			116 000	412	Jamaïque
Other countries	1 282	19	19 161	338	Autres pays
Total	68 913	537	699 942	6,507	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
United States			73 137	812	États-Unis
Other countries			686	8	Autres pays
Total			73 823	820	Total
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac 2403.99
United States	22 910	247	365 718	3,472	États-Unis
Other countries			5 573	74	Autres pays
Total	22 910	247	371 291	3,546	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	24 666	828	1 842 382	29,766	États-Unis
Spain			22 550	423	Espagne
Chile			116 388	1,098	Chili
Bahamas			25 230	466	Bahamas
Mexico	68 946	702	342 503	3,326	Mexique
Other countries	988	32	11 853	419	Autres pays
Total	94 600	1,563	2 360 908	35,502	Total
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés 2502.00
Other countries	436	1	4 588	34	Autres pays
Total	436	1	4 588	34	Total

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1990 Décembre 1990 Quantity Quantité	December 1990 Décembre 1990 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux 2308.90
United States	453 379	73	8 444 610	1,002	États-Unis
Other countries			126 312	22	Autres pays
Total	453 379	73	8 570 922	1,025	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	9 945 578	11,756	101 033 422	114,369	États-Unis
United Kingdom	17 359	22	797 670	1,168	Royaume-Uni
Korea, South	19 813	39	336 856	720	Corée du Sud
Thailand	208 463	359	2 922 165	4,985	Thaïlande
Other countries	2 656	5	420 509	751	Autres pays
Total	10 193 870	12,183	105 510 624	121,996	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	4 288 500	5,302	68 562 489	67,424	États-Unis
United Kingdom	18 607	146	258 288	714	Royaume-Uni
Belgium			22 703	483	Belgique
Finland			80 544	331	Finlande
France	100 430	777	1 116 745	4,797	France
Germany	78 444	134	717 605	5,633	Allemagne
Italy			128 684	403	Italie
Netherlands	107 726	186	471 772	845	Pays-Bas
Norway	23 307	89	224 852	543	Norvège
Switzerland	512	2	69 669	513	Suisse
Japan			269 951	840	Japon
Taiwan	7 236	26	244 811	658	Taiwan
Brazil	3 750	69	54 270	1,029	Brésil
Other countries	48 095	165	252 943	604	Autres pays
Total	4 676 607	6,902	72 475 328	84,822	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States			95 618	393	États-Unis
Other countries	27 242	71	184 394	455	Autres pays
Total	27 242	71	280 012	849	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	196 508	1,808	540 324	3,653	États-Unis
Zimbabwe	196 725	1,266	387 821	2,354	Zimbabwe
Other countries	16 850	66	346 240	1,004	Autres pays
Total	412 083	3,141	1 274 385	7,012	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
Other countries	7 784	4	29 444	20	Autres pays
Total	7 784	4	29 444	20	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
Netherlands	534	37	4 925	370	Pays-Bas
Cuba	362	85	4 558	1,061	Cuba
Other countries	406	16	11 171	474	Autres pays
Total	1 302	139	20 655	1,906	Total
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac 2402.20
United States	7 362	198	229 614	4,660	États-Unis
Other countries	2 999	78	67 075	870	Autres pays
Total	10 361	277	296 690	5,530	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries			456	4	Autres pays
Total			456	4	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	608	6	46 563	618	États-Unis
Denmark			37 015	525	Danemark
Netherlands	14 237	226	305 472	4,694	Pays-Bas
Sweden			42 607	705	Suède
Jamaica			70 645	319	Jamaïque
Other countries	500	3	34 172	453	Autres pays
Total	15 345	236	536 475	7,276	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
United States	1 535	14	83 341	871	États-Unis
Total	1 535	14	83 341	871	Total

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1990 Décembre 1990 Quantity Quantité	December 1990 Décembre 1990 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
United States	21 767	231	316 497	3,331	États-Unis	
Other countries	336	3	6 409	71	Autres pays	
Total	22 103	235	322 906	3,403	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	111 435	2,149	1 552 252	29,563	États-Unis	
Chile	41 457	349	117 017	1,051	Chili	
Bahamas			23 568	430	Bahamas	
Mexico	16 783	149	342 140	3,662	Mexique	
Other countries	1 529	53	60 089	1,250	Autres pays	
Total	171 204	2,701	2 095 067	35,957	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries			2 860	20	Autres pays	
Total			2 860	20	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
United States			2 341	536	États-Unis	
Other countries			29	7	Autres pays	
Total			2 370	544	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	739	145	10 877	2,487	États-Unis	
Total	739	145	10 877	2,487	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	116	119	1 967	1,813	États-Unis	
Other countries	18	8	180	217	Autres pays	
Total	134	127	2 148	2,030	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	612	37	4 130	897	États-Unis	
Total	612	37	4 130	897	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	79 948	1,471	926 357	18,400	États-Unis	
Other countries	48	23	360	232	Autres pays	
Total	79 997	1,494	926 717	18,632	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	5 483	158	288 176	4,362	États-Unis	
Other countries	11	1	187	19	Autres pays	
Total	5 494	160	288 364	4,382	Total	
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
United States	305	19	5 380	365	États-Unis	
Other countries			156	10	Autres pays	
Total	305	19	5 536	376	Total	
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies	2506.21
Other countries	10	1	1 093	123	Autres pays	
Total	10	1	1 093	123	Total	
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda	2506.29
Other countries	123	18	1 167	86	Autres pays	
Total	123	18	1 167	86	Total	
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés	2507.00
United States	34 413 093	5,623	505 996 333	74,585	États-Unis	
Other countries	4 849	2	435 521	131	Autres pays	
Total	34 417 942	5,626	506 431 855	74,717	Total	
2508.10 Bentonite	KGM		KGM		Bentonite	2508.10
United States	11 182 466	773	203 794 240	10,894	États-Unis	
Greece			26 015 000	1,202	Grèce	
Other countries			150 176	133	Autres pays	
Total	11 182 466	773	229 959 417	12,229	Total	
2508.20 Decolourising earths and fuller's earth	KGM		KGM		Terres décolorantes et terres à foulon	2508.20
United States	330 074	46	6 642 914	806	États-Unis	
Total	330 074	46	6 642 914	806	Total	
2508.30 Fire-clay	KGM		KGM		Argiles réfractaires	2508.30
United States	502 865	107	10 184 567	1,909	États-Unis	
Other countries	20 000	6	258 749	95	Autres pays	
Total	522 865	114	10 443 316	2,005	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1991 Décembre 1991 Quantity Quantité	December 1991 Décembre 1991 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux	2308.90
United States	284 655	37	4 458 768	593	États-Unis	
Total	284 655	37	4 458 768	593	Total	
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail	2309.10
United States	12 249 368	14,467	117 815 879	136,883	États-Unis	
United Kingdom	90 357	127	1 060 646	1,480	Royaume-Uni	
Austria			183 073	466	Autriche	
Korea, South	2 092	4	371 973	888	Corée du Sud	
Thailand	226 171	447	2 904 897	5,123	Thaïlande	
Other countries	12 787	25	189 103	391	Autres pays	
Total	12 580 775	15,071	122 525 572	145,233	Total	
2309.90 Animal feed preparrtions nes	KGM		KGM		Préparations alimentaires pour animaux, nda	2309.90
United States	8 133 572	7,963	77 550 266	79,574	États-Unis	
United Kingdom	11 654	16	136 518	393	Royaume-Uni	
Finland			81 088	329	Finlande	
France	158 247	1,396	1 192 568	9,383	Franco	
Germany	38 486	80	456 244	5,012	Allemagne	
Italy	42 014	44	343 208	877	Italie	
Netherlands	3 469	18	268 550	706	Pays-Bas	
Norway	23 520	25	214 911	594	Norvège	
Switzerland			106 651	1,220	Suisse	
Japan	21 555	68	1 734 875	1,388	Japon	
Taiwan	5 337	11	240 563	821	Taiwan	
Brazil	19 650	373	94 002	2,264	Brésil	
Other countries	47 689	49	733 189	1,629	Autres pays	
Total	8 505 193	10,048	83 152 635	104,196	Total	
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés	2401.10
United States	3 667	14	316 836	1,167	États-Unis	
Belgium			59 400	306	Belgique	
India			100 980	372	Inde	
Other countries	3 800	9	130 305	504	Autres pays	
Total	7 467	24	607 521	2,350	Total	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
United States	17 231	76	579 858	3,222	États-Unis	
Zimbabwe	192 000	1,152	251 042	1,309	Zimbabwe	
Argentina	1 411	4	83 676	318	Argentine	
Brazil	11 775	46	298 186	883	Brésil	
Other countries	12 673	48	131 020	482	Autres pays	
Total	235 090	1,328	1 343 782	6,216	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
Other countries	10 909	8	275 384	186	Autres pays	
Total	10 909	8	275 384	186	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Netherlands	401	32	5 479	470	Pays-Bas	
Cuba	1 063	199	3 356	749	Cuba	
Other countries	1 579	66	17 071	731	Autres pays	
Total	3 043	298	25 907	1,951	Total	
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac	2402.20
United States	21 218	403	345 863	6,482	États-Unis	
Other countries			35 357	647	Autres pays	
Total	21 218	403	381 220	7,130	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries			2 354	21	Autres pays	
Total			2 354	21	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
Canada	36 726	318	134 715	1,209	Canada	
United States	80 101	667	159 414	1,575	États-Unis	
United Kingdom	36 764	309	46 764	481	Royaume-Uni	
Netherlands	18 757	334	223 077	3,621	Pays-Bas	
Sweden	6 066	107	29 689	535	Suède	
Jamaica			68 774	490	Jamaïque	
Other countries	1 937	20	48 175	480	Autres pays	
Total	180 352	1,758	710 609	8,394	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1991 Décembre 1991 Quantity Quantité	December 1991 Décembre 1991 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
United States	13 925	95	133 242	1,502	États-Unis	
Total	13 925	95	133 242	1,502	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
United States	26 991	496	286 812	4,802	États-Unis	
Other countries	581	6	9 384	101	Autres pays	
Total	27 572	503	296 196	4,903	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	40 789	1,324	771 767	19,441	États-Unis	
Chile			74 311	715	Chili	
Bahamas			29 066	497	Bahamas	
Mexico	36 287	531	311 601	4,780	Mexique	
Other countries	1 704	22	16 007	373	Autres pays	
Total	78 780	1,879	1 202 752	25,808	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries	688	2	6 710	50	Autres pays	
Total	688	2	6 710	50	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
Other countries	9	2	1 429	218	Autres pays	
Total	9	2	1 429	218	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	826	189	7 593	1,903	États-Unis	
Other countries			4		Autres pays	
Total	826	189	7 597	1,904	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	71	77	1 280	1,241	États-Unis	
Other countries	15	7	141	170	Autres pays	
Total	86	84	1 421	1,411	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	177	82	3 975	1,069	États-Unis	
Other countries			18	53	Autres pays	
Total	177	82	3 993	1,122	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	87 153	1,427	758 729	14,613	États-Unis	
Other countries	38	27	786	193	Autres pays	
Total	87 191	1,454	759 515	14,806	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	1 269	128	125 018	2,868	États-Unis	
Other countries	124	24	1 184	199	Autres pays	
Total	1 393	152	126 202	3,067	Total	
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
Spain			33 060	1,148	Espagne	
Other countries	43	3	3 483	207	Autres pays	
Total	43	3	36 543	1,356	Total	
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies	2506.21
Other countries	66	8	1 353	149	Autres pays	
Total	66	8	1 353	149	Total	
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda	2506.29
Other countries	244	23	1 319	163	Autres pays	
Total	244	23	1 319	163	Total	
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés	2507.00
United States	41 333 018	5,666	520 054 170	65,791	États-Unis	
Other countries	33 386	17	508 010	86	Autres pays	
Total	41 366 404	5,684	520 562 180	65,878	Total	
2508.10 Bentonite	KGM		KGM		Bentonite	2508.10
United States	34 588 777	1,098	220 150 056	9,267	États-Unis	
Greece			48 430 000	2,423	Grèce	
Other countries			31 964	14	Autres pays	
Total	34 588 777	1,098	268 612 020	11,705	Total	
2508.20 Decolourising earths and fuller's earth	KGM		KGM		Terres décolorantes et terres à foulon	2508.20
United States	583 834	115	6 137 856	880	États-Unis	
Total	583 834	115	6 137 856	880	Total	

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(Cont'd)					(Suite)	
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali ues animaux	2308.90
Other countries			17 651	3	Autres pays	
Total	281 774	41	3 709 506	573	Total	
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail	2309.10
United States	13 872 784	17,321	142 491 888	166,687	États-Unis	
United Kingdom	57 118	89	1 007 629	1,417	Royaume-Uni	
Austria	56 110	116	263 654	499	Autriche	
Korea, South	27 174	67	242 968	691	Corée du Sud	
Thailand	271 830	623	2 030 741	4,481	Thaïlande	
Colombia	13 506	33	158 565	431	Colombie	
Other countries	92 371	167	283 862	524	Autres pays	
Total	14 390 893	18,421	146 479 308	174,733	Total	
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda	2309.90
United States	10 929 224	9,912	110 912 768	103,787	États-Unis	
United Kingdom	23 768	28	574 119	2,091	Royaume-Uni	
France	80 126	1,024	1 497 843	18,712	France	
Germany	35 103	258	638 261	4,829	Allemagne	
Italy	9 355	11	183 466	505	Italie	
Netherlands	11 672	20	295 116	820	Pays-Bas	
Norway	16 310	77	187 200	614	Norvège	
Switzerland	41 861	259	246 947	2,873	Suisse	
India	19 505	27	345 852	433	Inde	
Japan	26 813	181	301 018	1,463	Japon	
Taiwan	21 211	82	351 544	786	Taiwan	
Brazil			100 332	1,929	Brésil	
Other countries	21 497	67	642 816	1,171	Autres pays	
Total	11 236 445	11,951	116 277 286	140,019	Total	
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés	2401.10
Italy			216 103	347	Italie	
China, P. Rep.			300 000	412	Chine, Rép. pop.	
Other countries	19 630	139	158 968	561	Autres pays	
Total	19 630	139	675 071	1,321	Total	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
United States	66 787	439	589 939	2,711	États-Unis	
Italy	25 397	73	180 068	496	Italie	
Zimbabwe	305 684	1,054	536 084	2,155	Zimbabwe	
China, P. Rep.	192 145	575	1 103 200	3,530	Chine, Rép. pop.	
Thailand	59 499	768	178 061	1,147	Thaïlande	
Brazil	656 832	3,673	1 580 061	7,542	Brésil	
Other countries	76 403	245	391 040	1,511	Autres pays	
Total	1 382 748	6,829	4 558 455	19,097	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
United States	248 593	186	2 337 646	1,743	États-Unis	
Zimbabwe			430 500	370	Zimbabwe	
Brazil			333 643	301	Brésil	
Other countries			100 650	66	Autres pays	
Total	248 593	186	3 202 439	2,481	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Cuba	12	2	2 993	669	Cuba	
Other countries	554	41	18 469	946	Autres pays	
Total	566	44	21 462	1,615	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	32 102	490	283 628	7,108	États-Unis	
United Kingdom	445	13	14 872	343	Royaume-Uni	
Other countries	6 350	126	16 095	305	Autres pays	
Total	38 897	630	314 597	7,757	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries	185	1	5 379	30	Autres pays	
Total	185	1	5 379	30	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
Canada			49 817	451	Canada	
United States	229	3	387 707	3,603	États-Unis	
United Kingdom	32 392	182	929 110	7,761	Royaume-Uni	
Denmark	3 960	37	29 771	398	Danemark	
Netherlands	13 479	205	286 024	4,682	Pays-Bas	
Sweden			28 983	588	Suède	

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(Cont'd)					(Suite)	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
Other countries	1 685	23	36 975	314	Autres pays	
Total	51 745	452	1 748 389	17,800	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
United States	49 371	302	150 520	1,111	États-Unis	
Total	49 371	302	150 520	1,111	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
United States	27 797	524	271 251	5,237	États-Unis	
Other countries	51		7 034	75	Autres pays	
Total	27 848	524	278 285	5,313	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	69 730	2,179	611 520	22,137	États-Unis	
Chile			121 331	1,211	Chili	
Bahamas			45 264	755	Bahamas	
Mexico	29 950	499	258 925	4,206	Mexique	
Other countries	496	60	8 868	527	Autres pays	
Total	100 176	2,738	1 045 908	28,839	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries			9 475	56	Autres pays	
Total			9 475	56	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
Other countries	5	1	347	76	Autres pays	
Total	5	1	347	76	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	585	203	7 974	2,524	États-Unis	
Other countries			324	92	Autres pays	
Total	585	203	8 298	2,616	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	238	219	1 484	1,591	États-Unis	
Other countries			224	163	Autres pays	
Total	238	219	1 708	1,754	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	874	369	6 488	2,190	États-Unis	
Total	874	369	6 488	2,190	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	58 229	1,075	674 758	14,302	États-Unis	
Other countries	2	1	3 284	325	Autres pays	
Total	58 231	1,076	678 043	14,627	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	37 695	544	257 789	3,665	États-Unis	
Other countries	22		468	71	Autres pays	
Total	37 717	544	258 257	3,737	Total	
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
Other countries	179	11	2 889	193	Autres pays	
Total	179	11	2 889	193	Total	
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies	2506.21
Other countries			2 005	198	Autres pays	
Total			2 005	198	Total	
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda	2506.29
Other countries	163	24	1 290	142	Autres pays	
Total	163	24	1 290	142	Total	
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés	2507.00
United States	39 495 595	5,548	530 690 078	76,531	États-Unis	
Other countries	274		45 328	27	Autres pays	
Total	39 495 869	5,548	530 735 406	76,558	Total	
2508.10 Bentonite	KGM		KGM		Bentonite	2508.10
United States	37 164 194	1,468	177 610 734	10,783	États-Unis	
Greece			78 169 483	3,756	Grèce	
Other countries	2 000	2	29 832	27	Autres pays	
Total	37 166 194	1,470	255 810 049	14,567	Total	

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2306.30 Sunflower seed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de tournesol,même broyés/agglos en pellet 2306.30
Other countries			952 163	187	Autres pays
Total			952 163	187	Total
2306.50 Coconut or copra oil-cake & other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux & autres résidus so de coprah ou noix de coco, même broyés/agglos 2306.50
Other countries			4 134		Autres pays
Total			4 134		Total
2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		Tourteaux et autres résidus solides v/g nda,même broyés ou agglomérés en pellets 2306.90
United States	770 505	138	3 134 340	602	États-Unis
Total	770 505	138	3 134 340	602	Total
2307.00 Wine lees and argol	KGM		KGM		Lies de vin et tartre brut 2307.00
Other countries	1 567		50 056	7	Autres pays
Total	1 567		50 056	7	Total
2308.90 Veg mat, wastes, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux 2308.90
United States	552 893	81	5 287 640	774	États-Unis
Other countries			38 863	6	Autres pays
Total	552 893	81	5 326 503	781	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	18 279 715	23,340	165 719 147	200,636	États-Unis
United Kingdom	141 361	169	736 361	1,098	Royaume-Uni
Korea, South	27 611	69	282 564	847	Corée du Sud
Thailand	157 983	310	1 992 243	5,018	Thaïlande
Argentina	355		134 403	364	Argentine
Other countries	20 455	51	295 796	593	Autres pays
Total	18 627 480	23,941	169 160 514	208,559	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	10 261 025	11,392	125 471 239	125,048	États-Unis
United Kingdom	43 211	215	706 139	2,502	Royaume-Uni
Belgium	4 000	156	91 450	839	Belgique
France	41 515	387	1 089 616	13,408	France
Germany	17 360	185	445 743	3,726	Allemagne
Italy	23 362	350	178 620	983	Italie
Netherlands	107 446	155	778 610	1,181	Pays-Bas
Norway	24 184	51	312 975	916	Norvège
Switzerland	353	2	184 814	2,168	Suisse
India	2 412	10	338 003	433	Inde
Japan	27 446	139	1 726 153	2,157	Japon
Taiwan	269	6	183 773	699	Taiwan
Brazil			266 186	4,340	Brésil
Chile			1 204 120	734	Chili
Peru			1 156 284	586	Pérou
Other countries	41 434	54	251 676	668	Autres pays
Total	10 594 017	13,108	134 385 404	160,397	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
Italy			251 386	672	Italie
Zimbabwe	102 420	383	102 420	383	Zimbabwe
Other countries	3 814	15	288 750	813	Autres pays
Total	106 234	398	642 556	1,869	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	44 140	242	434 012	2,091	États-Unis
France			90 000	515	France
Spain			368 121	1,295	Espagne
Poland			87 882	429	Pologne
Malawi			100 000	338	Malawi
Zimbabwe	16 525	37	744 552	2,524	Zimbabwe
India			189 603	627	Inde
China, P. Rep.	25 609	94	924 701	3,530	Chine, Rép. pop.
Philippines			452 524	964	Philippines
Thailand			275 842	1,054	Thaïlande
Brazil	158 400	526	2 030 772	10,620	Brésil
Other countries	48 400	143	252 725	951	Autres pays
Total	293 074	1,044	5 952 660	24,942	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United States	33 480	13	2 029 908	1,499	États-Unis
Zimbabwe			331 132	326	Zimbabwe
China, P. Rep.			501 120	362	Chine, Rép. pop.
Other countries			447 134	375	Autres pays
Total	33 480	13	3 309 294	2,564	Total

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1993 Décembre 1993 Quantity Quantité	December 1993 Décembre 1993 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Cuba	571	144	3 706	931	Cuba	
Other countries	1 993	92	22 046	924	Autres pays	
Total	2 564	236	25 753	1,855	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	5 004	150	240 812	5,625	États-Unis	
France	555	13	16 809	351	France	
Other countries	1 212	23	13 813	297	Autres pays	
Total	6 771	186	271 434	6,274	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries	2 994	25	19 606	166	Autres pays	
Total	2 994	25	19 606	166	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	1 954	21	57 088	805	États-Unis	
United Kingdom	2 305	35	897 784	6,240	Royaume-Uni	
Ireland	9 006	158	121 384	2,285	Irlande	
Denmark	4 393	67	21 106	346	Danemark	
Netherlands	5 516	126	213 129	4,161	Pays-Bas	
Sweden			29 331	674	Suède	
Brazil			52 420	541	Brésil	
Other countries	668	9	12 782	172	Autres pays	
Total	23 842	418	1 405 028	15,227	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
United States	691	5	144 826	1,064	États-Unis	
Total	691	5	144 826	1,064	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
United States	30 326	550	309 737	5,969	États-Unis	
Other countries	734	6	5 762	62	Autres pays	
Total	31 060	556	315 499	6,031	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	31 203	2,141	579 064	24,367	États-Unis	
Chile			57 173	655	Chili	
Bahamas			41 432	772	Bahamas	
Mexico	12	195	321 700	5,282	Mexique	
Other countries	1 600	82	11 075	753	Autres pays	
Total	32 815	2,419	1 010 444	31,831	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries	339	3	9 594	65	Autres pays	
Total	339	3	9 594	65	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
Other countries	12	3	219	57	Autres pays	
Total	12	3	219	57	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	436	156	7 132	2,593	États-Unis	
Other countries			181	71	Autres pays	
Total	436	156	7 313	2,664	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	146	233	1 926	2,323	États-Unis	
Other countries	6	13	211	240	Autres pays	
Total	152	246	2 137	2,564	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	562	41	4 338	828	États-Unis	
Other countries			63	24	Autres pays	
Total	562	41	4 402	853	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	84 295	1,795	1 018 152	22,007	États-Unis	
South Africa			3 174	320	Afrique du Sud	
Other countries	11	10	205	103	Autres pays	
Total	84 306	1,805	1 021 531	22,431	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	12 117	220	376 860	4,183	États-Unis	
Other countries	507	21	2 002	302	Autres pays	
Total	12 624	242	378 862	4,486	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1994 Décembre 1994		Cumulative Totals Totaux cumulatifs		Marchandise/Pays	
	Quantity Quantité	Value Valeur $'000	Quantity Quantité	Value Valeur $'000		
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail	2309.10
United States	15 343 484	21,915	182 779 160	233,610	États-Unis	
United Kingdom	8 795	22	597 639	983	Royaume-Uni	
Korea, South	13 386	32	245 520	707	Corée du Sud	
Thailand	117 960	303	1 865 310	4,329	Thaïlande	
Other countries	115 864	216	791 574	1,625	Autres pays	
Total	15 599 489	22,490	186 279 204	241,255	Total	
2309.90 Animal feed preparations nes	KGM		KGM		*Préparations alimentaires pour animaux*, nda	2309.90
United States	7 943 637	14,495	91 939 568	144,531	États-Unis	
United Kingdom	19 054	22	739 085	1,973	Royaume-Uni	
Belgium	3 700	145	63 854	685	Belgique	
France	106 379	307	1 806 819	11,398	France	
Germany	15 499	106	927 450	2,239	Allemagne	
Italy	16 479	15	267 677	849	Italie	
Netherlands	25 256	104	653 310	4,299	Pays-Bas	
Norway	34 033	99	798 265	1,350	Norvège	
Switzerland	352	1	92 009	2,118	Suisse	
Japan	4 543	135	445 108	2,655	Japon	
Taiwan	39 329	80	254 016	764	Taiwan	
Brazil	21 180	513	141 957	3,411	Brésil	
Chile			4 017 420	2,987	Chili	
Peru	792 040	527	3 369 844	2,206	Pérou	
Other countries	126 316	194	1 626 335	2,772	Autres pays	
Total	9 147 797	16,750	107 142 720	182,244	Total	
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés	2401.10
United States	665	2	230 923	1,372	États-Unis	
Other countries	15 909	63	570 293	1,684	Autres pays	
Total	16 574	66	801 216	3,057	Total	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
United States	10 660	51	324 696	2,042	États-Unis	
Turkey			162 633	1,286	Turquie	
Malawi			519 289	731	Malawi	
Zimbabwe	722 390	725	3 242 810	7,416	Zimbabwe	
China, P. Rep.	153 600	486	2 757 264	7,381	Chine, Rép. pop.	
Thailand			453 420	913	Thaïlande	
Argentina			303 447	806	Argentine	
Brazil	236 252	591	2 100 000	7,051	Brésil	
Other countries	13 200	55	501 047	1,455	Autres pays	
Total	1 136 102	1,910	10 364 607	29,086	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
Other countries			1 240 430	895	Autres pays	
Total			1 240 430	895	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Cuba	1 550	257	8 139	1,537	Cuba	
Other countries	1 398	74	20 863	1,068	Autres pays	
Total	2 949	332	29 003	2,605	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	6 472	182	381 284	13,631	États-Unis	
France	2 787	62	31 729	683	France	
Other countries	921	31	16 807	433	Autres pays	
Total	10 180	276	429 820	14,747	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries	327	2	15 724	141	Autres pays	
Total	327	2	15 724	141	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	14 906	244	78 627	1,188	États-Unis	
United Kingdom	1 736	26	278 646	1,833	Royaume-Uni	
Ireland	4 448	87	118 723	2,136	Irlande	
Netherlands	11 407	253	112 164	2,328	Pays-Bas	
Sweden	3 489	93	32 509	702	Suède	
Other countries	1 042	14	27 101	407	Autres pays	
Total	37 029	719	639 772	8,597	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
United States	6 622	71	83 171	916	États-Unis	
Other countries			114	1	Autres pays	
Total	6 622	71	83 285	917	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1994 Décembre 1994 Quantity Quantité	Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Value Valeur $'000	Marchandise/Pays	
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda,incl extraits ou sauces de tabac	2403.99
United States	23 354	754	326 647	10,342	États-Unis	
Other countries			8 980	99	Autres pays	
Total	23 354	754	335 647	10,441	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	102 852	3,419	602 793	26,013	États-Unis	
Mexico	7 264	100	313 351	4,208	Maxique	
Other countries	260	29	23 986	975	Autres pays	
Total	110 376	3,548	940 130	31,197	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries			11 339	74	Autres pays	
Total			11 339	74	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
Other countries	247	31	370	51	Autres pays	
Total	247	31	370	51	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	1 205	404	2 724	827	États-Unis	
Other countries	27	10	29	10	Autres pays	
Total	1 232	415	2 753	838	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	237	324	2 287	2,690	États-Unis	
Other countries	35	55	616	925	Autres pays	
Total	272	379	2 903	3,615	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	79	120	3 325	799	États-Unis	
Other countries	23	63	198	94	Autres pays	
Total	102	183	3 523	894	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	2 549 511	2,354	3 604 156	26,193	États-Unis	
Other countries	3 620	171	18 457	1,038	Autres pays	
Total	2 553 131	2,526	3 622 613	27,231	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	29 798	406	317 468	3,880	États-Unis	
Other countries	20	5	1 640	202	Autres pays	
Total	29 818	411	319 108	4,083	Total	
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
Spain	36 179	1,525	77 870	3,105	Espagne	
Other countries	143	10	4 890	352	Autres pays	
Total	36 322	1,535	82 760	3,457	Total	
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies	2506.21
Other countries	299	6	1 668	181	Autres pays	
Total	299	6	1 668	181	Total	
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda	2506.29
Other countries	49	6	1 301	172	Autres pays	
Total	49	6	1 301	172	Total	
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés	2507.00
United States	42 086 498	6,864	626 595 991	91,359	États-Unis	
Other countries	29 152	17	122 058	69	Autres pays	
Total	42 115 642	6,882	626 718 049	91,428	Total	
2508.10 Bentonite	KGM		KGM		Bentonite	2508.10
United States	32 405 998	2,073	224 905 713	20,370	États-Unis	
Greece	27 000 000	1,644	80 329 000	4,932	Grèce	
India			22 520 224	1,364	Inde	
Other countries	574 200	174	1 883 953	590	Autres pays	
Total	59 980 198	3,891	329 638 890	27,257	Total	
2508.20 Decolourising earths and fuller's earth	KGM		KGM		Terres décolorantes et terres à foulon	2508.20
United States	743 217	103	9 260 337	1,377	États-Unis	
Other countries			5 462	3	Autres pays	
Total	743 217	103	9 265 799	1,380	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1995 Décembre 1995 Quantity Quantité	December 1995 Décembre 1995 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail	2309.10
United States	15 845 228	21,773	175 630 732	234.662	États-Unis	
Korea, South	67		375 063	902	Corée du Sud	
Thailand	110 517	276	2 072 921	4,902	Thaïlande	
Other countries	98 543	252	1 019 049	2,441	Autres pays	
Total	16 054 355	22,302	179 103 765	242,909	Total	
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda	2309.90
United States	19 970 109	14,835	207 625 029	161,378	États-Unis	
United Kingdom	37 971	60	672 957	1,652	Royaume-Uni	
Belgium	11 130	44	74 185	1,274	Belgique	
Denmark	11 988	454	121 733	1,725	Danemark	
France	130 096	228	2 239 340	11,679	France	
Germany	42 869	356	659 640	3,844	Allemagne	
Netherlands	102 100	132	485 768	1,146	Pays-Bas	
Norway	10 000	51	361 025	1,174	Norvège	
Switzerland	21 762	843	121 806	4,144	Suisse	
Japan	15 831	368	400 017	3,510	Japon	
Taiwan	16 456	56	271 104	837	Taiwan	
Brazil	2 040	71	749 480	3,269	Brésil	
Chile			1 225 118	929	Chili	
Peru	66 220	40	2 701 880	1,345	Pérou	
Other countries	62 300	45	1 246 245	2,688	Autres pays	
Total	20 500 872	17,567	217 953 335	200,600	Total	
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés	2401.10
United States			154 311	943	États-Unis	
Turkey			105 911	792	Turquie	
Other countries	80 454	227	590 865	1,524	Autres pays	
Total	80 454	227	851 087	3,260	Total	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
United States			100 003	799	États-Unis	
Portugal			27 285	659	Portugal	
Spain			530 075	806	Espagne	
Zimbabwe			2 760 428	5,903	Zimbabwe	
China, P. Rep.	4 400	17	2 625 664	6,681	Chine, Rép. pop.	
Thailand	217 800	563	818 730	2,014	Thaïlande	
Argentina	166 320	669	307 706	1,280	Argentine	
Brazil	237 408	1,292	2 794 969	12,117	Brésil	
Other countries	24 589	111	455 359	1,445	Autres pays	
Total	650 517	2,653	10 415 221	31,704	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
Other countries	160 320	145	463 621	391	Autres pays	
Total	160 320	145	463 621	391	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Cuba	1 187	295	12 020	2,529	Cuba	
Other countries	3 480	190	31 082	1,656	Autres pays	
Total	4 667	486	43 103	4,186	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	23 661	947	318 012	11,920	États-Unis	
France	2 475	55	29 174	660	France	
Other countries	14		19 786	361	Autres pays	
Total	26 150	1,003	366 972	12,941	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries			5 427	48	Autres pays	
Total			5 427	48	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	8 819	169	48 944	891	États-Unis	
United Kingdom	122 561	693	442 144	2,768	Royaume-Uni	
Ireland	6 175	87	63 084	1,073	Irlande	
Netherlands	10 152	262	117 964	2,848	Pays-Bas	
Sweden			30 468	840	Suède	
Other countries	2 180	33	52 210	630	Autres pays	
Total	149 887	1,245	754 815	9,053	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
United States	1 480	20	106 171	1,112	États-Unis	
Other countries			1 515	18	Autres pays	
Total	1 480	20	107 686	1,130	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1995 Décembre 1995		Cumulative Totals Totaux cumulatifs		Marchandise/Pays	
	Quantity Quantité	Value Valeur $'000	Quantity Quantité	Value Valeur $'000		
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda,incl extraits ou sauces de tabac	2403.99
United States	27 388	851	485 549	11,327	États-Unis	
Other countries	1 806	21	13 341	147	Autres pays	
Total	29 194	872	498 890	11,475	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	30 128	1,795	847 287	31,426	États-Unis	
Chile	37 656	457	78 808	963	Chili	
Mexico			335 775	4,893	Mexique	
Other countries	4 441	154	33 050	1,036	Autres pays	
Total	72 225	2,407	1 294 921	38,320	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries	628	5	15 873	87	Autres pays	
Total	628	5	15 873	87	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
Other countries	6	1	8 992	578	Autres pays	
Total	6	1	8 992	578	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	708	218	16 565	3,420	États-Unis	
Other countries	20	7	36	13	Autres pays	
Total	728	225	16 601	3,433	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	206	230	2 734	2,918	États-Unis	
Switzerland	37	95	264	670	Suisse	
Other countries	53	102	586	744	Autres pays	
Total	296	428	3 584	4,333	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	43	21	2 954	850	États-Unis	
Other countries	65	13	153	166	Autres pays	
Total	106	35	3 107	1,016	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	50 988	1,247	1 245 502	27,722	États-Unis	
Other countries	2 128	13	17 036	1,447	Autres pays	
Total	53 116	1,260	1 262 538	29,170	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	20 897	302	286 623	4,748	États-Unis	
Other countries	823	5	5 480	226	Autres pays	
Total	21 720	307	292 103	4,975	Total	
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
Spain	33	1	15 055	854	Espagne	
Other countries	578	42	6 443	444	Autres pays	
Total	611	44	21 498	1,299	Total	
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies	2506.21
Other countries			1 227	218	Autres pays	
Total			1 227	218	Total	
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda	2506.29
Other countries	12	1	1 284	156	Autres pays	
Total	12	1	1 284	156	Total	
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés	2507.00
United States	50 388 183	7,896	620 899 208	96,910	États-Unis	
Other countries	9 163	6	266 821	98	Autres pays	
Total	50 397 346	7,903	621 166 029	97,008	Total	
2508.10 Bentonite	KGM		KGM		Bentonite	2508.10
United States	9 841 361	1,141	277 690 216	19,170	États-Unis	
United Kingdom	138 600	58	4 339 929	1,410	Royaume-Uni	
Greece			52 961 339	5,125	Grèce	
Other countries	8 803 000	242	8 834 380	276	Autres pays	
Total	18 782 961	1,442	343 825 864	25,982	Total	
2508.20 Decolourising earths and fuller's earth	KGM		KGM		Terres décolorantes et terres à foulon	2508.20
United States	561 905	79	10 144 378	1,686	États-Unis	
Other countries	1 199		24 247	9	Autres pays	
Total	563 104	79	10 168 625	1,695	Total	

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1996 Décembre 1996		Cumulative Totals Totaux cumulatifs		Marchandise/Pays
	Quantity Quantité	Value Valeur $'000	Quantity Quantité	Value Valeur $'000	
2309.90 Animal feed preparations nes	KG		KG		Préparations alimentaires pour animaux, nda 2309.90
United States	15 967 162	14.461	155 605 037	135.660	États-Unis
United Kingdom	99 417	244	699 268	1.186	Royaume-Uni
Belgium	3 407	7	73 312	1.666	Belgique
Denmark	44 189	129	165 483	1.315	Danemark
France	92 869	908	1 048 862	6.675	France
Germany	61 579	547	562 051	5.241	Allemagne
Netherlands	49 594	209	663 206	2.134	Pays-Bas
Switzerland	7 913	14	94 570	1.944	Suisse
Bulgaria	9 000	232	63 685	1.666	Bulgarie
Japan	30 678	205	341 899	3.108	Japon
Taiwan	2 814	4	587 003	798	Taiwan
Brazil	29 069	525	197 874	3.674	Brésil
Chile			1 254 568	944	Chili
Peru	315 350	231	3 459 084	2.519	Pérou
Other countries	130 771	358	1 375 971	2.280	Autres pays
Total	16 838 108	17.839	165 765 819	168.817	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KG		KG		Tabacs bruts ou non fabriqués,non écotés 2401.10
United States	117 919	759	285 951	1.749	États-Unis
Turkey			275 975	822	Turquie
India			307 200	1.031	Inde
Other countries	26 180	117	853 579	1.948	Autres pays
Total	144 099	887	1 725 455	5.552	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KG		KG		Tabacs bruts ou non fabriqués, partiellement ou totalement écotés 2401.20
United States			122 606	772	États-Unis
Greece	59 400	162	343 515	917	Grèce
Italy	111 000	312	968 980	1.577	Italie
Spain	97 400	134	414 200	825	Espagne
Zimbabwe	394 800	1.002	1 819 578	7.334	Zimbabwe
Sri Lanka			189 180	812	Sri Lanka
India	737 600	2.295	1 828 400	6.047	Inde
China, P. Rep.			2 606 848	7.415	Chine, Rép. pop.
Thailand	225 700	695	2 037 065	7.997	Thaïlande
Brazil	299 900	1.465	1 759 152	8.649	Brésil
Other countries	278 070	768	850 512	3.000	Autres pays
Total	2 164 910	6.865	12 557 616	45.348	Total
2401.30 Tobacco refuse	KG		KG		Déchets de tabac 2401.30
Other countries	18 983	16	775 709	659	Autres pays
Total	18 983	16	775 709	659	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KG		KG		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
United States	8 832	222	44 012	1.351	États-Unis
Netherlands	605	64	6 772	721	Pays-Bas
Cuba	2 209	384	17 586	3.151	Cuba
Honduras	2 763	166	15 432	740	Honduras
Other countries	4 269	263	20 839	1.284	Autres pays
Total	18 678	1.099	104 413	7.249	Total
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac 2402.20
United States	5 160	148	279 453	10.226	États-Unis
France	2 502	65	35 039	867	France
Other countries	1 330	71	41 016	648	Autres pays
Total	8 992	285	355 508	11.742	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KG		KG		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries			4 726	42	Autres pays
Total			4 726	42	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KG		KG		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	2 958	32	167 810	2.009	États-Unis
United Kingdom	130 733	829	836 888	5.141	Royaume-Uni
Ireland	6 465	91	87 545	1.563	Irlande
Netherlands	14 542	388	105 660	2.650	Pays-Bas
Sweden			27 632	827	Suède
Other countries	2 481	24	34 479	625	Autres pays
Total	157 179	1.366	1 259 816	12.818	Total
2403.91 Homogenized or reconstituted tobacco	KG		KG		Tabacs homogénéisés ou reconstitués 2403.91
United States	5 557	58	97 480	1.136	États-Unis
Total	5 557	58	97 480	1.136	Total
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KG		KG		Tabac et succédané,fabriqués,nda,incl extraits ou sauces de tabac 2403.99
United States	33 313	1.065	392 556	12.579	États-Unis
Other countries			6 696	74	Autres pays
Total	33 313	1.065	399 252	12.654	Total

TABLE 3. IMPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. IMPORTATIONS PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1997 Décembre 1997 Quantity Quantité	December 1997 Décembre 1997 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	242 497	1,454	387 448	2,031	États-Unis
Turkey			775 851	2,148	Turquie
Tanzania, Un. Rep			153 600	898	Tanzanie, Rép. un
Japan			570 790	1,904	Japon
Other countries	29 110	122	696 892	2,365	Autres pays
Total	271 607	1,607	2 586 579	9,347	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	672	1	172 720	1,021	États-Unis
France	5		141 943	655	France
Greece			496 687	1,687	Grèce
Italy	2 720	8	1 085 157	3,318	Italie
Malawi			203 559	709	Malawi
Zimbabwe	1		1 681 520	8,957	Zimbabwe
India	1		2 142 187	6,953	Inde
China, P. Rep.			789 064	2,965	Chine, Rép. pop.
Japan			1 465 600	6,366	Japon
Thailand			543 273	2,316	Thaïlande
Argentina			335 704	2,038	Argentine
Brazil			1 703 827	8,605	Brésil
Venezuela			773 570	3,042	Venezuela
Honduras	21 772	97	188 798	790	Honduras
Other countries	11 733	50	540 819	1,921	Autres pays
Total	36 907	157	12 462 459	51,350	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
Zimbabwe			709 245	633	Zimbabwe
Brazil			1 578 509	2,128	Brésil
Other countries			932 973	1,035	Autres pays
Total			3 500 728	3,798	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
United States	3 341	234	73 551	2,759	États-Unis
Netherlands	440	37	12 227	1,315	Pays-Bas
Cuba	6 077	825	44 669	7,401	Cuba
Dominican Rep.	2 582	224	20 149	1,746	Rép. Dominicaine
Honduras	664	42	17 113	1,111	Honduras
Other countries	3 951	189	30 254	1,820	Autres pays
Total	17 873	1,610	197 766	16,155	Total
2402.20 Cigarettes containing tobacco	NIL		NIL		Cigarettes contenant du tabac 2402.20
United States	6 342	163	281 064	11,751	États-Unis
France	7 901	201	39 012	996	France
China, P. Rep.	5 650	235	17 750	600	Chine, Rép. pop.
Other countries	730	26	12 355	331	Autres pays
Total	22 823	625	350 183	13,679	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries	171	1	7 000	48	Autres pays
Total	171	1	7 000	48	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
Canada			194 162	2,026	Canada
United States	12 587	140	235 925	2,537	États-Unis
United Kingdom	10 021	83	447 256	4,042	Royaume-Uni
Ireland	12 766	151	93 839	1,200	Irlande
Netherlands	13 770	381	98 604	2,692	Pays-Bas
Sweden	916	27	24 390	764	Suède
Other countries	2 643	57	18 244	417	Autres pays
Total	52 734	843	1 112 422	13,681	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
United States	1 929	29	85 099	1,000	États-Unis
Other countries	301	3	1 813	14	Autres pays
Total	2 230	32	86 912	1,015	Total
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda,incl extraits ou sauces de tabac 2403.99
United States	20 113	928	331 330	12,997	États-Unis
Other countries	1 043	10	7 502	127	Autres pays
Total	21 156	938	338 832	13,124	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	39 271	2,056	796 116	31,761	États-Unis
Germany	3 019	285	10 633	1,142	Allemagne
Mexico	26 300	385	393 019	5,489	Mexique
Other countries	506	64	69 781	1,659	Autres pays
Total	69 104	2,791	1 269 550	40,052	Total

Table 3. Domestic Exports by Commodity and Country, H.S. Based
Tableau 3. Exportations nationales par marchandise et pays, base du S.H.

Commodity/Country	December 1988 Décembre 1988 Quantity Quantité	December 1988 Décembre 1988 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2306.40 Rape or colza seed oil-cake&other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux & autres résidus so de colza ou navette,même broyé/aggion en pellet 2306.40
United States	30 723 050	6,701	111 932 359	24,147	États-Unis
Ireland	9 000 000	571	9 000 000	571	Irlande
Norway			16 848 000	4,436	Norvège
India	3 323 830	774	3 323 830	774	Inde
Indonesia	7 155 644	1,792	7 155 644	1,792	Indonésie
Japan	8 313 805	1,917	31 173 589	8,720	Japon
Korea, South			22 218 948	5,644	Corée du Sud
Philippines	5 200 834	1,088	14 814 207	3,601	Philippines
Other countries			1 238 910	203	Autres pays
Total	63 717 163	12,845	217 705 587	49,894	Total
2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		Tourteaux et autres résidus solides vég nda,même broyés ou agglomérés en pellets 2306.90
Other countries	275 010	36	328 525	53	Autres pays
Total	279 010	36	328 525	53	Total
2307.00 Wine lees and argol	KGM		KGM		Lies de vin et tartre brut 2307.00
Other countries			38 436	7	Autres pays
Total			38 436	7	Total
2308.10 Acorns & horse-chestnuts used in animal feeding	KGM		KGM		Glands de chêne et marrons d'Inde utilisés pour l'alimentation des animaux 2308.10
Other countries			22 016	6	Autres pays
Total			22 016	6	Total
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux 2308.90
United States	2 751 984	494	28 741 743	3,157	États-Unis
United Kingdom			5 047 035	716	Royaume-Uni
Belgium	397 450	49	18 371 095	1,880	Belgique
Germany, West	547 350	59	8 182 130	985	Allemagne, ouest
Netherlands			5 876 450	594	Pays-Bas
Other countries	1 350 000	157	2 321 591	461	Autres pays
Total	5 056 784	761	69 550 054	7,795	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	1 853 336	1,664	18 385 949	15,807	États-Unis
United Kingdom	16 003	23	1 147 621	743	Royaume-Uni
Switzerland	211 800	22	465 201	351	Suisse
Japan	174 871	393	593 992	1,151	Japon
Puerto Rico	38 433	25	1 073 272	729	Porto Rico
Other countries	34 607	41	1 136 825	1,157	Autres pays
Total	2 329 150	2,172	22 803 860	19,950	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	11 079 760	2,440	156 639 303	39,103	États-Unis
United Kingdom	4 888	15	1 751 145	1,115	Royaume-Uni
Germany, West			1 326 275	781	Allemagne, ouest
Netherlands			1 317 713	314	Pays-Bas
Tanzania, Un. Rep			323 800	580	Tanzanie, Rép. un
Hong Kong	455 790	149	4 062 549	1,201	Hong Kong
Japan	80 144	269	654 550	719	Japon
Other countries	58 621	100	1 903 554	1,647	Autres pays
Total	11 689 203	2,976	167 878 900	45,564	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	94 569	322	4 204 565	17,064	États-Unis
United Kingdom			432 258	1,690	Royaume-Uni
Ireland			125 000	700	Irlande
Belgium			208 000	950	Belgique
Germany, West			314 117	1,448	Allemagne, ouest
Iceland			105 250	311	Islande
Netherlands			159 444	744	Pays-Bas
Libyan Arab, Jam.	280 800	1,010	280 800	1,010	Libyenne, Jam. ar
Hong Kong			1 150 050	3,644	Hong Kong
Australia			110 910	563	Australie
Other countries			96 179	405	Autres pays
Total	375 369	1,332	7 187 583	28,533	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	123 528	408	2 062 663	8,821	États-Unis
United Kingdom	158 304	751	3 567 371	15,966	Royaume-Uni
Ireland			810 210	4,230	Irlande
Belgium	37 400	136	478 130	2,324	Belgique
Finland			71 525	351	Finlande
France			118 800	715	France
Germany, West			958 685	3,820	Allemagne, ouest

Table 3. Domestic Exports by Commodity and Country, H.S. Based
Tableau 3. Exportations nationales par marchandise et pays, base du S.H.

Commodity/Country	December 1988 Décembre 1988 Quantity Quantité	December 1988 Décembre 1988 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
(Cont'd)					(Suite)	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
Bulgaria			86 400	414	Bulgarie	
Ghana	72 200	362	195 400	1,120	Ghana	
Hong Kong	232 485	967	786 882	3,229	Hong Kong	
Singapore			72 000	335	Singapour	
China, P. Rep.			212 516	1,757	Chine, Rép. pop.	
Australia			103 601	435	Australie	
Trinidad-Tobago			104 212	529	Trinité-Tobago	
Other countries			95 499	407	Autres pays	
Total	523 517	2,626	9 725 036	44,460	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
United States			914 911	523	États-Unis	
United Kingdom	82 652	305	977 019	866	Royaume-Uni	
Australia			82 494	336	Australie	
Other countries	23 400	11	663 151	258	Autres pays	
Total	106 052	317	2 637 585	1,984	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Other countries	672	20	59 444	322	Autres pays	
Total	672	20	59 444	322	Total	
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac	2402.20
United States	141 213	2,724	3 008 005	22,308	États-Unis	
Belgium			94 028	601	Belgique	
Germany, West			39 637	621	Allemagne, ouest	
Bahamas	7 980	205	81 271	1,513	Bahamas	
Bermuda	155	2	19 020	350	Bermudes	
Cuba			26 000	660	Cuba	
Other countries	2 349	46	30 761	576	Autres pays	
Total	151 697	2,978	3 301 722	26,802	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries			123	4	Autres pays	
Total			123	4	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	42		25 614	426	États-Unis	
Australia			66 150	459	Australie	
Other countries			4 974	49	Autres pays	
Total	42		96 738	935	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries			1 005	6	Autres pays	
Total			1 005	6	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
Other countries			675	5	Autres pays	
Total			675	5	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	270 662	4,841	3 025 529	47,081	États-Unis	
Other countries	906	84	4 495	522	Autres pays	
Total	271 568	4,926	3 030 024	47,603	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
United States			4 585	2,491	États-Unis	
Total			4 585	2,491	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
United States	79 741	6,950	945 581	80,213	États-Unis	
Belgium			144 102	17,672	Belgique	
France			207 576	25,799	France	
Israel	15 000	1,841	209 103	24,155	Israël	
South Africa	35 469	4,390	468 015	57,914	Afrique du Sud	
Morocco	136 462	17,028	1 895 960	235,360	Maroc	
Senegal			64 000	7,825	Sénégal	
Tunisia			474 432	56,299	Tunisie	
Bangladesh			16 283	2,043	Bangladesh	
Hong Kong			20 290	2,376	Hong Kong	
India	23 776	2,701	116 296	13,821	Inde	
Singapore			48 584	6,023	Singapour	
Indonesia	44 247	5,450	235 093	28,300	Indonésie	
Korea, South	101 759	12,368	462 945	55,550	Corée du Sud	
Philippines			13 477	1,405	Philippines	
Macau			76 149	9,220	Macao	
Taiwan			158 499	21,706	Taiwan	
Thailand			35 149	4,331	Thaïlande	

TABLE 3. DOMESTIC EXPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1989 Décembre 1989 Quantity Quantité	December 1989 Décembre 1989 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
(Cont'd)					(Suite)
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
Japan	253 275	303	1 483 363	2,504	Japon
Puerto Rico	20 698	18	445 082	334	Porto Rico
Other countries	93 713	152	752 662	935	Autres pays
Total	3 524 734	3,076	44 330 610	39,035	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	9 278 427	2,483	130 789 950	35,348	États-Unis
Tanzania, Un. Rep			122 209	421	Tanzanie, Rép. un
Hong Kong	206 796	61	2 173 727	676	Hong Kong
Malaysia			89 200	433	Malaisie
Japan	90 000	55	1 319 584	1,198	Japon
Other countries	60 706	71	2 067 933	2,080	Autres pays
Total	9 635 929	2,672	136 562 598	40,158	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	101 889	335	1 770 570	6,941	États-Unis
United Kingdom			297 858	1,410	Royaume-Uni
Netherlands			99 000	517	Pays-Bas
Taiwan			194 280	802	Taiwan
Other countries			126 276	521	Autres pays
Total	101 889	335	2 487 906	10,194	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	34 390	136	798 103	3,824	États-Unis
United Kingdom	201 960	887	3 802 164	18,809	Royaume-Uni
Ireland	20 250	112	493 450	2,725	Irlande
Belgium			285 250	1,339	Belgique
Finland	29 400	199	88 170	565	Finlande
France			67 800	388	France
Germany, West	137 400	285	1 223 200	5,142	Allemagne, ouest
Netherlands			127 813	440	Pays-Bas
Ghana	23 640	143	169 790	954	Ghana
Congo			103 752	326	Congo
Bangladesh			245 400	1,460	Bangladesh
Hong Kong	3 600	21	1 644 781	6,443	Hong Kong
Australia			182 400	1,100	Australie
Trinidad-Tobago			62 640	347	Trinité-Tobago
Other countries	9 000	32	282 225	1,183	Autres pays
Total	459 640	1,820	9 576 943	45,053	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United States	83 300	19	1 067 130	312	États-Unis
United Kingdom			1 921 318	1,702	Royaume-Uni
Other countries	119 800	93	1 245 224	679	Autres pays
Total	203 100	112	4 233 672	2,694	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
United States	754	14	22 368	389	États-Unis
Other countries	831	20	6 166	129	Autres pays
Total	1 585	34	28 534	518	Total
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac 2402.20
St Pierre-Miq.	900	25	17 736	481	St-Pierre-Miq.
United States	84 185	2,017	1 122 489	27,244	États-Unis
Belgium			55 208	1,641	Belgique
Germany, West			31 950	865	Allemagne, ouest
Bahamas	6 040	152	56 347	1,424	Bahamas
Other countries	2 822	77	21 127	576	Autres pays
Total	93 947	2,272	1 304 857	32,232	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	17 538	245	98 509	1,239	États-Unis
Other countries	35 519	198	42 492	273	Autres pays
Total	53 057	444	141 001	1,512	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
Other countries			11 394	68	Autres pays
Total			11 394	68	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	181 572	2,537	2 069 357	36,453	États-Unis
Other countries	371	41	68 033	527	Autres pays
Total	181 943	3,029	2 137 390	36,980	Total

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TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1990 Décembre 1990 Quantity Quantité	December 1990 Décembre 1990 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2306.20 Linseed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de lin,même broyés ou agglomérés en pellets 2306.20
United States	197 651	41	2 652 865	568	États-Unis
Other countries			10 000	8	Autres pays
Total	197 651	41	2 662 865	577	Total
2306.30 Sunflower seed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de tournesol,même broyés/agglom en pellet 2306.30
Other countries	62 171	12	899 849	159	Autres pays
Total	62 171	12	899 849	159	Total
2306.40 Rape or colza seed oil-cake&other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux & autres résidus so de colza ou navette,même broyé/agglom en pellet 2306.40
United States	20 762 652	3,352	225 925 373	38,013	États-Unis
Norway			8 799 000	1,730	Norvège
Indonesia	14 285 049	3,067	30 189 341	5,872	Indonésie
Japan	6 589 633	1,031	66 449 734	11.769	Japon
Korea, South			43 120 168	8,063	Corée du Sud
Thailand			4 330 000	791	Thaïlande
Mexico			1 659 344	353	Mexique
Total	41 637 334	7,	380 472 960	66,594	Total
2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		Tourteaux et autres résidus solides vég nda,même broyés ou agglomérés en pellets 2306.90
United States	1 165 332	274	26 977 392	6,850	États-Unis
Total	1 165 332	274	26 977 392	6,850	Total
2308.10 Acorns & horse-chestnuts used in animal feeding	KGM		KGM		Glands de chêne et marrons d'Inde utilisés pour l'alimentation des animaux 2308.10
Other countries			4 536	17	Autres pays
Total			4 536	17	Total
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux 2308.90
United States	9 947 791	937	106 816 563	12,343	États-Unis
Ireland			4 602 210	598	Irlande
Belgium	1 316 705	130	16 296 245	1,861	Belgique
Other countries	665 490	57	2 318 263	477	Autres pays
Total	11 929 986	1,125	130 033 281	15,281	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	6 476 708	5,545	63 277 503	57,549	États-Unis
United Kingdom			258 906	370	Royaume-Uni
Switzerland	93 467	136	351 762	488	Suisse
Japan	281 529	234	1 990 553	2,286	Japon
Other countries	151 064	117	983 488	993	Autres pays
Total	7 007 768	6,032	66 062 212	61,688	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimenteires pour animaux, nda 2309.90
United States	13 268 021	3,681	160 308 723	43,008	États-Unis
Hong Kong	306 054	86	1 906 958	825	Hong Kong
China, P. Rep.	10 906	192	78 594	343	Chine, Rép. pop.
Japan	116 500	75	1 511 374	1,036	Japon
Korea, South			240 227	474	Corée du Sud
Other countries	94 165	127	1 370 617	1,489	Autres pays
Total	13 795 646	4,163	165 416 493	47,179	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	151 893	453	1 270 578	5,237	États-Unis
France			73 206	395	France
Netherlands			149 487	664	Pays-Bas
Hong Kong			289 200	1,478	Hong Kong
Other countries	54 000	228	162 406	642	Autres pays
Total	205 893	681	1 944 877	8,417	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	90 000	499	1 427 764	7,223	États-Unis
United Kingdom	264 180	1,318	4 246 715	21,418	Royaume-Uni
Belgium	39 000	173	382 310	1,866	Belgique
Finland			128 550	847	Finlande
France			237 600	1,345	France
Germany	178 400	158	1 187 760	6,283	Allemagne
Netherlands	19 800	59	216 450	1,032	Pays-Bas
Ghana			98 200	566	Ghana
Bangladesh			155 535	958	Bangladesh
Hong Kong	263 000	1,206	2 757 975	11,991	Hong Kong
Singapore			61 400	354	Singapour
Australia			172 800	1,083	Australie
Other countries	14 800	84	258 607	1,083	Autres pays
Total	869 180	3,500	11 331 666	54,057	Total

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Commodity/Country	December 1990 Décembre 1990 Quantity Quantité	December 1990 Décembre 1990 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
United States	68 226	33	1 622 857	977	États-Unis	
United Kingdom	18 022	19	1 779 033	1,560	Royaume-Uni	
Hong Kong			540 800	467	Hong Kong	
Other countries	5 000	2	790 580	398	Autres pays	
Total	91 248	55	4 733 270	3,404	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Other countries	57	1	11 968	275	Autres pays	
Total	57	1	11 968	275	Total	
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac	2402.20
St Pierre-Miq.	1 290	38	16 962	500	St-Pierre-Miq.	
United States	159 629	4,005	1 682 828	38,780	États-Unis	
Bahamas	9 130	238	62 720	1,633	Bahamas	
Other countries	11 249	221	34 480	842	Autres pays	
Total	181 298	4,504	1 796 990	41,756	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries			495	17	Autres pays	
Total			495	17	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	35 774	423	564 075	6,756	États-Unis	
Other countries	1 500	18	64 560	482	Autres pays	
Total	37 274	442	628 635	7,239	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries			8 228	49	Autres pays	
Total			8 228	49	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
Other countries			330	7	Autres pays	
Total			330	7	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	205 394	4,128	1 893 855	36,824	États-Unis	
Other countries	634	61	3 959	425	Autres pays	
Total	206 028	4,189	1 897 814	37,249	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
United States			119 720	9,174	États-Unis	
Total			119 720	9,174	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
United States	115 219	11,856	1 411 855	138,333	États-Unis	
Belgium	48 335	6,447	203 383	22,871	Belgique	
Finland			170 740	16,398	Finlande	
France			155 076	17,182	France	
USSR			213 059	20,469	URSS	
Israel	37 000	4,292	253 578	27,298	Israël	
South Africa	36 117	3,770	225 200	22,260	Afrique du Sud	
Morocco	52 000	6,011	820 616	87,795	Maroc	
Senegal			36 279	3,810	Sénégal	
Tunisia	34 948	4,135	301 836	33,219	Tunisie	
Bangladesh			10 555	1,089	Bangladesh	
India	24 804	3,623	188 669	20,677	Inde	
China, P. Rep.			50 356	5,035	Chine, Rép. pop.	
Indonesia			303 672	31,530	Indonésie	
Korea, South			186 612	19,240	Corée du Sud	
Philippines			18 575	1,844	Philippines	
Taiwan	16 500	1,918	170 858	17,797	Taiwan	
Thailand	3 349	369	66 732	6,899	Thaïlande	
Australia	25 749	3,387	272 895	29,232	Australie	
New Zealand	21 653	2,400	156 724	17,427	Nouvelle-Zélande	
Argentina	36 047	4,051	116 238	12,251	Argentine	
Brazil	30 600	3,559	316 084	34,180	Brésil	
Chile			102 246	10,933	Chili	
Uruguay	2 703	339	16 529	1,847	Uruguay	
Cuba			19 704	1,968	Cuba	
Mexico	38 007	5,079	256 834	28,830	Mexique	
Other countries			18	5	Autres pays	
Total	523 031	61,244	6 044 923	630,433	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	541	81	11 100	1,414	États-Unis	
Other countries			1 500	135	Autres pays	
Total	541	81	12 600	1,549	Total	

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Commodity/Country	December 1991 Décembre 1991 Quantity Quantité	December 1991 Décembre 1991 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
(Cont'd)	KGM		KGM		(Suite)
2304.00 Soya-bean oil-cake and other solid residues,whether or not ground or pellet					2304.00 Tourteaux et autres résidus solides de soja,même broyés ou agglomérés en pellet
Other countries			16 000	11	Autres pays
Total	2 093 197	415	23 170 503	3,754	Total
2306.20 Linseed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		2306.20 Tourteaux et autres résidus solides de lin,même broyés ou agglomérés en pellets
United States			1 817 299	337	États-Unis
Other countries			427 158	62	Autres pays
Total			2 244 457	399	Total
2306.30 Sunflower seed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		2306.30 Tourteaux et autres résidus solides de tournesol,même broyés/agglom en pellet
Other countries	495 194	56	1 955 782	268	Autres pays
Total	495 194	56	1 955 782	268	Total
2306.40 Rape or colza seed oil-cake&other solid residues,whether or not ground or pellet	KGM		KGM		2306.40 Tourteaux & autres résidus so de colza ou navette,même broyé/agglom en pellet
United States	56 734 066	8,082	426 001 759	64,620	États-Unis
Norway	8 538 551	1,114	47 028 184	7,162	Norvège
Indonesia			20 798 882	3,535	Indonésie
Japan	9 853 698	1,390	89 187 260	12,434	Japon
Korea, South			16 168 981	2,423	Corée du Sud
Other countries	259 980	54	259 980	54	Autres pays
Total	75 386 295	10,642	599 445 046	90,231	Total
2306.50 Coconut or copra oil-cake & other solid residues,whether or not ground or pellet	KGM		KGM		2306.50 Tourteaux & autres résidus so de coprah ou noix de coco, même broyés/agglom
Other countries	237 480	33	237 480	33	Autres pays
Total	237 480	33	237 480	33	Total
2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		2306.90 Tourteaux et autres résidus solides vég nda,même broyés ou agglomérés en pellets
United States	989 941	304	13 684 992	4,232	États-Unis
Other countries			5 240	8	Autres pays
Total	989 941	304	13 690 232	4,240	Total
2307.00 Wine lees and argol	KGM		KGM		2307.00 Lies de vin et tartre brut
Other countries			18	6	Autres pays
Total			18	6	Total
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		2308.90 Mati vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux
United States	13 573 012	1,049	130 217 910	12,343	États-Unis
Belgium	1 344 000	95	15 184 450	1,263	Belgique
Other countries			329 215	88	Autres pays
Total	14 917 012	1,144	145 731 575	13,695	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		2309.10 Aliments pour chiens ou chats, conditionnés pour la vente au détail
United States	5 821 737	4,294	62 587 653	51,132	États-Unis
United Kingdom	95 005	99	406 370	572	Royaume-Uni
Germany	36 924	73	491 366	752	Allemagne
Japan	302 191	361	3 272 921	3,747	Japon
Other countries	142 523	116	1 499 135	1,407	Autres pays
Total	6 398 380	4,945	58 257 445	57,612	Total
2309.90 Animal feed preparations nes	KGM		KGM		2309.90 Préparations alimentaires pour animaux, nda
United States	13 013 227	3,553	148 469 572	42,199	États-Unis
Hong Kong	112 409	33	2 034 620	928	Hong Kong
China, P. Rep.	20 890	29	357 634	1,310	Chine, Rép. pop.
Japan	129 090	112	1 430 811	1,049	Japon
Korea, South	1 700	16	369 273	875	Corée du Sud
Other countries	300 092	240	2 275 598	2,341	Autres pays
Total	13 577 408	3,986	154 937 508	48,705	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		2401.10 Tabacs bruts ou non fabriqués,non écôtés
United States	37 112	137	1 470 283	6,164	États-Unis
Italy	238 004	981	933 334	3,446	Italie
Netherlands			148 200	833	Pays-Bas
Yugoslavia			217 800	1,081	Yougoslavie
Hong Kong			96 000	482	Hong Kong
Other countries			165 252	712	Autres pays
Total	275 116	1,118	3 030 849	12,721	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		2401.20 Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés
United States	118 800	597	4 245 932	20,422	États-Unis
United Kingdom	18 000	145	5 064 505	30,879	Royaume-Uni
Belgium			495 920	2,678	Belgique
Finland			128 183	845	Finlande

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Commodity/Country	December 1991 Décembre 1991		Cumulative Totals Totaux cumulatifs		Marchandise/Pays	
	Quantity Quantité	Value Valeur $'000	Quantity Quantité	Value Valeur $'000		
(Cont'd)					(Suite)	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
France			61 800	346	France	
Germany			1 608 722	7,322	Allemagne	
Greece			215 400	1,141	Grèce	
Netherlands			724 270	3,796	Pays-Bas	
Ghana	38 650	325	141 050	1,018	Ghana	
Bangladesh	59 400	420	247 200	1,662	Bangladesh	
Hong Kong	315 600	1,512	1 324 800	6,328	Hong Kong	
Singapore	46 000	279	76 400	466	Singapour	
Australia			171 200	1,019	Australie	
Trinidad-Tobago			60 000	358	Trinité-Tobago	
Other countries	19 200	72	167 480	843	Autres pays	
Total	615 650	3,352	14 732 862	79,127	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
United States	697 925	814	2 462 228	3,239	États-Unis	
United Kingdom			1 771 265	1,485	Royaume-Uni	
Hong Kong			721 984	586	Hong Kong	
Other countries	11 400	5	783 788	462	Autres pays	
Total	709 325	820	5 739 265	5,775	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Other countries	296	10	13 916	379	Autres pays	
Total	296	10	13 916	379	Total	
2402.20 Cigarettes containing tobacco	KGM		KGM		Cigarettes contenant du tabac	2402.20
St Pierre-Miq.	350	11	22 018	644	St-Pierre-Miq.	
United States	848 414	22,503	4 510 166	123,870	États-Unis	
Cyprus	21 100	110	71 080	350	Chypre	
Chile	8 640	44	137 490	684	Chili	
Bahamas			43 551	1,146	Bahamas	
Panama			64 160	329	Panama	
Other countries	4 290	25	159 943	1,427	Autres pays	
Total	882 794	22,694	5 008 408	128,454	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries			23	3	Autres pays	
Total			23	3	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
St Pierre-Miq.	2 000	17	40 964	500	St-Pierre-Miq.	
United States	380 082	6,403	2 385 971	35,701	États-Unis	
Hong Kong			180 150	1,115	Hong Kong	
Other countries			9 790	85	Autres pays	
Total	382 082	6,420	2 616 875	37,400	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries			22 416	136	Autres pays	
Total			22 416	136	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
Other countries			5 205	89	Autres pays	
Total			5 205	89	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	353 036	5,386	2 778 831	49,929	États-Unis	
Other countries	245	22	4 190	413	Autres pays	
Total	353 281	5,409	2 783 021	50,342	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries			2	10	Autres pays	
Total			2	10	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
United States	133 845	8,308	1 652 500	158,204	États-Unis	
Belgium			83 028	10,466	Belgique	
France			112 218	11,986	France	
Italy			11 407	1,219	Italie	
USSR	31 501	2,992	137 861	14,795	URSS	
Yugoslavia			25 058	2,474	Yougoslavie	
Israel			112 149	13,029	Israël	
South Africa	13 987	1,122	136 247	13,391	Afrique du Sud	
Morocco	92 354	8,792	822 747	87,671	Maroc	
Senegal	32 029	3,966	119 871	14,494	Sénégal	
Tunisia			351 544	39,945	Tunisie	
Bangladesh			11 000	1,397	Bangladesh	
India			355 223	41,946	Inde	
China, P. Rep.	15 000	1,532	44 613	4,914	Chine, Rép. pop.	

TABLE 3. DOMESTIC EXPORTS BY COMMODITY AND COUNTRY, U.S. BASED
TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1992 Décembre 1992 Quantity Quantité	December 1992 Décembre 1992 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
(Cont'd)					(Suite)
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
Taiwan			190 000	851	Taiwan
Bahamas			97 240	419	Bahamas
Other countries	21 483	54	120 930	531	Autres pays
Total	210 471	813	4 327 244	17,637	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	48 301	265	4 182 991	22,621	États-Unis
United Kingdom	335 360	2,017	7 101 641	42,580	Royaume-Uni
Ireland			59 400	396	Irlande
Belgium			746 460	4,363	Belgique
Finland			152 110	1,002	Finlande
France			87 600	437	France
Germany			1 089 000	6,112	Allemagne
Netherlands			612 810	3,680	Pays-Bas
Spain	91 675	399	1 156 706	4,691	Espagne
Ghana			109 350	881	Ghana
Bangladesh			386 600	2,735	Bangladesh
Hong Kong	19 200	112	4 046 048	21,202	Hong Kong
Singapore			239 800	1,549	Singapour
Australia	846	7	105 846	663	Australie
Trinidad-Tobago	28 400	149	102 590	563	Trinité-Tobago
Other countries			116 730	574	Autres pays
Total	523 782	2,951	20 295 682	114,056	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United States	636 342	1,216	3 835 281	5,667	États-Unis
United Kingdom			2 094 053	1,140	Royaume-Uni
Other countries	39 000	18	1 142 496	477	Autres pays
Total	675 342	1,235	7 071 830	7,284	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
Other countries	459	4	7 205	314	Autres pays
Total	459	4	7 205	314	Total
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac 2402.20
St Pierre-Miq.	1 620	58	28 808	1,060	St-Pierre-Miq.
United States	1 069 723	48,363	7 595 113	277,492	États-Unis
Belgium			123 500	783	Belgique
Former USSR	95 560	1,034	95 736	1,040	URSS antérieure
Cyprus	42 500	306	566 028	4,320	Chypre
United Arab Emir.	1 264	98	27 112	305	Émir. arabes unis
Saudi Arabia	25 500	198	120 594	1,118	Arabie Saoudite
Chile	27 270	233	154 008	1,139	Chili
Other countries	16 325	207	145 137	1,490	Autres pays
Total	1 279 762	50,499	8 856 036	288,751	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
St Pierre-Miq.	2 400	42	44 583	646	St-Pierre-Miq.
United States	215 273	3,669	2 448 673	42,201	États-Unis
Netherlands			145 132	1,208	Pays-Bas
Hong Kong			104 828	638	Hong Kong
Other countries			1 527	21	Autres pays
Total	217 673	3,711	2 744 743	44,716	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
Other countries			123 225	214	Autres pays
Total			123 225	214	Total
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac 2403.99
Hong Kong			180 000	1,167	Hong Kong
Other countries			758	53	Autres pays
Total			180 758	1,221	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	268 121	5,708	2 546 149	54,456	États-Unis
Other countries	311	39	3 594	519	Autres pays
Total	268 432	5,748	2 549 743	54,975	Total
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés 2502.00
Other countries			1	9	Autres pays
Total			1	9	Total
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés 2503.10
United States	125 568	5,630	1 916 281	103,357	États-Unis
France	24 835	1,675	104 515	8,220	France
Israel			164 451	11,925	Israël
South Africa	39 591	1,940	217 851	16,133	Afrique du Sud

Commodity/Country	December 1992 Décembre 1992 Quantity Quantité	Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Value Valeur $'000	Marchandise/Pays
2303.20 Beet-pulp, bagasse and other waste of sugar manufacture	KGM		KGM		Pulpes de betteraves, bagasses de cannes à sucre et autres déchets de sucrerie 2303.20
United States	36 000	5	14 148 000	1,631	États-Unis
Japan	4 388 340	438	17 087 180	1,605	Japon
Other countries			61 965	16	Autres pays
Total	4 424 340	444	31 297 145	3,253	Total
2303.30 Brewing or distilling dregs and waste	KGM		KGM		Drêches et déchets de brasserie ou de distillerie 2303.30
United States	3 391 000	588	52 262 000	8,527	États-Unis
Belgium			2 780 529	300	Belgique
Korea, South			1 210 530	404	Corée du Sud
Other countries	107 936	26	1 080 616	140	Autres pays
Total	3 498 936	615	57 342 675	9,372	Total
2304.00 Soya-bean oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de soja,même broyés ou agglomérés en pellet 2304.00
United States	2 943 951	760	33 082 444	7,912	États-Unis
Other countries			32 000	18	Autres pays
Total	2 943 951	760	33 114 444	7,931	Total
2306.20 Linseed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de lin,même broyés ou agglomérés en pellets 2306.20
Other countries			86 130	13	Autres pays
Total			86 130	13	Total
2306.30 Sunflower seed oil-cake and other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux et autres résidus solides de tournesol,même broyés/agglom en pellet 2306.30
Other countries	76 400	8	988 678	126	Autres pays
Total	76 400	8	988 678	126	Total
2306.40 Rape or colza seed oil-cake&other solid residues,whether or not ground or pellet	KGM		KGM		Tourteaux & autres résidus so de colza ou navette,même broyé/agglom en pellet 2306.40
United States	38 928 204	6,938	521 901 448	84,608	États-Unis
Ireland			4 980 372	718	Irlande
Norway			32 947 900	5,161	Norvège
Indonesia	4 557 051	825	27 696 196	4,179	Indonésie
Japan	2 957 624	517	103 260 438	16,412	Japon
Korea, South	1 970 544	291	28 097 835	4,642	Corée du Sud
Total	48 413 423	8,573	718 884 189	115,724	Total
2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		Tourteaux et autres résidus solides vég nda,même broyés ou agglomérés en pellets 2306.90
United States	845 677	283	15 027 920	5,097	États-Unis
Total	845 677	283	15 027 920	5,097	Total
2307.00 Wine lees and argol	KGM		KGM		Lies de vin et tartre brut 2307.00
Other countries	93	8	131	14	Autres pays
Total	93	8	131	14	Total
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Matl vég & déchets vég, résidus et sous-prod,nda,utilisés pour l'ali des animaux 2308.90
United States	11 980 254	1,607	96 626 163	13,420	États-Unis
Other countries			7 114 195	631	Autres pays
Total	11 980 254	1,607	103 740 358	14,051	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	5 596 094	4,870	63 993 749	53,198	États-Unis
United Kingdom	35 490	77	989 635	1,415	Royaume-Uni
Belgium	50 786	54	297 680	315	Belgique
Germany	83 196	167	638 990	1,039	Allemagne
Japan	286 140	331	3 979 391	4,628	Japon
Other countries	255 052	171	2 156 503	1,483	Autres pays
Total	6 306 758	5,672	72 055 948	62,081	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	15 340 762	5,084	161 950 233	51,924	États-Unis
France	16 471	5	760 327	838	France
Netherlands			130 587	415	Pays-Bas
Hong Kong	84 091	22	1 405 882	839	Hong Kong
Japan	34 000	21	1 315 637	900	Japon
Other countries	120 024	148	2 859 874	2,623	Autres pays
Total	15 597 348	5,282	168 422 540	57,541	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	119 988	420	3 480 074	13,903	États-Unis
Belgium			98 000	452	Belgique
France	69 000	338	69 000	338	France
Italy			203 000	746	Italie
Netherlands			69 000	394	Pays-Bas

TABLE 3. DOMESTIC EXPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1993 Décembre 1993 Quantity Quantité	December 1993 Décembre 1993 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	19 083 766	8,144	189 181 479	74,127	États-Unis
United Kingdom	123 197	110	656 041	719	Royaume-Uni
France	132 700	127	871 240	980	France
Romania			148 000	1,835	Roumanie
Russia			352 400	352	Russie
Hong Kong	48 144	175	1 169 544	2,071	Hong Kong
Japan	163 790	121	909 399	975	Japon
Taiwan	175 000	213	1 313 511	1,378	Taiwan
Cuba			1 679 325	789	Cuba
Other countries	107 064	96	2 746 278	2,382	Autres pays
Total	19 833 661	8,989	199 027 217	85,512	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	245 560	1,156	1 718 951	8,555	États-Unis
United Kingdom			59 359	371	Royaume-Uni
Italy			416 063	1,443	Italie
Netherlands			138 600	854	Pays-Bas
Bulgaria			198 000	1,107	Bulgarie
Peru			88 800	346	Pérou
Bahamas	16 218	77	63 784	300	Bahamas
Other countries			83 657	394	Autres pays
Total	261 778	1,234	2 767 214	13,374	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	259 200	1,816	2 797 924	16,931	États-Unis
United Kingdom	338 380	2,173	5 788 452	36,970	Royaume-Uni
Belgium	19 800	140	545 900	3,404	Belgique
Finland	15 960	109	148 210	1,015	Finlande
Germany			435 600	2,846	Allemagne
Spain	247 799	1,176	1 407 443	6,652	Espagne
Ghana			104 070	936	Ghana
Bangladesh			513 400	3,788	Bangladesh
Hong Kong			3 513 650	21,513	Hong Kong
Singapore			61 600	383	Singapour
Taiwan			72 000	323	Taiwan
Australia			100 287	668	Australie
Peru			99 000	386	Pérou
Trinidad-Tobago			94 660	554	Trinité-Tobago
Other countries			175 403	1,034	Autres pays
Total	881 139	5,416	15 857 599	97,200	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United States	68 400	180	2 799 039	5,551	États-Unis
United Kingdom	12 870	7	1 675 820	899	Royaume-Uni
Other countries			594 950	356	Autres pays
Total	81 270	187	5 069 809	6,808	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
United States			19 376	850	États-Unis
Other countries	439	12	3 057	78	Autres pays
Total	439	12	22 433	929	Total
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac 2402.20
St Pierre-Miq.	8 404	125	22 984	454	St-Pierre-Miq.
United States	860 833	32,181	15 660 930	603,368	États-Unis
Belgium	264 821	1,701	916 601	6,468	Belgique
Former Yugoslavia			10 550	385	Yougoslavie antér.
United Arab Emir.	15 680	76	58 806	373	Émir. arabes unis
Oman (Muscat)			91 836	676	Oman (Muscat)
Saudi Arabia	43 300	351	243 960	1,776	Arabie Saoudite
Japan	59 346	618	757 812	7,789	Japon
Chile	34 920	232	311 078	1,827	Chili
Uruguay			144 162	914	Uruguay
Cuba	7 930	214	33 250	922	Cuba
Other countries	6 540	60	237 308	1,196	Autres pays
Total	1 301 768	35,561	18 489 277	626,153	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
United States			12 150	421	États-Unis
Total			12 150	421	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
St Pierre-Miq.			104 418	1,452	St-Pierre-Miq.
United States	138 112	2,484	2 938 144	58,916	États-Unis
Netherlands			70 500	564	Pays-Bas
United Arab Emir.	72 000	360	933 708	4,746	Émir. arabes unis

Commodity/Country	December 1993 Décembre 1993 Quantity Quantité	December 1993 Décembre 1993 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
(Cont'd)					(Suite)	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
Hong Kong	57 696	340	131 094	740	Hong Kong	
Other countries	36 000	195	77 590	411	Autres pays	
Total	303 808	3,380	4 255 454	66,831	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries			36 930	96	Autres pays	
Total			36 930	96	Total	
2403.99 Tobacco extracts and essences	KGM		KGM		Extraits et sauces de tabac	2403.99
Hong Kong			180 000	1,119	Hong Kong	
Philippines	45 000	329	45 000	329	Philippines	
Other countries	10 985	83	16 121	187	Autres pays	
Total	55 985	413	241 121	1,636	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	312 293	8,281	3 082 701	73,649	États-Unis	
Other countries	244	51	22 867	271	Autres pays	
Total	312 537	8,332	3 105 568	73,920	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries	260	7	454	235	Autres pays	
Total	260	7	454	235	Total	
2503.10 Sulphur, crude or unrefined	TNE		TNE		Soufres bruts ou soufres non raffinés	2503.10
United States	86 684	3,104	1 505 427	49,938	États-Unis	
Israel			205 283	7,705	Israël	
South Africa			230 613	8,068	Afrique du Sud	
Morocco	125 501	4,766	788 607	29,829	Maroc	
Senegal			139 402	5,829	Sénégal	
Tunisia			99 163	5,700	Tunisie	
China, P. Rep.			114 648	7,539	Chine, Rép. pop.	
Indonesia			303 107	13,403	Indonésie	
Korea, South			21 645	992	Corée du Sud	
Taiwan			26 768	1,591	Taiwan	
Thailand	6 498	252	25 595	815	Thaïlande	
Australia			52 858	2,219	Australie	
New Zealand			134 020	6,030	Nouvelle-Zélande	
Argentina			37 853	1,531	Argentine	
Brazil	11 878	521	427 466	20,002	Brésil	
Chile	9 365	436	9 365	436	Chili	
Mexico			32 188	918	Mexique	
Other countries			5 895	252	Autres pays	
Total	239 926	9,081	4 159 903	162,806	Total	
2503.90 Sulphur nes, exc sublimated, precipitated & colloidal & crude or refined	TNE		TNE		Soufres nda, sauf soufre sublimé, precipité, colloidal & bruts etc.	2503.90
United States	2 922	289	28 818	3,127	États-Unis	
Other countries			5 156	149	Autres pays	
Total	2 922	289	33 974	3,276	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	1 322	1,066	16 705	13,278	États-Unis	
Austria			764	609	Autriche	
Turkey	126	94	1 073	951	Turquie	
Japan	54	56	887	750	Japon	
Other countries	62	89	928	865	Autres pays	
Total	1 564	1,306	20 357	16,455	Total	
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda	2504.90
United States	284	157	942	544	États-Unis	
Other countries			77	17	Autres pays	
Total	284	157	1 019	561	Total	
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux	2505.10
United States	8 988	108	161 584	934	États-Unis	
Other countries			346	84	Autres pays	
Total	8 988	108	161 930	1,018	Total	
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26	2505.90
United States	36	11	118 636	917	États-Unis	
St-Helena			69 544	722	Sainte-Hélène	
Other countries	17	5	7 446	85	Autres pays	
Total	53	17	195 626	1,726	Total	
2506.10 Quartz (other then natural sands)	TNE		TNE		Quartz (autres que les sables naturels)	2506.10
Other countries	25	28	35	57	Autres pays	
Total	25	28	35	57	Total	

TABLE 3. DOMESTIC EXPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1994 Décembre 1994 Quantity Quantité	December 1994 Décembre 1994 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, conditionnés pour la vente au détail 2309.10
United States	7 329 773	7,851	89 579 725	88,568	États-Unis
United Kingdom	65 472	111	1 704 360	2,331	Royaume-Uni
France	131 903	124	813 888	843	France
Germany	83 389	175	888 338	1,663	Allemagne
Netherlands	126 278	112	770 131	857	Pays-Bas
Czech Republic	66 479	83	1 696 292	1,138	Tchèque, Rép
Japan	360 371	742	4 378 070	6,693	Japon
Other countries	243 918	233	2 800 638	2,835	Autres pays
Total	8 407 583	9,434	102 631 442	104,932	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	23 050 257	9,604	276 406 138	109,356	États-Unis
Hong Kong	3 600	36	696 590	1,726	Hong Kong
Japan	161 500	174	2 323 349	3,474	Japon
Other countries	176 682	97	3 698 558	4,159	Autres pays
Total	23 392 039	9,912	283 124 635	118,716	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	364 116	1,661	2 036 035	8,822	États-Unis
United Kingdom			122 958	687	Royaume-Uni
Netherlands			178 200	1,081	Pays-Bas
Other countries			171 265	907	Autres pays
Total	364 116	1,661	2 508 458	11,499	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	55 809	405	575 274	2,808	États-Unis
United Kingdom	457 529	2,996	3 766 923	23,155	Royaume-Uni
Belgium	56 850	373	564 590	3,453	Belgique
Finland			125 430	775	Finlande
Germany	39 560	148	451 862	2,993	Allemagne
Spain	37 769	191	1 184 268	5,843	Espagne
Turkey	198 000	618	1 580 211	6,711	Turquie
Ghana			62 810	645	Ghana
Bangladesh			523 000	3,595	Bangladesh
Hong Kong			2 980 985	15,769	Hong Kong
Singapore			250 400	1,598	Singapour
Australia	79 200	499	277 200	1,772	Australie
Peru			113 800	621	Pérou
Other countries	20 196	115	380 870	2,109	Autres pays
Total	944 913	5,349	12 837 623	71,874	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
Other countries	250 480	283	2 045 329	1,569	Autres pays
Total	250 480	283	2 045 329	1,569	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
Other countries	2 225	89	18 819	635	Autres pays
Total	2 225	89	18 819	635	Total
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac 2402.20
United States	67 743	2,129	1 475 387	53,125	États-Unis
Belgium			879 507	7,207	Belgique
Cyprus			173 500	1,459	Chypre
United Arab Emir.			73 000	631	Émir. arabes unis
Saudi Arabia	11 598	147	483 438	3,879	Arabie Saoudite
Brunei Darussalam			92 300	831	Brunei Darussalam
Japan	35 100	392	444 120	4,897	Japon
Chile	76 270	645	508 604	3,814	Chili
Neth. Antilles	9 800	78	367 810	3,058	Antilles néerl.
Other countries	24 605	294	368 725	2,744	Autres pays
Total	225 116	3,689	4 858 391	81,650	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries			6 983	129	Autres pays
Total			6 983	129	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	26 789	477	978 994	15,673	États-Unis
United Arab Emir.	171 000	813	1 552 376	7,483	Émir. arabes unis
Hong Kong			135 000	842	Hong Kong
Other countries	4 500	21	163 811	847	Autres pays
Total	202 289	1,312	2 830 181	24,767	Total

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Commodity/Country	December 1995 Décembre 1995 Quantity Quantité	December 1995 Décembre 1995 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés	2401.10
United States	17 598	66	1 543 511	6,376	États-Unis	
Netherlands			277 200	1,648	Pays-Bas	
Other countries	15 300	79	76 400	396	Autres pays	
Total	32 898	146	1 897 211	8,421	Total	
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés	2401.20
United States	7 180	47	1 392 399	7,617	États-Unis	
United Kingdom	135 678	870	4 405 934	29,277	Royaume-Uni	
Belgium			459 940	2,717	Belgique	
Spain	75 538	398	1 386 074	7,092	Espagne	
Poland	57 120	227	418 824	1,694	Pologne	
Turkey	138 600	621	2 097 658	9,532	Turquie	
Ghana			74 790	761	Ghana	
South Africa	19 800	83	131 998	666	Afrique du Sud	
Bangladesh			755 485	5,562	Bangladesh	
Hong Kong			2 462 620	13,075	Hong Kong	
Singapore			110 011	686	Singapour	
Australia	118 800	784	118 800	784	Australie	
Peru			115 200	721	Pérou	
Trinidad-Tobago			112 890	705	Trinité-Tobago	
Other countries			226 187	1,243	Autres pays	
Total	552 716	3,033	14 268 810	82,138	Total	
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac	2401.30
United States	2 400	6	1 334 991	1,004	États-Unis	
United Kingdom	19 990	14	1 233 539	816	Royaume-Uni	
Turkey	15 840	39	525 690	1,286	Turquie	
Other countries	107 640	66	1 048 786	752	Autres pays	
Total	145 870	127	4 143 006	3,859	Total	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Other countries			10 461	434	Autres pays	
Total			10 461	434	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	66 907	2,302	1 050 872	37,819	États-Unis	
Cyprus	51 840	456	407 080	3,568	Chypre	
Oman (Muscat)			99 496	838	Oman (Muscat)	
Saudi Arabia			430 860	3,624	Arabie Saoudite	
Turkey	95 040	854	95 040	854	Turquie	
Benin			336 960	3,083	Bénin	
Japan	16 110	179	236 810	2,619	Japon	
Korea, South			42 900	843	Corée du Sud	
Chile	30 210	289	435 150	5,493	Chili	
Neth. Antilles			309 240	2,725	Antilles néerl.	
Panama	28 560	249	105 670	895	Panama	
Other countries	17 900	166	697 258	2,929	Autres pays	
Total	306 567	4,498	4 247 336	63,294	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Hong Kong			198 000	1,149	Hong Kong	
Other countries			699	51	Autres pays	
Total			198 699	1,200	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	107 050	898	1 310 061	12,948	États-Unis	
Finland			918 000	5,587	Finlande	
United Arab Emir.	72 780	299	1 658 700	7,679	Émir. arabes unis	
Hong Kong			132 300	829	Hong Kong	
Other countries	60 687	162	147 097	544	Autres pays	
Total	240 517	1,360	4 166 158	25,583	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries	800	2	14 335	54	Autres pays	
Total	800	2	14 335	54	Total	
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda, incl extraits ou sauces de tabac	2403.99
Other countries			90	2	Autres pays	
Total			90	2	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	255 964	7,079	2 983 917	77,592	États-Unis	
Other countries	322	36	2 905	542	Autres pays	
Total	256 286	7,115	2 986 822	78,135	Total	

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Commodity/Country	December 1996 Décembre 1996 Quantity Quantité	Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Value Valeur $'000	Marchandise/Pays
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, nda 2309.90
United States	37 451 100	16,938	426 945 089	201,631	États-Unis
Belgium	210	15	260 468	921	Belgique
Spain	38 399	126	345 351	844	Espagne
Hong Kong	2 520	91	248 010	1,829	Hong Kong
Japan	546 189	757	9 086 152	13,386	Japon
Korea, South	28 999	110	583 631	661	Corée du Sud
Taiwan	22 272	40	464 767	2,253	Taiwan
Other countries	756 851	744	4 540 510	5,428	Autres pays
Total	38 846 540	18,824	442 273 478	226,957	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States	321 194	1,669	2 386 758	8,496	États-Unis
Netherlands			623 400	5,755	Pays-Bas
Other countries	20 172	86	268 572	1,302	Autres pays
Total	341 366	1,755	3 278 710	15,554	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, partiellement ou totalement écôtés 2401.20
United States	121 400	634	2 992 552	18,153	États-Unis
United Kingdom			6 862 440	46,165	Royaume-Uni
Belgium			554 020	3,146	Belgique
Germany			217 800	1,000	Allemagne
Italy			353 880	1,487	Italie
Netherlands			89 416	606	Pays-Bas
Spain			1 041 389	5,656	Espagne
Switzerland	47 520	186	506 800	2,003	Suisse
Poland	112 844	442	1 377 284	5,413	Pologne
Turkey	277 200	1,510	6 776 391	26,973	Turquie
Tanzania, Un. Rep	39 600	165	178 200	748	Tanzanie, Rép. un
Bangladesh			393 600	1,536	Bangladesh
Hong Kong	217 800	1,276	660 800	3,979	Hong Kong
Singapore			217 566	1,015	Singapour
Australia			121 200	815	Australie
Peru	14 600	102	147 646	937	Pérou
Other countries			503 059	2,747	Autres pays
Total	831 164	4,318	22 304 043	124,385	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United States			649 797	625	États-Unis
United Kingdom	91 000	91	3 529 321	2,696	Royaume-Uni
Turkey			1 062 526	2,704	Turquie
Other countries	24 480	44	949 900	1,091	Autres pays
Total	115 480	136	6 191 344	7,117	Total
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac 2402.10
Other countries	617	7	6 587	168	Autres pays
Total	617	7	6 587	168	Total
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac 2402.20
United States	52 640	2,049	830 365	30,626	États-Unis
Belgium			103 680	920	Belgique
Saudi Arabia			108 700	911	Arabie Saoudite
Benin			164 160	1,461	Bénin
Hong Kong			41 452	1,340	Hong Kong
Japan			62 950	686	Japon
Chile	5 747	220	187 627	1,652	Chili
Panama	18 150	162	129 657	1,170	Panama
Other countries	10 672	205	218 449	3,501	Autres pays
Total	87 209	2,637	1 947 040	42,270	Total
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac 2402.90
Other countries			100	11	Autres pays
Total			100	11	Total
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion 2403.10
United States	38 666	377	247 963	4,218	États-Unis
Russia	630 000	5,322	5 670 000	17,921	Russie
United Arab Emir.			962 550	3,986	Émir. Arabes unis
Other countries			333 200	1,200	Autres pays
Total	668 666	5,700	5 213 713	27,328	Total
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués 2403.91
Other countries			317 943	1,054	Autres pays
Total			317 943	1,054	Total
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda, incl extraits ou sauces de tabac 2403.99
United States			99 841	1,016	États-Unis

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Commodity/Country	December 1996 Décembre 1996 Quantity Quantité	December 1996 Décembre 1996 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays
(Cont'd)					(Suite)
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda, incl extraits ou sauces de tabac 2403.99
Other countries			102 800	258	Autres pays
Total			202 641	1,274	Total
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer 2501.00
United States	418 100	11,452	3 812 582	108,257	États-Unis
Other countries	21	7	4 473	814	Autres pays
Total	418 121	11,460	3 817 055	109,071	Total
2503.00 Sulphur of all kinds,o/t sublimed, precipitated & colloidal sulphur	TNE		TNE		Soufres de toute espèce, n/q soufre sublimé, soufre précipité & souf colloïd 2503.00
United States	66 225	7,601	1 061 925	54,761	États-Unis
Israel			85 165	4,845	Israël
Egypt			33 000	990	Égypte
South Africa	51 656	2,012	504 626	31,365	Afrique du Sud
Morocco	79 370	3,667	854 706	72,564	Maroc
Senegal			63 397	6,436	Sénégal
Tunisia	33 300	1,347	273 787	20,529	Tunisie
India			39 065	4,202	Inde
China, P. Rep.			690 512	45,415	Chine, Rép. pop.
Indonesia			247 357	19,683	Indonésie
Korea, South			80 217	5,995	Corée du Sud
Philippines	22 000	1,026	150 003	10,455	Philippines
Taiwan			9 351	918	Taiwan
Thailand			38 032	3,108	Thaïlande
Vietnam	20 458	978	41 458	1,951	Viêt-Nam
Australia	16 294	554	99 520	4,690	Australie
New Zealand			166 505	12,139	Nouvelle-Zélande
Argentina			56 616	4,096	Argentine
Brazil	86 797	5,037	836 438	55,954	Brésil
Chile			106 570	8,976	Chili
Uruguay			14 115	1,139	Uruguay
Cuba	12 947	1,515	98 394	7,470	Cuba
Mexico	38 280	1,548	471 452	26,649	Mexique
Other countries			4 116	124	Autres pays
Total	427 327	20,290	6 026 327	404,468	Total
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes 2504.10
United States	1 120	1,156	13 581	13,476	États-Unis
United Kingdom	278	200	1 981	1,535	Royaume-Uni
Italy	20	14	1 256	881	Italie
Spain	80	60	929	730	Espagne
Turkey	100	70	900	646	Turquie
Other countries	170	181	1 448	1,161	Autres pays
Total	1 768	1,683	20 095	18,432	Total
2504.90 Natural graphite, nes	TNE		TNE		Graphite naturel, nda 2504.90
Other countries			302	276	Autres pays
Total			302	276	Total
2505.10 Silica sands and quartz sands	TNE		TNE		Sables siliceux et sables quartzeux 2505.10
United States	12 477	175	223 338	2,340	États-Unis
Other countries	36	12	494	265	Autres pays
Total	12 513	187	223 832	2,606	Total
2505.90 Natural sands nes, exc metal bearing sand of Chapter 26	TNE		TNE		Sables naturels nda, sauf sables métallifères du chapitre 26 2505.90
United States	27 956	272	123 235	1,771	États-Unis
Bahamas			51 407	1,270	Bahamas
Other countries			21 430	421	Autres pays
Total	27 956	272	196 072	3,463	Total
2506.10 Quartz (other than natural sands)	TNE		TNE		Quartz (autres que les sables naturels) 2506.10
Other countries	1	3	932	66	Autres pays
Total	1	3	932	66	Total
2506.21 Quartzite, crude or roughly trimmed	TNE		TNE		Quartzites brutes ou dégrossies 2506.21
United States			63 474	1,009	États-Unis
Total			63 474	1,009	Total
2506.29 Quartzite, nes	TNE		TNE		Quartzites, nda 2506.29
Other countries			62	8	Autres pays
Total			62	8	Total
2507.00 Kaolin and other kaolinic clays, whether or not calcined	KGM		KGM		Kaolin et autres argiles kaoliniques, mêmes calcinés 2507.00
Other countries			126 000	80	Autres pays
Total			126 000	80	Total

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2306.90 Veg oil-cake & other solid residues nes, whether or not ground or pelleted	KGM		KGM		Tourteaux et autres résidus solides vég nda,même broyés ou agglomérés en pellets 2306.90
United States	174 710	35	3 557 849	720	États-unis
Total	174 710	35	3 557 849	720	Total
2308.90 Veg mat, waste, residues & by-prod nes pelleted or not, used in animal feeding	KGM		KGM		Mati vég & déchets vég, résidus et sous- 2308.90 prod,nda,utilisés pour l'ali des animaux
United States	4 111 971	1,066	42 521 494	11,321	États-unis
Other countries	139 012	31	2 647 144	642	Autres pays
Total	4 250 933	1,097	45 168 638	11,963	Total
2309.10 Dog or cat food put up for retail sale	KGM		KGM		Aliments pour chiens ou chats, 2309.10 conditionnés pour la vente au détail
United States	12 349 679	14,317	149 550 513	156,875	États-unis
United Kingdom	208 485	505	2 587 792	3,095	Royaume-uni
Belgium	31 018	39	622 479	788	Belgique
France	142 558	180	1 912 990	2,307	France
Germany	139 548	217	1 806 740	2,897	Allemagne
Italy	57 588	92	736 878	1,355	Italie
Netherlands	85 945	118	911 709	1,198	Pays-Bas
Spain	41 229	63	859 740	1,140	Espagne
Switzerland	120 309	141	806 164	839	Suisse
Czech Republic	786 942	697	8 339 860	6,576	Tchèque, Rép
Russia	42 910	52	652 157	740	Russie
Hong Kong	40 185	77	581 456	604	Hong Kong
Japan	814 334	1,234	9 029 889	12,761	Japon
Taiwan	62 070	61	1 035 624	724	Taiwan
Australia	60 793	235	729 136	2,360	Australie
Other countries	198 221	278	3 482 972	3,899	Autres pays
Total	15 181 812	18,114	183 445 849	198,966	Total
2309.90 Animal feed preparations nes	KGM		KGM		Préparations alimentaires pour animaux, 2309.90 nda
United States	32 094 211	18,003	388 764 534	207,978	États-unis
United Kingdom	39 190	47	409 525	692	Royaume-uni
Belgium	5 000	28	339 999	981	Belgique
Germany	18 577	17	499 181	1,123	Allemagne
Netherlands	19 000	85	230 733	719	Pays-Bas
Hong Kong	50 000	30	795 668	2,449	Hong Kong
Japan	548 428	872	14 184 663	19,924	Japon
Korea, South	20 120	56	607 097	748	Corée du Sud
Taiwan	199 842	151	1 540 714	2,412	Taiwan
Brazil	107 000	79	1 132 040	1,069	Brésil
Chile			761 290	1,428	Chili
Other countries	1 383 355	1,507	6 912 794	9,185	Autres pays
Total	34 484 723	20,879	416 177 838	248,714	Total
2401.10 Tobacco, unmanufactured, not stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués,non écôtés 2401.10
United States			2 484 785	7,961	États-unis
Netherlands			376 200	2,349	Pays-Bas
Hong Kong			113 720	644	Hong Kong
Other countries			112 417	504	Autres pays
Total			3 087 122	11,460	Total
2401.20 Tobacco, unmanufactured, partly or wholly stemmed or stripped	KGM		KGM		Tabacs bruts ou non fabriqués, 2401.20 partiellement ou totalement écôtés
United States			2 735 729	20,156	États-unis
United Kingdom	603 514	3,939	3 472 982	21,706	Royaume-uni
Belgium			709 870	3,465	Belgique
France			240 372	955	France
Germany			99 000	643	Allemagne
Spain			636 921	3,589	Espagne
Switzerland			301 930	1,260	Suisse
Poland			1 160 505	4,870	Pologne
Russia			3 009 600	15,502	Russie
Turkey			6 189 821	32,535	Turquie
Tanzania, Un. Rep			277 200	1,268	Tanzanie, Rép. un
Bangladesh	22 600	181	365 000	2,916	Bangladesh
Hong Kong	79 200	559	2 775 580	18,278	Hong Kong
Malaysia	178 200	940	276 370	1,507	Malaisie
Australia			158 400	1,127	Australie
Peru			101 200	716	Pérou
Trinidad-Tobago			118 210	893	Trinité-Tobago
Other countries	19 200	98	929 104	4,298	Autres pays
Total	802 714	5,718	23 557 794	135,493	Total
2401.30 Tobacco refuse	KGM		KGM		Déchets de tabac 2401.30
United Kingdom	171 600	123	1 282 666	1,816	Royaume-Uni
Russia	402 560	1,410	1 343 370	4,622	Russie
Other countries	102 800	117	1 815 000	1,880	Autres pays
Total	676 960	1,651	4 441 036	8,319	Total

TABLE 3. DOMESTIC EXPORTS BY COMMODITY AND COUNTRY, H.S. BASED
TABLEAU 3. EXPORTATIONS NATIONALES PAR MARCHANDISE ET PAYS, BASE DU S.H.

Commodity/Country	December 1997 Décembre 1997 Quantity Quantité	December 1997 Décembre 1997 Value Valeur $'000	Cumulative Totals Totaux cumulatifs Quantity Quantité	Cumulative Totals Totaux cumulatifs Value Valeur $'000	Marchandise/Pays	
2402.10 Cigars, cheroots and cigarillos, containing tobacco	KGM		KGM		Cigares (y compris ceux à bouts coupés) et cigarillos, contenant du tabac	2402.10
Other countries	14	2	1 820	55	Autres pays	
Total	14	2	1 820	55	Total	
2402.20 Cigarettes containing tobacco	MIL		MIL		Cigarettes contenant du tabac	2402.20
United States	51 272	2,047	882 763	36,093	États-Unis	
Hong Kong	4 000	71	75 677	2,824	Hong Kong	
Philippines			39 000	1,527	Philippines	
Chile			117 960	1,630	Chili	
Paraguay	8 960	89	153 752	1,734	Paraguay	
Panama	14 200	178	93 751	1,275	Panama	
Other countries	7 705	149	83 626	1,431	Autres pays	
Total	86 137	2,537	1 446 529	46,517	Total	
2402.90 Cigars, cheroots, cigarillos and cigarettes, cntg tobacco substitutes	KGM		KGM		Cigares, cigarillos et cigarettes contenant des succédanés de tabac	2402.90
Other countries	616	10	1 232	17	Autres pays	
Total	616	10	1 232	17	Total	
2403.10 Smoking tobacco, whether or not cntg tobacco substitutes in any proportion	KGM		KGM		Tabac à fumer, même contenant des succédanés de tabac en toute proportion	2403.10
United States	13 229	212	170 162	2,727	États-Unis	
Russia			2 785 848	14,788	Russie	
Other countries	5 447	45	330 786	1,536	Autres pays	
Total	18 676	257	3 286 796	19,052	Total	
2403.91 Homogenized or reconstituted tobacco	KGM		KGM		Tabacs homogénéisés ou reconstitués	2403.91
Other countries			23 360	100	Autres pays	
Total			23 360	100	Total	
2403.99 Manufactured tobacco & substitute,nes, including extracts and substances	KGM		KGM		Tabac et succédané,fabriqués,nda, incl extraits ou sauces de tabac	2403.99
Other countries			200 260	537	Autres pays	
Total			200 260	537	Total	
2501.00 Salt (including table salt and denatured salt) pure sodium chloride & sea water	TNE		TNE		Sel (y compris le sel preparé pour la table & le sel dénaturé) etc; eau de mer	2501.00
United States	388 760	10,094	3 631 582	101,673	États-Unis	
Other countries	16	11	2 380	340	Autres pays	
Total	388 776	10,106	3 633 962	102,014	Total	
2502.00 Unroasted iron pyrites	TNE		TNE		Pyrites de fer non grillés	2502.00
Other countries	38	1	42	5	Autres pays	
Total	38	1	42	5	Total	
2503.00 Sulphur of all kinds,o/t sublimed, precipitated & colloidal sulphur	TNE		TNE		Soufres de toute espèce, a/q soufre sublimé, soufre précipité & souf colloïd	2503.00
United States	76 421	3,216	1 020 493	38,749	États-Unis	
Italy			20 788	1,611	Italie	
Israel			301 281	12,907	Israël	
South Africa			585 520	29,902	Afrique du Sud	
Morocco	55 670	3,375	1 199 234	91,428	Maroc	
Tunisia			459 209	25,829	Tunisie	
India	40 968	1,761	157 853	7,608	Inde	
China, P. Rep.	22 126	915	174 958	8,281	Chine, Rép. pop.	
Indonesia	10 856	828	79 238	5,528	Indonésie	
Korea, South			38 523	2,050	Corée du Sud	
Philippines			133 563	7,517	Philippines	
Thailand	6 499	288	33 583	2,353	Thaïlande	
Vietnam			21 000	1,092	Viêt-Nam	
Australia	22 168	948	107 512	4,439	Australie	
New Zealand	24 512	1,197	180 401	8,680	Nouvelle-Zélande	
Argentina			89 338	5,097	Argentine	
Brazil	82 062	6,813	942 775	64,708	Brésil	
Chile			35 970	2,983	Chili	
Cuba	12 832	1,593	130 445	15,600	Cuba	
Mexico	43 270	2,330	482 388	22,742	Mexique	
Other countries			35 551	1,867	Autres pays	
Total	397 384	23,269	6 229 623	360,982	Total	
2504.10 Natural graphite in powder or flakes	TNE		TNE		Graphite naturel, en poudre ou en paillettes	2504.10
United States	943	764	15 547	14,132	États-Unis	
United Kingdom			1 696	1,276	Royaume-Uni	
Austria	100	75	1 400	1,028	Autriche	
Italy			1 885	1,367	Italie	
Spain	100	77	1 156	875	Espagne	
Turkey	260	191	2 760	1,966	Turquie	
Other countries	20	20	1 224	943	Autres pays	
Total	1 423	1,130	25 668	21,591	Total	

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1988 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1988 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	26894.8	13346.0	13548.8	11499.1	6152.0	5347.0	13258.5	6632.0	6626.4	1318.8	222.2	1096.7	818.4	339.8	478.7
0	368.7	188.5	180.3	368.7	188.5	180.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	372.4	190.2	182.2	372.4	190.2	182.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	376.4	191.9	184.5	376.4	191.9	184.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	378.2	193.7	184.4	378.2	193.7	184.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	378.7	193.8	184.9	378.7	193.8	184.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	1874.4	958.1	916.3	1874.4	958.1	916.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	376.3	193.0	183.3	376.3	193.0	183.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	377.3	193.6	183.7	377.3	193.6	183.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	380.1	194.9	185.1	380.1	194.9	185.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	379.7	195.3	184.3	379.7	195.3	184.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	371.8	191.1	180.7	371.8	191.1	180.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1885.2	967.9	917.2	1885.2	967.9	917.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	365.0	187.3	177.7	365.0	187.3	177.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	368.5	188.5	180.0	368.5	188.5	180.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	370.2	189.3	180.8	370.2	189.3	180.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	371.9	190.1	181.8	371.9	190.1	181.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	361.4	184.2	177.1	361.3	184.2	177.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1836.9	939.4	897.5	1836.9	939.4	897.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	367.8	188.0	179.8	365.0	186.7	178.3	2.4	1.1	1.3	0.2	0.1	0.1	0.2	0.1	0.1
16	377.4	193.4	184.0	374.3	192.4	181.9	2.8	0.9	1.9	0.2	0.1	0.1	0.1	0.1	0.1
17	400.8	204.6	196.2	394.5	203.3	191.2	6.0	1.2	4.8	0.2	0.1	0.1	0.1	0.1	0.1
18	403.3	206.6	196.7	388.6	203.9	184.7	14.4	2.6	11.7	0.2	0.1	0.1	0.2	0.1	0.1
19	400.5	204.9	195.6	371.7	198.7	173.0	28.4	6.1	22.3	0.2	0.1	0.1	0.2	0.1	0.2
15-19	1949.8	997.5	952.2	1894.2	985.0	909.1	53.9	11.9	42.1	0.9	0.3	0.6	0.8	0.4	0.4
20	404.9	206.8	198.2	355.3	194.2	161.1	49.0	12.4	36.7	0.2	0.1	0.1	0.4	0.1	0.3
21	422.1	215.3	206.7	342.9	192.2	150.7	78.2	22.9	55.3	0.2	0.1	0.2	0.8	0.2	0.6
22	450.9	230.3	220.6	331.9	190.9	141.1	117.2	39.0	78.3	0.3	0.1	0.2	1.4	0.4	1.0
23	491.2	251.1	240.0	319.4	188.8	130.6	168.8	61.5	107.2	0.4	0.1	0.3	2.6	0.8	1.9
24	510.7	261.5	249.2	288.6	174.1	114.5	217.7	86.0	131.6	0.4	0.1	0.3	4.1	1.3	2.8
20-24	2279.8	1165.0	1114.7	1638.1	940.2	697.9	630.9	221.7	409.2	1.5	0.4	1.0	9.3	2.7	6.6
25	520.1	265.5	254.6	249.4	152.8	96.6	263.8	110.3	153.5	0.5	0.1	0.4	6.4	2.3	4.1
26	514.9	262.1	252.9	210.4	129.6	80.8	295.4	129.2	166.2	0.6	0.1	0.5	8.5	3.1	5.4
27	520.5	264.7	255.8	180.8	111.5	69.3	327.9	148.7	179.2	0.7	0.2	0.5	11.1	4.3	6.8
28	513.4	260.6	252.8	153.8	94.7	59.0	345.6	160.5	185.1	0.8	0.2	0.7	13.3	5.2	8.1
29	503.8	255.1	248.6	131.8	80.8	51.0	355.3	167.8	187.5	0.9	0.2	0.7	15.8	6.5	9.4
25-29	2572.7	1308.0	1264.8	926.2	569.5	356.7	1588.0	716.4	871.6	3.4	0.7	2.7	55.1	21.4	33.7
30	501.1	253.5	247.6	120.6	74.2	46.5	362.8	172.7	190.1	1.0	0.2	0.8	16.6	6.4	10.3
31	496.7	250.2	246.4	105.3	63.8	41.6	371.5	179.0	192.5	1.2	0.2	0.9	18.7	7.2	11.4
32	481.4	242.2	239.2	91.1	54.8	36.3	368.8	179.2	189.7	1.3	0.2	1.0	20.2	8.0	12.2
33	480.8	240.9	239.9	81.5	48.8	32.8	375.6	183.1	192.5	1.5	0.3	1.2	22.1	8.7	13.4
34	466.8	232.8	234.0	71.4	42.4	29.0	370.6	180.9	189.6	1.7	0.3	1.4	23.1	9.1	14.0
30-34	2426.7	1219.6	1207.1	470.0	283.9	186.1	1849.3	894.9	954.4	6.6	1.3	5.3	100.7	39.4	61.3
35	449.9	224.4	225.5	60.9	35.6	25.2	362.6	178.3	184.3	1.9	0.4	1.5	24.5	10.0	14.5
36	434.9	218.2	216.7	53.2	30.9	22.4	354.7	176.7	178.1	2.1	0.4	1.7	24.9	10.3	14.6
37	428.2	215.3	212.8	48.3	27.7	20.6	352.0	176.6	175.4	2.3	0.4	1.9	25.6	10.6	15.0
38	419.6	211.7	207.9	43.2	24.9	18.3	347.3	175.3	172.0	2.5	0.5	2.0	26.5	11.0	15.5
39	414.9	208.9	206.0	40.3	23.1	17.2	344.4	174.0	170.5	2.8	0.5	2.3	27.3	11.3	16.0
35-39	2147.4	1078.5	1068.9	245.9	142.3	103.6	1761.0	880.9	880.2	11.6	2.2	9.3	128.9	53.1	75.8
40	415.3	209.9	205.4	38.8	22.3	16.5	344.8	175.3	169.5	3.3	0.6	2.7	28.4	11.8	16.6
41	419.5	211.8	207.7	37.3	21.3	16.0	349.2	177.6	171.6	3.8	0.7	3.1	29.2	12.2	17.0
42	365.4	185.0	180.4	30.7	17.4	13.3	304.8	156.0	148.8	3.7	0.7	3.0	26.3	10.9	15.4
43	342.5	173.8	168.7	27.1	15.2	11.9	286.0	147.2	138.8	3.9	0.7	3.2	25.3	10.6	14.8
44	335.2	169.7	165.4	25.2	14.2	11.0	281.0	144.5	136.5	4.3	0.8	3.6	24.7	10.3	14.4
40-44	1877.8	950.2	927.6	159.1	90.3	68.8	1565.8	800.6	765.2	19.0	3.5	15.5	133.9	55.8	78.1

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1988 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1988 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	326.0	164.9	161.1	23.6	13.2	10.3	273.3	140.6	132.7	5.0	0.9	4.1	24.1	10.1	14.0
46	303.0	153.3	149.7	21.1	11.8	9.3	254.6	131.3	123.3	5.3	1.0	4.4	21.9	9.3	12.6
47	290.8	146.7	144.1	19.6	10.8	8.8	244.9	126.3	118.6	5.6	1.0	4.7	20.6	8.6	12.0
48	274.6	138.4	136.2	18.0	10.0	8.1	231.0	119.1	111.9	6.0	1.1	4.9	19.5	8.3	11.3
49	266.5	134.5	131.9	17.3	9.6	7.7	223.7	115.8	107.9	6.8	1.2	5.6	18.7	7.9	10.7
45-49	1460.8	737.8	723.1	99.6	55.3	44.3	1227.6	633.2	594.4	28.8	5.1	23.7	104.8	44.2	60.7
50	256.5	129.4	127.1	16.5	9.3	7.2	214.9	111.2	103.7	7.3	1.3	6.0	17.7	7.6	10.1
51	250.4	125.8	124.5	15.9	8.8	7.1	209.4	108.3	101.2	8.1	1.4	6.7	17.0	7.3	9.7
52	252.1	126.5	125.6	16.0	8.9	7.2	210.2	109.0	101.2	9.2	1.5	7.7	16.6	7.1	9.5
53	247.0	123.7	123.3	15.5	8.6	6.9	205.0	106.4	98.7	10.2	1.7	8.4	16.2	7.0	9.3
54	242.6	121.8	120.8	15.3	8.5	6.8	200.4	104.5	95.8	11.4	1.9	9.4	15.5	6.8	8.7
50-54	1248.5	627.2	621.3	79.3	44.1	35.2	1040.0	539.4	500.6	46.1	7.9	38.2	83.1	35.8	47.3
55	250.4	125.2	125.2	16.2	9.0	7.2	205.0	107.1	97.9	13.5	2.3	11.2	15.6	6.8	8.8
56	251.7	125.9	125.8	16.4	9.2	7.2	204.7	107.3	97.4	15.4	2.7	12.7	15.2	6.7	8.5
57	251.7	125.0	126.7	16.4	9.0	7.3	203.3	106.4	96.8	17.3	2.9	14.4	14.8	6.6	8.2
58	249.2	123.2	126.0	16.3	9.1	7.3	199.8	104.8	95.0	19.0	3.2	15.8	14.0	6.2	7.9
59	239.9	117.8	122.2	15.8	8.6	7.2	190.3	99.9	90.4	20.8	3.5	17.3	13.0	5.8	7.3
55-59	1242.9	617.1	625.8	81.2	44.9	36.3	1003.0	525.5	477.5	86.0	14.7	71.4	72.7	32.0	40.7
60	240.2	117.0	123.2	16.0	8.6	7.4	188.4	99.1	89.3	23.5	3.9	19.6	12.3	5.3	7.0
61	235.2	113.6	121.6	15.6	8.4	7.2	182.7	96.0	86.7	25.4	4.2	21.2	11.5	4.9	6.5
62	234.4	111.4	123.0	15.6	8.1	7.5	179.9	94.1	85.8	28.0	4.5	23.5	10.9	4.7	6.3
63	229.4	108.0	121.3	15.4	7.9	7.5	173.5	91.0	82.5	30.3	4.9	25.4	10.2	4.3	5.9
64	223.7	104.1	119.7	15.0	7.5	7.5	166.3	87.3	79.0	32.9	5.2	27.7	9.6	4.1	5.5
60-64	1162.9	554.0	608.9	77.6	40.5	37.1	890.8	467.5	423.3	140.1	22.8	117.4	54.5	23.3	31.1
65	217.3	100.2	117.1	14.6	7.2	7.4	159.2	84.0	75.2	34.8	5.4	29.4	8.7	3.6	5.1
66	216.9	99.4	117.6	14.4	6.9	7.5	156.1	83.0	73.1	38.1	5.9	32.2	8.3	3.5	4.8
67	207.5	94.1	113.4	14.3	6.6	7.7	145.7	78.1	67.7	39.9	6.2	33.7	7.6	3.2	4.4
68	196.9	88.8	108.1	13.7	6.2	7.5	135.5	73.4	62.1	40.9	6.3	34.6	6.8	2.9	3.9
69	170.8	76.0	94.8	12.2	5.4	6.8	114.4	62.4	52.0	38.8	5.9	32.8	5.5	2.3	3.2
65-69	1009.4	458.5	550.9	69.2	32.4	36.9	710.9	380.9	330.0	192.5	29.8	162.7	36.8	15.4	21.3
70-74	766.9	334.4	432.4	58.2	24.0	34.2	471.8	267.4	204.4	216.4	34.3	182.1	20.4	8.7	11.7
75-79	559.9	229.9	330.0	47.4	17.3	30.1	283.3	171.4	111.9	218.4	36.5	181.9	10.8	4.7	6.1
80-84	340.2	125.8	214.4	31.7	10.3	21.4	127.9	82.6	45.3	176.1	31.0	145.1	4.6	2.0	2.6
85-89	170.0	55.2	114.8	16.5	4.7	11.7	42.5	29.5	13.0	109.5	20.4	89.1	1.6	0.7	0.9
90+	82.7	21.8	60.9	8.5	2.0	6.5	11.7	8.4	3.3	61.9	11.2	50.7	0.6	0.2	0.3
Special Age Groups - Groupes d'âge particuliers															
0-14	5596.5	2865.4	2731.1	5596.5	2865.4	2731.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	6742.5	3451.5	3291.0	6730.3	3447.9	3282.5	11.2	3.2	8.0	0.5	0.2	0.4	0.4	0.2	0.2
18-24	3083.5	1576.5	1507.0	2398.4	1342.7	1055.6	673.7	230.4	443.3	1.8	0.5	1.3	9.7	2.8	6.8
18-64	17223.2	8668.8	8554.4	4537.2	2613.5	1923.7	11599.2	5688.7	5910.4	343.5	58.8	284.8	743.3	307.8	435.5
18+	20152.3	9894.5	10257.8	4768.7	2704.2	2064.6	13247.3	6628.8	6618.4	1318.3	222.0	1096.3	818.0	339.6	478.5
25-44	9024.6	4556.2	4468.4	1801.2	1086.0	715.2	6764.2	3292.8	3471.3	40.6	7.8	32.8	418.6	169.7	248.9
45-64	5115.1	2536.1	2579.0	337.6	184.8	152.8	4161.3	2165.5	1995.8	301.1	50.5	250.6	315.1	135.3	179.8
65+	2929.1	1225.7	1703.4	231.5	90.7	140.9	1648.1	940.1	708.0	974.7	163.2	811.6	74.7	31.7	43.0
0-90	26894.8	13346.0	13548.8	11499.1	6152.0	5347.0	13258.5	6632.0	6626.4	1318.8	222.2	1096.7	818.4	339.8	478.7
Median Age(Years) - Âge médian(années):															
	32.1	31.3	32.9	15.4	16.1	14.7	42.2	43.6	40.9	73.0	73.4	72.9	44.2	44.7	43.8
Mean Age(Years) - Âge moyen(années):															
	34.7	33.7	35.7	17.7	17.9	17.5	45.0	46.4	43.7	71.8	71.8	71.7	46.2	46.7	45.9

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1989 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1989 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	27379.3	13581.4	13797.9	11654.5	6230.3	5424.2	13520.2	6763.6	6756.5	1339.9	226.4	1113.5	864.8	361.1	503.7
0	382.7	196.0	186.7	382.7	196.0	186.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	371.5	189.9	181.6	371.5	189.9	181.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	375.3	191.6	183.7	375.3	191.6	183.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	383.6	195.7	187.9	383.6	195.7	187.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	387.9	198.7	189.2	387.9	198.7	189.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	1901.1	972.0	929.1	1901.1	972.0	929.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	382.1	195.5	186.6	382.1	195.5	186.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	381.9	195.8	186.1	381.9	195.8	186.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	382.6	196.4	186.2	382.6	196.4	186.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	385.3	197.4	187.9	385.3	197.4	187.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	384.4	197.7	186.6	384.4	197.7	186.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1916.3	982.8	933.5	1916.3	982.8	933.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	373.4	191.8	181.7	373.4	191.8	181.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	369.0	189.3	179.6	369.0	189.3	179.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	372.1	190.3	181.8	372.1	190.3	181.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	374.9	191.8	183.2	374.9	191.8	183.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	376.6	192.7	184.0	376.6	192.7	184.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1866.0	955.8	910.2	1866.0	955.8	910.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	366.3	187.0	179.3	363.9	185.9	178.0	2.1	1.0	1.1	0.2	0.1	0.1	0.2	0.1	0.1
16	372.6	190.6	182.0	369.6	189.7	179.9	2.7	0.8	1.9	0.2	0.1	0.1	0.1	0.1	0.1
17	383.2	196.1	187.1	377.2	194.9	182.4	5.7	1.1	4.6	0.2	0.1	0.1	0.1	0.1	0.1
18	407.1	207.4	199.6	392.2	204.7	187.6	14.5	2.7	11.8	0.2	0.1	0.1	0.2	0.1	0.1
19	411.2	210.0	201.2	381.8	203.6	178.3	28.9	6.3	22.6	0.2	0.1	0.1	0.2	0.1	0.1
15-19	1940.4	991.2	949.2	1884.8	978.6	906.1	54.0	11.9	42.1	0.9	0.3	0.6	0.8	0.4	0.4
20	409.5	208.4	201.1	359.9	195.6	164.3	48.9	12.5	36.4	0.2	0.1	0.1	0.4	0.1	0.3
21	413.6	210.1	203.5	337.1	187.5	149.6	75.5	22.3	53.2	0.2	0.1	0.2	0.7	0.2	0.5
22	429.5	218.2	211.3	318.0	181.2	136.8	109.9	36.5	73.4	0.3	0.1	0.2	1.3	0.3	1.0
23	457.3	232.7	224.6	300.8	176.3	124.6	153.7	55.6	98.1	0.3	0.1	0.2	2.4	0.7	1.7
24	497.4	253.5	244.0	285.8	171.0	114.8	207.4	81.1	126.2	0.4	0.1	0.3	3.9	1.2	2.7
20-24	2207.3	1122.7	1084.6	1601.7	911.7	690.0	595.5	208.1	387.4	1.4	0.4	1.0	8.8	2.6	6.2
25	516.9	263.8	253.1	253.4	154.7	98.7	256.8	106.7	150.1	0.4	0.1	0.3	6.2	2.3	3.9
26	527.1	268.4	258.7	221.1	136.1	85.0	296.9	128.9	168.0	0.6	0.1	0.5	8.5	3.2	5.3
27	522.2	265.1	257.1	187.1	115.2	71.9	323.5	145.4	178.1	0.6	0.1	0.5	10.9	4.3	6.5
28	528.5	268.1	260.4	163.7	100.8	62.9	350.6	161.6	189.0	0.8	0.2	0.6	13.4	5.5	7.9
29	521.9	264.2	257.7	141.6	86.7	54.9	363.3	170.6	192.8	0.9	0.2	0.7	16.1	6.8	9.3
25-29	2616.6	1329.6	1286.9	967.0	593.6	373.4	1591.1	713.1	877.9	3.4	0.8	2.6	55.1	22.2	33.0
30	512.1	259.2	252.9	128.1	78.9	49.2	366.4	173.6	192.7	1.0	0.2	0.8	16.6	6.5	10.1
31	509.0	257.5	251.5	112.4	68.4	44.0	376.7	181.3	195.4	1.1	0.2	0.9	18.8	7.5	11.3
32	503.3	253.5	249.7	99.0	59.8	39.2	382.3	185.2	197.1	1.3	0.3	1.0	20.8	8.3	12.4
33	486.6	244.8	241.7	85.8	51.6	34.2	377.2	184.0	193.2	1.5	0.3	1.2	22.1	8.9	13.2
34	485.4	243.4	242.1	77.4	46.2	31.2	382.6	187.2	195.4	1.7	0.3	1.3	23.9	9.7	14.2
30-34	2496.4	1258.4	1238.0	502.7	304.9	197.8	1885.1	911.3	973.8	6.5	1.3	5.1	102.1	40.9	61.2
35	470.6	234.9	235.7	66.3	38.9	27.4	376.6	184.8	191.8	1.9	0.4	1.5	25.8	10.7	15.1
36	453.4	226.2	227.2	57.9	33.6	24.3	367.2	181.3	185.9	2.1	0.4	1.7	26.1	10.9	15.3
37	439.2	220.5	218.7	51.9	29.8	22.0	358.4	179.0	179.4	2.3	0.4	1.8	26.6	11.1	15.5
38	432.8	217.7	215.1	46.7	26.9	19.8	355.7	178.7	177.0	2.5	0.5	2.0	27.9	11.7	16.2
39	424.5	214.3	210.2	43.3	24.9	18.4	349.9	176.8	173.1	2.8	0.5	2.2	28.5	12.0	16.6
35-39	2220.5	1113.5	1107.0	266.1	154.1	111.9	1807.8	900.7	907.1	11.6	2.3	9.3	135.0	56.3	78.6
40	419.3	211.1	208.2	61.0	23.4	17.5	346.0	174.9	171.1	3.2	0.6	2.6	29.2	12.1	17.0
41	419.1	211.9	207.2	38.6	22.0	16.6	347.0	176.6	170.4	3.6	0.7	3.0	29.8	12.6	17.3
42	422.4	213.2	209.2	36.3	20.4	15.9	350.9	178.9	171.9	4.1	0.8	3.3	31.1	13.0	18.1
43	367.5	185.9	181.6	29.8	16.7	13.1	305.8	156.8	149.0	4.1	0.8	3.3	27.8	11.7	16.2
44	343.9	174.3	169.6	26.4	14.8	11.6	287.1	147.8	139.3	4.2	0.8	3.5	26.2	11.0	15.2
40-44	1972.2	996.4	975.8	172.1	97.5	74.7	1636.7	835.0	801.7	19.2	3.7	15.6	144.1	60.3	83.8

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1989 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1989 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	335.5	169.7	165.8	24.7	13.8	10.9	280.0	144.1	135.9	5.0	0.9	4.1	25.8	10.8	15.0
46	326.2	164.9	161.3	23.1	12.9	10.3	272.9	140.7	132.3	5.6	1.0	4.6	24.5	10.3	14.2
47	303.5	153.4	150.1	20.7	11.4	9.3	254.6	131.6	123.0	5.7	1.0	4.6	22.6	9.4	13.1
48	291.6	146.9	144.7	19.3	10.6	8.7	244.3	126.0	118.3	6.2	1.1	5.0	21.8	9.2	12.6
49	275.0	138.6	136.4	18.0	9.9	8.1	230.0	119.0	111.0	6.8	1.2	5.6	20.3	8.5	11.7
45-49	1531.7	773.3	758.3	105.7	58.5	47.3	1281.8	661.4	620.5	29.2	5.3	23.9	114.9	48.2	66.7
50	267.1	134.7	132.4	17.3	9.7	7.6	223.2	115.5	107.7	7.3	1.3	6.0	19.3	8.2	11.1
51	257.0	129.6	127.4	16.3	9.1	7.2	214.6	111.4	103.2	8.0	1.4	6.6	18.2	7.8	10.4
52	250.3	125.7	124.6	15.8	8.6	7.1	208.4	108.3	100.1	8.9	1.5	7.4	17.2	7.3	9.9
53	252.1	126.5	125.6	15.7	8.7	7.0	209.1	108.7	100.3	10.0	1.7	8.3	17.3	7.4	9.9
54	247.0	123.7	123.4	15.4	8.5	6.9	203.9	106.1	97.8	11.2	1.9	9.3	16.5	7.2	9.3
50-54	1273.5	640.2	633.3	80.4	44.5	35.9	1059.2	550.0	509.2	45.4	7.8	37.6	88.5	37.9	50.6
55	242.9	121.7	121.2	15.4	8.6	6.9	199.0	104.1	94.9	12.7	2.2	10.5	15.8	6.8	9.0
56	249.9	124.8	125.1	16.0	8.9	7.1	203.3	106.4	96.9	14.8	2.6	12.2	15.8	6.9	8.9
57	251.2	125.5	125.8	16.1	8.9	7.2	203.0	106.8	96.2	16.7	2.9	13.8	15.4	6.8	8.6
58	250.9	124.3	126.6	16.0	8.9	7.2	201.4	105.8	95.6	18.6	3.2	15.4	14.9	6.5	8.4
59	247.6	122.2	125.4	16.0	8.7	7.3	196.6	103.7	92.9	20.8	3.5	17.2	14.2	6.3	7.9
55-59	1242.5	618.5	624.0	79.5	43.9	35.6	1003.4	526.9	476.4	83.5	14.3	69.1	76.1	33.3	42.8
60	238.6	116.8	121.8	15.6	8.5	7.2	187.2	98.9	88.4	22.6	3.8	18.8	13.1	5.6	7.4
61	238.3	115.7	122.6	15.6	8.4	7.2	185.2	97.7	87.5	25.1	4.3	20.9	12.3	5.3	7.0
62	233.3	112.2	121.1	15.3	8.1	7.2	179.3	94.7	84.6	27.2	4.5	22.7	11.5	5.0	6.6
63	232.7	110.1	122.6	15.4	8.0	7.5	176.1	92.6	83.5	30.3	4.9	25.3	10.9	4.6	6.3
64	227.5	106.7	120.8	15.1	7.6	7.5	169.3	89.3	80.0	32.8	5.3	27.5	10.2	4.4	5.8
60-64	1170.3	561.4	608.9	77.1	40.5	36.6	897.2	473.2	424.0	138.0	22.8	115.2	58.0	24.8	33.2
65	222.0	102.7	119.2	14.8	7.4	7.4	162.9	86.0	76.9	34.9	5.5	29.5	9.4	3.9	5.5
66	215.1	98.6	116.5	14.2	6.9	7.3	154.9	82.2	72.7	37.2	5.8	31.3	8.8	3.7	5.1
67	214.1	97.5	116.6	14.5	6.9	7.7	150.9	80.8	70.2	40.5	6.4	34.0	8.2	3.5	4.8
68	204.4	92.1	112.3	13.9	6.4	7.5	141.1	76.0	65.1	41.9	6.5	35.4	7.5	3.1	4.3
69	193.4	86.6	106.8	13.3	6.0	7.3	130.3	71.2	59.2	43.2	6.7	36.4	6.6	2.7	3.9
65-69	1048.9	477.6	571.4	70.6	33.5	37.2	740.2	396.2	344.0	197.6	31.0	166.6	40.5	16.9	23.6
70-74	773.9	337.0	436.9	56.9	23.6	33.3	478.5	269.9	208.6	216.8	34.4	182.4	21.6	9.1	12.5
75-79	583.9	239.6	344.3	48.1	17.5	30.6	297.7	179.4	118.3	226.2	37.7	188.6	11.9	5.1	6.8
80-84	353.3	130.6	222.6	32.2	10.3	21.9	134.2	86.4	47.8	181.9	31.8	150.1	5.0	2.2	2.9
85-89	178.6	58.2	120.4	17.2	4.9	12.3	45.3	31.4	14.0	114.3	21.2	93.1	1.7	0.7	1.0
90+	86.0	22.6	63.4	9.0	2.1	6.8	12.5	8.8	3.7	63.9	11.4	52.5	0.6	0.3	0.4
Special Age Groups - Groupes d'âge particuliers															
0-14	5683.4	2910.6	2772.9	5683.4	2910.6	2772.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	6805.6	3484.3	3321.3	6794.1	3481.0	3313.1	10.5	2.9	7.6	0.5	0.2	0.3	0.4	0.2	0.2
18-24	3025.6	1540.2	1485.4	2375.7	1319.9	1055.9	638.9	217.1	421.9	1.8	0.5	1.2	9.2	2.7	6.4
18-64	17549.2	8831.6	8717.6	4626.4	2657.4	1969.0	11801.2	5788.7	6012.5	338.5	58.8	279.8	783.1	326.7	456.4
18+	20573.8	10097.1	10476.6	4860.4	2749.3	2111.1	13509.6	6760.7	6748.9	1339.3	226.2	1113.1	864.4	360.9	503.5
25-44	9305.6	4698.0	4607.6	1907.9	1150.1	757.8	6920.6	3360.1	3560.6	40.7	8.0	32.6	436.4	179.7	256.6
45-64	5218.0	2593.4	2624.6	342.7	187.4	155.3	4241.6	2211.6	2030.1	296.1	50.2	245.9	337.6	144.2	193.3
65+	3024.6	1265.6	1759.0	234.0	91.9	142.1	1708.4	972.0	736.4	1000.8	167.4	833.4	81.3	34.2	47.1
0-90	27379.3	13581.4	13797.9	11654.5	6230.3	5424.2	13520.2	6763.6	6756.5	1339.9	226.4	1113.5	864.8	361.1	503.7
Median Age(Years) - Âge médian(années):															
	32.4	31.7	33.2	15.4	16.1	14.7	42.4	43.7	41.1	73.2	73.5	73.1	44.5	44.8	44.2
Mean Age(Years) - Âge moyen(années):															
	34.9	33.9	35.9	17.8	18.0	17.5	45.2	46.5	43.9	72.0	71.9	72.0	46.5	46.8	46.3

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1990 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1990 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	27790.6	13780.7	14009.9	11796.4	6302.0	5494.5	13725.4	6866.1	6859.3	1358.3	230.4	1127.9	910.4	382.2	528.2
0	401.7	205.9	195.8	401.7	205.9	195.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	385.4	197.4	188.0	385.4	197.4	188.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	374.8	191.6	183.1	374.8	191.6	183.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	379.5	193.8	185.7	379.5	193.8	185.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	393.4	201.1	192.3	393.4	201.1	192.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	1934.7	989.7	944.9	1934.7	989.7	944.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	388.9	199.0	189.9	388.9	199.0	189.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	387.7	198.3	189.4	387.7	198.3	189.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	386.3	197.9	188.5	386.3	197.9	188.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	386.8	198.3	188.5	386.8	198.3	188.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	389.5	199.5	190.0	389.5	199.5	190.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1939.2	992.9	946.3	1939.2	992.9	946.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	384.4	197.4	187.1	384.4	197.4	187.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	377.1	193.7	183.4	377.1	193.7	183.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	372.7	191.3	181.4	372.7	191.3	181.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	375.7	192.2	183.5	375.7	192.2	183.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	379.7	194.4	185.3	379.7	194.4	185.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1889.6	969.0	920.6	1889.6	969.0	920.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	381.7	195.6	186.1	379.5	194.6	184.9	1.9	0.8	1.0	0.2	0.1	0.1	0.2	0.1	0.1
16	371.8	190.1	181.7	368.8	189.2	179.6	2.7	0.8	1.9	0.2	0.1	0.1	0.1	0.1	0.1
17	378.5	193.7	184.8	372.6	192.5	180.1	5.6	1.1	4.5	0.2	0.1	0.1	0.1	0.1	0.1
18	390.2	199.4	190.8	376.0	196.7	179.3	13.9	2.6	11.3	0.2	0.0	0.1	0.2	0.1	0.1
19	413.3	210.2	203.1	384.0	203.6	180.4	28.9	6.5	22.5	0.2	0.1	0.1	0.2	0.1	0.1
15-19	1935.6	989.0	946.6	1880.9	976.6	904.3	53.0	11.8	41.2	0.9	0.3	0.6	0.8	0.4	0.4
20	417.5	212.7	204.8	367.7	199.6	168.1	49.2	12.8	36.3	0.2	0.1	0.1	0.4	0.1	0.3
21	415.5	210.7	204.8	339.8	188.0	151.8	74.7	22.4	52.4	0.2	0.1	0.2	0.7	0.2	0.5
22	419.2	212.4	206.8	312.2	176.8	135.4	105.4	35.2	70.3	0.2	0.1	0.2	1.3	0.3	0.9
23	433.3	219.5	213.8	288.1	167.5	120.7	142.6	51.2	91.4	0.3	0.1	0.2	2.3	0.7	1.6
24	460.9	233.8	227.1	269.1	159.8	109.3	187.9	72.8	115.1	0.4	0.1	0.3	3.5	1.1	2.4
20-24	2146.4	1089.0	1057.4	1577.0	891.7	685.3	559.8	194.4	365.4	1.4	0.4	1.0	8.2	2.5	5.7
25	500.1	253.8	246.3	250.2	151.5	98.7	243.6	99.9	143.6	0.4	0.1	0.3	5.9	2.2	3.6
26	518.9	264.1	254.8	223.3	137.3	86.0	286.8	123.5	163.3	0.6	0.1	0.4	8.2	3.3	5.0
27	529.5	268.8	260.8	195.7	120.4	75.2	322.4	143.7	178.7	0.6	0.2	0.5	10.8	4.5	6.4
28	525.3	266.4	258.8	168.0	103.5	64.5	343.3	157.2	186.2	0.8	0.2	0.6	13.1	5.6	7.5
29	532.1	269.6	262.5	149.6	91.6	58.0	365.5	170.8	194.8	0.9	0.2	0.7	16.1	7.0	9.1
25-29	2605.8	1322.7	1283.1	986.8	604.3	382.4	1561.7	695.0	866.6	3.3	0.8	2.5	54.1	22.6	31.6
30	525.8	265.9	259.9	136.5	84.1	52.5	371.6	175.0	196.7	0.9	0.2	0.7	16.7	6.7	10.0
31	516.2	260.9	255.3	118.4	72.2	46.2	378.0	180.9	197.2	1.1	0.2	0.8	18.7	7.6	11.1
32	512.9	259.2	253.7	104.6	63.5	41.1	386.2	186.8	199.4	1.2	0.3	1.0	20.8	8.5	12.3
33	505.6	254.4	251.2	92.6	55.8	36.8	388.8	189.0	199.9	1.4	0.3	1.1	22.7	9.3	13.4
34	488.3	245.5	242.8	80.8	48.5	32.4	382.0	186.8	195.2	1.6	0.3	1.3	23.9	9.9	14.0
30-34	2548.8	1285.8	1263.0	533.0	324.0	209.0	1906.7	918.4	988.3	6.3	1.4	4.9	102.8	42.0	60.8
35	487.1	244.0	243.1	71.5	42.1	29.3	386.9	190.1	196.9	1.9	0.4	1.5	26.8	11.4	15.4
36	472.1	235.5	236.6	62.9	36.6	26.3	379.6	186.9	192.7	2.1	0.4	1.7	27.4	11.6	15.8
37	454.7	226.8	228.0	56.1	32.2	23.9	368.4	182.4	186.0	2.3	0.5	1.8	28.0	11.8	16.2
38	441.4	221.5	219.9	49.7	28.7	21.1	360.2	180.1	180.1	2.5	0.5	2.0	29.0	12.2	16.8
39	435.5	218.8	216.6	46.5	26.7	19.8	356.3	179.0	177.4	2.8	0.6	2.2	29.9	12.6	17.2
35-39	2290.7	1146.6	1144.2	286.7	166.3	120.4	1851.4	918.4	933.1	11.6	2.3	9.2	141.0	59.6	81.5
40	427.4	215.5	211.9	43.6	25.0	18.6	350.5	177.2	173.4	3.1	0.6	2.5	30.2	12.7	17.5
41	422.2	212.4	209.8	40.3	22.8	17.5	347.6	175.9	171.7	3.5	0.7	2.8	30.8	13.0	17.8
42	421.3	212.9	208.5	37.4	21.0	16.4	348.1	177.6	170.5	3.9	0.8	3.1	31.9	13.4	18.5
43	423.6	213.6	210.0	34.9	19.6	15.4	351.4	179.4	172.0	4.5	0.9	3.6	32.8	13.8	19.0
44	368.3	186.0	182.3	28.8	16.1	12.7	306.4	157.1	149.3	4.3	0.8	3.5	28.8	12.0	16.8
40-44	2062.9	1040.4	1022.5	185.0	104.5	80.5	1704.1	867.2	836.9	19.4	3.8	15.6	154.5	64.9	89.6

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1990 (IR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1990 (IR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	344.3	174.1	170.1	25.8	14.3	11.4	286.0	147.3	138.6	5.0	0.9	4.0	27.6	11.5	16.0
46	335.0	169.1	165.9	24.2	13.4	10.8	279.0	143.8	135.3	5.6	1.0	4.6	26.2	10.9	15.2
47	325.5	164.3	161.2	22.4	12.3	10.1	271.9	140.4	131.5	5.8	1.1	4.7	25.3	10.5	14.8
48	303.4	153.1	150.3	20.2	11.0	9.2	253.3	131.0	122.3	6.2	1.2	5.0	23.7	9.9	13.8
49	291.8	146.9	144.8	19.2	10.5	8.7	243.1	125.8	117.3	6.9	1.2	5.7	22.6	9.4	13.1
45-49	1599.9	807.6	792.3	111.8	61.6	50.2	1333.3	688.3	645.0	29.4	5.4	24.0	125.3	52.4	72.9
50	274.8	138.4	136.3	17.8	9.9	7.9	228.9	118.4	110.4	7.3	1.3	6.0	20.8	8.8	12.0
51	267.1	134.5	132.7	16.9	9.4	7.6	222.5	115.3	107.2	8.0	1.4	6.6	19.7	8.4	11.3
52	257.1	129.5	127.6	16.1	8.8	7.3	213.7	111.5	102.3	8.8	1.5	7.3	18.5	7.8	10.7
53	250.0	125.4	124.6	15.4	8.5	6.9	207.1	107.7	99.4	9.6	1.6	8.0	17.9	7.5	10.3
54	251.5	126.2	125.4	15.4	8.4	7.0	207.6	108.2	99.3	11.1	1.9	9.2	17.5	7.6	9.9
50-54	1300.5	654.0	646.6	81.7	45.0	36.7	1079.8	561.2	518.7	44.7	7.7	37.0	94.3	40.1	54.2
55	247.4	123.6	123.8	15.4	8.5	6.9	202.7	105.8	96.9	12.5	2.1	10.4	16.7	7.1	9.6
56	242.5	121.4	121.1	15.2	8.4	6.8	197.5	103.6	93.9	13.8	2.4	11.4	16.0	7.0	9.0
57	249.0	124.2	124.7	15.6	8.6	7.0	201.3	105.9	95.5	16.0	2.8	13.3	16.0	7.0	9.0
58	250.4	124.9	125.5	15.6	8.7	7.0	201.2	106.3	94.9	17.9	3.1	14.8	15.6	6.8	8.8
59	249.9	123.5	126.3	15.7	8.5	7.2	198.7	105.0	93.8	20.3	3.4	16.8	15.1	6.6	8.5
55-59	1239.1	617.7	621.4	77.5	42.7	34.8	1001.5	526.6	475.0	80.6	13.9	66.6	79.4	34.5	44.9
60	246.2	121.2	124.9	15.9	8.6	7.3	193.4	102.6	90.8	22.6	3.9	18.7	14.3	6.1	8.2
61	236.6	115.4	121.2	15.3	8.2	7.0	184.1	97.4	86.7	24.4	4.2	20.1	12.9	5.5	7.3
62	236.1	114.3	121.9	15.3	8.1	7.2	181.6	96.4	85.2	27.0	4.5	22.5	12.3	5.3	7.0
63	231.2	110.8	120.4	15.2	8.0	7.2	175.2	93.1	82.1	29.4	4.9	24.5	11.4	4.8	6.5
64	230.4	108.6	121.8	15.2	7.8	7.4	171.7	90.8	80.9	32.6	5.4	27.2	10.9	4.6	6.2
60-64	1180.5	570.3	610.3	76.8	40.7	36.1	906.0	480.3	425.7	135.9	22.9	113.1	61.7	26.4	35.3
65	225.4	105.2	120.2	14.8	7.5	7.3	165.7	87.9	77.8	34.7	5.6	29.2	10.1	4.2	5.9
66	219.6	101.1	118.5	14.3	7.1	7.3	158.5	84.1	74.3	37.3	6.0	31.3	9.5	4.0	5.6
67	212.3	96.8	115.5	14.1	6.8	7.4	150.2	80.1	70.0	39.4	6.3	33.1	8.6	3.6	5.0
68	210.8	95.4	115.4	14.1	6.6	7.5	146.2	78.7	67.5	42.4	6.7	35.8	8.1	3.4	4.8
69	200.8	90.0	110.8	13.4	6.1	7.3	135.8	73.9	61.9	44.3	7.0	37.3	7.3	3.0	4.3
65-69	1068.8	488.4	580.4	70.7	34.0	36.7	756.3	404.7	351.6	198.2	31.6	166.7	43.6	18.1	25.5
70-74	798.5	348.2	450.3	56.6	23.7	32.9	497.6	279.6	218.0	220.8	35.1	185.7	23.5	9.8	13.7
75-79	607.1	249.1	357.9	48.6	17.7	30.9	311.9	187.2	124.7	233.6	38.7	194.9	13.0	5.5	7.5
80-84	366.5	136.0	230.5	32.7	10.3	22.4	140.9	90.6	50.3	187.5	32.7	154.7	5.5	2.4	3.1
85-89	186.1	60.6	125.6	17.9	5.1	12.8	47.9	33.0	14.9	118.5	21.8	96.7	1.9	0.8	1.1
90+	90.0	23.7	66.3	9.5	2.3	7.2	13.5	9.5	4.0	66.3	11.7	54.6	0.7	0.3	0.4
Special Age Groups - Groupes d'âge particuliers															
0-14	5763.4	2951.6	2811.8	5763.4	2951.6	2811.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	6895.5	3531.0	3364.5	6884.3	3527.9	3356.5	10.2	2.7	7.5	0.5	0.2	0.3	0.4	0.2	0.2
18-24	2949.9	1498.6	1451.3	2337.0	1292.0	1045.0	602.6	203.5	399.2	1.7	0.5	1.2	8.6	2.6	6.0
18-64	17778.2	8943.7	8834.5	4676.2	2681.0	1995.1	11947.2	5858.8	6088.4	332.9	58.7	274.3	821.9	345.2	476.7
18+	20895.1	10249.7	10645.4	4912.1	2774.1	2138.0	13715.3	6863.4	6851.9	1357.8	230.2	1127.6	910.0	382.0	528.0
25-44	9508.3	4795.5	4712.7	1991.4	1199.1	792.3	7023.9	3399.1	3624.8	40.5	8.3	32.3	452.5	189.1	263.3
45-64	5320.0	2649.5	2670.5	347.8	189.9	157.9	4320.7	2256.3	2064.4	290.7	49.9	240.8	360.8	153.4	207.4
65+	3117.0	1306.0	1810.9	235.9	93.1	142.9	1768.0	1004.6	763.5	1024.9	171.5	853.4	88.1	36.9	51.3
0-90	27790.6	13780.7	14009.9	11796.4	6302.0	5494.5	13725.4	6866.1	6859.3	1358.3	230.4	1127.9	910.4	382.2	528.2
Median Age(Years) - Âge médian(années):															
	32.8	32.0	33.5	15.4	16.0	14.7	42.7	43.9	41.4	73.4	73.6	73.4	44.8	44.9	44.7
Mean Age(Years) - Âge moyen(années):															
	35.0	34.0	36.0	17.8	18.1	17.6	45.4	46.7	44.1	72.2	72.0	72.2	46.7	46.9	46.6

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1991 (PR) - continued
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1991 (PR) - suite

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	28117.6	13938.1	14179.5	11893.2	6348.8	5544.4	13891.4	6951.5	6939.8	1377.3	234.6	1142.7	955.7	403.2	552.5
0	401.7	206.4	195.4	401.7	206.4	195.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	403.2	206.7	196.6	403.2	206.7	196.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	386.9	198.2	188.7	386.9	198.2	188.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	378.1	193.3	184.7	378.1	193.3	184.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	383.3	195.8	187.5	383.3	195.8	187.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	1953.2	1000.3	952.9	1953.2	1000.3	952.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	391.9	200.1	191.8	391.9	200.1	191.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	393.3	201.1	192.3	393.3	201.1	192.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	390.4	199.6	190.9	390.4	199.6	190.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	388.3	198.5	189.8	388.3	198.5	189.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	388.9	199.0	190.0	388.9	199.0	190.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1952.9	998.2	954.7	1952.9	998.2	954.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	389.8	199.2	190.6	389.8	199.2	190.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	387.6	198.9	188.7	387.6	198.9	188.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	380.3	195.2	185.1	380.3	195.2	185.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	376.2	193.1	183.1	376.2	193.1	183.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	379.1	193.9	185.2	379.1	193.9	185.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1913.0	980.5	932.5	1913.0	980.5	932.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	384.6	197.1	187.5	382.7	196.2	186.5	1.6	0.7	0.9	0.2	0.1	0.1	0.1	0.1	0.1
16	386.5	198.1	188.4	383.5	197.3	186.2	2.7	0.7	2.0	0.2	0.1	0.1	0.1	0.1	0.1
17	376.9	192.5	184.3	370.9	191.3	179.6	5.6	1.1	4.5	0.2	0.1	0.1	0.1	0.1	0.1
18	383.4	196.0	187.4	369.4	193.3	176.2	13.7	2.6	11.0	0.2	0.1	0.1	0.2	0.1	0.1
19	394.6	201.3	193.2	366.8	194.9	171.9	27.4	6.3	21.1	0.2	0.1	0.1	0.2	0.1	0.1
15-19	1925.9	985.1	940.9	1873.3	973.0	900.3	50.9	11.4	39.5	0.9	0.3	0.6	0.8	0.4	0.4
20	415.5	210.8	204.8	366.5	197.8	168.8	48.3	12.8	35.6	0.2	0.1	0.1	0.4	0.1	0.3
21	419.9	213.2	206.7	344.7	190.3	154.4	74.3	22.6	51.7	0.2	0.1	0.2	0.7	0.2	0.5
22	418.2	211.5	206.7	313.3	176.4	136.8	103.4	34.7	68.7	0.2	0.1	0.2	1.3	0.3	0.9
23	421.4	212.9	208.5	283.3	163.7	119.7	135.7	48.5	87.1	0.3	0.1	0.2	2.2	0.7	1.5
24	433.9	219.2	214.7	257.3	151.7	105.6	173.1	66.4	106.7	0.3	0.1	0.3	3.2	1.0	2.2
20-24	2109.0	1067.7	1041.3	1565.1	879.8	685.2	534.8	185.0	349.7	1.3	0.4	0.9	7.8	2.4	5.4
25	460.6	233.3	227.3	235.2	141.7	93.4	219.8	89.4	130.4	0.4	0.1	0.3	5.3	2.1	3.2
26	498.7	252.8	245.9	219.7	134.4	85.2	270.7	115.0	155.7	0.6	0.1	0.4	7.8	3.2	4.6
27	517.0	262.6	254.4	196.8	121.2	75.7	309.2	136.9	172.4	0.6	0.1	0.5	10.4	4.4	5.9
28	527.7	267.6	260.1	174.2	107.3	66.9	339.8	154.4	185.5	0.7	0.2	0.6	13.0	5.8	7.2
29	524.7	265.9	258.7	152.6	93.5	59.1	355.7	165.3	190.4	0.8	0.2	0.6	15.6	7.0	8.6
25-29	2528.7	1282.2	1246.5	978.4	598.1	380.3	1495.2	660.8	834.4	3.1	0.8	2.3	51.9	22.4	29.5
30	532.6	269.6	263.0	143.4	88.4	55.0	371.8	174.2	197.5	0.9	0.2	0.7	16.5	6.8	9.8
31	526.9	266.3	260.5	125.3	76.5	48.8	381.8	181.7	200.1	1.0	0.2	0.8	18.7	7.8	10.9
32	517.6	261.4	256.2	109.3	66.5	42.8	386.5	186.0	200.4	1.2	0.3	0.9	20.7	8.6	12.0
33	514.6	260.0	254.6	97.8	59.2	38.6	392.6	190.8	201.8	1.4	0.3	1.1	22.8	9.6	13.2
34	506.3	254.7	251.6	87.0	52.2	34.8	393.1	191.7	201.3	1.6	0.4	1.2	24.7	10.4	14.3
30-34	2598.0	1312.0	1285.9	562.8	342.9	219.9	1925.7	924.5	1001.1	6.1	1.4	4.7	103.4	43.2	60.2
35	488.5	245.4	243.1	74.4	44.1	30.4	385.2	189.2	196.0	1.8	0.4	1.4	27.0	11.7	15.3
36	487.0	243.9	243.1	67.6	39.6	28.0	388.8	191.6	197.2	2.1	0.4	1.7	28.4	12.2	16.2
37	472.1	235.6	236.5	60.9	35.0	25.8	379.6	187.6	192.0	2.3	0.5	1.8	29.4	12.6	16.9
38	454.5	226.6	227.9	53.3	30.7	22.7	368.3	182.6	185.7	2.5	0.5	2.0	30.4	12.8	17.5
39	442.5	222.0	220.6	49.3	28.3	21.0	359.5	179.8	179.6	2.8	0.6	2.2	31.0	13.2	17.7
35-39	2344.7	1173.5	1171.2	305.6	177.7	127.9	1881.4	930.9	950.5	11.5	2.4	9.1	146.2	62.6	83.7
40	437.0	219.5	217.5	46.4	26.5	19.9	356.2	179.1	177.2	3.0	0.6	2.4	31.4	13.3	18.1
41	429.8	216.6	213.2	42.4	24.0	18.3	352.0	178.3	173.7	3.4	0.7	2.7	32.0	13.6	18.3
42	424.4	213.3	211.1	38.8	21.7	17.2	348.7	176.9	171.8	3.8	0.8	3.0	33.0	13.9	19.1
43	423.1	213.6	209.5	35.8	20.1	15.7	349.4	178.5	171.0	4.3	0.8	3.5	33.6	14.2	19.4
44	424.5	213.9	210.6	33.6	18.7	14.8	352.1	180.1	172.0	4.7	0.9	3.8	34.1	14.2	19.9
40-44	2138.8	1077.0	1061.8	196.9	111.0	85.9	1758.5	892.9	865.6	19.3	3.9	15.4	164.1	69.2	94.8

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.2 Population by Marital Status, Age and Sex, July 1, 1991 (PR) - concluded
Tableau 1.2 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1991 (PR) - fin

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	368.7	186.0	182.7	28.0	15.5	12.5	305.0	156.8	148.3	5.2	1.0	4.2	30.5	12.8	17.8
46	344.0	173.7	170.3	25.4	14.0	11.4	285.1	147.1	138.1	5.5	1.0	4.5	27.9	11.6	16.3
47	334.1	168.3	165.8	23.2	12.7	10.5	278.0	143.2	134.7	5.7	1.1	4.6	27.2	11.2	15.9
48	324.5	163.6	160.9	21.8	11.8	10.0	269.9	139.6	130.3	6.4	1.2	5.2	26.5	11.0	15.4
49	302.8	152.6	150.3	20.0	10.9	9.1	251.5	130.2	121.2	6.9	1.3	5.6	24.5	10.2	14.3
45-49	1674.1	844.1	830.0	118.4	64.9	53.5	1389.5	716.9	672.6	29.7	5.5	24.1	136.6	56.8	79.8
50	291.6	146.6	145.0	19.0	10.5	8.5	242.1	125.1	117.0	7.4	1.3	6.1	23.1	9.7	13.4
51	274.5	138.2	136.4	17.4	9.6	7.8	228.1	118.3	109.9	7.9	1.4	6.6	21.1	8.9	12.2
52	267.1	134.2	132.9	16.6	9.0	7.7	221.6	115.4	106.2	8.8	1.5	7.3	20.0	8.4	11.6
53	257.1	129.3	127.8	15.7	8.6	7.0	212.8	111.0	101.8	9.5	1.6	7.9	19.1	8.0	11.1
54	249.5	125.0	124.6	15.0	8.2	6.9	205.8	107.2	98.7	10.7	1.8	8.8	18.0	7.8	10.2
50-54	1339.9	673.2	666.7	83.7	45.8	37.9	1110.5	577.0	533.6	44.3	7.6	36.7	101.3	42.8	58.6
55	251.6	125.8	125.8	15.3	8.4	6.8	206.3	107.8	98.5	12.3	2.1	10.2	17.7	7.4	10.2
56	247.0	123.3	123.7	15.1	8.3	6.8	201.3	105.3	96.1	13.6	2.4	11.2	17.0	7.4	9.7
57	242.2	121.2	121.0	14.9	8.2	6.7	196.1	103.3	92.7	15.1	2.6	12.4	16.2	7.0	9.1
58	248.0	123.5	124.4	15.0	8.3	6.8	199.5	105.3	94.3	17.2	3.0	14.2	16.2	7.0	9.2
59	249.7	124.3	125.4	15.4	8.4	7.1	198.8	105.6	93.2	19.6	3.4	16.2	15.9	6.9	8.9
55-59	1238.4	618.2	620.2	75.8	41.6	34.2	1002.0	527.3	474.7	77.7	13.5	64.2	82.9	35.8	47.2
60	248.8	122.7	126.1	15.8	8.6	7.3	195.5	103.8	91.7	22.1	3.8	18.3	15.3	6.5	8.8
61	244.2	119.9	124.2	15.5	8.4	7.1	190.2	101.2	89.0	24.5	4.3	20.2	14.0	6.0	7.9
62	234.6	114.1	120.5	14.9	8.0	6.9	180.5	96.2	84.4	26.2	4.4	21.8	12.9	5.6	7.4
63	233.9	112.7	121.1	15.2	8.1	7.2	177.4	94.6	82.8	29.2	5.0	24.3	12.1	5.1	6.9
64	228.8	109.2	119.6	15.0	7.8	7.2	170.8	91.2	79.7	31.6	5.4	26.3	11.3	4.9	6.4
60-64	1190.2	578.6	611.6	76.5	40.8	35.7	914.4	486.9	427.6	133.7	22.9	110.8	65.5	28.1	37.5
65	228.3	107.1	121.2	14.9	7.7	7.2	168.2	89.4	78.8	34.6	5.6	29.0	10.7	4.5	6.3
66	222.8	103.5	119.4	14.4	7.3	7.2	161.1	85.9	75.3	37.1	6.1	31.0	10.2	4.3	5.9
67	216.7	99.3	117.4	14.1	6.9	7.2	153.9	82.1	71.8	39.5	6.4	33.0	9.2	3.8	5.3
68	209.3	94.9	114.4	13.7	6.5	7.1	145.7	78.3	67.4	41.5	6.6	34.9	8.5	3.5	5.0
69	207.4	93.2	114.2	13.4	6.2	7.3	140.8	76.4	64.4	45.2	7.3	37.9	7.9	3.3	4.7
65-69	1084.6	497.9	586.7	70.5	34.5	36.0	769.7	412.0	357.7	197.7	32.0	165.7	46.6	19.3	27.3
70-74	834.0	364.3	469.7	56.9	24.0	32.8	523.3	293.2	230.1	228.0	36.3	191.7	25.8	10.7	15.1
75-79	622.2	255.6	366.6	48.4	17.6	30.8	321.9	192.7	129.1	238.0	39.4	198.6	13.9	5.8	8.1
80-84	382.3	142.2	240.1	33.4	10.4	23.0	148.6	95.4	53.2	194.3	33.9	160.5	6.0	2.6	3.4
85-89	192.4	62.2	130.2	18.4	5.1	13.3	50.1	34.2	15.9	121.9	22.0	99.9	2.0	0.8	1.2
90+	95.5	25.5	70.0	10.1	2.5	7.6	14.8	10.3	4.5	69.7	12.3	57.5	0.8	0.3	0.5
Special Age Groups - Groupes d'âge particuliers															
0-14	5819.1	2978.9	2840.1	5819.1	2978.9	2840.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	6967.0	3566.7	3400.4	6956.2	3563.8	3392.4	9.9	2.5	7.4	0.5	0.2	0.3	0.4	0.2	0.2
18-24	2887.0	1465.0	1422.0	2301.3	1268.0	1033.3	575.8	194.0	381.9	1.7	0.5	1.2	8.2	2.6	5.6
18-64	17939.6	9023.8	8915.8	4699.4	2690.8	2008.5	12053.0	5911.1	6142.0	327.0	58.5	268.6	860.2	363.4	496.8
18+	21150.6	10571.5	10779.1	4937.1	2785.0	2152.0	13881.5	6949.0	6932.4	1376.8	234.4	1142.4	955.3	403.0	552.3
25-44	9610.1	4844.7	4765.4	2043.8	1229.7	814.0	7060.8	3409.1	3651.7	40.0	8.4	31.5	465.6	197.5	268.2
45-64	5442.5	2714.1	2728.5	354.3	193.1	161.2	4416.5	2308.0	2108.4	285.4	49.6	235.8	386.4	163.4	223.0
65+	3211.0	1347.7	1863.3	237.7	94.2	143.5	1828.4	1038.0	790.5	1049.8	175.9	873.8	95.1	39.6	55.5
0-90	28117.6	13938.1	14179.5	11893.2	6348.8	5544.4	13891.4	6951.5	6939.8	1377.3	234.6	1142.7	955.7	403.2	552.5
Median Age(Years) - Âge médian(années):															
	33.2	32.5	33.9	15.3	16.0	14.6	43.0	44.3	41.7	73.6	73.7	73.6	45.1	45.1	45.1
Mean Age(Years) - Âge moyen(années):															
	35.3	34.2	36.2	17.9	18.1	17.6	45.6	47.0	44.3	72.4	72.2	72.4	47.0	47.1	47.0

(IR): Revised intercensal estimates. - Estimations intercensitaires révisées.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.4 Population by Marital Status, Age and Sex, July 1 1992 (PR)
Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1992 (PR)

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	28435.6	14091.6	14344.0	12065.2	6440.6	5624.5	14125.0	7027.0	7098.0	1212.4	184.3	1028.1	1033.0	439.6	593.4
0	401.7	206.0	195.7	401.7	206.0	195.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	403.8	207.3	196.5	403.8	207.3	196.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	405.4	207.8	197.6	405.4	207.8	197.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	389.4	199.4	189.9	389.4	199.5	189.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	381.0	194.8	186.2	381.0	194.8	186.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	1981.2	1015.3	966.0	1981.2	1015.3	966.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	386.5	197.4	189.1	386.5	197.4	189.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	395.1	201.8	193.3	395.1	201.8	193.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	396.2	202.6	193.6	396.2	202.6	193.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	393.2	201.0	192.2	393.2	201.0	192.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	391.0	199.9	191.1	391.0	199.9	191.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1962.1	1002.8	959.3	1962.1	1002.8	959.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	391.8	200.5	191.3	391.8	200.5	191.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	392.5	200.7	191.8	392.5	200.7	191.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	390.3	200.3	190.0	390.3	200.3	190.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	382.9	196.6	186.3	382.9	196.6	186.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	378.9	194.5	184.4	378.9	194.5	184.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1936.4	992.6	943.8	1936.4	992.6	943.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	382.0	195.6	186.5	382.0	195.6	186.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
16	387.5	198.5	188.9	385.4	197.7	187.7	1.8	0.7	1.1	0.2	0.1	0.1	0.2	0.1	0.1
17	389.9	199.6	190.3	386.2	198.7	187.5	3.4	0.8	2.6	0.2	0.1	0.1	0.1	0.1	0.1
18	380.7	194.4	186.3	372.7	192.9	179.8	7.7	1.4	6.3	0.2	0.1	0.1	0.2	0.1	0.1
19	387.5	197.9	189.6	368.5	194.2	174.3	18.6	3.6	15.0	0.2	0.1	0.1	0.2	0.1	0.2
15-19	1927.6	986.0	941.6	1894.8	979.0	915.8	31.4	6.5	25.0	0.7	0.2	0.4	0.7	0.3	0.4
20	398.0	202.8	195.2	361.2	194.1	167.2	36.2	8.5	27.7	0.2	0.1	0.1	0.4	0.1	0.3
21	418.6	212.2	206.3	355.9	195.0	160.9	61.6	16.9	44.7	0.2	0.1	0.1	0.8	0.2	0.6
22	423.1	214.6	208.5	329.5	185.2	144.4	91.8	28.9	62.9	0.2	0.1	0.1	1.5	0.4	1.1
23	421.0	212.9	208.1	293.6	168.6	125.0	124.8	43.5	81.3	0.2	0.1	0.1	2.4	0.7	1.7
24	423.3	213.8	209.4	260.0	153.2	106.7	159.0	59.2	99.8	0.2	0.1	0.2	4.1	1.3	2.7
20-24	2083.9	1056.3	1027.6	1600.3	896.2	704.1	473.4	157.1	316.3	1.0	0.3	0.6	9.3	2.8	6.5
25	436.0	220.2	215.7	232.3	139.5	92.8	197.7	78.7	119.0	0.3	0.1	0.2	5.7	2.0	3.8
26	462.7	234.4	228.3	210.1	128.8	81.3	244.0	102.2	141.8	0.2	0.1	0.1	8.4	3.4	5.0
27	500.3	253.6	246.7	196.5	121.8	74.7	292.2	126.9	165.3	0.4	0.1	0.3	11.2	4.7	6.5
28	518.1	263.3	254.8	176.4	109.7	66.7	327.2	147.3	179.9	0.4	0.1	0.3	14.0	6.1	7.9
29	527.6	267.5	260.2	156.6	97.0	59.5	353.6	162.7	190.9	0.5	0.1	0.4	16.9	7.7	9.3
25-29	2444.6	1238.9	1205.7	972.0	596.9	375.0	1414.6	617.8	796.9	1.7	0.5	1.3	56.3	23.8	32.5
30	524.6	265.7	258.9	138.3	85.0	53.4	366.2	171.6	194.6	0.6	0.1	0.5	19.4	8.9	10.5
31	532.9	269.7	263.1	131.8	81.6	50.3	380.2	179.4	200.8	0.6	0.1	0.5	20.3	8.6	11.7
32	526.6	266.0	260.5	115.8	70.8	45.0	387.4	185.2	202.3	0.7	0.1	0.5	22.6	9.8	12.7
33	518.1	261.5	256.6	102.1	62.2	40.0	390.7	188.6	202.1	0.9	0.2	0.7	24.4	10.5	13.9
34	514.9	259.9	255.0	91.9	55.6	36.3	395.7	192.6	203.1	1.0	0.2	0.8	26.2	11.4	14.8
30-34	2616.9	1322.7	1294.2	580.1	355.2	224.9	1920.3	917.5	1002.8	3.7	0.8	2.9	112.8	49.2	63.6
35	506.2	254.4	251.9	82.1	49.3	32.8	395.0	192.8	202.2	1.2	0.3	1.0	27.8	12.0	15.8
36	488.3	245.0	243.3	70.4	41.7	28.7	386.5	189.9	196.6	1.3	0.2	1.1	30.1	13.2	16.9
37	487.8	243.6	243.4	64.6	37.8	26.8	389.3	191.8	197.5	1.6	0.3	1.3	31.4	13.7	17.7
38	471.9	235.3	236.7	58.3	33.5	24.9	379.6	187.5	192.1	1.7	0.3	1.4	32.2	13.9	18.3
39	454.6	226.5	228.2	51.4	29.5	21.9	368.1	182.4	185.8	2.0	0.4	1.6	33.1	14.2	18.9
35-39	2408.8	1204.6	1203.4	326.9	191.7	135.2	1918.5	944.3	974.2	7.9	1.5	6.4	154.7	67.1	87.6
40	442.4	221.6	220.8	47.7	27.4	20.4	358.8	179.3	179.6	2.3	0.4	1.8	33.6	14.6	19.0
41	437.2	219.4	217.8	45.2	25.8	19.4	355.6	178.6	177.0	2.3	0.4	1.9	34.1	14.6	19.5
42	429.5	216.3	213.2	41.3	23.4	17.8	351.0	177.5	173.4	2.7	0.5	2.2	34.5	14.8	19.7
43	424.2	213.1	211.1	37.9	21.1	16.8	347.7	176.2	171.5	3.1	0.6	2.5	35.5	15.2	20.3
44	422.8	213.3	209.4	35.0	19.6	15.4	348.8	177.9	170.8	3.6	0.6	3.0	35.4	15.2	20.2
40-44	2156.1	1083.7	1072.3	207.0	117.3	89.8	1761.9	889.5	872.4	14.0	2.5	11.4	173.1	74.4	98.8

See notes at end of following page. - Voir les notes à la fin de la page suivante.

Table 1.4 Population by Marital Status, Age and Sex, July 1 1992 (PR)
Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1992 (PR)

Canada — In thousands - En milliers

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	424.0	213.6	210.4	32.9	18.3	14.6	351.2	179.5	171.8	4.0	0.7	3.3	35.8	15.1	20.7
46	368.1	185.5	182.6	27.4	15.1	12.3	304.1	156.0	148.1	4.2	0.7	3.5	32.3	13.7	18.7
47	343.3	173.3	170.1	24.9	13.7	11.2	284.4	146.4	138.0	4.6	0.7	3.9	29.4	12.4	17.0
48	333.5	167.8	165.7	22.8	12.4	10.4	277.5	142.6	134.9	4.8	0.8	4.0	28.4	11.9	16.5
49	323.8	163.0	160.8	21.4	11.5	9.8	269.5	138.9	130.5	5.5	0.9	4.5	27.6	11.6	16.0
45-49	1792.7	903.1	889.6	129.4	71.2	58.2	1486.8	763.4	723.3	23.1	3.9	19.2	153.5	64.6	88.9
50	302.2	152.0	150.2	19.6	10.7	9.0	251.2	129.7	121.5	6.0	1.0	5.0	25.4	10.7	14.7
51	291.1	146.1	145.0	18.7	10.3	8.4	242.5	124.8	117.7	6.1	1.0	5.1	23.9	10.1	13.8
52	274.0	137.7	136.3	17.1	9.4	7.7	228.5	118.0	110.5	6.6	1.0	5.6	21.8	9.3	12.5
53	266.5	133.6	132.9	16.4	8.8	7.6	222.0	115.0	107.0	7.5	1.1	6.4	20.7	8.8	11.9
54	256.5	128.6	127.8	15.4	8.5	7.0	213.2	110.7	102.5	8.2	1.2	7.0	19.6	8.3	11.4
50-54	1390.3	698.1	692.2	87.2	47.5	39.7	1157.4	598.2	559.1	34.3	5.2	29.1	111.4	47.1	64.3
55	248.8	124.3	124.6	14.8	8.0	6.8	206.3	106.9	99.4	9.3	1.5	7.9	18.4	7.9	10.5
56	250.9	125.1	125.7	15.0	8.2	6.8	207.4	107.7	99.7	10.4	1.6	8.8	18.1	7.6	10.4
57	246.2	122.6	123.6	14.9	8.1	6.7	202.4	105.1	97.2	11.6	1.8	9.8	17.4	7.6	9.9
58	241.2	120.3	120.8	14.6	8.0	6.6	197.0	103.1	93.9	13.1	2.1	11.0	16.5	7.2	9.3
59	246.7	122.5	124.2	14.7	8.0	6.7	200.4	105.0	95.4	15.1	2.4	12.7	16.4	7.1	9.3
55-59	1233.8	614.9	618.9	74.0	40.4	33.6	1013.5	527.8	485.7	59.4	9.3	50.2	86.8	37.4	49.4
60	248.2	123.2	125.1	15.1	8.1	7.0	199.6	105.3	94.3	17.4	2.7	14.7	16.1	7.0	9.1
61	247.2	121.4	125.7	15.5	8.3	7.2	197.1	103.6	93.5	19.2	3.0	16.2	15.3	6.5	8.9
62	242.5	118.6	123.8	15.2	8.2	7.0	191.7	100.9	90.7	21.5	3.5	18.0	14.1	6.1	8.1
63	232.7	112.6	120.1	14.5	7.7	6.8	182.0	95.8	86.1	23.2	3.5	19.7	13.0	5.6	7.4
64	231.6	111.1	120.5	14.9	7.8	7.1	178.6	94.2	84.4	26.1	4.1	22.0	12.1	5.1	7.0
60-64	1202.2	586.9	615.3	75.2	40.1	35.1	949.0	499.9	449.0	107.4	16.7	90.7	70.6	30.2	40.4
65	226.1	107.3	118.8	14.6	7.5	7.1	171.8	90.6	81.2	28.4	4.5	24.0	11.3	4.8	6.5
66	225.4	105.1	120.3	14.5	7.4	7.1	169.3	88.8	80.5	31.0	4.5	26.5	10.7	4.4	6.3
67	219.5	101.3	118.2	14.0	6.9	7.0	162.1	85.2	76.8	33.4	4.9	28.4	10.1	4.1	5.9
68	213.1	96.9	116.1	13.7	6.6	7.1	154.7	81.3	73.4	35.6	5.3	30.3	9.1	3.8	5.3
69	205.5	92.3	113.1	13.3	6.2	7.0	146.3	77.3	69.0	37.5	5.4	32.1	8.4	3.4	5.0
65-69	1089.5	502.9	586.6	70.0	34.6	35.4	804.0	423.1	380.9	165.9	24.6	141.3	49.6	20.5	29.1
70-74	875.9	382.9	493.0	57.9	24.7	33.2	583.0	316.7	266.3	205.6	29.5	176.1	29.4	12.0	17.4
75-79	633.8	259.7	374.1	47.3	17.1	30.2	356.0	205.1	151.0	215.3	31.3	184.0	15.1	6.2	8.9
80-84	399.5	148.9	250.6	34.1	10.6	23.5	174.8	107.3	67.5	184.0	28.3	155.7	6.6	2.8	3.9
85-89	201.0	64.5	136.5	18.7	5.0	13.7	61.4	40.0	21.5	118.8	18.7	100.1	2.1	0.9	1.3
90+	100.1	26.8	73.3	10.7	2.6	8.1	18.9	12.8	6.0	69.7	11.0	58.7	0.9	0.4	0.5
Special Age Groups - Groupes d'âge particuliers															
0-14	5879.8	3010.6	2869.1	5879.8	3010.6	2869.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	7039.2	3604.4	3434.8	7033.4	3602.6	3430.8	5.2	1.5	3.7	0.3	0.1	0.2	0.3	0.1	0.1
18-24	2852.1	1448.6	1403.5	2341.4	1283.2	1058.2	499.7	162.1	337.6	1.3	0.5	0.8	9.7	2.9	6.8
18-64	18096.6	9101.6	8995.1	4793.1	2743.4	2049.7	12121.6	5920.6	6201.1	253.0	40.9	212.1	928.9	396.7	532.2
18+	21396.4	10487.2	10909.2	5031.8	2838.0	2193.8	14119.8	7025.5	7094.3	1212.1	184.2	1027.9	1032.7	439.5	593.3
25-44	9625.6	4850.0	4775.6	2085.9	1261.1	824.9	7015.3	3369.1	3646.3	27.4	5.3	22.1	496.9	214.5	282.4
45-64	5619.0	2803.0	2816.0	365.8	199.1	166.6	4606.6	2389.4	2217.2	224.3	35.1	189.2	422.3	179.3	243.0
65+	3299.8	1385.6	1914.2	238.6	94.6	144.1	1998.2	1105.0	893.2	959.1	143.3	815.8	103.8	42.7	61.1
0-90	28435.6	14091.6	14344.0	12065.2	6440.6	5624.5	14125.0	7027.0	7098.0	1212.4	184.3	1028.1	1033.0	439.6	593.4
Median Age(Years) - Âge médian(années):															
	33.6	32.8	34.3	15.4	16.1	14.7	43.7	44.9	42.4	74.5	74.5	74.5	45.3	45.1	45.4
Mean Age(Years) - Âge moyen(années):															
	35.5	34.4	36.5	17.9	18.2	17.7	46.3	47.5	45.1	73.4	73.1	73.5	47.1	47.0	47.1

(PR): Updated postcensal estimates. - Estimations postcensitaires mises à jour.
Note: Each figure has been rounded independently to the nearest hundred.
Nota: Chaque nombre a été arrondi individuellement à la centaine près.

Table 1.4 Population by Marital Status, Age and Sex, July 1, 1993 (PR)
Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1993 (PR)

Canada (In thousands - En milliers)

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
TOTAL	28940.6	14343.1	14597.5	12336.5	6581.8	5754.7	14055.3	7030.4	7025.0	1424.2	247.7	1176.4	1124.6	483.3	641.4
0	393.1	201.3	191.8	393.1	201.3	191.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
1	404.6	207.1	197.4	404.6	207.1	197.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
2	405.8	208.4	197.4	405.8	208.4	197.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
3	407.2	208.6	198.5	407.2	208.6	198.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
4	392.2	200.7	191.5	392.2	200.7	191.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0- 4	2002.8	1026.2	976.7	2002.8	1026.2	976.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5	385.0	196.7	188.3	385.0	196.7	188.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
6	387.3	197.4	190.0	387.3	197.4	190.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
7	399.0	203.6	195.5	399.0	203.6	195.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
8	399.2	203.8	195.4	399.2	203.8	195.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
9	395.5	201.8	193.6	395.5	201.8	193.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
5- 9	1966.0	1003.3	962.7	1966.0	1003.3	962.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10	392.8	200.7	192.1	392.8	200.7	192.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
11	393.0	200.8	192.2	393.0	200.8	192.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
12	395.6	202.4	193.2	395.6	202.4	193.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
13	394.0	202.4	191.7	394.0	202.4	191.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
14	387.5	199.0	188.5	387.5	199.0	188.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
10-14	1962.9	1005.2	957.7	1962.9	1005.2	957.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
15	383.8	197.1	186.7	383.6	197.0	186.6	0.2	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0
16	387.2	198.1	189.0	386.8	198.1	188.7	0.4	0.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0
17	392.6	201.1	191.5	389.9	200.2	189.7	2.3	0.8	1.6	0.2	0.1	0.1	0.2	0.1	0.1
18	395.2	202.2	193.0	389.7	201.0	188.7	5.2	1.0	4.1	0.2	0.1	0.1	0.2	0.1	0.1
19	386.2	196.8	189.4	373.9	194.5	179.4	11.9	2.2	9.8	0.2	0.1	0.1	0.2	0.1	0.1
15-19	1944.9	995.3	949.6	1923.8	990.9	933.0	20.0	4.0	16.0	0.6	0.2	0.4	0.5	0.2	0.3
20	392.9	200.3	192.5	365.3	194.5	170.8	27.0	5.7	21.3	0.2	0.1	0.1	0.4	0.1	0.3
21	405.1	206.0	199.0	354.9	193.3	161.6	49.1	12.5	36.6	0.2	0.1	0.2	0.9	0.2	0.6
22	426.8	215.8	211.1	346.7	192.3	154.4	78.1	22.9	55.2	0.3	0.1	0.2	1.7	0.5	1.2
23	432.7	218.9	213.8	317.2	180.7	136.5	112.3	37.3	75.0	0.3	0.1	0.2	2.8	0.8	2.0
24	430.7	217.5	213.2	278.5	162.5	116.1	147.7	53.7	94.0	0.3	0.1	0.2	4.1	1.3	2.9
20-24	2088.1	1058.5	1029.6	1662.6	923.2	739.4	414.2	132.0	282.2	1.3	0.4	1.0	10.0	2.9	7.1
25	433.9	219.0	214.9	244.1	146.2	97.9	183.4	70.7	112.7	0.4	0.1	0.3	5.9	2.0	3.9
26	446.5	225.5	221.0	216.8	132.1	84.7	221.2	90.5	130.7	0.5	0.1	0.4	7.9	2.8	5.1
27	473.3	239.6	233.6	195.8	121.5	74.3	265.7	113.5	152.2	0.6	0.1	0.4	11.2	4.5	6.7
28	510.7	258.9	251.9	183.3	114.9	68.5	311.7	137.5	174.2	0.8	0.2	0.6	14.9	6.3	8.6
29	528.0	268.2	259.8	164.9	103.3	61.6	343.8	156.7	187.1	0.8	0.2	0.6	18.3	8.0	10.4
25-29	2392.3	1211.2	1181.1	1005.0	617.9	387.1	1325.9	569.0	756.9	3.0	0.7	2.3	58.3	23.6	34.7
30	538.0	273.0	265.0	147.6	92.1	55.6	368.5	171.2	197.2	1.0	0.3	0.8	20.9	9.5	11.4
31	534.7	271.2	263.5	130.9	80.7	50.2	379.3	179.4	199.9	1.1	0.3	0.8	23.4	10.9	12.5
32	541.6	274.4	267.2	125.7	77.7	48.0	390.2	185.8	204.4	1.2	0.3	0.9	24.5	10.7	13.8
33	535.0	270.5	264.6	111.3	67.8	43.5	395.6	190.5	205.0	1.4	0.3	1.1	26.7	11.8	15.0
34	525.3	265.3	260.0	98.3	59.6	38.6	396.9	192.7	204.2	1.6	0.4	1.2	28.5	12.6	15.9
30-34	2674.6	1354.4	1320.2	613.9	377.9	236.0	1930.4	919.6	1010.8	6.3	1.5	4.8	124.0	55.4	68.6
35	521.8	263.6	258.2	89.1	53.8	35.3	400.6	195.9	204.7	1.8	0.4	1.4	30.3	13.6	16.8
36	512.4	257.6	254.7	79.8	47.7	32.1	398.5	195.3	203.2	2.0	0.5	1.5	32.0	14.2	17.8
37	494.2	248.3	246.0	68.7	40.4	28.3	389.2	192.2	197.0	2.3	0.5	1.8	34.1	15.2	18.9
38	492.2	246.4	245.8	63.2	36.6	26.6	391.3	193.7	197.6	2.6	0.6	2.1	35.1	15.5	19.6
39	476.7	237.7	239.0	57.4	32.6	24.7	380.6	188.7	191.9	2.8	0.6	2.2	35.9	15.7	20.1
35-39	2497.4	1253.7	1243.7	358.1	211.1	147.1	1960.2	965.8	994.4	11.5	2.6	9.0	167.5	74.3	93.2
40	458.6	228.5	230.1	50.5	28.7	21.8	368.5	183.3	185.2	3.1	0.7	2.4	36.5	15.8	20.7
41	446.2	223.7	222.5	47.1	26.8	20.3	359.0	180.1	178.9	3.5	0.7	2.7	36.7	16.0	20.6
42	440.0	220.9	219.1	44.6	25.3	19.3	354.8	178.7	176.1	3.8	0.8	3.0	36.8	16.1	20.8
43	432.5	217.8	214.6	40.9	23.0	17.8	350.0	177.5	172.5	4.2	0.9	3.4	37.4	16.4	21.0
44	426.4	214.2	212.2	37.5	20.7	16.7	346.1	175.9	170.2	4.7	1.0	3.7	38.1	16.6	21.6
40-44	2203.7	1105.1	1098.6	228.5	124.5	96.8	1778.3	895.5	882.8	19.3	4.1	15.2	185.5	80.9	104.6

See footnote(s) and abbreviation(s) at the end of the publication.

Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, July 1, 1993 (PR) - continued
Tableau 1.4 *Population selon l'état matrimonial, l'âge et le sexe, au 1er juillet 1993 (PR)* - suite

Canada (In thousands - En milliers)

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin	Total	Male Masculin	Female Féminin
45	424.8	214.2	210.6	34.6	19.2	15.3	346.5	177.1	169.3	5.3	1.1	4.2	38.5	16.8	21.7
46	426.0	214.5	211.5	32.6	18.0	14.6	349.2	178.9	170.3	5.8	1.1	4.6	38.5	16.5	22.1
47	369.6	186.3	183.3	27.2	14.9	12.3	301.9	155.5	146.4	6.3	1.2	5.0	34.2	14.7	19.5
48	344.6	173.7	170.8	24.7	13.5	11.2	281.8	145.6	136.3	6.7	1.3	5.5	31.3	13.4	17.9
49	334.5	168.2	166.3	22.6	12.2	10.3	274.7	141.7	133.0	7.0	1.4	5.6	30.2	12.8	17.3
45-49	1899.5	957.0	942.5	141.6	77.9	63.7	1554.1	798.8	755.3	31.1	6.1	25.0	172.6	74.2	98.5
50	324.5	163.2	161.3	21.2	11.3	9.8	266.6	138.0	128.6	7.8	1.5	6.3	28.9	12.4	16.5
51	302.8	152.2	150.6	19.5	10.5	9.0	248.3	128.8	119.5	8.4	1.6	6.8	26.7	11.4	15.3
52	291.6	146.1	145.5	18.5	10.1	8.4	239.0	123.7	115.3	9.0	1.6	7.3	25.1	10.7	14.4
53	274.4	137.6	136.8	16.9	9.2	7.7	225.1	116.9	108.2	9.7	1.7	8.0	22.7	9.8	12.9
54	267.0	133.6	133.4	16.2	8.6	7.6	218.8	114.2	104.6	10.7	1.8	8.9	21.4	9.1	12.3
50-54	1460.3	732.8	727.4	92.2	49.7	42.6	1197.9	621.6	576.2	45.5	8.2	37.2	124.7	53.3	71.4
55	257.0	128.7	128.4	15.2	8.3	6.9	210.0	109.8	100.2	11.6	2.0	9.6	20.2	8.6	11.6
56	249.6	124.3	125.3	14.6	7.8	6.8	202.9	105.9	97.0	13.0	2.3	10.7	19.0	8.3	10.7
57	250.9	124.9	126.1	14.8	8.0	6.8	202.7	106.3	96.4	14.8	2.6	12.3	18.6	7.9	10.7
58	246.4	122.5	124.0	14.6	7.9	6.7	197.7	103.9	93.9	16.3	2.9	13.4	17.8	7.7	10.0
59	241.2	120.1	121.2	14.3	7.7	6.6	192.1	101.8	90.3	18.0	3.2	14.8	16.8	7.3	9.5
55-59	1245.2	620.4	624.9	73.6	39.8	33.8	1005.5	527.8	477.8	73.7	13.0	60.8	92.4	39.8	52.6
60	246.5	122.1	124.4	14.5	7.8	6.7	195.0	103.5	91.5	20.4	3.6	16.8	16.6	7.2	9.5
61	247.7	122.5	125.1	14.9	7.9	7.0	193.6	103.6	90.0	22.9	4.0	19.0	16.3	7.1	9.2
62	246.1	120.4	125.7	15.2	8.1	7.1	189.5	101.3	88.2	25.7	4.5	21.2	15.6	6.5	9.1
63	241.2	117.5	123.7	14.8	7.9	7.0	183.8	98.5	85.3	28.4	5.1	23.3	14.2	6.0	8.1
64	231.1	111.4	119.7	14.2	7.4	6.8	173.5	93.2	80.3	30.3	5.1	25.1	13.1	5.6	7.5
60-64	1212.5	593.9	618.6	73.7	39.1	34.5	935.3	500.1	435.3	127.7	22.3	105.4	75.8	32.3	43.4
65	229.7	109.7	120.0	14.5	7.5	7.0	169.7	91.4	78.3	33.4	5.7	27.6	12.1	5.1	7.1
66	224.0	105.8	118.2	14.2	7.2	7.0	162.4	87.6	74.8	36.0	6.2	29.8	11.3	4.8	6.5
67	222.4	103.1	119.3	14.0	7.0	7.0	158.7	85.3	73.4	39.1	6.4	32.6	10.7	4.4	6.3
68	216.4	99.3	117.1	13.6	6.7	6.9	151.0	81.5	69.5	41.7	6.9	34.8	10.1	4.1	6.0
69	209.5	94.7	114.8	13.3	6.3	7.0	143.2	77.4	65.8	44.1	7.4	36.7	9.0	3.7	5.3
65-69	1102.1	512.6	589.5	69.7	34.7	35.0	784.9	423.2	361.7	194.2	32.7	161.6	53.3	22.1	31.2
70-74	915.3	400.2	515.2	58.9	25.5	33.4	579.7	321.7	258.0	243.6	39.7	203.9	33.1	13.3	19.9
75-79	641.0	262.3	378.7	46.4	16.8	29.5	333.5	197.7	135.8	244.8	41.0	203.8	16.3	6.7	9.6
80-84	417.5	155.9	261.6	34.5	10.6	23.9	165.2	105.0	60.1	210.5	37.3	173.2	7.3	3.0	4.4
85-89	209.6	67.2	142.4	19.1	4.9	14.2	53.8	36.9	16.9	134.4	24.5	109.9	2.3	0.9	1.4
90+	104.9	28.1	76.8	11.2	2.7	8.5	16.3	11.5	4.8	76.6	13.5	63.1	0.9	0.4	0.5
Special Age Groups - Groupes d'âge particuliers															
0-14	5931.7	3034.7	2897.1	5931.7	3034.7	2897.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
0-17	7095.3	3631.0	3464.3	7092.0	3630.0	3462.1	2.9	0.8	2.0	0.2	0.1	0.1	0.2	0.1	0.1
18-24	2869.5	1457.5	1412.0	2426.1	1318.7	1107.4	431.3	135.2	296.1	1.7	0.5	1.2	10.4	3.1	7.3
18-64	18454.9	9285.9	9168.9	5004.7	2856.5	2148.2	12119.1	5933.4	6185.7	319.9	59.1	260.8	1011.2	436.9	574.3
18+	21845.3	10712.1	11133.2	5244.4	2951.8	2292.7	14052.4	7029.5	7022.9	1424.0	247.7	1176.3	1124.5	483.2	641.3
25-64	9768.0	4924.4	4843.5	2197.5	1331.4	866.2	6994.9	3349.9	3645.0	40.2	9.0	31.3	535.3	234.2	301.1
45-64	5817.4	2904.0	2913.4	381.1	206.5	174.6	4692.8	2448.3	2244.5	278.0	49.6	228.4	465.5	199.6	265.9
65+	3390.5	1426.2	1964.2	239.7	95.2	144.5	1933.4	1096.1	837.3	1104.1	188.6	915.5	113.3	46.3	67.0
TOTAL	28940.6	14343.1	14597.5	12336.5	6581.8	5754.7	14055.3	7030.4	7025.0	1424.2	247.7	1176.4	1124.6	483.3	641.4
Median Age(Years) - Âge médian(années)															
	33.9	33.2	34.7	15.6	16.3	14.9	43.8	45.2	42.5	74.8	74.8	74.8	45.4	45.3	45.6
Mean Age(Years) - Âge moyen(années)															
	35.7	34.6	36.7	18.1	18.4	17.8	46.4	47.7	45.0	72.8	72.5	72.9	47.1	47.8	47.2

See footnote(s) and abbreviation(s) at the end of the publication.

Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1994 (PR)

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1994 (PR)

Age - Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes
TOTAL	29,251,285	14,494,078	14,757,207	12,517,106	6,676,388	5,840,720	14,085,080	7,042,359	7,042,721	1,443,551	253,835	1,189,716	1,205,546	521,496	684,050
0	387,906	198,793	189,113	387,906	198,793	189,113	-	-	-	-	-	-	-	-	-
1	393,087	201,808	191,279	393,087	201,808	191,279	-	-	-	-	-	-	-	-	-
2	405,883	207,797	198,086	405,883	207,797	198,086	-	-	-	-	-	-	-	-	-
3	408,033	209,519	198,514	408,033	209,519	198,514	-	-	-	-	-	-	-	-	-
4	410,621	210,369	200,252	410,621	210,369	200,252	-	-	-	-	-	-	-	-	-
0-4	2,005,530	1,028,286	977,244	2,005,530	1,028,286	977,244	-	-	-	-	-	-	-	-	-
5	396,777	203,060	193,717	396,777	203,060	193,717	-	-	-	-	-	-	-	-	-
6	387,210	197,816	189,394	387,210	197,816	189,394	-	-	-	-	-	-	-	-	-
7	389,405	198,454	190,951	389,405	198,454	190,951	-	-	-	-	-	-	-	-	-
8	401,121	204,602	196,519	401,121	204,602	196,519	-	-	-	-	-	-	-	-	-
9	401,550	205,066	196,484	401,550	205,066	196,484	-	-	-	-	-	-	-	-	-
5-9	1,976,063	1,008,998	967,065	1,976,063	1,008,998	967,065	-	-	-	-	-	-	-	-	-
10	397,787	203,094	194,693	397,787	203,094	194,693	-	-	-	-	-	-	-	-	-
11	395,111	201,861	193,250	395,111	201,861	193,250	-	-	-	-	-	-	-	-	-
12	395,753	202,347	193,406	395,753	202,347	193,406	-	-	-	-	-	-	-	-	-
13	399,136	204,216	194,920	399,136	204,216	194,920	-	-	-	-	-	-	-	-	-
14	397,678	204,264	193,414	397,678	204,264	193,414	-	-	-	-	-	-	-	-	-
10-14	1,985,465	1,015,782	969,683	1,985,465	1,015,782	969,683	-	-	-	-	-	-	-	-	-
15	390,874	200,810	190,064	390,727	200,776	189,951	141	30	111	-	-	-	6	4	2
16	386,687	198,546	188,141	386,359	198,494	187,865	313	43	270	3	2	1	12	7	5
17	390,204	199,020	190,584	389,322	199,521	189,801	849	87	762	13	4	9	20	8	12
18	395,803	202,509	193,294	391,515	201,389	190,126	3,930	976	2,954	187	64	123	171	80	91
19	396,810	203,654	195,156	389,371	201,728	187,643	9,030	1,778	7,252	191	69	122	218	79	139
15-19	1,962,378	1,005,139	957,239	1,947,294	1,001,908	945,386	14,263	2,914	11,349	394	139	255	427	178	249
20	389,650	198,141	191,509	369,584	193,913	175,671	19,437	4,048	15,389	207	62	145	422	118	304
21	396,434	201,713	194,721	358,007	192,560	165,447	37,394	8,895	28,499	204	52	152	829	206	623
22	408,323	207,291	201,032	343,020	189,159	153,861	63,386	17,620	45,768	262	63	199	1,653	449	1,204
23	429,326	216,710	212,616	330,012	185,802	144,210	96,139	30,004	66,135	336	93	243	2,839	811	2,028
24	434,946	219,816	215,130	297,629	172,292	125,337	132,505	46,054	86,451	361	100	261	4,451	1,370	3,081
20-24	2,058,679	1,043,671	1,015,008	1,698,252	933,726	764,526	348,863	106,621	242,242	1,370	370	1,000	10,194	2,954	7,240
25	432,557	218,213	214,344	257,792	152,682	105,110	168,062	63,313	104,749	406	115	291	6,297	2,103	4,194
26	435,435	219,718	215,717	223,526	135,901	87,625	202,943	80,706	122,237	479	106	373	8,487	3,005	5,482
27	447,515	226,115	221,400	197,235	121,871	75,364	238,828	100,086	138,742	587	136	451	10,865	4,022	6,843
28	474,407	240,316	234,091	177,748	111,625	66,123	281,514	122,581	158,933	640	152	488	14,505	5,958	8,547
29	511,787	259,400	252,387	167,003	105,535	61,468	325,479	145,700	179,779	861	207	654	18,444	7,958	10,486
25-29	2,301,701	1,163,762	1,137,939	1,023,304	627,614	395,690	1,216,826	512,386	704,440	2,973	716	2,257	58,598	23,046	35,552
30	529,056	268,724	260,332	150,534	94,885	55,649	355,479	163,748	191,731	942	226	716	22,101	9,865	12,236
31	539,210	273,625	265,585	135,390	84,770	50,620	377,591	177,041	200,550	1,148	287	861	25,081	11,527	13,554
32	535,656	271,661	263,995	121,083	74,813	46,270	385,977	183,709	202,268	1,233	287	946	27,363	12,852	14,511
33	542,109	274,507	267,602	117,749	72,904	44,845	394,537	188,553	205,984	1,366	309	1,057	28,457	12,741	15,716
34	535,724	270,673	265,051	104,997	63,950	41,047	398,760	192,697	206,063	1,571	365	1,206	30,396	13,661	16,735
30-34	2,681,755	1,359,190	1,322,565	629,753	391,322	238,431	1,912,344	905,748	1,006,596	6,260	1,474	4,786	133,396	60,646	72,752
35	525,527	265,172	260,355	92,944	56,325	36,619	396,528	193,993	204,535	1,797	436	1,361	32,258	14,418	17,840
36	522,207	263,606	258,599	84,696	50,953	33,745	401,478	196,906	204,572	2,006	481	1,525	34,025	15,268	18,757
37	512,773	257,599	255,174	76,313	45,430	30,883	396,811	195,738	203,073	2,239	524	1,715	35,410	15,907	19,503
38	494,660	248,196	246,464	65,899	38,554	27,345	386,787	192,085	196,702	2,541	568	1,973	37,433	16,989	20,444
39	492,717	246,335	246,382	60,887	35,160	25,727	390,378	193,296	197,082	2,936	652	2,284	38,516	17,227	21,289
35-39	2,547,884	1,280,910	1,266,974	380,741	226,422	154,319	1,977,982	972,018	1,005,964	11,519	2,661	8,858	177,642	79,809	97,833
40	477,376	237,796	239,580	55,658	31,517	24,141	379,742	188,323	191,419	3,147	704	2,443	38,829	17,252	21,577
41	458,980	228,468	230,512	49,097	27,803	21,294	367,146	182,563	184,583	3,479	757	2,722	39,258	17,345	21,913
42	446,819	223,643	222,976	45,892	26,039	19,853	357,569	179,294	178,275	3,860	822	3,038	39,298	17,488	21,810
43	440,424	220,902	219,522	43,674	24,655	19,019	353,194	178,077	175,117	4,235	910	3,325	39,321	17,260	22,061
44	433,011	217,926	215,085	40,107	22,487	17,620	348,651	177,022	171,629	4,721	972	3,749	39,532	17,445	22,087
40-44	2,256,410	1,128,735	1,127,675	234,428	132,501	101,927	1,806,302	905,279	901,023	19,442	4,165	15,277	196,238	86,790	109,448

See footnote(s) and abbreviation(s) at the end of the publication. Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1994 (PR) - continued

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1994 (PR) - suite

Age - Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes	Total	Males Hommes	Females Femmes
45	426,945	214,276	212,669	36,796	20,252	16,544	344,452	175,215	169,237	5,255	1,171	4,084	40,442	17,638	22,804
46	425,252	214,273	210,979	33,971	18,818	15,153	344,774	176,328	168,446	5,819	1,204	4,615	40,688	17,923	22,765
47	426,222	214,427	211,795	32,020	17,605	14,415	347,183	177,945	169,248	6,365	1,281	5,084	40,644	17,596	23,048
48	369,484	185,991	183,493	26,864	14,533	12,131	300,174	154,603	145,571	6,914	1,387	5,527	35,732	15,468	20,264
49	344,392	173,341	171,051	24,320	13,217	11,103	280,129	144,716	135,413	7,402	1,414	5,988	32,541	13,994	18,547
45-49	1,992,295	1,002,308	989,987	153,771	84,425	69,346	1,616,722	828,807	787,915	31,755	6,457	25,298	190,047	82,619	107,428
50	334,162	167,806	166,354	22,176	11,988	10,188	272,970	140,826	132,144	7,700	1,524	6,176	31,316	13,470	17,846
51	324,160	162,841	161,339	20,812	11,084	9,728	264,802	137,182	127,620	8,510	1,637	6,873	30,056	12,938	17,118
52	302,483	151,864	150,619	19,160	10,276	8,884	246,506	127,969	118,519	9,162	1,706	7,454	27,653	11,891	15,762
53	291,488	145,720	145,768	18,149	9,842	8,307	237,826	122,912	114,714	9,874	1,807	8,067	25,639	11,159	14,480
54	274,309	137,246	137,063	16,611	8,979	7,632	223,755	116,222	107,533	10,618	1,899	8,719	23,325	10,146	13,179
50-54	1,526,622	765,479	761,143	96,908	52,169	44,739	1,245,861	645,131	600,530	45,864	8,575	37,289	138,189	59,604	78,585
55	266,798	133,177	133,621	15,915	8,397	7,518	217,244	113,385	103,859	11,752	2,038	9,714	21,887	9,357	12,530
56	256,783	128,086	128,697	14,961	8,114	6,847	208,431	109,043	99,388	12,740	2,201	10,539	20,631	8,728	11,903
57	249,115	123,590	125,525	14,386	7,651	6,735	201,253	105,112	96,141	14,245	2,511	11,734	19,231	8,316	10,915
58	250,811	124,402	126,209	14,563	7,862	6,701	201,090	105,734	95,356	16,199	2,844	13,355	18,739	7,942	10,797
59	245,797	121,797	124,000	14,374	7,697	6,677	195,631	103,102	92,529	17,856	3,206	14,648	17,936	7,790	10,146
55-59	1,269,104	631,052	638,052	74,239	39,741	34,498	1,023,649	536,376	487,273	72,792	12,802	59,990	98,424	42,133	56,291
60	240,499	119,399	121,100	14,035	7,519	6,516	189,893	100,988	88,905	19,640	3,528	16,112	16,931	7,364	9,567
61	245,386	121,179	124,207	14,197	7,631	6,566	192,255	102,429	89,826	22,130	3,933	18,197	16,804	7,186	9,618
62	246,219	121,426	124,793	14,584	7,714	6,870	190,611	102,411	88,200	24,745	4,311	20,434	16,279	6,990	9,289
63	244,375	119,158	125,217	14,910	7,855	7,055	186,293	99,990	86,303	27,652	4,871	22,781	15,520	6,442	9,078
64	239,380	116,146	123,234	14,468	7,600	6,868	180,343	97,074	83,269	30,439	5,467	24,972	14,130	6,005	8,125
60-64	1,215,859	597,308	618,551	72,194	38,319	33,875	939,395	502,892	436,503	124,606	22,110	102,496	79,664	33,987	45,677
65	228,832	109,838	118,994	13,816	7,146	6,670	169,564	91,595	77,969	32,413	5,584	26,829	13,039	5,513	7,526
66	226,910	107,780	119,130	14,099	7,215	6,884	165,123	89,384	75,739	35,649	6,190	29,459	12,039	4,991	7,048
67	220,961	103,722	117,239	13,829	6,891	6,938	157,600	85,485	72,115	38,286	6,619	31,667	11,246	4,727	6,519
68	219,146	100,897	118,249	13,590	6,873	6,917	153,526	83,045	70,481	41,412	6,875	34,537	10,618	4,304	6,314
69	212,658	96,865	115,793	13,164	6,340	6,824	145,600	79,105	66,495	43,954	7,386	36,568	9,940	4,034	5,906
65-69	1,108,507	519,102	589,405	68,498	34,265	34,233	791,413	428,614	362,799	191,714	32,654	159,060	56,882	23,569	33,313
70-74	951,038	416,873	534,165	59,828	26,132	33,496	606,025	335,300	270,725	246,810	40,910	207,900	36,575	14,531	22,044
75-79	647,941	265,163	382,778	45,368	16,494	28,874	338,507	199,746	138,761	246,398	41,861	204,537	17,668	7,062	10,606
80-84	436,382	162,937	273,445	34,829	10,641	24,188	174,472	110,265	64,207	218,837	38,781	180,056	8,244	3,250	4,994
85-89	218,152	69,957	148,195	19,217	4,835	14,382	56,218	38,444	17,774	140,271	25,731	114,540	2,446	947	1,499
90+	109,520	29,426	80,094	11,626	2,808	8,818	16,438	11,818	4,620	80,546	14,429	66,117	910	371	539
Special Age Groups - Groupes d'âge particuliers															
0-14	5,967,056	3,053,066	2,913,992	5,967,056	3,053,066	2,913,992	-	-	-	-	-	-	-	-	-
0-17	7,134,823	3,652,042	3,482,781	7,133,466	3,651,857	3,481,609	1,303	160	1,143	16	6	10	38	19	19
15-64	19,812,887	9,977,554	9,835,133	6,310,884	3,528,147	2,782,737	12,102,007	5,918,172	6,183,835	316,975	59,469	257,506	1,082,821	471,766	611,055
18-24	2,653,292	1,449,834	1,403,458	2,479,138	1,336,843	1,142,295	361,823	109,375	252,448	1,748	503	1,245	10,583	3,113	7,470
18-64	18,644,922	9,378,578	9,266,344	5,144,476	2,929,356	2,215,120	12,100,704	5,918,012	6,182,692	316,959	59,463	257,496	1,082,783	471,747	611,036
18+	22,116,462	10,842,036	11,274,426	5,383,642	3,024,531	2,359,111	14,063,777	7,042,189	7,041,578	1,443,535	253,829	1,189,706	1,205,508	521,477	684,031
25-44	9,787,750	4,932,597	4,855,153	2,268,226	1,377,859	890,367	6,913,454	3,295,431	3,618,023	40,194	9,016	31,178	565,876	250,291	315,585
45-64	6,003,880	2,996,147	3,007,733	397,112	214,654	182,458	4,825,427	2,513,206	2,312,221	275,017	49,944	225,073	506,324	218,343	287,981
65-74	2,059,545	935,975	1,123,570	128,126	60,397	67,729	1,397,438	763,914	633,524	440,524	73,564	366,960	93,457	38,100	55,357
65+	3,471,540	1,463,456	2,008,082	238,166	95,175	143,991	1,963,073	1,124,187	858,886	1,126,578	194,366	932,210	122,725	49,730	72,995
75+	1,411,995	527,483	884,512	111,040	34,778	76,262	565,635	360,273	225,362	686,052	120,802	565,250	29,268	11,630	17,638
TOTAL	29,251,295	14,494,078	14,757,207	12,517,108	6,676,388	5,840,720	14,065,080	7,042,359	7,042,721	1,443,581	253,836	1,189,716	1,205,546	521,496	684,050
Median Age (Years) - Âge médian (années)															
	34.4	33.6	35.1	15.7	16.4	15.0	44.3	45.7	43.0	74.3	74.3	74.3	45.6	45.4	45.8
Mean Age (Years) - Âge moyen (années)															
	35.9	34.9	36.9	18.3	18.5	17.9	46.8	48.1	45.5	73.1	72.7	73.1	47.2	47.0	47.4

See footnote(s) and abbreviation(s) at the end of the publication. Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1995 (PR)
Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1995 (PR)

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
TOTAL	29,615,325	14,675,972	14,939,353	12,718,943	6,782,953	5,935,990	14,146,104	7,071,513	7,074,591	1,463,158	260,847	1,202,311	1,287,120	560,659	726,461
0	383,197	197,180	186,017	383,197	197,180	186,017	-	-	-	-	-	-	-	-	-
1	386,959	198,482	188,477	386,959	198,482	188,477	-	-	-	-	-	-	-	-	-
2	395,151	202,803	192,348	395,151	202,803	192,348	-	-	-	-	-	-	-	-	-
3	408,203	208,901	199,302	408,203	208,901	199,302	-	-	-	-	-	-	-	-	-
4	410,302	210,722	199,580	410,302	210,722	199,580	-	-	-	-	-	-	-	-	-
0-4	1,983,812	1,018,088	965,724	1,983,812	1,018,088	965,724	-	-	-	-	-	-	-	-	-
5	413,237	211,680	201,557	413,237	211,680	201,557	-	-	-	-	-	-	-	-	-
6	398,948	204,159	194,789	398,948	204,159	194,789	-	-	-	-	-	-	-	-	-
7	389,288	198,901	190,387	389,288	198,901	190,387	-	-	-	-	-	-	-	-	-
8	391,466	199,471	191,995	391,466	199,471	191,995	-	-	-	-	-	-	-	-	-
9	403,179	205,720	197,459	403,179	205,720	197,459	-	-	-	-	-	-	-	-	-
5-9	1,996,118	1,019,931	976,187	1,996,118	1,019,931	976,187	-	-	-	-	-	-	-	-	-
10	403,990	206,340	197,650	403,990	206,340	197,650	-	-	-	-	-	-	-	-	-
11	400,205	204,406	195,799	400,205	204,406	195,799	-	-	-	-	-	-	-	-	-
12	398,022	203,374	194,648	398,022	203,374	194,648	-	-	-	-	-	-	-	-	-
13	399,213	204,179	195,034	399,213	204,179	195,034	-	-	-	-	-	-	-	-	-
14	403,019	206,248	196,771	403,019	206,248	196,771	-	-	-	-	-	-	-	-	-
10-14	2,004,449	1,024,547	979,902	2,004,449	1,024,547	979,902	-	-	-	-	-	-	-	-	-
15	401,335	206,172	195,163	401,186	206,139	195,047	144	30	114	-	-	-	5	3	2
16	394,493	202,625	191,868	394,175	202,580	191,595	302	39	263	5	3	2	11	3	8
17	390,441	200,381	190,060	389,637	200,283	189,354	775	87	688	9	4	5	20	7	13
18	394,370	201,556	192,814	391,873	201,217	190,656	2,446	321	2,125	16	5	11	35	13	22
19	400,742	204,717	196,025	392,605	202,889	189,716	7,731	1,675	6,056	187	62	125	219	91	128
15-19	1,981,381	1,015,451	965,930	1,969,476	1,013,108	956,368	11,398	2,152	9,246	217	74	143	290	117	173
20	403,964	205,873	198,091	386,926	202,125	184,801	16,445	3,561	12,884	196	71	125	397	116	281
21	394,756	200,330	194,426	364,019	192,957	171,062	29,683	7,095	22,588	222	65	157	832	213	619
22	401,306	203,812	197,494	348,176	189,507	158,669	51,370	13,862	37,508	220	59	161	1,540	384	1,156
23	412,817	209,248	203,569	328,693	183,677	145,016	81,111	24,740	56,371	289	69	220	2,724	762	1,962
24	433,384	218,643	214,741	312,101	178,155	133,946	116,478	39,029	77,449	371	100	271	4,434	1,359	3,075
20-24	2,046,227	1,037,906	1,008,321	1,739,915	946,421	793,494	295,087	88,287	206,800	1,298	364	934	9,927	2,834	7,093
25	439,266	221,859	217,407	278,069	163,359	114,710	154,193	56,195	97,998	416	116	300	6,588	2,189	4,399
26	436,852	220,272	216,580	238,511	143,285	95,226	189,207	73,812	115,395	468	130	338	8,666	3,045	5,621
27	439,822	221,961	217,861	205,915	126,773	79,142	222,099	90,847	131,252	553	130	423	11,255	4,211	7,044
28	451,809	228,362	223,447	181,632	113,439	68,193	255,557	109,348	146,209	678	158	520	13,942	5,417	8,525
29	478,943	242,625	236,318	163,884	103,849	60,035	296,506	130,997	165,509	753	180	573	17,800	7,599	10,201
25-29	2,246,692	1,135,079	1,111,613	1,068,011	650,705	417,306	1,117,562	461,199	656,363	2,868	714	2,154	58,251	22,461	35,790
30	516,137	261,657	254,480	154,230	98,250	55,980	338,587	153,249	185,338	991	238	753	22,329	9,920	12,409
31	533,432	271,027	262,405	139,670	88,526	51,144	366,597	170,458	196,139	1,085	265	820	26,080	11,778	14,302
32	543,212	275,752	267,460	126,388	79,255	47,133	386,511	182,686	203,825	1,304	331	973	29,009	13,480	15,529
33	539,132	273,481	265,651	113,604	70,145	43,459	393,010	188,321	204,689	1,403	339	1,064	31,115	14,676	16,439
34	545,315	276,078	269,237	111,580	69,016	42,564	400,040	192,134	207,906	1,547	358	1,189	32,148	14,570	17,578
30-34	2,677,228	1,357,995	1,319,233	645,472	405,192	240,280	1,884,745	886,848	997,897	6,330	1,531	4,799	140,681	64,424	76,257
35	538,697	272,088	266,609	99,853	60,726	39,127	403,082	195,458	207,624	1,749	403	1,346	34,013	15,501	18,512
36	528,292	268,505	261,787	88,928	53,784	35,144	401,666	196,002	205,664	2,007	485	1,522	35,691	16,234	19,457
37	525,010	264,849	260,161	81,619	48,903	32,716	403,365	198,190	205,175	2,234	543	1,691	37,792	17,213	20,579
38	515,337	258,762	256,575	73,868	43,791	30,077	400,009	196,701	203,308	2,501	596	1,905	38,959	17,674	21,285
39	497,066	249,287	247,779	63,870	37,172	26,698	389,887	192,980	196,907	2,833	642	2,191	40,476	18,493	21,983
35-39	2,604,402	1,311,491	1,292,911	408,138	244,376	163,762	1,998,009	979,331	1,018,678	11,324	2,669	8,655	186,931	85,115	101,816
40	494,839	247,203	247,636	59,157	33,926	25,231	390,913	193,834	197,079	3,252	714	2,538	41,517	18,729	22,788
41	479,055	238,530	240,525	54,224	30,513	23,711	379,495	188,594	190,901	3,493	758	2,735	41,843	18,665	23,178
42	460,568	229,178	231,390	48,001	27,066	20,935	366,625	182,568	184,037	3,895	840	3,055	42,047	18,684	23,363
43	448,057	224,366	223,691	45,034	25,448	19,586	356,873	179,207	177,666	4,323	933	3,390	41,827	18,778	23,049
44	441,807	221,582	220,225	42,890	24,120	18,770	352,386	177,863	174,523	4,749	1,029	3,720	41,782	18,570	23,212
40-44	2,324,326	1,160,859	1,163,467	249,306	141,073	108,233	1,846,292	922,086	924,206	19,712	4,274	15,438	209,016	93,426	115,590

See footnote(s) and abbreviation(s) at the end of the publication. Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1995 (PR) - continued
Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1995 (PR) - suite

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
45	434,334	218,571	215,763	39,433	22,030	17,403	347,849	176,808	171,041	5,248	1,080	4,168	41,804	18,653	23,151
46	427,908	214,659	213,249	36,286	19,902	16,384	343,416	174,866	168,550	5,788	1,256	4,532	42,418	18,635	23,783
47	426,008	214,578	211,430	33,528	18,517	15,011	343,488	175,773	167,715	6,390	1,316	5,074	42,602	18,972	23,630
48	426,783	214,570	212,213	31,595	17,330	14,265	345,564	177,215	168,349	6,976	1,412	5,564	42,648	18,613	24,035
49	369,559	185,821	183,738	26,241	14,245	11,996	298,549	153,826	144,723	7,575	1,517	6,058	37,194	16,233	20,961
45-49	2,084,592	1,048,199	1,036,393	167,083	92,024	75,059	1,678,866	858,488	820,378	31,977	6,581	25,396	206,666	91,106	115,560
50	344,337	173,087	171,250	23,923	12,926	10,997	278,479	143,894	134,585	8,148	1,575	6,573	33,787	14,692	19,095
51	334,070	167,499	166,571	21,856	11,750	10,106	271,006	139,842	131,164	8,532	1,713	6,819	32,676	14,194	18,482
52	323,918	162,444	161,474	20,468	10,835	9,633	262,956	136,210	126,746	9,349	1,832	7,517	31,145	13,567	17,578
53	302,429	151,571	150,858	18,895	10,076	8,819	245,040	127,282	117,758	10,049	1,884	8,165	28,445	12,329	16,116
54	291,329	145,412	145,917	17,952	9,716	8,236	235,998	122,204	113,794	10,797	1,984	8,813	26,582	11,508	15,074
50-54	1,596,083	800,013	796,070	103,094	55,303	47,791	1,293,479	669,432	624,047	46,875	8,988	37,887	152,635	66,290	86,345
55	274,215	136,895	137,320	16,379	8,799	7,580	222,219	115,554	106,665	11,675	2,091	9,584	23,942	10,451	13,491
56	266,559	132,719	133,840	15,632	8,181	7,451	215,655	112,655	103,000	12,854	2,230	10,624	22,418	9,653	12,765
57	256,359	127,600	128,759	14,678	7,883	6,795	206,643	108,245	98,398	13,921	2,433	11,488	21,117	9,039	12,078
58	248,591	123,058	125,533	14,088	7,425	6,663	199,325	104,305	95,020	15,516	2,774	12,742	19,662	8,554	11,108
59	249,869	123,690	126,179	14,278	7,642	6,636	198,934	104,840	94,094	17,601	3,105	14,496	19,056	8,103	10,953
55-59	1,295,593	643,962	651,631	75,055	39,930	35,125	1,042,776	545,599	497,177	71,567	12,633	58,934	106,195	45,800	60,395
60	245,070	121,110	123,960	14,086	7,494	6,592	193,433	102,249	91,184	19,387	3,489	15,898	18,164	7,878	10,286
61	239,437	118,441	120,996	13,765	7,300	6,465	187,341	99,932	87,409	21,328	3,836	17,492	17,003	7,373	9,630
62	244,011	119,993	124,018	13,874	7,337	6,537	189,393	101,184	88,209	23,864	4,267	19,597	16,880	7,205	9,675
63	244,685	120,202	124,483	14,261	7,464	6,797	187,468	101,076	86,392	26,707	4,704	22,003	16,249	6,958	9,291
64	242,372	117,734	124,638	14,556	7,586	6,970	182,664	98,503	84,161	29,674	5,269	24,405	15,478	6,376	9,102
60-64	1,215,575	597,480	618,095	70,542	37,181	33,361	940,299	502,944	437,355	120,960	21,565	99,395	83,774	35,790	47,984
65	236,877	114,411	122,466	14,066	7,296	6,770	176,110	95,270	80,840	32,586	5,886	26,700	14,115	5,959	8,156
66	226,091	108,031	118,060	13,422	6,861	6,561	165,188	89,750	75,438	34,521	5,959	28,562	12,960	5,461	7,499
67	223,919	105,823	118,096	13,699	6,945	6,754	160,356	87,407	72,949	37,960	6,624	31,336	11,904	4,847	7,057
68	217,639	101,607	116,032	13,390	6,597	6,793	152,515	83,310	69,205	40,677	7,126	33,551	11,057	4,574	6,483
69	215,296	98,472	116,824	13,090	6,293	6,797	148,106	80,665	67,441	43,659	7,323	36,336	10,441	4,191	6,250
65-69	1,119,822	528,344	591,478	67,667	33,992	33,675	802,275	436,402	365,873	189,403	32,918	156,485	60,477	25,032	35,445
70-74	968,135	425,825	542,310	59,494	26,325	33,169	619,319	342,182	277,137	249,441	41,634	207,807	39,881	15,684	24,197
75-79	672,193	275,664	396,529	44,858	16,370	28,488	355,342	208,392	146,950	252,545	43,379	209,166	19,448	7,523	11,925
80-84	455,675	170,280	285,395	34,673	10,642	24,231	184,416	115,221	69,195	227,148	40,826	186,322	9,238	3,591	5,647
85-89	226,533	73,981	154,552	19,650	4,879	14,771	59,792	40,948	18,844	146,285	27,113	119,172	2,806	1,041	1,765
90+	114,489	30,877	83,612	11,930	2,866	9,064	16,447	12,002	4,445	85,208	15,584	69,624	904	425	479
Special Age Groups - Groupes d'âge particuliers															
0-14	5,984,379	3,062,566	2,921,813	5,984,379	3,062,566	2,921,813	-	-	-	-	-	-	-	-	-
0-17	7,170,648	3,671,744	3,498,904	7,169,377	3,671,588	3,497,809	1,221	156	1,065	14	7	7	36	13	23
15-64	20,072,099	10,108,435	9,963,664	6,496,092	3,625,313	2,870,779	12,108,513	5,916,366	6,192,147	313,128	59,393	253,735	1,154,366	507,363	647,003
18-24	2,841,339	1,444,179	1,397,160	2,524,393	1,350,527	1,173,866	305,264	90,283	214,981	1,501	431	1,070	10,181	2,938	7,243
18-64	18,885,830	9,499,257	9,386,573	5,311,094	3,018,311	2,294,783	12,107,292	5,916,210	6,191,082	313,114	59,386	253,728	1,154,330	507,350	646,980
18+	22,444,677	11,004,228	11,440,449	5,549,566	3,111,385	2,438,181	14,144,883	7,071,357	7,073,526	1,463,144	260,840	1,202,304	1,287,084	560,646	726,438
25-44	9,852,648	4,965,424	4,887,224	2,370,927	1,441,346	929,581	6,846,606	3,249,464	3,597,144	40,234	9,188	31,046	594,879	265,426	329,453
45-64	6,191,843	3,089,654	3,102,189	415,774	224,438	191,336	4,955,420	2,576,483	2,378,957	271,379	49,767	221,612	549,270	238,986	310,284
65-74	2,087,957	954,169	1,133,788	127,161	60,317	66,844	1,421,594	778,584	643,010	438,844	74,552	364,292	100,358	40,716	59,642
65+	3,558,847	1,504,971	2,053,876	238,472	95,074	143,398	2,037,591	1,155,147	882,444	1,150,030	201,454	948,576	132,754	53,296	79,458
75+	1,470,890	550,802	920,088	111,311	34,757	76,554	615,997	376,563	239,434	711,186	126,902	584,284	32,396	12,580	19,816
TOTAL	29,615,325	14,575,972	14,939,353	12,718,943	6,782,953	5,935,990	14,146,104	7,071,513	7,074,591	1,463,158	260,847	1,202,311	1,287,120	560,659	726,461
Median Age (Years) - Âge médian (années)															
	34.8	34.0	35.5	15.9	16.6	15.2	44.8	46.1	43.4	74.6	74.6	74.6	45.9	45.6	46.1
Mean Age (Years) - Âge moyen (années)															
	36.1	35.1	37.1	18.4	18.7	18.1	47.2	48.5	45.9	73.3	72.9	73.4	47.4	47.2	47.6

See footnote(s) and abbreviation(s) at the end of the publication.
Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1996 (PR)

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1996 (PR)

Age Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
TOTAL	29,969,209	14,847,259	15,121,950	12,915,730	6,884,534	6,031,196	14,214,081	7,101,590	7,112,491	1,480,001	266,524	1,213,477	1,359,397	594,611	764,786
0	370,140	189,496	180,644	370,140	189,496	180,644	-	-	-	-	-	-	-	-	-
1	383,193	196,586	186,607	383,193	196,586	186,607	-	-	-	-	-	-	-	-	-
2	389,509	199,778	189,731	389,509	199,778	189,731	-	-	-	-	-	-	-	-	-
3	397,786	204,145	193,643	397,788	204,145	193,643	-	-	-	-	-	-	-	-	-
4	410,668	210,150	200,518	410,668	210,150	200,518	-	-	-	-	-	-	-	-	-
0-4	1,951,298	1,000,155	951,143	1,951,298	1,000,155	951,143	-	-	-	-	-	-	-	-	-
5	413,737	212,422	201,315	413,737	212,422	201,315	-	-	-	-	-	-	-	-	-
6	415,694	212,937	202,757	415,694	212,937	202,757	-	-	-	-	-	-	-	-	-
7	401,483	205,443	196,040	401,483	205,443	196,040	-	-	-	-	-	-	-	-	-
8	391,786	200,164	191,622	391,786	200,164	191,622	-	-	-	-	-	-	-	-	-
9	393,987	200,806	193,181	393,987	200,806	193,181	-	-	-	-	-	-	-	-	-
5-9	2,016,687	1,031,772	984,915	2,016,687	1,031,772	984,915	-	-	-	-	-	-	-	-	-
10	405,825	207,122	198,703	405,825	207,122	198,703	-	-	-	-	-	-	-	-	-
11	406,723	207,774	198,949	406,723	207,774	198,949	-	-	-	-	-	-	-	-	-
12	403,277	206,016	197,261	403,277	206,016	197,261	-	-	-	-	-	-	-	-	-
13	401,607	205,233	196,374	401,607	205,233	196,374	-	-	-	-	-	-	-	-	-
14	402,975	206,198	196,777	402,975	206,198	196,777	-	-	-	-	-	-	-	-	-
10-14	2,020,407	1,032,343	988,064	2,020,407	1,032,343	988,064	-	-	-	-	-	-	-	-	-
15	406,650	208,125	198,525	406,496	208,087	198,409	151	35	116	-	-	-	3	3	-
16	404,834	207,990	196,844	404,559	207,940	196,619	257	40	217	6	2	4	12	8	4
17	398,206	204,431	193,775	397,497	204,335	193,162	676	81	595	12	5	7	21	10	11
18	394,752	202,435	192,317	392,493	202,129	190,364	2,205	291	1,914	19	7	12	35	8	27
19	399,259	203,739	195,520	393,112	202,721	190,391	6,041	996	5,045	25	3	22	81	19	62
15-19	2,003,701	1,026,720	976,981	1,994,157	1,025,212	968,945	9,330	1,443	7,887	62	17	45	152	48	104
20	405,732	206,752	198,980	390,211	203,166	187,045	14,946	3,397	11,549	203	65	138	372	124	248
21	409,123	207,945	201,178	381,773	201,197	180,576	26,414	6,474	19,940	212	72	140	724	202	522
22	399,617	202,327	197,290	354,705	190,060	164,625	43,212	11,772	31,440	248	69	179	1,452	406	1,046
23	405,784	205,709	200,075	334,611	184,353	150,258	68,483	20,627	47,856	265	65	200	2,425	664	1,761
24	417,154	211,143	206,011	311,687	176,471	135,216	101,123	33,394	67,729	338	77	261	4,006	1,201	2,805
20-24	2,037,410	1,033,876	1,003,534	1,772,987	955,267	817,720	254,178	75,664	178,514	1,266	348	918	8,979	2,597	6,382
25	437,961	220,646	217,315	293,157	169,564	123,593	138,408	49,087	89,321	430	113	317	5,966	1,882	4,084
26	443,871	223,983	219,888	259,006	154,120	104,886	175,990	66,856	109,134	484	131	353	8,391	2,876	5,515
27	441,828	222,514	219,314	221,113	134,354	86,759	209,071	84,006	125,065	546	144	402	11,098	4,010	7,088
28	445,020	224,437	220,583	190,624	118,648	71,976	239,909	100,360	139,549	651	148	503	13,636	5,281	8,555
29	456,694	230,716	225,978	168,272	105,929	62,343	270,867	117,999	152,868	808	195	613	16,747	6,593	10,154
25-29	2,225,374	1,122,296	1,103,078	1,132,172	682,615	449,557	1,034,245	418,308	615,937	2,919	731	2,188	56,038	20,642	35,396
30	483,721	244,981	238,740	152,222	96,992	55,230	309,803	138,934	170,869	889	208	681	20,807	8,847	11,960
31	521,007	264,030	256,977	143,828	91,975	51,853	350,474	160,283	190,191	1,125	257	868	25,580	11,515	14,065
32	536,234	273,269	264,965	130,546	82,976	47,570	376,862	176,526	200,336	1,239	292	947	29,587	13,475	16,112
33	547,531	277,719	269,812	118,773	74,633	44,140	394,878	187,440	207,238	1,483	366	1,117	32,597	15,280	17,317
34	542,811	274,994	267,817	107,362	66,332	41,030	399,460	191,890	207,570	1,614	383	1,231	34,375	16,389	17,986
30-34	2,633,304	1,334,993	1,298,311	652,731	412,908	239,823	1,831,277	855,073	976,204	6,350	1,506	4,844	142,946	65,506	77,440
35	548,989	277,696	271,293	106,577	65,924	40,653	405,225	195,028	210,197	1,752	403	1,349	35,435	16,341	19,094
36	541,992	273,386	268,606	95,671	58,034	37,637	406,896	197,592	209,304	1,971	445	1,526	37,454	17,315	20,139
37	531,160	267,650	263,510	85,514	51,578	33,936	404,569	197,710	206,859	2,247	529	1,718	36,830	17,833	20,997
38	528,008	266,161	261,847	78,764	47,000	31,764	406,163	199,995	206,168	2,492	588	1,904	40,589	18,578	22,011
39	518,010	259,996	258,014	71,523	42,190	29,333	401,645	197,936	203,709	2,779	638	2,141	42,083	19,232	22,831
35-39	2,668,159	1,344,889	1,323,270	438,049	264,726	173,323	2,024,498	988,261	1,036,237	11,241	2,603	8,638	194,371	89,299	105,072
40	499,581	250,392	249,189	62,057	35,950	26,107	391,110	193,723	197,387	3,154	710	2,444	43,260	20,009	23,251
41	496,948	248,031	248,917	57,630	32,894	24,736	391,284	194,071	197,213	3,610	807	2,803	44,424	20,259	24,165
42	480,812	239,280	241,532	52,909	29,571	23,338	379,288	188,766	190,522	3,882	859	3,023	44,733	20,084	24,649
43	462,076	229,778	232,298	46,829	26,257	20,572	366,211	182,607	183,604	4,335	947	3,388	44,701	19,967	24,734
44	449,423	225,007	224,416	44,020	24,798	19,222	356,377	179,223	177,154	4,789	1,041	3,748	44,237	19,945	24,292
40-44	2,388,840	1,192,488	1,196,352	263,445	149,470	113,975	1,884,270	938,390	945,880	19,770	4,364	15,406	221,355	100,264	121,091

See footnote(s) and abbreviation(s) at the end of the publication. Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1996 (PR) - continued

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1996 (PR) - suite

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
45	442,957	222,137	220,850	42,062	23,563	18,499	351,768	177,784	173,984	5,248	1,142	4,106	43,909	19,648	24,261
46	435,255	219,015	216,240	38,703	21,563	17,140	346,860	176,461	170,399	5,774	1,212	4,562	43,918	19,779	24,139
47	428,506	214,917	213,591	35,659	19,496	16,163	342,225	174,456	167,769	6,357	1,402	4,955	44,267	19,563	24,704
48	426,346	214,706	211,640	32,969	18,146	14,823	342,315	175,292	167,023	6,948	1,443	5,505	44,114	19,825	24,289
49	426,833	214,471	212,362	31,134	17,015	14,119	343,843	176,285	167,558	7,601	1,560	6,041	44,255	19,611	24,644
45-49	2,159,929	1,085,246	1,074,683	180,527	99,783	80,744	1,727,011	880,278	846,733	31,928	6,759	25,169	220,463	96,426	122,037
50	369,315	185,542	183,773	25,839	13,976	11,863	296,829	153,040	143,789	8,280	1,680	6,600	38,367	16,846	21,521
51	343,982	172,676	171,306	23,547	12,669	10,878	276,775	143,160	133,615	8,672	1,742	7,130	34,788	15,105	19,683
52	333,727	167,114	166,613	21,504	11,516	9,988	269,511	139,237	130,274	9,290	1,887	7,403	33,322	14,474	18,848
53	323,559	162,090	161,469	20,161	10,642	9,519	261,097	135,377	125,720	10,215	2,023	8,192	32,086	14,048	18,038
54	302,028	151,116	150,912	18,578	9,822	8,756	243,320	126,489	116,831	10,980	2,103	8,877	29,150	12,702	16,448
50-54	1,672,611	838,538	834,073	109,629	58,625	51,004	1,347,532	697,303	650,229	47,637	9,435	38,202	167,713	73,175	94,536
55	290,831	144,949	145,882	17,633	9,483	8,150	234,321	121,478	112,843	11,801	2,217	9,584	27,076	11,771	15,305
56	273,653	136,328	137,325	16,073	8,576	7,497	220,511	114,842	105,669	12,754	2,339	10,415	24,315	10,571	13,744
57	265,792	132,080	133,712	15,344	7,953	7,391	213,680	111,883	101,797	14,051	2,498	11,553	22,717	9,746	12,971
58	255,379	126,817	128,562	14,313	7,633	6,680	204,474	107,356	97,118	15,258	2,714	12,544	21,334	9,114	12,220
59	247,489	122,218	125,271	13,814	7,238	6,576	196,917	103,310	93,607	16,941	3,062	13,879	19,817	8,608	11,209
55-59	1,333,144	662,392	670,752	77,177	40,883	36,294	1,069,903	558,869	511,034	70,805	12,830	57,975	115,259	49,810	65,449
60	248,651	122,727	125,924	14,001	7,427	6,574	196,251	103,700	92,551	19,131	3,429	15,702	19,268	8,171	11,097
61	243,680	120,014	123,666	13,792	7,267	6,525	190,487	100,995	89,492	21,063	3,846	17,217	18,338	7,906	10,432
62	237,816	117,228	120,588	13,403	7,038	6,365	184,299	98,665	85,634	23,052	4,188	18,864	17,062	7,337	9,725
63	242,119	118,597	123,522	13,511	7,086	6,425	186,025	99,779	86,246	25,722	4,610	21,112	16,861	7,122	9,739
64	242,364	118,540	123,824	13,859	7,156	6,703	183,586	99,396	84,190	28,637	5,041	23,596	16,282	6,947	9,335
60-64	1,214,630	597,106	617,524	68,566	35,974	32,592	940,648	502,535	438,113	117,605	21,114	96,491	87,811	37,483	50,328
65	239,753	115,960	123,773	14,155	7,290	6,865	178,381	96,697	81,684	31,784	5,665	26,119	15,433	6,329	9,105
66	233,928	112,495	121,433	13,606	6,949	6,657	171,449	93,302	78,147	34,820	6,318	28,502	14,053	5,926	8,127
67	222,897	105,955	116,942	13,013	6,526	6,487	160,154	87,575	72,579	36,860	6,436	30,422	12,870	5,416	7,454
68	220,222	103,468	116,754	13,241	6,604	6,637	154,906	84,999	69,907	40,278	7,089	33,189	11,797	4,776	7,021
69	213,536	99,036	114,500	12,902	6,254	6,648	146,783	80,789	65,994	42,959	7,552	35,407	10,892	4,441	6,451
65-69	1,130,336	536,934	593,402	66,917	33,623	33,294	811,673	443,362	368,311	186,701	33,062	153,639	65,045	26,887	38,158
70-74	981,384	433,918	547,466	59,168	26,821	32,547	629,942	347,956	281,986	249,062	42,459	206,603	43,212	16,862	26,350
75-79	704,909	289,300	415,609	44,933	16,565	28,368	378,385	219,709	158,676	259,624	44,722	214,902	21,967	8,304	13,663
80-84	467,590	174,754	292,836	34,596	10,401	24,195	190,824	118,851	71,973	232,021	41,680	190,341	10,149	3,822	6,327
85-89	239,453	77,624	161,829	20,123	4,892	15,231	63,526	43,317	20,211	152,711	28,304	124,407	3,091	1,111	1,980
90+	120,043	31,915	88,128	12,161	2,699	9,462	16,737	12,271	4,466	90,299	16,590	73,709	846	355	491
Special Age Groups - Groupes d'âge particuliers															
0-14	5,988,392	3,064,270	2,924,122	5,988,392	3,064,270	2,924,122	-	-	-	-	-	-	-	-	-
0-17	7,196,082	3,684,816	3,513,266	7,195,944	3,684,632	3,512,312	1,084	156	928	18	7	11	36	21	15
15-64	20,337,102	10,236,544	10,096,558	6,669,440	3,725,463	2,963,977	12,122,992	5,916,124	6,206,868	309,583	59,707	249,876	1,215,087	537,250	677,837
18-24	2,831,421	1,440,050	1,391,371	2,558,592	1,360,117	1,198,475	262,424	76,951	185,473	1,310	358	952	9,095	2,624	6,471
18-64	19,127,412	9,617,998	9,509,414	5,480,888	3,105,101	2,375,787	12,121,908	5,915,968	6,205,940	309,565	59,700	249,865	1,215,051	537,229	677,822
18+	22,771,127	11,162,443	11,608,684	5,718,786	3,199,902	2,518,884	14,212,997	7,101,434	7,111,563	1,479,983	266,517	1,213,466	1,359,361	594,590	764,771
25-44	9,915,677	4,994,666	4,921,011	2,486,397	1,509,719	976,678	6,774,290	3,200,032	3,574,258	40,280	9,204	31,076	614,710	275,711	338,999
45-64	6,380,314	3,183,282	3,197,032	435,899	235,265	200,634	5,085,194	2,638,985	2,446,209	267,975	50,136	217,837	591,246	258,894	332,352
65-74	2,111,720	970,852	1,140,868	126,085	60,244	65,841	1,441,615	791,318	650,297	435,763	75,521	360,242	108,257	43,769	64,488
65+	3,643,715	1,544,445	2,099,270	237,898	94,801	143,097	2,091,089	1,185,466	905,623	1,170,418	208,817	963,601	144,310	57,361	86,949
75+	1,531,995	573,593	958,402	111,813	34,557	77,256	649,474	394,148	255,326	734,655	131,296	603,359	36,053	13,592	22,461
TOTAL	29,969,209	14,847,259	15,121,950	12,915,730	6,884,534	6,031,196	14,214,081	7,101,590	7,112,491	1,480,001	266,524	1,213,477	1,359,397	594,611	764,786
Median Age (Years) - Âge médian (années)															
	35.2	34.4	35.9	16.2	16.8	15.5	45.2	46.5	43.9	74.9	74.8	74.9	46.3	46.0	46.5
Mean Age (Years) - Âge moyen (années)															
	36.4	35.3	37.4	18.6	18.9	18.3	47.5	48.8	46.2	73.5	73.1	73.6	47.7	47.5	48.0

See footnote(s) and abbreviation(s) at the end of the publication.

Voir renvoi(s) et abréviation(s) à la fin de la publication.

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1997 (PP) - continued

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1997 (PP) - suite

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
TOTAL	30,286,596	14,999,677	15,286,919	13,090,271	6,975,656	6,114,615	14,270,475	7,124,687	7,145,788	1,498,159	272,748	1,225,411	1,427,691	626,586	801,105
0	363,195	186,033	177,162	363,195	186,033	177,162	-	-	-	-	-	-	-	-	-
1	373,038	190,701	182,337	373,038	190,701	182,337	-	-	-	-	-	-	-	-	-
2	386,156	198,090	188,066	386,156	198,090	188,066	-	-	-	-	-	-	-	-	-
3	392,579	201,334	191,245	392,579	201,334	191,245	-	-	-	-	-	-	-	-	-
4	400,833	205,679	195,154	400,833	205,679	195,154	-	-	-	-	-	-	-	-	-
0-4	1,915,801	981,837	933,964	1,915,801	981,837	933,964	-	-	-	-	-	-	-	-	-
5	414,746	212,270	202,476	414,746	212,270	202,476	-	-	-	-	-	-	-	-	-
6	416,821	214,084	202,737	416,821	214,084	202,737	-	-	-	-	-	-	-	-	-
7	418,671	214,495	204,176	418,671	214,495	204,176	-	-	-	-	-	-	-	-	-
8	404,501	207,001	197,500	404,501	207,001	197,500	-	-	-	-	-	-	-	-	-
9	394,710	201,679	193,031	394,710	201,679	193,031	-	-	-	-	-	-	-	-	-
5-9	2,049,449	1,049,529	999,920	2,049,449	1,049,529	999,920	-	-	-	-	-	-	-	-	-
10	396,858	202,336	194,522	396,858	202,336	194,522	-	-	-	-	-	-	-	-	-
11	408,815	208,753	200,062	408,815	208,753	200,062	-	-	-	-	-	-	-	-	-
12	409,810	209,464	200,346	409,810	209,464	200,346	-	-	-	-	-	-	-	-	-
13	406,691	207,764	198,927	406,691	207,764	198,927	-	-	-	-	-	-	-	-	-
14	404,956	207,052	197,904	404,956	207,052	197,904	-	-	-	-	-	-	-	-	-
10-14	2,027,130	1,035,369	991,761	2,027,130	1,035,369	991,761	-	-	-	-	-	-	-	-	-
15	406,279	207,895	198,384	406,140	207,861	198,279	136	31	105	-	-	-	3	3	-
16	409,595	209,638	199,957	409,338	209,592	199,746	240	37	203	7	2	5	10	7	3
17	408,026	209,614	198,412	407,357	209,523	197,834	636	76	560	12	4	8	21	11	10
18	401,708	206,097	195,611	399,553	205,791	193,762	2,102	288	1,814	17	6	11	36	12	24
19	398,480	204,032	194,448	392,539	203,043	189,496	5,839	966	4,873	24	6	18	78	17	61
15-19	2,024,088	1,037,276	986,812	2,014,927	1,035,810	979,117	8,953	1,398	7,555	60	18	42	148	50	98
20	402,773	205,148	197,625	389,363	202,390	186,973	13,141	2,700	10,441	37	5	32	232	53	179
21	409,230	208,030	201,200	383,360	201,426	181,934	24,937	6,328	18,609	220	67	153	713	209	504
22	412,152	209,080	203,072	370,450	197,361	173,089	40,116	11,267	28,849	243	78	165	1,343	374	969
23	402,194	203,293	198,901	338,839	183,795	155,044	60,727	18,748	41,979	286	73	213	2,342	677	1,665
24	408,133	206,581	201,552	315,079	175,892	139,187	88,931	29,496	59,435	307	70	237	3,816	1,123	2,693
20-24	2,034,482	1,032,132	1,002,350	1,797,091	960,864	836,227	227,852	68,539	159,313	1,093	293	800	8,446	2,436	6,010
25	419,975	212,330	207,645	290,952	166,933	124,019	123,056	43,533	79,523	390	87	303	5,577	1,777	3,800
26	441,102	222,011	219,091	272,920	159,603	113,317	159,639	59,578	100,061	488	125	363	8,055	2,705	5,350
27	447,277	225,504	221,773	240,429	144,524	95,905	195,536	77,003	118,533	564	146	418	10,748	3,831	6,917
28	445,696	224,341	221,355	204,767	125,556	79,211	226,504	93,454	133,050	648	167	481	13,777	5,164	8,613
29	448,949	226,253	222,696	176,099	110,464	65,635	255,373	109,060	146,313	785	172	593	16,712	6,557	10,155
25-29	2,202,999	1,110,439	1,092,560	1,185,167	707,080	478,087	960,108	382,628	577,480	2,855	697	2,158	54,869	20,034	34,835
30	459,998	232,242	227,756	155,067	98,281	56,786	284,052	125,631	158,421	934	220	714	19,945	8,110	11,835
31	487,133	246,475	240,658	140,843	90,177	50,666	321,069	145,557	175,512	1,026	234	792	24,195	10,507	13,688
32	524,466	265,581	258,885	134,401	86,296	48,105	359,770	165,781	193,989	1,278	294	984	29,017	13,210	15,807
33	541,763	274,722	267,041	122,811	78,248	44,563	384,700	181,030	203,670	1,415	334	1,081	32,837	15,110	17,727
34	551,048	279,151	271,897	112,569	70,796	41,773	401,049	191,029	210,020	1,663	403	1,260	35,767	16,923	18,844
30-34	2,564,408	1,298,171	1,266,237	665,691	423,798	241,893	1,750,640	809,028	941,612	6,316	1,485	4,831	141,761	63,860	77,901
35	545,731	276,056	269,675	102,247	63,100	39,147	404,132	194,486	209,646	1,818	428	1,390	37,534	18,042	19,492
36	551,656	278,619	273,037	102,353	63,215	39,138	408,736	196,975	211,763	1,967	450	1,517	38,598	17,979	20,619
37	544,536	274,283	270,253	92,228	55,805	36,423	409,698	199,203	210,495	2,192	494	1,698	40,418	18,781	21,637
38	533,647	268,569	265,058	82,778	49,779	32,999	406,650	198,951	207,699	2,500	584	1,916	41,719	19,275	22,444
39	530,388	267,127	263,261	76,587	45,566	31,021	407,628	200,923	206,705	2,791	654	2,137	43,382	19,984	23,398
35-39	2,705,958	1,364,674	1,341,284	456,193	277,465	178,728	2,036,846	990,538	1,046,308	11,268	2,610	8,658	201,651	94,061	107,590
40	520,318	260,895	259,423	69,704	40,998	28,706	402,848	198,587	204,261	3,104	714	2,390	44,662	20,596	24,066
41	501,564	251,181	250,383	60,569	34,937	25,632	391,454	194,094	197,360	3,532	801	2,731	46,009	21,349	24,660
42	498,601	248,764	249,837	56,429	32,087	24,342	391,265	194,333	196,932	4,028	901	3,127	46,879	21,443	25,436
43	482,155	239,832	242,323	51,859	28,904	22,955	378,915	188,692	190,223	4,344	971	3,373	47,037	21,285	25,772
44	463,286	230,327	232,959	45,919	25,656	20,263	365,745	182,825	183,120	4,827	1,053	3,774	46,795	20,993	25,802
40-44	2,465,924	1,230,999	1,234,925	284,480	162,582	121,898	1,930,227	958,331	971,896	19,835	4,440	15,395	231,382	105,646	125,736

Table 1.4 Population by Marital Status, Age and Sex, Canada, July 1, 1997 (PP) - concluded

Tableau 1.4 Population selon l'état matrimonial, l'âge et le sexe, Canada au 1er juillet 1997 (PP) - fin

Age / Âge	All Statuses - Tous états			Single - Célibataires			Married - Marié(e)s			Widowed - Veuf(ve)s			Divorced - Divorcé(e)s		
	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin	Total	Males Masculin	Females Féminin
45	450,314	225,452	224,862	43,244	24,292	18,952	355,590	179,048	176,542	5,319	1,167	4,152	46,161	20,945	25,216
46	443,468	222,311	221,157	41,395	23,130	18,265	350,465	177,313	173,152	5,801	1,273	4,528	45,807	20,595	25,212
47	435,586	219,128	216,458	38,132	21,174	16,958	345,634	176,024	169,610	6,336	1,348	4,988	45,484	20,582	24,902
48	428,329	214,693	213,636	35,128	19,148	15,980	340,379	173,513	166,866	6,947	1,542	5,405	45,875	20,490	25,385
49	426,111	214,409	211,702	32,524	17,845	14,679	340,686	174,525	166,161	7,618	1,601	6,017	45,283	20,436	24,845
45-49	2,183,808	1,095,993	1,087,815	190,423	105,589	84,834	1,732,754	880,423	852,331	32,021	6,931	25,090	228,610	103,050	125,560
50	426,448	214,082	212,366	30,724	16,742	13,982	342,121	175,474	166,647	8,334	1,729	6,605	45,269	20,137	25,132
51	368,635	184,968	183,667	25,469	13,707	11,762	294,926	152,180	142,746	9,031	1,854	7,177	39,209	17,227	21,982
52	343,197	172,066	171,129	23,186	12,436	10,750	274,746	142,174	132,572	9,680	1,919	7,761	35,585	15,539	20,046
53	332,994	166,506	166,488	21,199	11,297	9,902	267,539	138,279	129,260	10,170	2,077	8,093	34,086	14,853	19,233
54	322,850	161,463	161,387	19,866	10,417	9,449	259,277	134,507	124,770	11,134	2,220	8,914	32,573	14,319	18,254
50-54	1,794,124	899,087	895,037	120,444	64,599	55,845	1,438,609	742,614	695,995	48,349	9,799	38,550	186,722	82,075	104,647
55	301,170	150,451	150,719	18,255	9,605	8,650	241,309	125,609	115,700	12,013	2,341	9,672	29,593	12,896	16,697
56	289,885	144,184	145,701	17,327	9,257	8,070	232,222	120,580	111,642	12,914	2,449	10,465	27,422	11,898	15,524
57	272,661	135,535	137,126	15,754	8,343	7,411	218,341	113,900	104,441	13,998	2,605	11,393	24,568	10,687	13,881
58	264,717	131,267	133,450	15,029	7,730	7,299	211,406	110,946	100,462	15,380	2,774	12,606	22,900	9,817	13,083
59	254,201	125,892	128,309	14,024	7,429	6,595	201,931	106,258	95,673	16,713	3,011	13,702	21,533	9,194	12,339
55-59	1,382,634	687,329	695,305	80,389	42,364	38,025	1,105,211	577,293	527,918	71,018	13,180	57,838	126,016	54,492	71,524
60	246,029	121,101	124,928	13,511	7,005	6,506	194,031	102,073	91,958	18,527	3,390	15,137	19,960	8,633	11,327
61	247,058	121,567	125,491	13,684	7,190	6,494	193,187	102,431	90,756	20,826	3,779	17,047	19,361	8,167	11,194
62	241,681	118,587	123,094	13,423	6,986	6,437	187,059	99,543	87,516	22,845	4,205	18,640	18,354	7,853	10,501
63	235,596	115,631	119,965	13,045	6,780	6,265	180,585	97,049	83,536	24,953	4,545	20,408	17,013	7,257	9,756
64	239,594	116,843	122,751	13,113	6,782	6,331	181,901	97,996	83,905	27,767	5,006	22,761	16,813	7,059	9,754
60-64	1,209,958	593,729	616,229	66,776	34,743	32,033	936,763	499,092	437,671	114,918	20,925	93,993	91,501	38,969	52,532
65	239,301	116,541	122,760	13,415	6,841	6,574	178,899	97,348	81,553	30,748	5,451	25,297	16,239	6,903	9,336
66	236,656	113,927	122,729	13,740	6,966	6,774	173,539	94,589	78,950	34,044	6,115	27,929	15,333	6,257	9,076
67	230,445	110,220	120,225	13,184	6,637	6,547	166,159	90,980	75,179	37,159	6,766	30,393	13,943	5,837	8,106
68	218,957	103,446	115,511	12,538	6,183	6,355	154,475	85,066	69,409	39,220	6,907	32,313	12,724	5,290	7,434
69	215,979	100,772	115,207	12,757	6,260	6,497	148,944	82,298	66,646	42,657	7,564	35,093	11,621	4,650	6,971
65-69	1,141,338	544,906	596,432	65,634	32,887	32,747	822,016	450,279	371,737	183,828	32,803	151,025	69,860	28,937	40,923
70-74	986,109	439,037	547,072	58,546	26,684	31,862	634,272	351,384	282,888	247,233	42,946	204,287	46,058	18,023	28,035
75-79	743,030	305,627	437,403	45,649	17,037	28,612	404,275	232,737	171,538	267,944	46,502	221,442	25,162	9,351	15,811
80-84	476,836	177,905	298,731	33,490	9,892	23,598	196,034	121,303	74,731	236,039	42,676	193,363	11,073	4,034	7,039
85-89	251,625	81,924	169,701	20,559	4,931	15,628	68,242	46,089	22,153	159,234	29,645	129,589	3,590	1,259	2,331
90+	127,095	33,714	93,381	12,432	2,596	9,836	17,673	13,011	4,662	96,148	17,796	78,350	842	309	533
Special Age Groups - Groupes d'âge particuliers															
0-14	5,992,380	3,066,735	2,925,645	5,992,380	3,066,735	2,925,645	-	-	-	-	-	-	-	-	-
0-17	7,216,280	3,693,882	3,522,398	7,215,215	3,693,711	3,521,504	1,012	144	868	19	6	13	34	21	13
15-64	20,568,383	10,349,829	10,218,554	6,861,581	3,814,894	3,046,687	12,127,963	5,909,884	6,218,079	307,733	60,378	247,355	1,271,106	564,673	706,433
18-24	2,834,670	1,442,261	1,392,409	2,589,183	1,369,698	1,219,485	235,793	69,793	166,000	1,134	305	829	8,560	2,465	6,095
18-64	19,344,483	9,722,682	9,621,801	5,638,746	3,187,918	2,450,828	12,126,951	5,909,740	6,217,211	307,714	60,372	247,342	1,271,072	564,652	706,420
18+	23,070,316	11,305,795	11,764,521	5,875,056	3,281,945	2,593,111	14,269,463	7,124,543	7,144,920	1,498,140	272,742	1,225,398	1,427,657	626,565	801,092
25-44	9,939,269	5,004,263	4,935,006	2,591,531	1,570,925	1,020,606	5,677,821	3,140,525	3,537,296	40,274	9,232	31,042	629,663	283,801	346,062
45-64	6,570,524	3,276,136	3,294,388	458,032	247,295	210,737	5,213,337	2,699,422	2,513,915	266,306	50,835	215,471	632,849	278,586	354,263
65-74	2,127,447	983,943	1,143,504	124,180	59,571	64,609	1,456,288	801,663	654,625	431,061	75,749	355,312	115,918	48,960	68,958
65+	3,725,833	1,583,113	2,142,720	236,310	94,027	142,283	2,142,512	1,214,803	927,709	1,190,426	212,370	978,056	156,585	61,913	94,672
75+	1,598,386	599,170	999,216	112,130	34,456	77,674	686,224	413,140	273,084	759,365	136,621	622,744	40,667	14,953	25,714
TOTAL	30,286,596	14,999,677	15,286,919	13,090,271	6,975,556	6,114,615	14,270,475	7,124,687	7,145,788	1,498,159	272,748	1,225,411	1,427,691	626,586	801,105
Median Age (Years) - Âge médian (années)															
	35.6	34.8	36.4	16.4	17.0	15.7	45.6	47.0	44.3	75.2	75.0	75.2	46.6	46.3	46.9
Mean Age (Years) - Âge moyen (années)															
	36.6	35.6	37.6	18.9	19.1	18.4	47.8	49.2	46.6	73.7	73.3	73.8	48.1	47.8	48.3

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	Canada		
	Total - Sex	**Male**	**Female**
Total - Age - Canada	**28,846,760**	**14,170,030**	**14,676,735**
under / moins 1	366,690	187,375	179,320
1	375,785	193,055	182,730
2	380,855	195,320	185,535
3	391,150	200,640	190,505
4	403,340	206,175	197,170
5	407,930	209,130	198,800
6	410,600	210,355	200,245
7	394,510	202,195	192,315
8	385,200	197,115	188,085
9	391,775	200,495	191,280
10	399,185	204,990	194,195
11	400,820	206,235	194,585
12	399,100	204,610	194,490
13	397,655	203,930	193,720
14	396,680	203,600	193,085
15	401,555	205,905	195,650
16	398,200	204,840	193,360
17	390,075	200,160	189,915
18	383,500	196,295	187,205
19	385,790	196,155	189,635
20	384,350	194,510	189,835
21	383,175	192,670	190,500
22	371,060	185,660	185,395
23	375,965	187,850	188,115
24	383,505	191,135	192,370
25	402,755	200,190	202,565
26	403,290	200,615	202,675
27	399,970	197,765	202,205
28	404,160	199,195	204,970
29	420,495	207,515	212,980
30	450,105	222,620	227,480
Total - Age - 0 to/à 30	12,239,225	6,208,300	6,030,915

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International Journal of Advertising, 1989, 8, 351-362

The Evaluation of Sports Sponsorships

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This article considers how sports sponsorships are evaluated by sponsors. The important question is to determine whether a systematic approach is used in the light of the huge expenditures involved in sponsorships. The role of sports sponsorships in the promotional mix is discussed, as well as the evaluation of sports sponsorships. This study involved a sample of 28 sponsors in South Africa during 1988. A framework for the evaluation of sponsorships is presented for use by companies wishing to enter the world of sponsorship.

There has been a dramatic increase in sports sponsorship over the last few years. In 1986, 3400 companies in the USA spent about $1.35 billion on sponsoring sport and at least $6.2 billion on sports marketing (Eisenhart, 1988). In South Africa, an estimated R65 million was spent on sports sponsorship, while an additional R50 million was spent to promote and back up the sponsorship involvement (Grobler, 1986). In 1987 the estimated expenditure was R150 million (Goldswain, 1988, personal interview).

Because of the large sums of money involved, marketers need to pay attention to the issue of how to evaluate sports sponsorship. 'Determining whether a sports sponsorship is money well spent is a gray area for most marketers' (Eisenhart, 1988, p. 94). This article has two main objectives. Firstly, it establishes how South African marketers evaluate their sports sponsorships and secondly, it develops a process for the evaluation of sports sponsorships.

SPORTS SPONSORSHIP AND THE PROMOTIONAL MIX

No sports event can sell itself on its own momentum. It takes an imaginative mix of all the communication tools available to extend the impact of the event (Hurley, 1986). In fact Lapin (1987) says the initial sponsorship fee is not the end, it's just the beginning. He says sports sponsorships need to be supported with promotions, additional advertising, incentive programmes, sampling, publicity and community activities. Furthermore, he says, the event should

be merchandized internally with retailers, customers, government leaders, sales staff and employees.

One way of establishing where sports sponsorship fits into the promotional mix is to define the term. Sponsorship is an agreement in terms of which a sponsor provides some aid to a beneficiary which may be an association, a team or an individual, to enable the latter to pursue some activity and thereby derives the benefits contemplated in terms of its promotion strategy (Abratt *et al.*, 1987). It becomes clear that sports sponsorship concerns more than one element of the promotional mix. It depends on the initial marketing and thereafter on the promotional objectives set. 'In essence modern sponsorship is a mutually beneficial business arrangement between sponsor and sponsored to achieve defined objectives' (Head, 1981, p. 2).

'The marketer does need to define the purpose of his financial support' (Jefkins, 1974, p. 144). It can be to promote a brand name and maximize sales, e.g., Coca-Cola sponsoring a sporting event or alternatively to reverse a limited image, e.g., Yardley sponsoring the MacLaren racing car team. Yardley had the double problem — how to make men accept a name famed for feminine products and at the same time leave behind the lavender water image. 'Sponsorship is Yardley's way of educating the market — its MacLaren's sponsorship aims to create a racier more exciting dynamic image' (Jefkins, 1974, p. 145).

There is a two-fold marketing value of sponsorship. Firstly, 'publicity results from a popular sponsorship, mainly of a name plugging kind' (Jefkins, 1974, p. 133) and secondly 'investments in goodwill' (Jefkins, 1974, p. 133). This can lead to public recognition of respectability, responsibility and status.

'A good sports marketing programme works on many levels' (Frankel, 1986, p. 5). It can have a positive effect on consumers, the trade and a company's employees. Among consumers it can improve brand awareness and image, encourage trial and promote consumer loyalty. A good programme can provide the trade with a special sales tool, serve as a springboard from merchandizing and promotion themes, and form the foundation for some exciting incentive and motivation programmes. For a company's employees it can create a sense of pride and unity (Frankel, 1986).

EVALUATION OF SPORTS SPONSORSHIPS

Before we can establish how companies evaluate the effectiveness of sports sponsorships, a brief review of why companies sponsor sport is necessary.

'A growing number of companies who are looking to reach their target audience during leisure time have turned to sports events sponsorship as a market vehicle' (Messon and Tilson, 1987, p. 52). Sports sponsorships can offer cost-effective exposure for a product, associate a company or product name with a specific event, and provide companies with high visibility activities, particularly if the events are national or international in scope. All of this

contributes to the bottom-line performance. 'Companies get into sponsorship because they can expect a return on the bottom line' (Ukman, 1984, p. 21).

The reasons for club sponsorship in British football reveal the diverse factors that make such sponsorship so attractive (Davidson, 1984):

Chance of press and TV coverage of the company name;
Heightened awareness of the company amongst a young, predominantly male audience;
The opportunity to offer novel entertainment facilities to trade clients; and
The morale-boosting effect on the company's work force.

'Sponsorships that do not work', says Kevin Havelock, Promotions Manager at Guinness, 'are those with insufficient thought behind them' (Davidson, 1984, p. 33). Havelock says without the support of a full marketing package the impact of sponsorship falls flat on its face. Companies need to put more effort into using the sponsorship as a promotional tool before and after as well as during the event' (Miles, 1987, p. 12).

Sponsorship requires measurement over a broad area of activity for besides one's objectives (which could be single-minded, but are more than likely diverse), one needs to 'market' the sponsorship. 'Although sponsorship used to be evaluated on the same terms as advertising, now it is a combination of advertising, public relations, quantitative data and gut feeling' says Steve Kesnit, President of Kemper Sports Management (Fitch, 1986). 'It is naïve to judge an event successfully comparing media exposure to the cost of placing a spot. You cannot say the fact that a corporate name appears 20 times has the same amount of effectiveness as a TV commercial because you cannot control the message the way you do in a TV spot' (Ukman quoted in Fitch, 1986).

Messon and Tilson (1987) say because companies are turning away from traditional giving, towards a more market-driven strategic-management bottom-line approach to philanthropy, they are looking for a tangible return for their contributions. 'The balance sheet is the best score card,' says Ray Benton, President of ProServ (Fitch, 1986). Therefore many companies are measuring their giving in terms of how well the corporation's objectives are being met. Doing good is being measured by many businesses in terms of how much it contributes to a company's competitive edge.

Specific techniques for evaluating the effectiveness of sports sponsorship identified by Messon and Tilson include:

Extent of media coverage, number of programme participants and sales volume increases;
Pre- and post-programme awareness studies to determine the effects of their event on corporate image, product recognition and corporate objectives. 'Chrysler measures the success of its sponsorship by image exposure not direct sales' according to Phill Brockhern, Sports Marketing, Chrysler (quoted in Beyer, 1986).

The ideal research programme should consist of four value added levels, where each constructive level contributes more specific and instrumental information than the preceding one (Pearseul, 1987):

Level one
Set measurable goals, e.g., 'The goal of our sports sponsorship is to increase consumer awareness of product X among young professional male participants by 15 percentage points.'

Level two
Research the sports interest of target customers. This is more applicable in the planning process.

Level three
Measure the results. The best format for measurement depends on the individual situation and objectives. Three-way surveys (pre-event, event and post-event) of a designated audience are generally the best method for detecting changes in name awareness, corporate image, product use, etc., as a result of sports sponsorship.

Level four
Re-evaluate the cost effectiveness. 'It is foolish to include sports in the marketing mix and then not subject it to strict evaluation criteria' (Perseaul, 1987, p. 25).

In order to assess the programme's (sponsorship) effectiveness as a public relations or marketing tool, a formal multiple technique evaluation programme should be developed' (Mihalik, 1984, p. 23). The types of measurements identified by Mihalik include:

— cost accounting techniques (they should be prepared even if not required);
— participating frequency counts per dollar spent;
— the number of complaints per programme;
— dollar equivalent of free advertising;
— attitude surveys geared to programme results;
— pre- and post-contest surveys of attitudes towards the sponsor; and
— time-trend analyses of product awareness and image enhancement.

Finally, Ukman says an accepted means of 'measuring the effectiveness will have to be developed to prove event market clout' (quoted in Fitch, 1986). To date she believes the best judge is a combination of the number of people reached on site and the amount of the cost that is self-liquidated.

THE STUDY

The main objective of this study was to establish how South African companies evaluate their sponsorships. Two propositions were developed:

P1 Most companies do not have an evaluation system.
P2 Companies that do evaluate their sponsorships do not use a formal process or system.

Some preliminary research was undertaken during January 1988. The views of the general managers of two of the leading sports sponsors in South Africa were obtained. Furthermore, interviews were held with the secretary of the South African Sports Sponsor Association, and the managing director of the South African Cricket Union. All the interviewees responded positively to the need to develop some sort of framework for the evaluation of sponsorships. Based on these responses, a formal study was undertaken. A questionnaire was designed and based on the theory as well as the discussions with the interviewees in the preliminary research.

THE SAMPLE

It was decided to approach all the national sponsors of the three major supported sports in South Africa, namely Soccer, Rugby and Cricket. The national sponsors of horse racing were also included because the biggest individual sponsorship spends are on horse racing. Despite the fact that some companies were involved in more than one of the four sports chosen, a list of 40 different companies was obtained. Questionnaires were mailed to the 40 companies in February 1988. The companies were telephoned and told that the questionnaire had been posted with a covering letter. The respondent was asked to complete the questionnaire and return it in the self-addressed envelope enclosed. A total of 28 replies were received which represents a 70 per cent response. The designation of the respondents is shown in Table 1. It is interesting to note that respondents ranged from Managing Director to Sports Promotion Manager.

Although four sports were chosen, Table 2 shows that the respondents sponsored 23 different sports.

THE RESULTS AND DISCUSSION

The reasons for sponsoring sport are shown in Table 3. The most important reason for sponsoring sport was promotional activity. Social responsibility was also an important reason.

It is important for a company to project a favourable image. Projecting the image of being concerned in the community affairs and improving the lifestyle of members of the community were said to be important reasons for engaging in sponsorship. Many respondents mentioned that they sponsor sport to assist staff recruitment. A company having wide exposure in the media can get the reputation of being a young dynamic firm which people would like to join.

Table 1 *Designation of respondent*

Designation	Number of respondents
Marketing Director	3
Marketing Services Manager	1
Group PR Manager	1
Regional Manager	1
Director	3
PR Manager	2
Assistant General Manager PR	1
Senior Brand Manager	1
Marketing Co-ordinator	1
Marketing Manager	2
Executive Assistant Manager	1
Senior Manager - Marketing Communications	1
Senior Communications Specialist	1
Sports Promotion Manager	1
Advertising Manager	1
Product Manager	1
Managing Director	1
National Sales Manager — sport	1
Sports sponsorship Manager	1
Advertising Executive	1
Not given	2
Total	28

Table 2 *Types of sports sponsored*

Sport	Response (f)	Percentage
Football (soccer)	12	18
Horse racing	7	10
Cricket	7	10
Rugby	8	12
Motor sport	4	6
Boxing	1	1.5
Athletics	4	6
Golf	4	6
Yachting	1	1.5
Bowls	1	1.5
Road running	2	3
Life saving	1	1.5
Karate	1	1.5
Darts	2	3
Canoeing	1	1.5
Wrestling	1	1.5
Tennis	2	3
Hockey	3	4.5
Squash	1	1.5
Softball	1	1.5
Baseball	1	1.5
Netball	1	1.5
Horse jumping	1	1.5
Total	67	100

Table 3 *Reasons for sponsoring sport*

Reason	Response (f)	Percentage
Social responsibility	15	54
Corporate philanthropy	5	18
Pressure from overseas parent	—	—
Promotional activity	23	82
Other	3	11
Maximum possible response	28	100

Note: Multiple responses.

Table 4 *Promotional mix element involved*

Mix elements	Response (f)	Percentage
Advertising	23	82
Personal selling	9	32
Sales promotion	13	46
Public relations/publicity	27	96
Other	1	4
Maximum possible response	28	100

Note: Multiple responses.

Many young applicants will be attracted to a company because it offers a sponsored team in a soccer or cricket league. One of the most important objectives for respondents engaging in sponsorship is the achievement of media coverage. Television and newspaper coverage was regarded as very important to those companies seeking name awareness.

Respondents were asked which elements of the promotional mix were involved in sports sponsorship (Table 4). The most important element of the promotional mix was public relations/publicity. Advertising was also important. The least important factor was personal selling. The findings confirm that all four elements of the promotional mix are involved with sports sponsorship. However, the findings confirm that most of the respondents regard sponsorship as part of the public relations and publicity exercise in the company. This is not surprising because publicity has the advantage of greater exposure potential because it is not an advertisement and because there are no salespersons involved. Most people will, therefore, watch and listen. The amount of a generous sponsorship often results in a great deal of publicity being given to an event which would otherwise have been merely another event on the sporting calendar.

Advertising was also an important factor in relation to sports sponsorship. Sponsorship is communication by an identified seller to a selected audience. Viewers of sports programmes on television cannot fail to notice brand names displayed on banners around the perimeters of tennis courts and football fields,

or printed on the jerseys of football teams and strategically placed on rally motor cars. Thus, one can conclude that sponsorship is a form of advertising.

Objective setting is a very clear prerequisite for overall promotional evaluation and for evaluation of the individual mix elements. Twenty four respondents (86 per cent) stated that they set specific objectives. Of the four respondents who did not set objectives, the reasons given were that 'they were very long term' and that objectives were 'not measureable'.

Strategic decision makers must determine the basic goals, characteristics and philosophies that will shape the strategic position of the company. This is known as the company mission. This philosophy extends, in particular, to the marketing functions of the company — it reveals the image of the company which it seeks to project. One of the purposes of the marketing strategy is communicating with target customers by using available communications tools. The narrow view of the communications mix is that these tools are advertising, personal selling, sales promotion and publicity. The broad view includes the image the consumers have of the company. Objectives have to be set for each element of the promotional mix, and this includes sponsorship. Respondents were asked whether a set procedure or process is followed to evaluate sports sponsorship. Seventeen companies (61 per cent) said yes and 11 said no. Reasons for saying no included 'too difficult to analyse'; 'it is virtually impossible to do so'; 'very difficult to evaluate'; and 'it is too difficult to measure'. Proposition number one is thus rejected because 61 per cent of the respondents said that they do have a set procedure.

Of the respondents who answered yes, a set procedure does exist; the following are examples of such procedures:

(1) Exposure through the media and advertising spend.
(2) Exposure in the media and increase in business.
(3) How effectively it reached the target market.
(4) Client reaction and participation.
(5) Effectiveness from a sales promotion, sales and public relations point of view.
(6) Cost-effectiveness of community response. Promotional effectiveness.
(7) Publicity gained through the media.
(8) Consumer awareness and attitude.
(9) Column centimetres in press and magazines, radio time, television time, spectator support.
(10) Exposure in the media and market perceptions (by way of research).
(11) Media exposure.
(12) Television coverage and media interest. Continuity of publicity and customer reaction.
(13) Media coverage, size of spectator turnout, well-organized administrative body and fixed venues.
(14) Extent to which the objectives set before the sports event took place were reached.
(15) Media mileage obtained. Increase in sales in specific areas.

(16) Awareness and attitude. Value of editorial space. Physical exposure of company branding (on posters, banners, etc.).
(17) Sales and television advertising gained from the events.

Media exposure is the most evaluated activity. However, as media exposure is only one aspect of sports sponsorship, this trend revealed the need for a comprehensive evaluation framework. The second proposition is thus accepted. This framework is presented below in a step by step sequence.

A PROCESS FOR THE EVALUATION OF SPORTS SPONSORSHIP

The process which should be followed by sports sponsors is shown in Figure 1. Each step is described below:

Step 1

The starting point is the setting of objectives. There is no point in trying to proceed or even evaluate results unless measurable objectives are set. Ideally the bias should be towards quantifiable objectives, e.g., 'Increase consumer awareness of product X among young professional male participants by 15 percentage points'. Where management believes qualitative objectives are also important, e.g., 'Improve company image or enhance goodwill', they should make sure that these objectives are measurable.

Step 2

A specific person needs to be made responsible for the sports sponsorship evaluation. Since the various promotional mix elements are involved in sports sponsorship, it makes logical sense to assign somebody from 'marketing' to be responsible for evaluation. However, many factors could influence the decision, such as organizational structure and the importance of the sports sponsorship in overall company strategy. Where the sports sponsor has an internal marketing research department or has access to an external market researcher, close liaison between these people and the incumbent responsible for sports sponsorship should take place.

Step 3

Decide which promotional mix elements are involved. The list acts as a reminder of which elements to choose from. Once the elements have been identified, the initial objectives set can be categorized into each mix element.

Step 4

Once initial objectives have been categorized into mix elements, gaps can be identified, particularly in two areas. Firstly in terms of relevance and measurability and secondly whether each mix element has specific objectives.

Step 5

The list indicates the time periods available for evaluation. The most com-

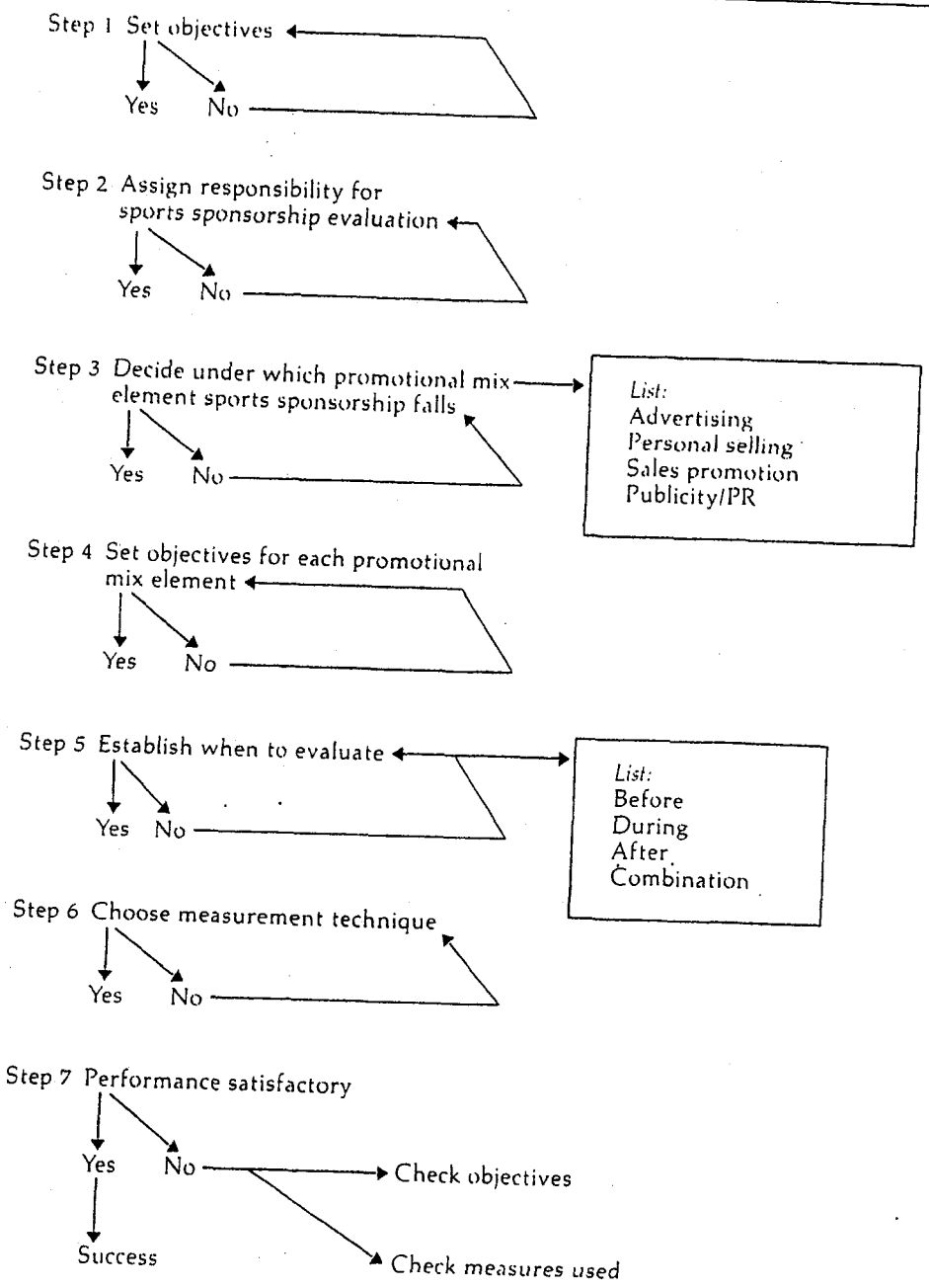

Figure 1. A framework for the evaluation of the effectiveness of sports sponsorship.

prehensive way is to evaluate over a period of time which implies a combination of the time periods. The important issues are that if only one period is chosen, it might be difficult to compare results whereas if a combination of periods are chosen, a benchmark or base data need to be established so that a meaningful comparison can be made.

Step 6

Choose the relevant measurement technique. This is a very important part of the evaluation process, hence the need for well-defined and measurable objectives.

Step 7

The final step is to compare the results obtained to the objectives set. If the performance meets or exceeds the standards set, then success has been achieved. If not, two things need to be reviewed: the objectives set and the measures used. The measurement techniques should be checked to ensure they did indeed obtain the results given and whether they were the correct techniques to use.

CONCLUSION

It is clear that the sponsor must evaluate the sponsorship because of the vast amount of money involved. While this study shows that many sponsors do evaluate their sponsorship, a more systematic approach needs to be taken. This article has addressed this issue by presenting a framework for the evaluation of sponsorships.

The need for continued research by companies sponsoring sport is evident. The issue of evaluation of sponsorships, indeed the monitoring of a company's total communications programme, is far from resolved. More still needs to be done to determine whether the sponsorship was appropriate and whether it was successful. The measurement techniques are to be checked to ensure that they did indeed obtain the results given and whether they were the correct techniques to use.

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Action on smoking and health

TOBACCO SPONSORSHIP OF SPORT

ASH's Briefing on how the tobacco industry
beats the ban on television advertising
by sponsoring high-profile sport,
and how the BBC helps them;
how tobacco money can be replaced,
and what the BBC and the Government should do now

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ASH's BRIEFING ON

TOBACCO SPONSORSHIP OF SPORT

The Dangers of Tobacco

1. Nothing rivals tobacco in the damage it does to the health of the people of the United Kingdom. It is the cause of about one in every six deaths, and the total of 111,000 a year is about *six times* as many as the sum total of deaths from all accidental causes (including road accidents), all murders, manslaughters and suicides, plus deaths from use of illegal drugs and from AIDS. At least one in three smokers dies as a result of smoking. Of these, half die under the age of 70, and their average loss of life is 24 years; those who die over the age of 70 on average lose eight years of life[1]. Many of these deaths follow long and painful illnesses - particularly those from emphysema and other lung diseases.

2. Tobacco is unique in other respects than the sheer scale of damage it causes. It kills when used exactly as intended by those who make it and sell it. It has no safe level of use. Smokers typically start in early teenage, but there is a long delay before the damage to their health appears, making self-deception about its effects easy. Moreover, the nicotine in tobacco is addictive - comparably so to heroin or cocaine - so that it is difficult to quit. For all these reasons, it has long been recognised by Governments and public health authorities here and abroad that special measures are needed to discourage tobacco use and to limit its promotion.

3. It is the (effectively unanimous) view of the health community, shared by about 70% of the public, that tobacco advertising and promotion should be totally prohibited, and a Bill to this end received an unopposed Second Reading on February 11 after a closure motion was carried by 227 to 17. The Bill, introduced by Mr Kevin Barron MP and due for its Report Stage and Third Reading on 13 May, would put an end to sponsorship of sporting or any other events by tobacco companies, not by banning sponsorship as such but by preventing its use for the purpose of promoting tobacco products.

The Extent of Tobacco's Involvement in Sport

4. Just as tobacco advertising and promotion is regulated in the main by a so-called "voluntary agreement" between the Department of Health and the tobacco industry, so sports sponsorship is the subject of a similar agreement between the industry and the Department of National Heritage (and its predecessor departments). We assess the worth of the agreement below, but note here that it requires that expenditure on sponsorship of sport is capped at its 1985 level, uprated for inflation. That limit is not published (this is not the only matter where the agreements impose secrecy) but it is believed to be between £8 million and £9 million at the current time.

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1 *Mortality from Tobacco in Developed Countries: Indirect Estimation from National Vital Statistics*: Peto et al, *Lancet*, 23 May 1992, vol 239 pp. 1268-78.

5. In a paid insert in the *UK Press Gazette* (30 September 1991) the Tobacco Manufacturers Association (then called the Tobacco Advisory Council) claimed that under £5mn was spent on sports sponsorship. In their current booklet "Support for Sport" they claim expenditure of "around £9m" out of a total of £250 mn. commercial sponsorship of sport. RSL, a market research body whose sponsorship research division Sportscan produces six-monthly reports, valued tobacco sponsorship at £7.3 mn in 1991 and £7.0 mn in 1992: whether the TMA figure is comparable, indicating an increase in spending in 1993, is not clear.

6. However, the important fact shown by these figures is that tobacco sponsorship makes up a very small part of the whole. The TAC's 1991 estimate was that it amounted to only about 3% of total commercial sponsorship of sport. Their current £9mn figure is about 3.6% of the total they quote of £250mn. Given that sports governing bodies not infrequently have to find replacement sponsors, the prospect of phasing out tobacco sponsorship (Mr Barron's Bill as amended in Committee provides a period of two years' grace for existing contracts after the Bill becomes law) is not an overwhelmingly difficult prospect.

7. The number of tobacco "involvements" in sports sponsorship reported by RSL Sportscan averages about 20-24 in each six-monthly reporting period:

	Jan - June	July-Dec
1991	19	28
1992	22	29
1993	13	23

Sports receiving sponsorship from tobacco companies currently or recently include cricket, rugby league, ice hockey, golf, polo, equestrianism, angling, greyhound racing, yachting, motor racing, motor cycling, snooker, billiards and darts.

8. On other hand, sports that do not take tobacco money include athletics, swimming, association football (although one minor league club accepts sponsorship from a snuff manufacturer) and rugby union (although they did so until 1988). It is also worth noting that recent Olympic Games have been promoted as smoke-free.

Objections to Tobacco's Links with Sport

9. Sportsmen and sportswomen often resent the association of their pursuit of fitness, health and physical prowess with smoking - a habit which inhibits performance immediately and leads for many to crippling illnesses and death. Sebastian Coe said in 1987 when the current voluntary agreement was introduced: "Tobacco is an inappropriate sponsor of sport"[2]. Alan Smith, the Test and County Cricket Board's Chief Executive, wrote to ASH "I rather

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2 *Daily Telegraph* 20.1.87

doubt personally whether a new tobacco sponsor would ever again be acceptable to TCCB" if Gallaher ("Benson & Hedges") dropped out.[3] Under the terms of their sponsorship of the "Regal" Trophy, Hanson Industries' Imperial Tobacco requires that 200 cigarettes be put out in the dressing room for every player at every match. We understand that many of the players feel insulted and sickened by this practice, but they are of course inhibited from speaking out by their terms of employment.

10. In March 1992, a number of sports personalities, including J P R Williams, Brian Clough, Adrian Moorhouse and Nick Allott, joined stars from the arts world in putting their names to a "Tobacco-Free Charter" which called for a ban on tobacco sponsorship and which was delivered to the Prime Minister. In a television documentary in 1991[4] Nigel Mansell was seen on camera being briefed by a PR man and then repeating exactly his script in praise of Philip Morris's sponsorship of Grand Prix racing, but if he is happy being manipulated in this way we suspect he is untypical.

11. Public opinion, moreover, is strongly against tobacco sponsorship of sport. In an NOP poll carried out in November 1993, 32% of the public disapproved and an additional 25% strongly disapproved against only 20% who approved and a mere 4% who strongly approved. Even among smokers, 47% disapproved and only 33% approved.

Sponsorship is Advertising

12. The association of sport and smoking is especially dangerous as sports stars are often the heroes of the young who seek to emulate them. This concern is not fanciful, as is shown both by academic research and by the testimony of the tobacco companies themselves. As to the academic research, we refer in particular to a study conducted by the Advertising Research Unit of the University of Strathclyde. This involved individual interviews with 726 children aged from 6 to 17 conducted at the time that John Player Special as well as Marlboro were sponsoring formula 1 motor racing. The study found that:

> "Only 9% of the primary school children named Marlboro or John Player Special as sponsoring motor racing. Nevertheless, 47% of them *[offered an array of nine cigarette advertisements]* pointed to advertisements for these brands (which did not refer to motor racing) as being liked by "someone who likes excitement and fast cars". This suggests that associations between brand names (or their visual clues) and exciting sports can be elicited by simple advertisements. That such associations can be elicited even in children of primary school age is a cause for concern." [5]

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3 Letter dated 26 February 1990

4 *Public Eye*, 25 October 1991

5 P P Aitken, D S Leathar & S I Squair, *Children's Awareness of cigarette brand sponsorship of sports and games in the UK*, Health Education Research (1986) 1:3, 203-211.

13. It is this sort of association, lodged in the mind at an early age, that can lead insidiously to children "having relatively less negative views about smoking", which, as a recent Advertising Association publication reported, is one of the most important factors associated with starting to smoke.[6]

14. The tobacco companies make much hypocritical propaganda about their motives: for example, the TMA's new booklet, *Support for Sport*, referred to above, writes of sponsorship providing "an opportunity for the sponsor to re-invest socially in the community in which it trades - to the benefit of the sporting body concerned, the followers and participants of the sport and the quality of the event itself". But there is more honest testimony from them, as the following quotations make clear:

"Sports sponsorship . . . is a form of advertising which enables us to introduce glamour and excitement" [7]

"Basically it *(viz, sponsorship)* is part and parcel with the marketing of your product. It is one of a range of tools. No-one hands over big cheques just to give themselves a warm fuzzy feeling"[8]

"We made it clear from the day we announced our sponsorship . . . that we were in the business of selling cigarettes, not the racing business"[9]

"We *(Marlboro)* are the number one brand in the world. What we wanted *(in sponsoring Formula One motor racing)* was to promote a particular image of adventure, of courage, of virility . . ." [10]

"It's expensive, but we've examined it closely and decided that it is good value"[11]

"We're not handing money out for nothing. We have gone into this very thoroughly and the entire John Player Special publicity is built around motor racing seen as a fast, exciting trendy sport for the young . . ."[12]

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6 *Ads and Fags*, Advertising Association, 1994, quoting Goddard, *Why do children start smoking?* OPCS, 1990.

7 Michael Whitehead, Gallaher International, February 1986

8 Cynthia von Maerestetten, vice-president, corporate affairs, Rothmans, June 1987

9 Edward J Horrigan, R J Reynolds (now RJR-Nabisco), August 1980

10 Aleardo Buzzi, Philip Morris, *Newsweek*, March 1983.

11 Brian Wray, Marketing Director, John Player & Son, *Newsweek*, March 1983

12 Gordon Watson, General Manager, BAT (Hong Kong), November 1984.

"What we are trying to do is associate Marlboro with activities which are favoured by younger people. This means sports and music, rock music et cetera . . . "[13]

"We're *not* in the sports business. We *use* sports as an avenue for advertising our products"[14]

"I must be absolutely frank - I could not quite get it squared with my conscience . . . I felt unhappy about it, and felt unhappy about the rather covert and subtle advertising of tobacco that takes place - sponsorship of sporting events and that type of thing. So I felt myself relieved of a certain burden when I was freed from my connection with the tobacco industry"[15]

Television Coverage

15. As the study quoted above sets out, it is almost certainly through television coverage that the associations between cigarette brands and sports become known. (The associations mentioned by children were predominantly those involving events that had had extensive television coverage.) The value for the sponsor lies precisely in the television coverage gained by high-profile events, and that value is multiplied for cigarette manufacturers by the fact that they are legally barred from advertising on television in the normal way. Thus it is unsurprising that on one occasion when a technicians strike threatened to black out coverage of the rugby league cup final, John Player, its then sponsors, insisted that the match be postponed: "No television coverage, no match, said John Player", reported a director of the advertising agency Saatchi and Saatchi.[16]

16. Television advertising of tobacco has been banned by law throughout the European Union (the UK led the way in 1965) and in many other countries, including the USA, but televised sponsored sport offers the tobacco industry an easy way round this restriction. No wonder that in a 1989 survey 64% of 9-15 year-olds said that they had "often" or "sometimes" seen cigarette advertising on television[17]. No wonder, equally, Philip Morris see motor racing sponsorship as "the only appropriate vehicle for simultaneous international communication with our consumers, whatever their language and politics" [18]

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13 Jean-Pierre Paschoud, Philip Morris Marketing Director, Switzerland, 1980, quoted in *Washington Post Magazine*, 20.2.94

14 Wayne Robertson, R J Reynolds (now RJR-Nabisco), September 1989.

15 Lord Dunleath, chairman, Carreras Rothmans (Northern Ireland) until 1983, in Northern Ireland Assembly, 20.3.85

16 Fynn, A E (1981), *Cigarette advertising and health education: use and abuse of the media* in *Health Education and the Media*, ed. Leathar, Hastings & Davies, Pergamon Press.

17 *Beating the Ban*, Health Education Authority, 1990.

18 Aleardo Buzzi, Philip Morris, *Autosport*, June 1987

17. In this matter of giving tobacco companies publicity by televising their sponsored events, the ITV companies have acted with responsibility: a long-standing agreement made under the auspices of the Independent Television Companies Association (of which the franchise-holding companies are the members) lays down a self-denying ordinance under which they refrain from televising sports events with tobacco sponsorship. The ITCA general secretary was quoted as saying when the agreement was made: "We feel this is a stance that is appropriate for us as public service broadcasters . . . We do not think sport and tobacco ought to be associated. If sport wants to be associated with tobacco, then we are saying OK, but do not expect television coverage."[19] In correspondence with ASH following the recent award of new franchises, the companies confirmed their intention to maintain this policy.

18. By contrast, the BBC continues to give extensive coverage to tobacco-sponsored events. In 1993, according to RSL Sportscan, the BBC broadcast 211 hours of tobacco-sponsored sport[20]. This analysis, however, completely excludes motor racing, which is one of the most obvious tobacco-sponsored sports. The omission is justified by the fact that it is not the sport's central organisation that is sponsored but some of the participating teams and many of the drivers. RSL have informed us that there were in fact 47½ hours of motor-racing on television in 1993 (all in the first half of the year).

19. Surveys[21] published by the Health Education Authority have shown that on average brand names, logos etc. were on the screen for between about 3 minutes and 25 minutes in each hour of sports broadcasting, the highest values being for motor-racing. A calculation made for the *Tobacco Free Charter* (mentioned above) found a total exposure time for tobacco logos and brandnames of 1100 minutes in one year: if the equivalent time had been bought on ITV in 1989, even at cheap rates it would have cost £24 mn; at peak rates it would have cost up to £77 mn - and most of the coverage is of course at peak times. The value of such exposure to the companies is obvious and offers an incomparable return on their quite small investment.

20. Frequent protests have been made to the BBC, urging it to follow the ITV companies' lead. But the BBC has taken only half-hearted action. They have laid down guidelines for their own producers which require care not to focus unnecessarily on the static advertising

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19 *The Independent*, 25 February 1987.

20 Source: RSL Sportscan, private communication based on as-yet-unpublished draft report, which gives the following breakdown: (a) Imperial Tobacco (Hanson Industries): Embassy snooker: 97 hours; Embassy darts: 16 hours; Regal rugby league: 7 hours; (b) Gallaher: Benson & Hedges cricket: 34 hours; Benson & Hedges snooker: 26 hours; Benson & Hedges golf: 7 hours; Silk Cut rugby league: 8 hours; Silk Cut equestrianism: 6 hours; (c) Rothmans: Dunhill golf: 9 hours; (d) other: 1 hour. The total of 211 hours compares with 181 hours in 1992, 179 hours in 1991 and a peak of 382 hours in 1985.

21 For example, *Beating the Ban* (1990) and *Tobacco and the BBC* (1992)

signs at such sports events[22] - they cannot, of course, avoid the signs on players' clothing or on racing cars - and they say they "will not sign new contracts to cover tobacco-sponsored sports events which it has not previously covered"[23] - but they are quite ready to renew their contracts for events they have televised in the past - maybe (we are unclear) including events that they have not covered for some years.

21. We understand that the matter has been discussed and strong views made known in the BBC's General Advisory Council - yet even as they discussed the subject, the BBC bought, scheduled and showed a series of seven programmes following the Marlboro Mclaren Formula One motor racing team through a season. These programmes inevitably gave invaluable and extensive advertising to Marlboro cigarettes, whose logo (the red chevron) was omnipresent and whose name was continually on the screen. Letters from the BBC suggest that they imposed conditions on the filming: we can only comment that some of the programmes in the series gave more intensive exposure to the Marlboro name and logo than any Grand Prix race coverage we have previously seen. We understand that an analysis of this series is being submitted to the Committee by the Health Education Authority and we commend to the Committee's consideration also the HEA's previous reports on the subject, in particular *Tobacco and the BBC* (1992)[24].

Withdrawing from Tobacco Sponsorship

22. In March 1993 the Sports Council adopted a new policy on tobacco sponsorship: the Council declared itself against tobacco sponsorship of sport, offered to help governing bodies of sport to find non-tobacco company sponsors when existing tobacco sponsorship contracts expire, and decided to work for the phased withdrawal of all sponsorship of sport by tobacco companies.[25] ASH warmly welcomed this policy, which is exactly in line with our own. It is certainly more in keeping with the fundamental spirit and aims of sport than the policy of the Central Council for Physical Recreation, which appears to embrace tobacco sponsorship without qualm or hesitation.

23. It is important to note that there are good prospects for implementing this withdrawal from tobacco sponsorship. First, as mentioned above, there is relatively little money involved: well under £10 mn out of a current total of about £250 mn. commercial sponsorship. Secondly, sports have experience already of having to find new sponsors when

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22 We believe that in any case they exercise no control over coverage taken from foreign stations of events abroad.

23 Producers' Guidelines, BBC 1993

24 *Tobacco and the BBC* reproduces the reply from the then chairman of the monitoring committee (COMATAS) to the chairman of the Health Education Authority to the HEA's complaints in their earlier *Bearing the Ban*. We understand that the further reply promised in that letter, dated 11 January 1991, has never been received. ..

25 Letter from David Pickup, Sports Council Director-General, to Director of ASH, 6 May 1993.

existing ones - not least tobacco sponsors[26] - fail to renew their contracts and some are on record as not expecting undue difficulty in finding new backers, albeit unsurprisingly they tend to say that they would not welcome the prospect: for example, David Harrison, chief executive of the World Professional Billiards and Snooker Association (WPBSA) has been quoted as saying: "If we had to replace our tobacco sponsors, we believe we could do so . . ." and Peter Smith of the Test and County Cricket Board as saying: "I expect we would be able to sell the Benson & Hedges again to a new sponsor . . . We get a number of inquiries asking when a contract comes to an end."[27] Michael Horst, vice-president of corporate affairs of Philip Morris (which makes Marlboro), has been reported to the effect that in the event of a ban on tobacco sponsorship of motor racing, the Philip Morris food subsidiary General Foods (which incorporates Kraft and Jacobs-Suchard), "could decide part of the vacuum was worth filling".[28]

24. Apart from alternative commercial sponsors, there are other potential sources of new funding. These include the National Lottery and the Foundation for Sport and the Arts, which disposes of £60m pa. In other countries, sponsorship funds have been created out of increased tobacco taxation: in France, New Zealand and some states in Australia. (In the UK, the £9 mn spent by tobacco companies on sport is equivalent to 0.2p tax on a packet of 20 cigarettes - or to about one-ninth of the proceeds to the Exchequer of the tax on cigarettes consumed by children every year[29].)

France, New Zealand, Australia

25. In France, tobacco sponsorship of sport was already heavily restricted by the *loi Veil* of 1976 before the total ban came in with the *loi Evin* in 1993. A year after that law was passed in January 1991, the president of the French Automobile Federation was still declaring that there would be no difficulty in finding new sponsors for motor sport, but by the end of the year, encouraged by the tobacco industry, he was taking a diametrically opposite view, and there were threats of the French 1993 Grand Prix being cancelled. As a result, the French Government voted a fund of 450 mn francs to replace tobacco sponsorship of motor sports, of which about 250 mn francs has so far been spent. They also legislated to legalise television coverage of foreign Grand Prix races complete with tobacco advertising. The

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26 For example, Rothmans ended their sponsorship of Grand Prix snooker in 1992, Carrolls theirs of the Irish Golf open tournament after 1993; Davidoff Cigars withdrew from sponsoring the Cowdray Park Gold Cup polo event in 1991. RJR-Nabisco announced in 1993 the withdrawal of its Camel brand's participation in Formula 1 motor racing and Philip Morris that it will not renew its sponsorship of women's tennis in the USA when the "Virginia Slims" contract expires this year.

27 Both in Yorkshire Post, 17 May 1991.

28 Glasgow Herald, 20 January 1991

29 Cigarette duty excluding VAT on tobacco consumed by under-16s amounts to about £65 mn (PQ, 1.3.93); VAT on the same cigarettes yields about £15 mn (PQ, 8.3.94), so that total proceeds from children's smoking are about £80 mn a year.

remaining doubt about the French law is whether it covers "indirect sponsorship" - e.g., by Peter Stuyvesant Travel, who sponsor some winter sports. A court case on this will reach the appeal court later this year.

26. In New Zealand the wide-ranging Smoke-Free Environments Act, passed in 1990, included provisions to ban tobacco advertising and sponsorship and to set up a Health Sponsorship Council, a government-funded body to offer replacement funding to groups that were previously supported by tobacco companies. Existing contracts are allowed to continue until mid-1995 - a two-year extension of the original deadline to bring New Zealand into line with Australia, where the legislation was passed more recently. The current funding of the Health Sponsorship Council is NZ$4.4 mn - a reduction on the original NZ$6 mn. There is an exemption for tobacco-sponsored "international sporting events" that involve at least three countries, including New Zealand, and take place in at least two countries, and other minor exemptions[30].

27. In Australia most states introduced bans on some forms of tobacco advertising between 1987 and 1991, and four of them (Victoria, South Australia, Western Australia and the Australian Capital Territory) created funds, from a small proportion of tobacco taxation, to promote health, in part by replacing tobacco sponsorship of sport. The 1989 national ban on advertising in newspapers and magazines was followed in 1992 by a ban on most remaining forms of tobacco advertising, including sponsorship. The latter is being phased in by early 1996. [A very recent proposal to provide A$42.5 mn over 3½ years from general taxation to replace tobacco sponsorship of sport has not yet been decided on, but previous similar proposals have been rejected.] The law provides a Ministerial power to grant exemptions for events of national or international significance (e.g., Formula One motor-racing); and there is no control over televised events from abroad.

Formula One Motor Racing

28. The principal problems that have been experienced in introducing bans on tobacco sponsorship relate to Formula One motor racing. The 16 Grand Prix races are held in 14 countries, of which Australia, Canada, France, Italy and Portugal have tobacco advertising bans. Tobacco sponsorship is reported to total as much as £90 mn a year worldwide[31]. It is not for ASH to say whether the huge investment by the tobacco industry in Formula One has benefitted motor racing as a competitive sport, but it has obviously raised the entry price[32] and thereby reduced the number of teams - from 39 to 26 in 1993. This has been

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30 These are for round-the-world yacht races which include a stop-over in New Zealand, subject to the yachts observing restrictions on promotion while in New Zealand, and (subject to approval by the Minister of Health) for participants in "any competition of international significance" who are not New Zealand residents.

31 *Evening Standard*, 9 June 1993

32 A revealing article in the *Daily Telegraph* on 14 June 1993 reported that, whereas Marlboro McLaren paid Ayrton Senna $23mn in 1993, lesser-known drivers have themselves to pay to be able to drive - perhaps as much as $2mn./season.

largely the result of tobacco sponsorship, and the sport clearly has a unique appeal to the tobacco companies, in that it allows them to circumvent existing and (they hope) potential future bans on television advertising for tobacco - and indeed outright tobacco advertising bans.

29. We note in passing that it is difficult to reconcile the extent of tobacco sponsorship of Formula One motor racing at about £90 mn a year (as quoted above), which would naturally indicate about £6 million per country staging a race, and the "voluntary agreement" limit of about £9 mn overall for tobacco sports sponsorship in the UK. Certainly, RSL's estimate of spending on sports sponsorship (at about £7-£8 mn) does not include motor racing: it would seem to follow from this that the figures reported by the tobacco industry to the Department of National Heritage similarly include nothing for motor racing. It would be interesting to know on what basis it is excluded, but ASH would speculate that, as with the exclusion of motor racing from the RSL statistics, the reason is that the sponsorship attaches not to the sport as a whole but to the participants. Since the end-effect in television coverage is identical, and since motor-racing provides a far higher proportion of screen-time for tobacco logos and other identifiers, we find this anomalous - another marked failure of control by voluntary agreement.

Recommendations

30. To sum up, then, sponsorship of sport by tobacco companies is a method of advertising cigarettes and other tobacco products. It provides them, at very low cost (about £9 mn) substantial television and other publicity which they could not otherwise obtain either at all (because of the ban on tobacco advertising on television) or for anything like that price. The ITV companies have refused to show tobacco-sponsored sport, but the BBC shows many hours of it. Other countries have introduced bans (with some transitional or other exemptions) on tobacco sponsorship. In the remainder of this memorandum, we examine what courses are open to the UK Parliament and Government and to the BBC.

(a) The BBC

31. To deal first with the BBC, with their extensive sports coverage they are obviously in a more difficult position than ITV. However, we do not accept that they have done all that they can and should do as a responsible public body. We recommend that they should put pressure on sports bodies to drop their tobacco sponsors, and meanwhile they should reduce or eliminate coverage of such events. They should:

- systematically monitor all sight and mention of tobacco sponsors, their names, logos and other identifying details on BBC programmes; correlate these data with audience figures to provide a measure of exposure, and publish annual or more frequent reports, justifying if they can any failure to decrease the extent of coverage;

- adopt a unilateral and immediate policy of reducing the exposure of tobacco names, logos etc by reduced coverage of events and by tighter control of how events are covered, including whenever possible agreeing controls with foreign television stations whose coverage is being relayed;

- immediately cease calling events by their tobacco-advertising name (e.g., by referring to the Rugby League Challenge Cup, not to the Silk Cut Challenge Cup), both on radio and television and in publications such as *Radio Times*;

- seek, when television contracts are renewed, if there is a choice, to televise - or give greater coverage to - events that are not tobacco-sponsored. (Obviously, the public demand for coverage of some events is such that eliminating it is not an immediately practical course, but in some sports they could choose to concentrate coverage on events that are not tobacco-sponsored);

- insist, when television contracts are renewed, that all tobacco advertising signs, names, logos etc should be placed out of view of the cameras, and that sets, participants' clothing and their equipment (and programme titles) should not use colours or colour combinations distinctive of tobacco brands;

- while tobacco signs, logos etc remain on screen, broadcast health warnings whenever such events are covered - e.g., at the start and close of each spell of coverage - since the health warnings on the signs themselves are invariably completely illegible - if even visible - on the television screen;

- build into contracts a provision whereby, should any breach of the agreed rules be the responsibility of the sport concerned or the promoters of the event, they pay the BBC a fine roughly equivalent to the advertising value of the exposure given to the tobacco name or sign had it been on one of the commercial channels;

- inform the relevant sport's governing body when sponsorship contracts come up for renewal that coverage will be facilitated and perhaps expanded if non-tobacco sponsors are found.

32. In all this, they should seek to concert a policy with the satellite stations - and the ITV companies - so that they do not undermine each other. We would urge the same policies on the satellite stations, but recognise that they do not have the same obligations to the public as the BBC, and for this reason we do not expect a wholly satisfactory outcome without Government intervention (see below).

(b) The Government

33. The Government should renounce their fig-leaf policy of reliance on the so-called "Voluntary Agreement" on sponsorship. The Department of Health's "Voluntary Agreement" on advertising and promotion is grossly unsatisfactory, but the agreement on sports sponsorship is many times weaker and less effective. The Health Education Authority's *Beating the Ban* (1990) and *Tobacco and the BBC* (1992) clearly demonstrate how the terms of the agreement are violated with impunity, since they are so legalistically interpreted. We refer, for example, to the finding that in indoor bowls there is no "set playing position" - in that players may bowl from anywhere along the set line or indeed from behind it - and that therefore tobacco advertising signs are permitted to be placed immediately behind the position from which the players invariably bowl, in full view of the cameras and in clear breach of the intent of the agreement.

34. The Tobacco Manufacturers Association in their new booklet[33] quote Sir John Blelloch, chairman of COMATAS, the monitoring committee that made this ruling, in his annual report:

> What has been said before about the commitment of all members to the letter and the spirit of the Agreement still holds true.

What ASH has said previously is that the agreement is interpreted legalistically according to its letter. Sir John's words are, in fact, true only insofar as the spirit of the agreement is one of the tobacco industry seeking to minimise the concessions it makes and of the Department of National Heritage (and its predecessors) seeking to maximise the cash the tobacco industry pours into sponsorship.

35. The sponsorship "Voluntary Agreement" provides a tailor-made means of evading some of the controls imposed by the Department of Health's agreement. For example, the Cigarette Code (part of the latter agreement) provides that advertisements should not

> . . . include or imply any personal testimonial for, or recommendation of, the product by any well-known person of distinction in any walk of life, nor should they claim directly or indirectly the recommendation of a particular brand by any group or class of people engaged in an activity or calling which particularly attracts public admiration or emulation [para 2.9]
>
> . . . feature heroes of the young [para 2.13]
>
> . . . imply that smoking is associated with success in sport [para. 2.14]

It is difficult to think of a more direct contradiction of these rules than is provided by the sponsorship of sport and sportspeople by the tobacco industry. It is clear that the Department of Health find the sports sponsorship agreement unsatisfactory: not only did the Secretary of State in her (leaked) memorandum to the Cabinet of 5 November 1993 propose that it should be renegotiated, but in giving evidence to the Health Committee in October 1992 she gave the clearest indication that she was unhappy with the current agreement[34].

36. However, the renegotiation of the "voluntary agreement" is not a satisfactory way of dealing with the parasitic use of sport to promote tobacco. Such agreements and the allied approach of self-regulation are potentially satisfactory when the aim is to control fringe operators and outlaw undesirable practices in an otherwise legitimate field of activity - as with

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33 *Support for Sport*, Tobacco Manufacturers Association, 1994, page 11.

34 See Health Committee (1992-93) second report: *The European Commission's Proposed Directive on the Advertising of Tobacco Products*, minutes of evidence, page 32, questions 91-94.

mainstream advertising and the Advertising Standards Authority. Tobacco promotion whether through sponsorship, advertising or any other method is the promotion of an addictive and deadly drug. It is untrue that most methods of promoting tobacco are acceptable with only a few fringe practices needing policing: the whole activity is immoral and the public are demanding that it be outlawed.[35]

37. Rather, what the "voluntary agreements" achieve is to cast an aura of legitimacy and official respectability over the deliberate fostering of increased use of tobacco[36]. By compromising the position of the Government, the "voluntary agreements" grant legitimacy to tobacco advertising: they declare that it is socially acceptable, subject to its observing the undemanding rules set out in the agreements. In turn, then, tobacco advertising legitimises the whole tobacco industry, whose business is making profits from addiction, disease and death. By contrast, a ban on advertising and sponsorship raises questions about the congruence of the industry's activities and the values of the community as a whole.

38. The Government should finally admit that in a caring society the acceptability of tobacco advertising must be open to question. It should agree to allow Parliament to decide the matter, on the basis of free votes on Mr Kevin Barron's Bill, for which it should if necessary provide time. That Bill, as stated above, would have the effect of ending tobacco companies' sponsorship of sport, but only after a suitable lead-in period. Entirely contrary to Tobacco Manufacturers Association's claim that "Where tobacco sponsorship has been banned, total funding for sport has been dramatically reduced"[37], sport has not suffered any more than transitional difficulties where bans have been enacted. It is anyway very difficult to see how a ban could lead to a dramatic reduction when tobacco supplies only 3½% of the total income from sponsorship.

39. If, nevertheless, new resources are judged to be required to replace the small proportion of sponsorship provided by the tobacco industry, then either this should be made

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35 We have not in this memorandum provided detailed examples of the way the Voluntary Agreement is circumvented or breached, since these have been documented copiously by the Health Education Authority in the publications already referred to: *Beating the Ban* (1990) and *Tobacco and the BBC* (1992) and the several similar publications that preceded these. One point that is worth noting, however, is the blatant breach by Marlboro-sponsored teams in Formula One racing of the rule in para. G.13 of the agreement which bans "display of house or brand names or symbols on participants and officials, their vehicles . . . likely to come within the scope of the television cameras", in that the symbol of the Marlboro brand, the red chevron, is prominently displayed on both cars and clothing.

36 The Government accept that advertising increases tobacco use - see, for example, Hansard, 16 December 1993, written answers col. 813, where Mr Tom Sackville says: "The Government believe that tobacco advertising does have an effect on consumption". This is indeed the whole basis of the ban on television advertising and of the "voluntary agreements".

37 *Support for Sport*, page 9.

a first call on the new National Lottery and/or the Foundation for Sport and the Arts or the Government should itself provide a transitional fund - if necessary by way of a marginal element (about 0.2 pence) in the next Budget's increase in cigarette duty.

40. There is a further step the Government should take: it should initiate consultation with other governments over the control of satellite television coverage of sponsored sport. This is a wider question, since it relates to the whole problem of the control of international broadcasting from satellites. It connects, in particular, with satellite television advertising of tobacco, which can now be received in some countries with domestic bans on such advertising. The same thing could happen here as commercial satellite broadcasters become more and more powerful, and controls are needed to prevent it. Undoubtedly, the response to further controls on (or by) the BBC will be threats to transfer events to satellite carriers, and the BBC's hand would be much stronger if there were the prospect of controls on Sky and its rivals.

41. In conclusion, we revert to the fundamental assertion that there is no possible justification, least of all the small transitional difficulties of finding replacement sponsors, for any link between sport and tobacco - the one the pursuit of health and physical fitness, the other an addictive, debilitating and too often lethal drug. Even if there is no statutory ban on tobacco advertising, the BBC, the Government and the governing bodies of those sports that still provide tobacco companies with an advertising platform should line up with the Sports Council, the ITV companies and the governing bodies of those sports that eschew such undesirable deals and should make it clear to the tobacco industry over the next few months that there is no place for tobacco in sport. If they did so, they would be joining a worldwide movement towards protecting young people from tobacco; and the United Kingdom's adherence to this policy for health could prove significant, both in eliminating the last vestiges of tobacco sponsorship in countries that are at present ahead of us and in influencing more countries, including those in the developing world, to prevent tobacco tightening its grip on their sports and other cultural activities.

17 March 1994

TOBACCO ADVERTISING

The case for a ban

ASH's brief on the case against the *advertising* and *promotion* of tobacco

(5th edition: January 1996)

5th edition: January 1996

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ISBN 1 872428 07 X

TOBACCO ADVERTISING

- the case for a ban

As soon as any part of a person's conduct affects prejudicially the interests of others, society has jurisdiction over it, and the question whether the general welfare will or will not be promoted by interfering with it, becomes open to discussion... Whenever, in short, there is a definite damage, or a definite risk of damage, either to an individual or to the public, the case is taken out of the province of liberty, and placed in that of morality or law.

J S Mill, *On Liberty*

ACTION ON SMOKING AND HEALTH

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Acknowledgements

I have received help from many people in preparing this Brief, both in its four earlier versions and in this latest edition, and I should like to acknowledge in particular the assistance and advice of the following who have contributed significantly to the present revision:

Boudewijn de Blij (Stichting Volksgezondheid en Roken, Netherlands), John Bloom (American Cancer Society), Grace Burnside (Ulster Cancer Foundation), Alison Chadwick and Sally Hughes (Abbott Mead Vickers BBDO), Katherine Edhouse (Australian Council on Smoking and Health), Sandra Greer and Alastair Hill (RSL Research Services Ltd), Mervi Hara-Etelaharju (Tupakkapoliittinen yhdistys, Finland), Andrew Hayes (European Cancer Leagues, Brussels), Luk Joossens (former director of BASP), Murray Laugesen (Health New Zealand), Karen Lewis (Advocacy Institute, Washington, USA), Pascal Mélihan-Cheinin (Comité National contre le Tabagisme, France), Paul Nordgren (Folkhälsoinstitutet, Sweden), Richard Peto (ICRF Clinical Trial Service Unit, Oxford), Ana Alvarez Reqejo (Consejerja de Sanidad y Bienestar Social, Junta de Castilla y León, Spain), Heather Selin (Non-Smokers' Rights Association, Canada), and Terje Svendsen (Statens Tobakksskaderåd, Norway).

Most of all I am grateful to all those in the ASH office, particularly Amanda Sandford, for responding so reliably to my endless lists of requests for obscure references and esoteric information.

None of their efforts of course implies that anyone other than I am responsible for any errors or omissions in what I hope will nevertheless be a valuable aid in the campaign to ban the obnoxious promotion for profit of the world's least recognised dangerous drug.

David Pollock

December 1995

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"The solution to many of today's medical problems will not be found in the research laboratories of our hospitals but in our Parliaments. For the prospective patient, **the answer may not be cure by incision at the operating table but prevention by decision at the Cabinet table**... Historically, a nation would look to its doctors for better health. **Now they should look to their Members of Parliament.**"

Sir George Young, MP
Community Medicine, Vol.3 No.1 p.314 (Aug.1981)

"The presence of massive amounts of tobacco product promotions... simply dwarfs efforts to communicate the health hazards of smoking. Simply stated, many people just do not take health warnings seriously when they are bombarded at every turn of the head with soothing tobacco company ads promoting their product as normal, good and glamorous...

"The time has come where Ministers responsible for health cannot simply utter nice, comforting words about health. Action has to be taken."

Jake Epp, Canadian Minister of National Health & Welfare
in the Canadian House of Commons, 23.11.87, 31.5.88

1: INTRODUCTION: THE CASE FOR A BAN ON TOBACCO ADVERTISING

1.1 This brief summarises the arguments in favour of a ban on all tobacco promotion and advertising and answers the most common counter-arguments.

1.2 A ban is justified on health grounds *(see section 2)*. Tobacco is the most dangerous consumer product known - the only one that kills when used as the makers intend. Smoking is far and away the biggest cause of avoidable death, leading to at least 110,000 deaths a year in the UK[1] (though one estimate puts it as high as 150,000[2]). On the more conservative basis:

> Smoking kills 30 times as many people as road accidents[3].
>
> It kills 153 times as many people as die in fires - and many of these are caused by careless smokers[4].
>
> In fact, for every person who dies in any kind of accident whatever, **nine** die from smoking[5].
>
> It kills 15 times as many people as die from suicide, murder or manslaughter[6].
>
> It kills 91 times as many people as died from AIDS in 1994 - in fact, it kills each year 15 times as many people as have died from AIDS in the UK since that epidemic began[7].
>
> It kills as many people a day as die from illicit drug use in a year[8].

1.3 It is highly addictive, comparably so to heroin or cocaine according to the US Surgeon General[9], and the health risks are long-term ones, so that starting is easier and quitting is more difficult. **The promotion of such a product for sale for profit is morally indefensible and should no longer be tolerated.**

1.4 No-one claims that advertising is the only determinant of tobacco consumption or smoking prevalence: to do so would be absurd. It is equally absurd, however, to claim (as the industry does[10]) that advertising does not expand (or slow the contraction of) the market and that it does not in fact assist in the recruitment of new smokers.

---

1 *The Smoking Epidemic*, Health Education Authority, 1991.

2 Peto R, Lopez AD *et al*, Mortality from Smoking in Developed Countries 1950-2000, Oxford, 1994

3 UK road deaths in 1994 totalled 3,650 *(source: Royal Society for the Prevention of Accidents)*

4 *Fire Statistics, UK, 1993*, Home Office, which shows that 720 people died in fires started by smoking materials in 1993.

5 All accidental deaths and deaths from adverse effects (classifications E800-949) in 1992 (the latest year for which OPCS figures are yet available) totalled 12,427 *(source: OPCS, Scottish and Northern Ireland Registrars-General)*.

6 Deaths in 1992 *(see previous note)* from murder totalled 499, manslaughter etc. 2,235, suicide 4,628 *(source: OPCS, Scottish and Northern Ireland Registrars-General)*.

7 AIDS deaths in 1994 totalled 1,211 and from 1982-94 totalled 7,019 (*Home Office Statistical Bulletin 17/95*, 19.7.95, quoting Public Health Laboratory Service Communicable Disease Surveillance Centre and Scottish Centre for Infection and Environmental Health)

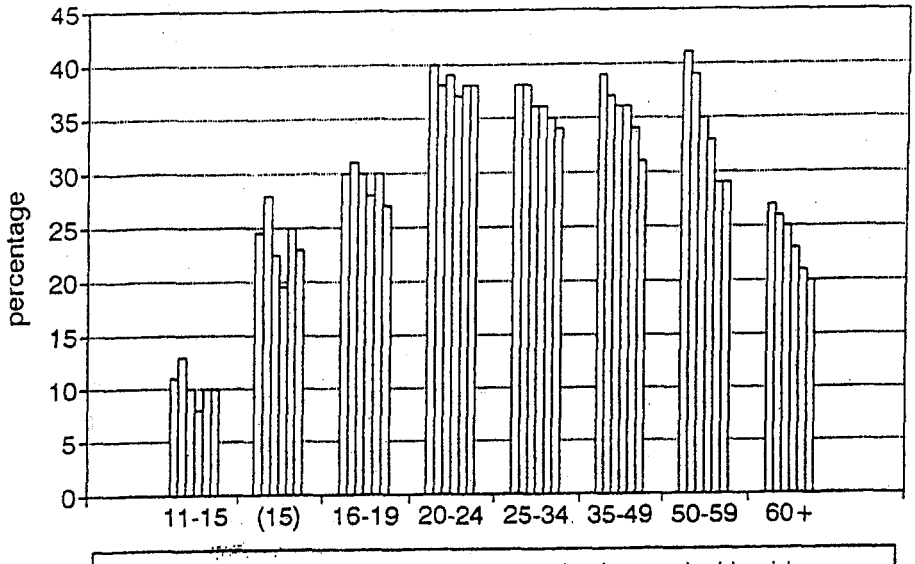
8 Deaths of notified addicts from illicit drug use totalled 301 in 1993. There were in addition 261 deaths of notified addicts from natural or other causes unrelated to drug use and ten deaths related to addiction of therapeutic origin. (*Home Office Statistical Bulletin 17/95*, 19.7.95) Even if, which seems unlikely, deaths are as underreported - one in five (*AIDS and drugs misuse*, HMSO 1988) - as addiction, smoking still kills 73 times as many people as do illicit drugs.

9 *The Health Consequences of Smoking - Nicotine Addiction*, a report of the U S Surgeon-General: 1988

10 For example: "It can easily be demonstrated that advertising neither increases consumption, nor the incidence of smoking" - *Hear the Other Side* no. 2, Tobacco Advisory Council, 1992

Prevalence by Age Group 1982-1992

(Source: OPCS surveys)



Successive bars within each age group show results of successive biennial surveys from 1982 to 1992. Note that a downward trend in prevalence is evident only in the older age groups - and the *recent upturn in children's smoking* is not included.

GRAPH 1.1

1.5 It is not just that the quantity of tobacco advertising overwhelms the health education message: it also undermines it. The Government has recognised this since the 1950s - and used the omnipresence of tobacco advertising to justify to itself its failure to run a high-profile anti-smoking campaign[1] People do not believe the Government would allow really harmful products to be advertised - and they therefore conclude that *"smoking can't really be dangerous or the Government would ban advertising"* - as 44% of smokers reported in a survey[2].

1.6 Advertising is a potent force in maintaining smoking as an apparently normal, socially acceptable habit: it swamps the health education message, reinforces the habit for those already hooked - and recruits new smokers, *the overwhelming majority of whom start as children.*[3]

1.7 As a result, the decline in smoking prevalence in the last decade has been confined to older age groups - *see graph 1.1.* **There are more young smokers aged 11-15 now than at any time since 1984** *(see section 3.2).* Young smokers are still being recruited and, however quickly most of them decide they wish to kick the habit, a high proportion find it impossible to quit or else take many years before they manage to do so.[4]

1.8 **We owe it to our children and grandchildren to spare them from the epidemic of disease, disability and death from smoking that has marked the middle and later years of the 20th century.**

---

1 For example, after the first report from the Royal College of Physicians in 1962, the Cabinet decided that "a major advertising campaign by the Government . . . might well be ineffective unless at the same time restrictions were placed on advertising by the tobacco manufacturers. If this were not done the Government would appear to be entering into an advertising competition with the tobacco companies. This would be an expensive, and probably ineffective, venture." - *Cabinet minutes C.C. 19(62), item 4, 6.3.62.*

2 Marsh and Matheson: *Smoking Attitudes & Behaviour*, HMSO 1983.

3 Diamond, A and Goddard, E: *Smoking among secondary schoolchildren in 1994*, HMSO, 1995

4 McNeill AD, *The development of dependence on smoking in children*, British Journal of Addiction 1991; 86: 589-592; *see also section 7.7.2.*

1.9 An advertising ban will save many children from being misled into thinking smoking is a desirable habit - smart, "cool", sophisticated, adult or whatever. It will help adult smokers to quit. And it will mark society's rejection of the morally indefensible promotion of addiction to what has been recognised for at least 40 years as a most dangerous drug.

1.10 On the basis of the results of the ban in New Zealand *(see section 8.3)*, the UK could expect a boost to its reduction in *per capita* cigarette consumption (down there by over 20% in the first four years after the ban) and some reduction in the prevalence of smoking among young adults (down 8% among 15-19-year-olds from 26.8% in 1990 to 24.7% in 1994).

1.11 Moreover, ASH estimates, on the basis of the results of the ban in Norway *(see section 8.5)*, that if the UK banned tobacco advertising there would be 60,000 fewer smokers aged 13-15 within five years, 115,000 fewer within ten years and 145,000 within 15 years. Without a ban up to a half of these teenagers will die from smoking-related diseases.

1.12 In its 1992 White Paper *The Health of the Nation* the Government set itself a target: to reduce under-age smoking by one-third from 8% of 11-15-year-olds in 1988 to under 6% in 1994. **In the event, the proportion went UP, not down: 12% of 11-15-year-olds were smoking regularly at the end of 1994.** But the Government still has time to achieve its other targets:

to cut adult smoking from 30% to 20% of the population by 2000 - *see graph 3.1*

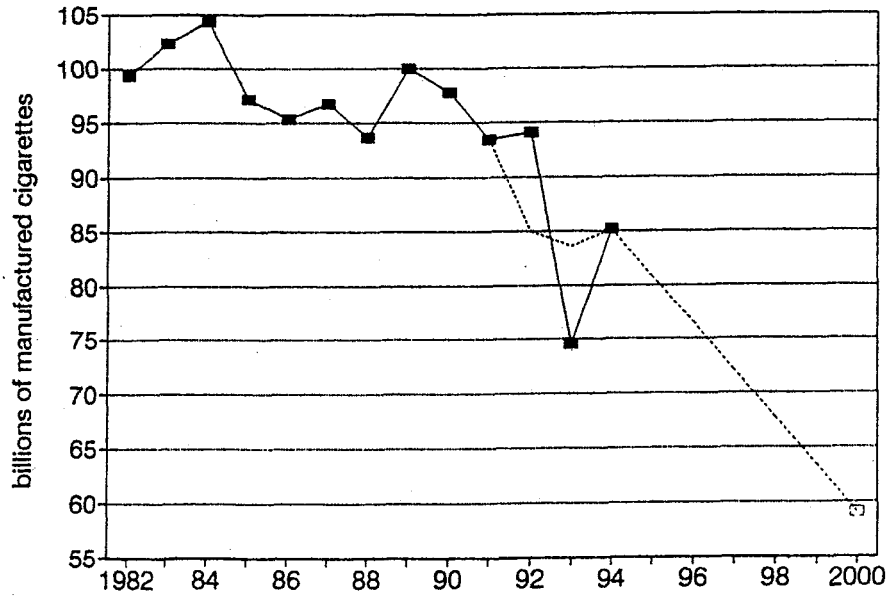
to reduce cigarette consumption by 40% from 98 billion cigarettes in 1990 to 59 billion a year by 2000 - *see graph 1.2*

1.13 Other methods can deliver much of the required progress, but an advertising ban is an essential component if these targets are to be reached. The Department of Health's own experts *(see section 8.1)* have advised that an advertising ban would deliver a significant reduction in smoking. Their finding about New Zealand is particularly significant: it is a society much like our own and before their advertising ban was introduced it was already in advance of the UK in its tobacco control policies - *see section 8.1.9.*

Total Cigarette Consumption

Progress to Government's Target

Source: Customs and Excise Annual Reports



GRAPH 1.2

1.14 If the Government is serious about these White Paper targets it cannot afford to reject an advertising ban. It would provide a significant cut in smoking and would immensely reinforce all other efforts - whether by education, by price increases and by providing cessation advice. Above all, it would deliver Health Ministers from a policy in which they are seen by all but the most sophisticated observers as staunchly defending the tobacco industry against all reason and in the face of expert and public opinion.

> *In the hope of saving 100 lives a year[1], the law compels the wearing of seat belts in the back of cars: smoking takes* ***three times as many lives every day****.*

[1] *Hansard* 11.1.93, written answers col. W518.

2: THE DANGERS OF SMOKING

2.1 In the UK, tobacco causes **at least 111,000 premature deaths a year** - one every 4 minutes 45 seconds. The main contributors to this death toll are:

81% of all deaths from lung cancer -	about 32,000
18% of all deaths from heart disease -	about 32,000
76% of all deaths from bronchitis and emphysema -	about 22,000
11% of all deaths from stroke -	about 9,000

plus another 16,000 deaths, mainly from other cancers[1].

2.2 In the European Union smoking-related deaths total **over half a million a year**. In 1990, before the accession of Austria, Finland and Sweden, the total was estimated at 511,700 (423,000 men and 88,700 women), including nearly half (47%) of all male deaths and one in 12 (8%) of female deaths between the ages of 35 and 69. The three latest member states add another 23,000 deaths a year (18,200 men and 4,800 women). The overall total is slowly declining, with an increase among women offset by a slightly greater decline among men.[2]

2.3 Almost all smokers start smoking as teenagers. About half of all those who smoke regularly from teenage years on are killed by their habit - half of them in old age (over 70) and half in middle age. Those killed in middle age lose an average of 20-25 years of life by comparison with non-smokers. Those who die from smoking in old age lose on average about eight years of life. Most of those killed by smoking are not particularly heavy smokers[3].

2.4 These startling figures are derived from the classic study of about 34,500 British male doctors started 1951 by Austin Bradford Hill and Richard Doll. The 40-year follow-up report[4] by Professors Sir Richard Doll and Richard Peto showed that **smoking increased deaths from 24 causes:**

Cancer of the lung, mouth, pharynx, larynx, oesophagus, stomach, intestine, pancreas and bladder
Leukaemia
Tuberculosis
Pneumonia
Chronic bronchitis and emphysema
Pulmonary heart disease
Hypertensive heart disease etc
Ischaemic heart disease
Myocardial degeneration

---

1 *The Smoking Epidemic*, Health Education Authority, 1991. The figure for lung cancer is probably underestimated - owing to the methodology used - by about 3,000 - see Appendix 1 to the report itself.

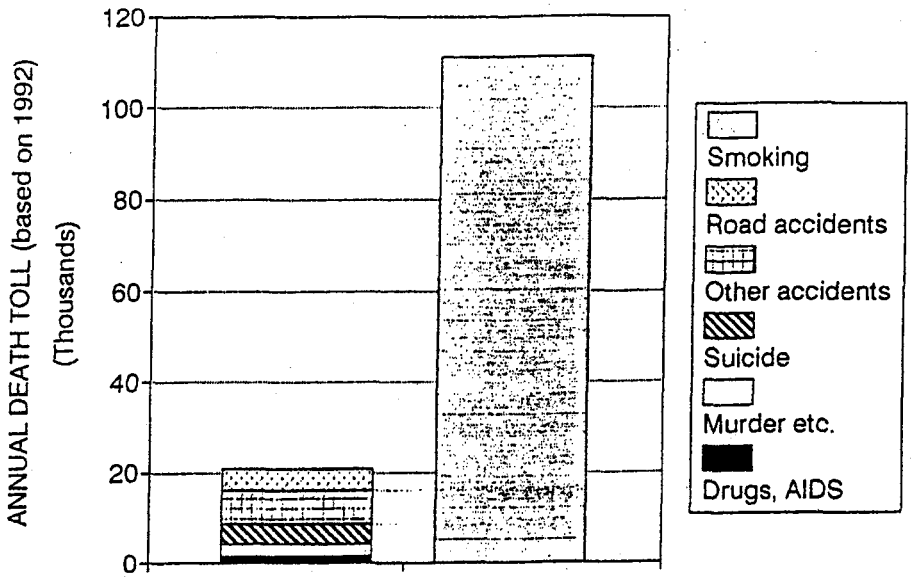
2 *Tobacco and Health in the European Union - an overview*, BASP, Brussels, 1994 and *Smoking Prevention* no 27, March 1995, BASP, Brussels, 1995, based on Peto, Lopez *et al*, Mortality from Smoking in Developed Countries 1950-2000, Oxford, 1994

3 Peto, R: Smoking and death: the past 40 years and the next 40: *BMJ* 1994; **309**:937-9

4 Doll, Peto *et al.*, Mortality in relation to smoking: 40 years' observation on male British doctors: *BMJ* 1994; **309**:901-11

Smoking's Death Toll

Five times all other avoidable deaths



GRAPH 2.1

Arteriosclerosis
Cerebral thrombosis (stroke)
Cerebral haemorrhage
Subarachnoid haemorrhage
Aortic aneurysm
Stomach ulcer
Duodenal ulcer

2.5 **Smoking also causes** cancer of the cervix (obviously not shown by the study of male doctors), and a variety of other conditions: for example, peripheral vascular disease (including Buerger's disease, which is unique to smokers and can result in amputations).

It is associated with higher risk of migraine, of miscarriage and perinatal mortality, low birthweight and comparatively low school achievement in children of smoking mothers, and with slower healing of wounds.

It aggravates fertility problems in women, organic impotence in men, noise-induced hearing loss, loss of the sense of smell, stomach ulcers, sickle cell anaemia, diabetes mellitus, cataracts, Crohn's disease, Grave's disease, etc.

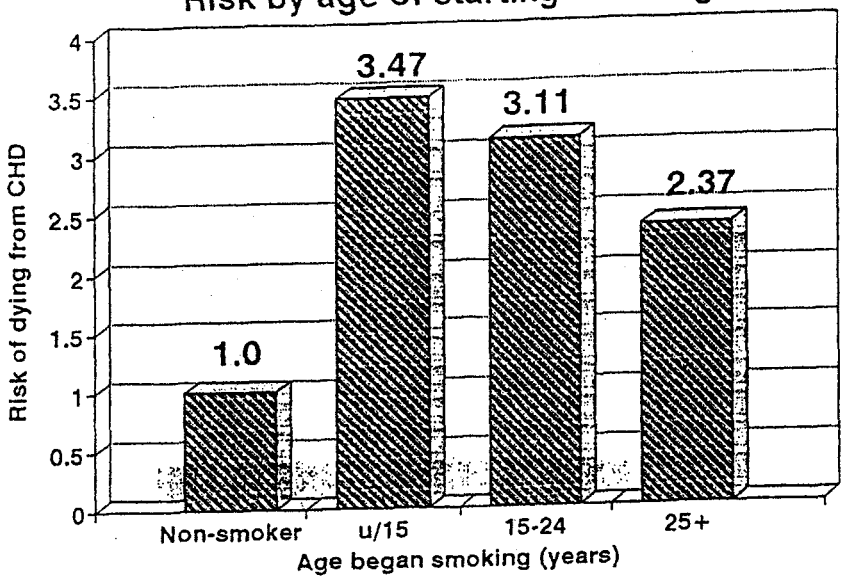
It accelerates the menopause in women and onset of AIDS in HIV patients.

2.6 ***On average, with every cigarette a smoker shortens his or her life by eleven-and-a-half minutes.***

At 20 a day, that's TWO MONTHS LOST FOR EVERY YEAR OF SMOKING.

Deaths at 45-54 from Coronary Heart Disease

Risk by age of starting smoking

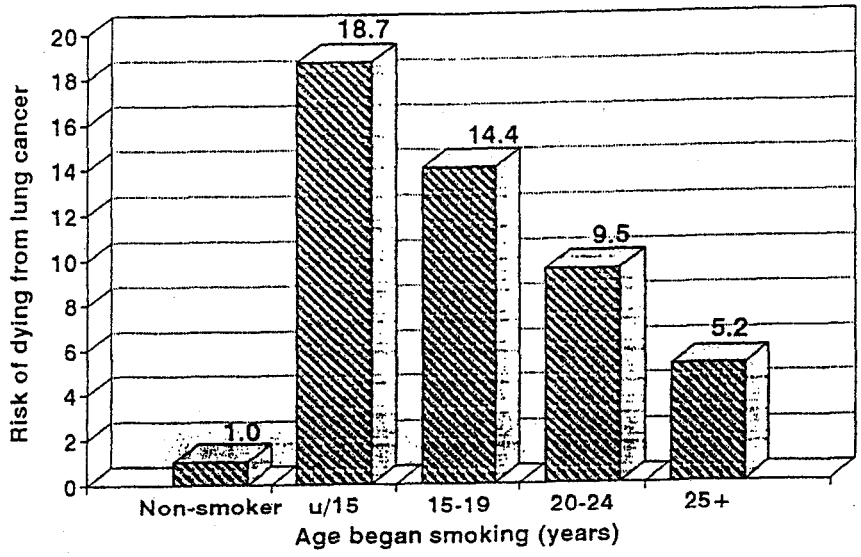


Source: US Surgeon General, Cardiovascular Disease, 1983, p. 117

GRAPH 2.2

Deaths from Lung Cancer

Risk by age of starting smoking



Source: US Veterans Study, Health Consequences of Smoking, US Surgeon-General, 1982

GRAPH 2.3

2.7 And smokers aren't the only ones who pay:

> Fires caused by smoking produced 172 deaths and nearly over 2,000 serious injuries in 1993.[1]
>
> And other people's smoke causes lung cancer, killing hundreds of non-smokers a year in the UK, probably thousands in the EC as a whole[2]. Passive smoking also causes heart disease[3], probably killing many more people this way than by lung cancer, and is associated with chronic bronchitis, serious respiratory diseases in children, "glue ear" and other diseases[4].

2.8 The dangers of smoking are so much greater than those from any other single cause - *see graph 2.1* - that little or no weight can be attached to the argument from opponents of the ban that it would be the thin end of a wedge, likely to lead to bans on advertising of other products such as toys, cars, etc. *(See section 18 on this line of argument.)*

2.9 Moreover, in view of the effect of advertising on children, it is especially important to note how much more dangerous it is to start a lifetime's smoking as a teenager than later in life. Those who start smoking under the age of 15 are three-and-a-half times more likely to die of coronary heart disease at age 45-54 than non-smokers, whereas those who start at age 25 or above only increase their risk by 2.4 times.[5] With lung cancer the increased risk of starting smoking young is much greater: the chance of dying from lung cancer is 19 times that of a non-smoker if you start smoking under the age of 15, only 5 times greater if you start at 25 or over.[6] *See graphs 2.2, 2.3.*

---

1 *Fire Statistics, UK, 1993*, Home Office
2 Press release, Commission of the European Communities, 10.10.93
3 Glantz SA, Parmley WW: *Passive smoking and heart disease*: JAMA 1995; **273**: 1047-1058
4 *Smoking and the Young*, Royal College of Physicians of London, 1992
5 *Cardiovascular Disease*, US Surgeon-General, 1983
6 *The Health Consequences of Smoking*, US Surgeon-General, 1982, drawing on the US Veterans Study

3: THE PREVALENCE OF SMOKING IN ADULTS AND CHILDREN

3.1 Smoking by Adults

3.1.1 In Great Britain, the proportion of cigarette smokers has been falling slowly for many years and has now reached 27% - *see graph 3.1.* In addition about 7% of men (but almost no women) smoke cigars or pipes but not cigarettes, bringing the overall prevalence of smoking of any form to 32%:[1]

%	Men	Women	Total
1972	52	41	46
1974	51	41	46
1976	46	38	42
1978	45	37	40
1980	42	37	39
1982	38	33	35
1984	36	32	34
1986	35	31	33
1988	33	30	32
1990	31	29	30
1992	29	28	28
1994	28	26	27

3.1.2 Smoking is more prevalent among young people than the middle-aged and elderly[2]:

Percentage of Smokers by Age	Men	Women	Total
Age 16-19	29	25	27
Age 20-24	39	37	38
Age 25-34	34	34	34
Age 35-49	32	30	31
Age 50-59	28	29	29
Age 60+	21	19	20
Total	29	28	28

See also graph 1.1.

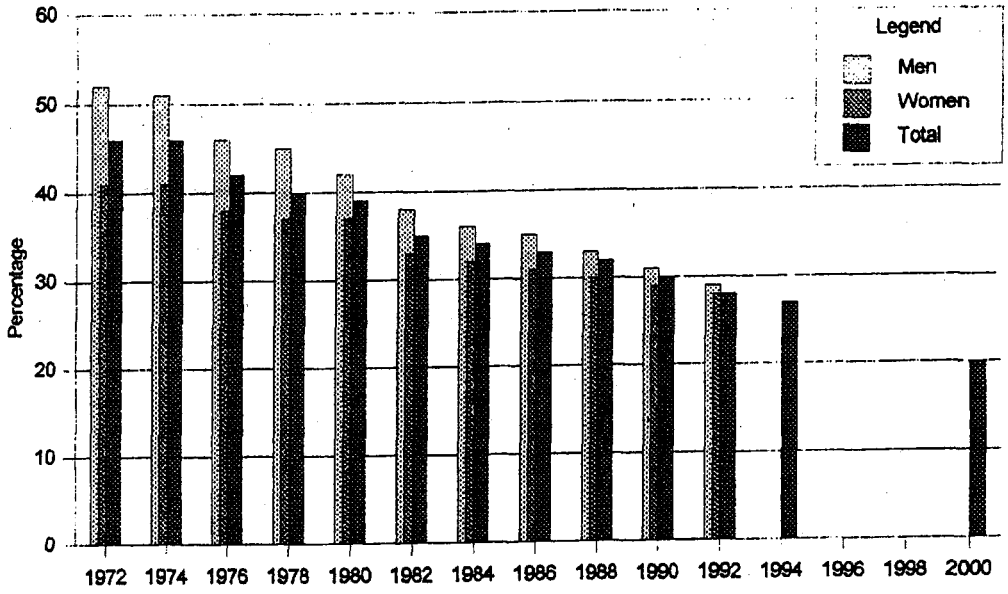
---

1 OPCS General Household Survey, 1992 *(HMSO 1994)* and preliminary results of 1994 survey

2 *ibid.*

Smoking Prevalence: Adults

with target for 2000

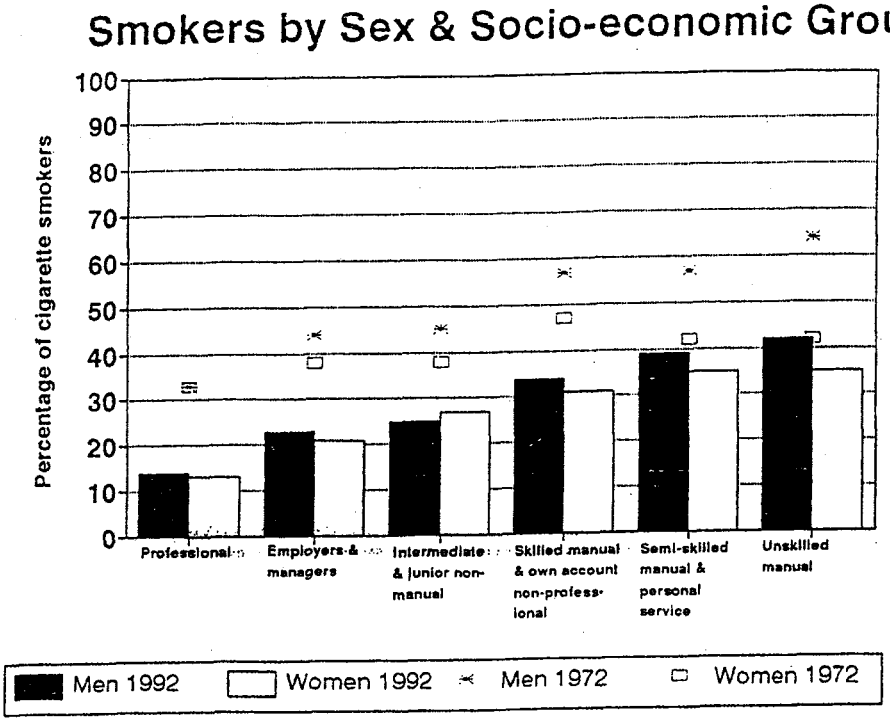


GRAPH 3.1

3.1.3 Smoking - and therefore the disease and death it causes - is much more prevalent in the lower social classes than among professional and similar groups. It has also declined more rapidly among the higher-ranking groups.[1]

Percentage of Smokers by Socio-Economic Group	Men	Women
Professional	14	13
Employers and managers	23	21
Intermediate and junior non-manual	25	27
Skilled manual and own-account non-professional	34	31
Semi-skilled manual and personal service	39	35
Unskilled manual	42	35
Total non-manual	22	23
Total manual	36	33
Overall total	29	28

See graph 3.2.



GRAPH 3.2

3.2 Smoking by children

3.2.1 Smoking by young people under the age at which they may legally be sold tobacco has *risen* over recent years. In 1994, among those aged 11-15, 12% smoked regularly in England and Scotland and 9% in Wales:[1]

%	Regular smokers aged 11-15					
	England		Scotland		Wales	
	Boys	Girls	Boys	Girls	Boys	Girls
1982	11	11	15	14	11	11
1984	13	13	16	17	*	*
1986	7	12	10	14	7	9
1988	7	9	*	*	*	*
1990	9	11	11	12	8	11
1992	9	10	10	13	9	9
1993	8	11	*	*	*	*
1994	10	13	13	12	7	10

* *Surveys not carried out in these years*

---

1 Diamond, A and Goddard, E: *Smoking by among secondary schoolchildren in 1994*, HMSO, 1995

3.2.2 The detailed 1994 figures show the pattern including occasional smokers:

%	Regular* smokers	Occasional smokers
England	12	9
Scotland	12	9
Wales	9	8

* *Regular here means one or more cigarettes a week - but for all regular smokers the weekly average was 50 or more*[1].

3.2.3 These overall figures conceal a steep rise in smoking with age. In England, 26% of boys and 30% of girls are regular smokers by the age of 15:

%	Regular and occasional smokers at ages 11- 15					
	England		Scotland		Wales	
	Regular	Occas.	Regular	Occas.	Regular	Occas.
11	1	5			0	3
12	2	5	2*	6*	2	6
13	6	11	10	9	8	8
14	17	12	18	11	12	12
15	28	12	22	11	20	10

* *includes 11 and 12 year olds: age groups for Scotland are differently defined and not strictly comparable with England and Wales.*

3.2.4 **Thus before it is legal to sell them cigarettes over one in four children is already a regular smoker** - *see graph 3.3.* **Another one in eight is smoking occasionally.** ***And under one in three has not tried smoking.***

3.2.5 Very few people start smoking as adults. In fact, in a survey of young adult smokers only about one in twenty had not started before the age of 20. Four out of five had started before reaching 18; almost half before reaching 16. About one in six adult smokers surveyed had started even before reaching the age of 14.[2] Smoking is indeed a disease of childhood.

3.2.6 The illegal market for cigarettes smoked by under-16s is estimated to be worth over £130 million a year - equivalent to about 950 million cigarettes at £2.73 per pack of 20. (The price of cigarettes has now risen to about £2.88.) **About £100 million of this goes to the Government in tax** (including VAT)[3].

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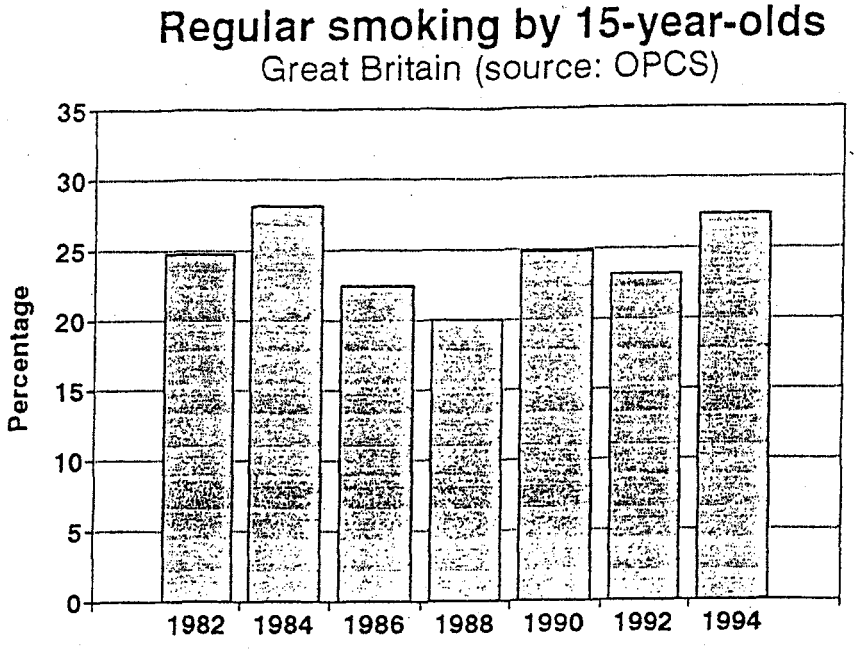
1 England: boys: 54; girls 47; Wales: boys: 53; girls: 50; Scotland: boys: 56; girls 46.

2 *Smoking among young adults*, Murray M *et al*, Gower Publishing, 1988

3 David Heathcoat-Amory, Paymaster-General, in a Parliamentary written answer: *Hansard*, 7.12.95, column W332.



Graph based on population of individual countries and on Diamond and Goddard "Smoking among secondary schoolchildren in 1994"

GRAPH 3.3

4: PAST ATTEMPTS TO CONTROL TOBACCO ADVERTISING, WITH A SUMMARY OF THE PRESENT VOLUNTARY AGREEMENTS

4.1 Early Demands and First Concessions

4.1.1 Although there were suspicions about the risks of smoking much earlier, the first good retrospective studies linking it with lung cancer were published in 1950 & 1952[1]. These were conducted by Professor Austin Bradford Hill and Dr Richard Doll under the auspices of the Medical Research Council and stimulated the large-scale prospective study of British doctors *(see section 2.4)*. Before the first report of the doctors study, however, demands were raised[2] in the appropriate advisory committee to the Ministry of Health for public statements and propaganda about the risks of smoking. As those risks became clearer, with the reports on the doctors study in 1954 and 1956[3] and a damning statement from the MRC in 1957[4], Government came under pressure not only to publicise the risks but also to curb the promotion of tobacco.[5]

4.1.2 However, it was not until after the Royal College of Physicians produced their report *Smoking and Health* in 1962 that the Government, which was assiduously lobbied throughout the 1950s and early 1960s by the tobacco companies, either undertook any publicity (having previously left it to local health authorities) or took any steps to encourage limitation of the industry's uninhibited advertising of its products. After the RCP report, when public and Parliamentary pressure for controls had induced the manufacturers to adopt a limited code of self-denial for television advertising, the Government[6] discreetly pressed them to generalise it to other media. This was the beginning of the Cigarette Code *(see section 4.5.2)*.[7]

4.1.3 In 1965, the Postmaster-General, Tony Benn, brought about (without recourse to legislation) a total ban on cigarette advertising on television. Kenneth Robinson, the Minister of Health, having failed to induce the manufacturers to extend their voluntary restrictions, announced in 1967 (after a Cabinet battle) his intention to legislate to control advertising and in particular coupon schemes (then run on a huge scale). The move was politically unpopular and was killed off by Richard Crossman when the Ministry of Health was placed under him as Secretary of State for Health and Social Security.

4.1.4 In 1971, a voluntary agreement was made by Sir Keith Joseph as Health Minister under which the first health warnings were placed on packs and a reference to the warning was placed on advertisements. The agreement has been revised every few years since then, with the Government always trumpeting it as a step forward for health and the industry never conceding more than was necessary to give the Government cover for not

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1 Doll, R & Hill, AB. Smoking and carcinoma of the lung. *BMJ* 1950; ii: 739-748; Doll, R & Hill, AB. A study of the aetiology of carcinoma of the lung. *BMJ* 1952; ii: 1271-1286.

2 Notably by Dr Horace Joules, of whom one Ministry of Health minute in the Public Records Office notes: "He is as you know the main protagonist against smoking - on the CHSC [Central Health Services Council], on the SAC [Standing Advisory Committee on Cancer & Radiation} and in the Press" - PRO file MH.55.1011

3 Doll R & Hill AB. The mortality of doctors in relation to their smoking habits: a preliminary report. *BMJ* 1954; i: 1451-1455; Doll R & Hill AB. Lung cancer and other causes of death in relation to smoking: a second report on the mortality of British doctors. *BMJ* 1956; ii: 1071-1076.

4 Published 27.6.57 simultaneously with a Parliamentary statement by the Minister of Health, Dennis Vosper.

5 For example, an amendment to ban television advertising of cigarettes was moved by Dr Barnet Stross MP when the Television Bill to set up commercial television was debated on 31.5.54.

6 Rather, Lord Hailsham, as Lord President of the Council, acting to a large extent on his own initiative.

7 The account in this and the preceding paragraph is based on documents in the Public Record Office.

legislating.

4.1.5 Under the next Labour government Dr David Owen as Health Minister announced his intention to schedule tobacco under the 1968 Medicines Act as a substance which, though not a medicine, was capable of causing danger to the health of the community if used without proper safeguards. Before the inevitable battle over such a move (which would probably have involved a challenge in the courts), Cabinet changes moved Owen to the Foreign Office in 1977, and his successor, Roland Moyle, dropped the idea in favour of a slightly strengthened voluntary agreement.

4.1.6 In 1977 the first "voluntary agreement" on sports sponsorship, which was seen as blatantly evading the ban on television advertising, was made, but the Government department involved was not Health but the Department of the Environment , which had responsibility for sport. This has remained the pattern since, with the sports Ministry (currently National Heritage) always showing much more interest in obtaining sponsorship funds than in controlling tobacco promotion.

4.1.7 The next attempt to bring tobacco advertising under legal control was made by Sir George Young, the junior Health Minister in Margaret Thatcher's first government, with qualified backing from the Secretary of State, Patrick Jenkin. However, plans to legislate were frustrated in 1981 by a lack of Parliamentary time and in 1982 by a Government reshuffle which moved all the Health Ministers who favoured tobacco control to other jobs or the backbenches (Sir George went to the Department of the Environment) and left in charge Dr Gerard Vaughan, an outright opponent of legislation. The background to both these attempts was one of vigorous political lobbying by the tobacco companies among right-wing MPs and campaigning by their newly-founded front organisation, FOREST.

4.1.8 No other initiative to legislate on tobacco advertising has been made by any Government: the bans on tobacco advertising on radio and television under European Directive on broadcasting were implemented administratively, the powers in section 188 of the Broadcasting Act of 1990 for the Government to give directions to the broadcasting authorities and the authorities' duty under that Act to take account of the UK's international obligations being relied on to ensure that the Independent Television Commission extended the 1965 ban on television advertising of cigarettes to other tobacco products and that the Radio Authority banned radio advertising of cigarettes and hand-rolling tobacco.[1] Many attempts at legislation were, however, made from the backbenches - at least 15 Bills were introduced by the Labour MP Laurie Pavitt - but none made any progress.[2]

4.2 <u>The EU Draft Directive</u>

4.2.1 In 1991, the European Commission published a draft Directive *(see section 19)* proposing a total ban on all tobacco advertising throughout the Community. This replaced an earlier draft proposing much more limited controls, which had been vigorously opposed both by those countries wanting no statutory controls at all (including the UK) and by those wanting total bans. Publication of the Directive led immediately to the initiation of a public campaign by health groups, including ASH, the British Medical Association, the Health Education Authority, the major medical charities (Cancer Research Campaign, Imperial Cancer Research Fund, British Heart Foundation etc) and many others, to win public support for a ban and to try to persuade the Government to withdraw its opposition.

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1 Private communication from Department of National Heritage, 5.12.95

2 The account of events from 1965 to 1985 is largely based on *The Smoke Ring* by Peter Taylor (Sphere, 1985).

4.2.2 Although the campaign in the country built up to impressively high levels, and doctors and other health professionals were loud in their support, the Government remained steadfast in its opposition. Along with a handful of other EU member states, they ensured that at successive six-monthly meetings of the Council of (Health) Ministers no progress was made with the Directive.

4.2.3 Within the UK, the Health Select Committee produced a report[1] on the proposal, coming out in support (the Conservative MP Roger Sims voted for a ban, producing a majority report against the Government's policy, but even the minority view was sympathetic - *see section 9.2*). The Health Department, under siege from doctors and the public, commissioned its Chief Economic Adviser to examine the question whether advertising bans produced cuts in smoking. To their embarrassment he reported[2] that they did *(see section 8.1)*, and although his methodology was subjected to sharp attack by the tobacco and advertising industries his report had a significant influence on public opinion.

4.3 The Campaign for a Backbench Bill

4.3.1 With the stalemate in Europe, the campaign in the UK switched to seeking a ban by way of domestic legislation, in the hope that a Private Member's Bill might be pushed through Parliament despite the Government's opposition. A Bill introduced by Hugh Bayley MP on 27 January 1993 under the Ten Minute Rule was given a first reading by 206-61, which encouraged a more serious attempt in the following session.

4.3.2 In the ballot at the start of the 1993/94 session, Kevin Barron MP drew third place and took up the Bill that had been drafted for Hugh Bayley which was now substantially improved so as to merit possible enactment. On 11 February 1994 the Bill[3] was given an unopposed Second Reading (amounting to approval in principle) after the motion to close the debate was won by 227 votes to 17. The Bill was strengthened rather than weakened in Committee (the detailed examination process), but fell at the Report Stage, despite the clear support of the House, when a handful of opponents put down a total of 108 amendments for debate, plus 5 new clauses. In the single day available, only one group of amendments was disposed of - by 108 votes to 19 - but time had run out. The Government chose the opportunity to announce their new voluntary agreement - *see section 4.5.*

4.3.3 That was not quite the end of the 1994 campaign: Lord McColl of Dulwich, the distinguished surgeon and Conservative peer, moved a recast version of the Bill as an amendment to the Criminal Justice and Public Order Bill during its Committee Stage in the House of Lords but was withdrawn by him when it seemed unlikely to succeed. A near-identical version was moved at the Report Stage by Lord Rea, a Labour peer and general practitioner, but was lost on a vote by 51-117, the vote being on party lines although it was officially not whipped.

4.3.4 There was no attempt at legislation in the 1994/95 session, and the EU draft Directive remains blocked, although its prospects were somewhat improved by the accession of the three new EU members in January 1995 *(see section 19.4).*

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1 *The European Commission's Proposed Directive on the Advertising of Tobacco Products*, Health Committee's Second Report of 1992-93, HMSO, December 1992

2 *Effect of Tobacco Advertising on Tobacco Consumption*, Department of Health, October 1992

3 ASH can provide copies of the Bill with a commentary on the rationale for each provision. A brief summary is included at section 5.8.2.

4.4 Summary of present controls

4.4.1 There are no statutory controls in the UK over tobacco advertising as such: even the bans on TV and some radio advertising *(see section 4.1.8)* were implemented administratively.

4.4.2 All other controls on advertising are the result of the so-called "voluntary" agreements between the Government and the tobacco industry. There are currently three such agreements, summarised below. The summaries are not complete and in particular do not cover fully the extent to which advertising for cigars, pipe tobacco and hand-rolling tobacco are covered by the provisions for cigarettes.

4.5 **Tobacco Products' Advertising and Promotion**
(published 21.12.94 by the Department of Health)

4.5.1 This regulates

(a) the content of advertisements for cigarettes and cigarette tobacco (but not cigars or pipe tobacco), through the Cigarette Code
(b) methods of sales promotion, through the Promotion Code
(c) the media used for advertising
(d) the volume of advertising in some media
(e) the warnings to be placed on advertisements (warnings on packs are now governed by legislation, as required by the EU).

4.5.2 The **Cigarette Code** is part of the British Code of Advertising and complaints are adjudicated by the Advertising Standards Authority[1]. It provides that advertisements have to be cleared in advance by the Committee of Advertising Practice. The rules "should be observed in the spirit as well as in the letter". Humour likely to have a particular appeal to the young is banned; advertising must not incite people to start smoking, encourage increased consumption, suggest smoking is "safe, healthy, natural, necessary for relaxation or concentration, popular or appropriate in all circumstances . . ." There are rules about the depiction of people smoking (for example, they should always clearly be over the age of 25); advertisements should not link smoking with "social, romantic or business success. . ." or suggest endorsement by prominent figures (including fictional characters and people in admired roles). There should be no appeal to the adventurous or rebellious, particularly the young; and advertisements should not "claim that . . . smoking enhances people's masculinity, femininity, appearance or independence ... [or] associate smoking with sport or with active or outdoor games".[2]

4.5.3 The **Cigarette Promotion Code** is mainly concerned with ensuring that promotional offers are made only to smokers over the age of 18. There are restrictions on the issue of free samples (which have in general to be personally requested; press advertisements can only offer vouchers by which samples can be requested). Health warnings etc. are to be included. The **Cigarette Sampling Code** limits the issue of free samples to adult smokers and bars offers at events where more than 30% of those attending are expected to be under 18.

4.5.4 Shopfront permanent advertising is to be removed by 31.12.96 and is not to be replaced by temporary material of similar impact. Advertising is not allowed in cinemas, on video-

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1 The ASA's address is Brook House, 2-16 Torrington Place, London WC1E 7HN.
2 This is only an indication of the contents of the Code, which has 26 clauses.

cassettes for sale or hire, in computer games, in magazines directed wholly or mainly to the under-18s or where 25% or more of the adult readership is women aged 15-24, from banner-towing aircraft, on the exterior of vehicles, on posters smaller than 48-sheet, on hoardings within 200 metres of the front entrances of schools or clearly visible from schools and playgrounds. Manufacturers will endeavour to stop tobacco brandnames and designs being used on other manufacturers' goods for the under-18s, and will encourage other advertisers who feature cigarettes to conform to the Cigarette Code.

4.5.5 Spending on poster advertising for UK-manufactured cigarettes will be limited to 30% of the total in the year to 31.3.80, adjusted for inflation and for imported cigarettes to 3.5% of the domestic total. There are provisions for monitoring spending on posters and on (uncontrolled) press advertising, totals for which will be reported confidentially by the trade associations to the Department of Health.

4.5.6 All cigarette and hand-rolling tobacco advertisements (on posters, in the press, and on video) and packet inserts (e.g. coupons) will include a health warning across its base taking up 20% of the total area. (Warnings on cigar and pipe-tobacco advertising are to take up 10% of the area.) The typefaces and sizes are specified, with the warning in larger type than the following lines, which are "Chief Medical Officers' Warning" and the statement of tar and nicotine yields. A rotation is laid down for the several warnings (the same ones as on packets) and for the use of white-on-black and black-on-white. Publications with over 80% of their sales overseas are excluded. Signs at televised events should be covered by the TV authorities during coverage. There are rules also about warnings on shop advertising material (including the temporary material that can continue after 1996).

4.5.7 The Agreement is monitored by a committee drawn equally from the industry and the Department of Health under an independent chairman, COMATAS (Committee on Monitoring the Agreements on Tobacco Advertising and Sponsorship), to which complaints (other than those relating to the Cigarette Code) should be addressed[1].

4.6 **Sponsorship of Sport**
(Published 31.1.95 by the Department of National Heritage)[2]

4.6.1 There is to be no sponsorship of activities where the majority of the participants are under 18 or which appeal predominantly to the under-18s. Sponsorship of any sport not appearing on a list of 65 sports currently or previously sponsored will require the agreement of the Minister for Sport. The DNH is to be given advance information of planned sponsored events.

4.6.2 Spending for each company will be limited to the 1985 level plus inflation. Totals are to be aggregated for all companies and reported to COMATAS and the DNH. Of the total, only 15% will be used for "media advertising or other promotional material directly related to the events".

4.6.3 Event names are to exclude words "such as 'filter', 'king-size', 'No.4' etc" but may use brandnames.

4.6.4 Press and poster advertisements and static signs at events are to carry a health warning as far as possible in conformity with the advertising voluntary agreement and as far as

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1 The Committee's address is PO Box 3982, London SE1 8YJ

2 This agreement is the first to be signed by a Minister as well as by the industry. It is to run at least until 1.6.99.

practicable conform to the Cigarette Code. Posters below 48 sheets are permitted. Advertising and signs should not normally be placed within 200 meters of front entrances to schools. There is to be no cinema advertising. Advertising should not depict cigarette packets, echo the design of cigarette advertising (except for brandnames used as sponsors), show participants in any sport or their clothing or equipment, or anyone smoking, etc.

4.6.5 Static advertising signs may be covered up by the TV authorities during coverage. Signs stating the name of the event are permitted provided they are not in camera sightlines for prolonged periods, carry a health warning, and are limited in number (as set out in a schedule). Brandnames may not appear on participants, officials or equipment likely to be seen by TV cameras. Set design and colours other than signs are not to resemble the sponsor's product.

4.6.6 The Agreement does not cover "spending on sponsorship of sports where a majority of the events or activities take place outside the United Kingdom" but it does cover display of signs, publicity etc for events in the UK. *(This provision excludes Formula 1 motor racing from the limits on spending.)*

4.6.7 The Agreement is monitored by COMATAS *(see section 4.5.7).*

4.7 **Packaging**
(Published 21.12.94 by the Department of Health)

4.7.1 This one-paragraph agreement, prompted by protests about a set of special Camel "art" packet designs, says that pack designs should not appeal more to those under 18 than to the population as a whole.

4.8 There was previously also an agreement also on **product modification**, reached in 1983, under which tar levels were to be reduced and the industry provided £1 mn. a year for research. This agreement has expired and has in effect been replaced by the EU-required regulations which specify maximum tar yields.

4.9 **A critique of the voluntary agreement system is given in section 15.**

5: WHAT THE LAW SHOULD SAY

5.1 Anticipating the Industry's Reaction to a Ban

It is necessary not only to ban "ordinary" advertising - on posters, in the press and so on - but to anticipate what the industry's reaction to such a ban would be and to take pre-emptive action accordingly. Luckily, we know already from the experience of other countries what the industry does when faced with a simple ban on advertising or one containing any loopholes.

5.2 Indirect Advertising

5.2.1 For example, in Italy and in Norway, they resorted to **indirect advertising** - i.e., they used the imagery already associated with cigarette brands while purporting to advertise other goods.

5.2.2 In Norway, the Government's response was robust. Advertisements for Camel boots that were barely distinguishable from previous Camel cigarette advertisements were accepted only when the characteristic lettering of the word "Camel" and the camel trademark itself were dropped[1].

5.2.3 In Italy, by contrast, where the 1962 ban was introduced more as a measure to protect the beleaguered Italian tobacco industry against foreign imports, indirect advertising flourishes unchallenged. A long television advertisement[2] focuses on Marlboro billboards at a Formula 1 motor race and on the Marlboro flashes on the drivers' clothes. But the small print in the final shot reveals that the ad is not for cigarettes but for the helmet the driver is wearing!

5.2.4 Similarly, in Malaysia, where direct advertising is banned, the industry spent huge sums advertising (for example) Benson and Hedges Gold jewellery, purportedly to boost the trade of one small jewellery shop with a negligible turnover, while a travel agency with a turnover of $3mn was the focus of a $2mn-a-year television advertising campaign for holidays in "Salem Country" (Salem is a major American brand from R J Reynolds) - and yet when a potential client asked to book a Salem holiday the answer was "Oh no no no. We only advertise the name. . . No, no, there's only advertisement on TV."[3]

5.3 Brand-stretching

5.3.1 A closely related resort of the industry if advertising is banned is **brand-stretching**: finding legitimate merchandise on which to place their tobacco brandnames or trademarks. This started long ago, with the Dunhill brand covering luxury goods as well as cigarettes. In the mid-1980s, the Silk Cut name appeared on a line of clothing and a holiday and travel company. More recently and more cynically, Philip Morris has licensed its Marlboro name to makers of expensive "outdoor" designer clothes and has established a market for them, partly through dedicated shops. Likewise, R J Reynolds has put its Camel brandname on high quality heavy boots and on expensive rugged watches,

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1 *New York State Journal of Medicine*, July 1985

2 ASH has a video-recording of this advertisement.

3 *Tobacco Wars*, First Tuesday (Yorkshire Television, 1992)

allowing the adventure imagery of its cigarette promotion to ride over to the new goods. BAT has been reported to be "planning to launch a range of non-cigarette luxury goods to carry the brand of one of its international tobacco products"[1].

5.3.2 In Canada after their advertising ban advertisements (for example) for Matinée Ltd Fashion Foundation (a $500,000 sponsorship of 18 aspiring designers) appeared widely in the exact style and colours associated with Matinée cigarettes. The cost of the advertising campaign was probably much greater than the cost of the sponsorship it allegedly promoted[2]. The clear intention of such moves is that when cigarette advertising is banned, advertising for the goods that share the brandname will function as an effective substitute.

5.3.3 The rationale for such brandstretching was set out in a leaked 1979 document from BAT:

> *Opportunities should be explored by all companies* [viz, in the BAT group] *to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifiers . . . The principle is to ensure that tobacco lines can be effectively publicised when all direct lines of communication are denied.*[3]

5.4 "Brand-borrowing"

Alternatively, if advertising is banned, the industry may introduce new brands of cigarette that share an existing high-profile brandname for non-tobacco goods. Until an outcry forced it to draw back, the French tobacco company Seita, then nationalised, reacted to the impending French advertising ban by introducing a cigarette brand called Chevignon after a highly successful brand of young people's fashion wear.

5.5 Direct Mail

5.5.1 Some countries have introduced bans on advertising in named media. The result is, of course, to channel all the industry's effort into those media not banned - even if they are not traditional routes for tobacco advertising. In anticipation of a partial ban, the UK tobacco industry has been devoting considerable effort to building up mailing lists of smokers. The rash of special offers (e.g., the Rothmans offer of a free three-month subscription to one of five EMAP style and popular music titles in return for only five proof of purchase stickers from Marlboro Lights packets[4]), free sample offers and competitions in the last few years has been directed at getting their customers to "register". Similarly, Gallaher was reported to have invested in paying a direct marketing company, MKP Direct, to turn a warehouse full of old redemption applications from old coupon schemes into a usable database of more than a million names and addresses by eliminating duplicates and checking the names and addresses against electoral registers.[5]

5.5.2 The same motives lie behind the renewed interest in coupon schemes with "gift

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1 *Marketing Week*, 11.11.94

2 *Journal of the Addiction Research Foundation*, Ontario, March/April 1994

3 Quoted in Taylor, P, *The Smoke Ring*, Sphere 1985

4 *Marketing Week*, 7.10.94

5 *Precision Marketing*, 4.2.91; *The Guardian*, 17.7.92, which reported that two other direct marketing firms, CACI and CCN, had been similarly employed.

catalogues". Apart from the hope that such methods of promotion themselves may escape a ban, they add thousands of names to the mailing lists of current customers. (The Gallaher "Gratis" catalogue is particularly objectionable, since it is run for the company by the Index arm of Littlewoods, who back the Roy Castle Cause for Hope (lung cancer centre) Appeal[1].) These mailing lists are already being used, with several promotional magazines appearing for smokers of particular brands or smokers at large: e.g., *The Virginian* from Imperial Tobacco for users of Golden Virginia hand-rolling tobacco[2]. Another magazine, *Lighting Up,* from Blyth Publishing is being distributed free through retailers[3].

5.6 Sponsorship

5.6.1 Finally, but high on the list of alternative methods of promotion, is sponsorship - of sport, predominantly, but also of the arts and of events: anything from a disco upwards. Sponsorship is dealt with in detail elsewhere *(see section 12)* but it is noteworthy that there seems to have been recently a growth in the number of promotions aimed directly at promoting cigarettes rather than purporting to be acts of civic generosity: the Marlboro Lights "Lighten Up Comedy Tour" is a case in point: it was focused strongly on students and proved popular[4].

5.6.2 Canada's experience of compromising on a ban on sports and arts sponsorship is also significant. Their Act allowed sponsorship by the companies but not in the name of brands. Very quickly the industry set up companies specially named for each brand in order to maintain the advertising value of sponsorship. Thus came about the Players Ltd Racing, Benson and Hedges Inc. Symphony of Fire and du Maurier Ltd Arts and Jazz promotions, all heavily promoted beyond any sensible level for the events to which they are related[5].

5.7 Packaging

Canada has under serious consideration a step beyond a total advertising ban, namely, a requirement that cigarettes be sold only in plain ("generic") packs. The need for such a step is evident: the pack would be the last way in which a glamorous image could be conveyed. And the advertising industry (less discreet than the tobacco industry itself) has already publicly acknowledged that that would happen: Robin Joy, of David Taylor Design Management and a former Gallaher regional manager for Europe, said after the latest voluntary agreement was announced:

> *In the early days, the packs themselves were highly evocative. As mass-marketing advertising took off, packs became basic. All the images of cigarette brands were transmitted through the mass media. Much more attention will now have to go into pack design.*[6]

And Alasdair Ritchie, chief executive of TBWA Holmes Knight Ritchie, has said:

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1 *Liverpool Echo,* 5.1.95
2 *Independent on Sunday,* 17.4.94
3 *Marketing,* 30.6.94
4 *Incentive Today,* October 1994
5 *Journal of the Addiction Research Foundation,* Ontario, March/April 1994
6 *Marketing,* 19.5.94

If we get to the point where there is no communication through advertisements or sponsorship, what can we do: the pack is an advertising medium.[1]

5.8 Drafting the Law

5.8.1 Considerations such as those set out above about the experience of other countries led UK tobacco control campaigners to adopt a radical approach to the drafting of the Bill that was first introduced by Hugh Bayley and then in a substantially improved version by Kevin Barron MP when he won third place in the Private Members' ballot in the 1993/94 session. **Rather than specify what was not allowed, the Bill seeks to outlaw anything that may reasonably be considered to promote the smoking of tobacco.** The Bill then specifies exemptions for innocent activities and where concessions are considered necessary.

5.8.2 The following is a brief summary of the main contents of the Bill[2]:

(1) Publishing an advertisement for tobacco is an offence except in specified circumstances. "Publishing" has the wide meaning it usually carries in English law. "Advertisement" is defined to include any form of communication, other than package designs, which might reasonably be considered to promote the smoking of tobacco, directly or indirectly. *(This definition covers advertising exploiting sponsorship of events, advertising of matches, lighters etc using tobacco brandnames, and indirect advertising for non-tobacco goods under tobacco names.)* In deciding whether a communication promotes smoking, regard is to be had to the names of producers etc, and to the use of words, signs, colours or colour combinations etc. associated with a tobacco product. *(This ensures that indirect advertising is effectively covered.)*

(2) The specified circumstances referred to in (1) permit:

(a) advertising in specialist retail tobacconists' premises, and in other retail outlets if the advertisement is confined to a price list with a health warning. Such point of sale advertising may not be visible from outside the premises;

(b) trade advertising, company letterhead etc;

(c) imported publications provided that the publication is intended mainly for a readership outside the UK and that the total of copies imported exceeds neither an absolute limit (say, 5,000) nor a maximum proportion of the total number of copies (say 25%);

(d) material printed for export;

(e) "advertisements" that are neither published for a (financial etc) consideration nor published by anyone in the tobacco business;

(f) "advertisements" that are neither published for a (financial etc) consideration provided (directly or indirectly) by anyone in the tobacco business nor with the intention of promoting any specific tobacco product.

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1 *Marketing*, 19.5.94

2 The paragraphs in this summary do not correspond exactly with the clauses in the Bill. ASH can provide a copy of the Bill with a detailed commentary to *bona fide* enquirers.

Exceptions (e) and (f) are designed to cover innocent "publication" of "advertisements" (in the wide meanings applying in the Bill) such as private endorsements of products in conversation, journalism in defence of smoking, re-publication of tobacco advertisements for historical or other interest, etc.

(g) advertisements for non-tobacco products bearing names associated with tobacco products, but only if the tobacco product is already on the market, the name was originally not a tobacco brandname, and the sales of the non-tobacco product(s) substantially exceed the tobacco ones. *(This covers Dunhill, where it would be impractical to prevent the brandname being used for tobacco, but prevents new products being promoted under tobacco names as a way round the advertising ban.)*

(h) advertisements already in (physical) existence when the ban comes into force, subject to necessary provisos.

(3) Free or cheap distributions of tobacco products are barred (but normal trade discounts are protected), as are gifts or benefits of any kind (including the right to participate in a game etc) related to tobacco purchases.

(4) The Secretary of State is to have power to make necessary regulations.

(5) Penalties are specified: a fine of up to £5,000 and/or six months' imprisonment on summary conviction, an unlimited fine and/or two years' imprisonment on conviction on indictment.

(6) The Act is to come into force a year after it is passed and is to extend to Scotland and Northern Ireland.

6: THE GOVERNMENT'S POSITION

6.1 Although the Government's position has shifted subtly over the past few years as they were forced to take note of new evidence in support of a ban, in essence it remains as stated in one of a succession of standard letters to the public:

> *The Government has consistently taken the view that the right way to control the promotion and advertising of cigarettes is through a continuation of the successful system of voluntary agreements between the Government and the tobacco industry. Although complex, the system is comprehensive... and... the Government believes it is effective...*[1]

6.2 For example, **Stephen Dorrell**, then the junior Health Minister but now the Secretary of State, said on TV the day the EU draft directive was announced:

> *Our approach has achieved very dramatic reductions in tobacco consumption and we need to be quite careful before we go over to a different formula that hasn't achieved a health gain that is anywhere near what we have achieved in this country by our methods.*[2]

(This claim was in part based on false statistics: *see section 20.5).*

6.3 The Secretary of State at that time, **William Waldegrave**, had inherited from his predecessor, Kenneth Clarke, a policy of opposing European moves to control tobacco advertising and seemed unable to change it. He showed no doctrinaire opposition to a ban. For example, he said

> *I do not rule it out for ever, certainly: but it is just not the highest priority at the moment...* [3]

He also told a group of health correspondents that he would introduce a ban if other measures did not work quickly enough[4]. *See also section 6.17 below.*

6.4 **Virginia Bottomley**, Waldegrave's successor and Dorrell's predecessor as Secretary of State, had when junior Minister said:

> *If cigarettes were introduced today, their production and sale would probably be banned.* [5]

However, whether through conviction or political necessity, she vigorously opposed the campaign for a ban. For example, she said:

> *Our approach is to support the end, rather than the means. Advertising control is only one means out of many.* [6]

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1 Taken from one of many such letters on ASH's files.
2 *News at Ten*, 15.5.91
3 *News at Ten*, 4.6.91
4 *Daily Express*, 2.10.91
5 *Hansard*, 20.7.90, col. 1340
6 *Daily Telegraph*, 23.12.94, *à propos* the EU draft Directive - *on which see section 19.*

6.5 This opposition was unaffected by the fact that Ministers publicly acknowledged that advertising tended to increase (or slow the decline in) consumption of tobacco. For example, **Tom Sackville,** junior Health Minister, said in answer to a Parliamentary Question:

> *The Government believe that tobacco advertising does have an effect on consumption. This is why successive governments over the last 22 years have controlled tobacco advertising by a system of voluntary agreements.* [1]

By contrast, **Gerry Malone** (then Minister of State for Health) has been quoted as saying that an advertising ban would not achieve the desired results.[2]

6.6 Support for the system of voluntary agreements was underlined recently by **John Bowis**, Parliamentary Secretary at the Department of Health, when he said, commenting on the latest annual report from COMATAS:

> *This report confirms the Government's view that voluntary agreements provide an effective way of controlling tobacco advertising and promotion. We have recently agreed with the industry to strengthen the controls in key areas. The new controls will have a particular impact on levels of outdoor advertising and will dramatically increase the impact of health warnings. The Committee will monitor the operation of the revised agreement when it comes into force later this year.*
>
> *It is significant that the two countries in Europe with the best records in reducing smoking are Britain and the Netherlands - both have voluntary controls on tobacco advertising. We believe that an effective voluntary agreement on advertising, combined with high tobacco prices and action to encourage parents to give the right no-smoking messages to their children are the most effective ways of cutting cigarette consumption and stopping children from starting to smoke.* [3]

(On the ineffectiveness of voluntary agreements, see section 15.)

6.7 The policy was based on a reluctance to interfere with the right of the companies to free speech, as exemplified by their advertising: in their response to the Health Select Committee's report supporting a ban they stated:

> *The Government believes that the imposition of a statutory ban on the advertising of a product which is legal to sell would be a major change of principle which would need to be justified in terms of the likely size of any effect. . . [T]he Government remain to be convinced that sufficient evidence is presently available to provide such justification. . .* [4]

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1 *Hansard*, 16.12.93, col. W813

2 *GP*, 5.8.94

3 Quoted in a press notice from the Department of Health, 8.8.94, on 7th annual report of COMATAS.

4 Department of Health, *Government Response to the Second Report from the Health Committee, session 1992-93*, March 1993

6.8 The position was unchanged when in February 1994 **Dr Brian Mawhinney**, as Minister of Health, launched the Government's Action Plan to reduce smoking:

> *The issue of tobacco advertising continues to attract attention. Thanks to our effective and long-standing voluntary agreements with the industry, advertising is already strictly limited. The Government has reviewed the evidence thoroughly and found little to support the argument that a statutory ban would have a dramatic effect on further reducing smoking, especially in comparison with the impact of other measures such as price or parental influence. Indeed, the international evidence is that a statutory ban is in itself no guarantee of success in reducing smoking and it is notable that the two European countries with the best record for reducing smoking in recent years - the Netherlands and the UK - both favour the voluntary approach.*[1]

6.9 A more egregious example of fallacious *post hoc ergo propter hoc* argument would be difficult to find, and Ministers have indeed never ventured to suggest how a total ban could be less effective than a partial one.[2] *(On the claim concerning the Netherlands and the UK, see section 20.5.)*

6.10 How far the Government - and in particular the Department of Health - is influenced by its close relationship with the tobacco industry, brought about by the repeated need to re-negotiate and monitor the voluntary agreements, it is difficult to tell. A consultant to Imperial Tobacco, John Wood, of the Lowe Group advertising agency, said recently:

> *The tobacco industry has always had an extremely good relationship with the health department.*[3]

Moreover, at the time that Kevin Barron's Bill to ban tobacco advertising was in Parliament and the 1994 Voluntary Agreement was still being negotiated, the Outdoor Advertising Action Group, a lobby group for the poster industry, found that Government Ministers were remarkably willing to accept their invitations. Although Health Ministers declined, **Keith Mans**, the PPS to the then Secretary of State, Virginia Bottomley, had lunch with Roger Fernley, Managing Director of British Transport Advertising and coordinator of the Outdoor Advertising Group. A later letter from Andrew Smith, group managing director of Ian Greer Associates, to Fernley spoke of "the need to keep up the pressure on the department [of Health], as advised by Keith Mans MP". Others who accepted the offer of one-to-one briefings over an eight-week period included **Ian Hamilton** (then Minister for Corporate Affairs), **Ian Sproat** (Parliamentary Undersecretary at the Department of National Heritage), **Graham Bright** (PPS to the Prime Minister), **David Amess** (PPS to Michael Portillo, then Chief Secretary to the Treasury), **Andrew Mitchell** (Government Health Whip), **Dame Angela Rumbold** (vice-chairman of the Conservative Party) and **Marion Roe** (chairman of the Health Select Committee).[4]

6.11 **Kenneth Clarke**, the Chancellor of the Exchequer, has a particularly close relationship

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1 Department of Health press release, 7.2.94

2 Friends of the industry have suggested that the health warnings on advertisements have more effect than the advertisements themselves. If so, the industry are remarkably short-sighted in continuing to spend so much on publishing such damaging material. However, the answer would not be to continue to permit advertising but to ban it and replace it with a continuing public health campaign, perhaps financed by a portion of the tax on cigarettes (1p per packet yields over £40 mn a year).

3 *Sunday Telegraph*, 24.1.93

4 *The Guardian*, 22.11.94

with Sir Patrick Sheehy, chairman until December 1995 of BAT. When Home Secretary he appointed him to chair a controversial enquiry into the police, and in November 1995 he hosted a dinner to mark Sheehy's retirement.[1]

6.12 On the Government's support for the voluntary agreement *see section 15.1.*

6.13 The threadbare nature of the Government's policy was, however, laid bare - and divisions within the Cabinet brought to light - when in early 1994 a secret memorandum from **Virginia Bottomley** to the Prime Minister, copied to other Cabinet Ministers, was leaked to the press, along with replies from some other Ministers. The following are extracts from Mrs Bottomley's paper[2]:

> *[T]obacco advertising does affect total tobacco consumption, not just brand share. Further restrictions on tobacco advertising up to and including a ban could therefore be expected to reduce smoking; other countries have introduced bans which have had a useful effect in their particular circumstances; from the evidence available it is not possible to quantify the size of the effect of a ban in this country with any degree of certainty.*
>
> *. . . [I]n my view the evidence available does* ***not*** *provide sufficient justification for imposing a statutory ban on all forms of tobacco advertising.*
>
> *. . . Current policy is vulnerable in Parliament . . . It is not clear that we could ensure a majority on any division. . . In the longer term we shall be vulnerable in the EC. . .*
>
> *. . .[E]ach 1% reduction in smoking prevalence could be expected to prevent 1,100 deaths from smoking related diseases a year in the longer term. . . Current policy is seen by some commentators as undermining other efforts to reduce tobacco consumption. A shift in policy would have major symbolic value. . .*

6.14 However, she set out the following (remarkably weak) reasons for opposing a ban:

> *The imposition of a statutory ban on all forms of the advertising of a product which is legal to sell would be a major change of principle, and might be seen as establishing a precedent for other products. The principle of commercial freedom of expression is not one which should be passed over lightly. While the present voluntary agreements and the ban on broadcasting recognise that this principle does need to be weighed against the need to protect young people in particular, a complete ban would disregard the principle entirely.*
>
> *Other factors, such as price and parental influence, have a* ***far greater*** *influence on smoking habits than advertising.*
>
> *Banning tobacco advertising would leave the tobacco industry with up to £100 million to spend on other activities, such as a*

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1 *Sunday Telegraph* 19.11.95

2 dated 5.11.93 and headed Policy In Confidence: ASH has a copy in its files.

price war, unless there was a compensatory tax increase.

Sports and arts would need to find alternative sources of sponsorship money (sports sponsorship by the tobacco industry is required to be less than 1985 levels in real terms under the voluntary agreement - around £8 million).

The tobacco industry would inevitably develop new ways of promoting cigarettes to circumvent any legislation. A legislative ban would lack the flexibility to adapt to future circumstances.

6.15 Among the reactions from other Ministers that were also leaked[1], **Michael Heseltine**, then President of the Board of Trade, referred to Mrs Bottomley's "surprising conclusion" and wrote:

I am persuaded by the medical evidence . . . that a ban on tobacco advertising would not only further reduce smoking but would contribute to improvements in people's health and avoid the damaging economic burdens which the consequences of ill health place on business. . . [I]f the Government really wishes . . . to inspire confidence in its actions on reducing smoking and illegal sales, an outright ban instead of some half-way house of severely constrained advertising is the credible way forward.

6.16 **John Gummer**, Secretary of State for the Environment, wrote:

If the Government wants to be seen to be serious about reducing the prevalence of smoking and improving peoples' [sic] *health the right course of action would be to go for an outright ban on tobacco advertising.*

6.17 **William Waldegrave**, Chancellor of the Duchy of Lancaster, wrote:

I myself would not have opposed an outright ban if Virginia had felt able to move that far - the argument which her paper stresses, about whether to curb the freedom to advertise a legal product, was effectively conceded years ago when cigarette commercials were banned from just those media whose methods of advertising were thought to be most effective.

6.18 The Government's official position seems in fact to be based on a combination of political factors:

a. departmental interest (e.g., of the Treasury, Industry, National Heritage *(sports sponsorship)* departments) is part of the way the system works.

b. opposition from those with strong libertarian principles, including Kenneth Clarke, Chancellor of the Exchequer and a powerful influence in the Cabinet, who see the ban as interference with the freedom of the tobacco and advertising industries.

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[1] ASH has copies of the quoted memoranda.

c opposition by those free-market disciples most opposed to regulation of industry.

d. opposition to the "nanny state", with a ban seen as a "do-gooding" intrusion into the realm of personal responsibility. (This attitude is comparable to that of *The Times* in the mid-19th century when it said in a leader opposing campaigners for a clean water supply *We prefer to take our chance of cholera and the rest than be bullied into health.*[1]

e. association of the proposal for a ban with the European Union, which incurs for it the opposition of some sections of the Conservative Party.

It seems that these political considerations are at present holding back the Government from a step which, on health grounds, is totally justified and which would reinforce their generally reasonable policies on tobacco - e.g., their consistent support for increased taxes.

6.19 This Brief sets out not only to demonstrate the health case for a ban but to answer the doubts that have been expressed about it on other grounds.

6.20 Meantime, the regrettable result of the Government's obstinate resistance to an advertising ban is an increasing scepticism about their other policies to control and reduce smoking. This understandable scepticism is in ASH's belief unjustified but it threatens to undermine the goodwill that will be needed to implement those policies.

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[1] *The Times*, 1.8.1854

7: CIGARETTE ADVERTISING AND CHILDREN

7.1 INTRODUCTION

7.1.1 The US Surgeon General[1] has suggested that there are seven ways in which tobacco advertising and promotion can increase tobacco consumption:

- by encouraging children or young adults to experiment with tobacco and thereby slip into regular use
- by encouraging smokers to increase their consumption
- by reducing smokers' motivation to quit
- by encouraging former smokers to resume smoking
- by discouraging full and open discussion of the hazards of smoking as a result of media dependence on advertising revenues
- by muting opposition to controls on tobacco as a result of the dependence of organisations receiving sponsorship from tobacco companies
- by creating through the ubiquity of advertising, sponsorship etc an environment in which tobacco use is seen as familiar and acceptable and the warnings about its health effects are undermined.

7.1.2 Much research has been directed at proving these various effects. In particular, there is now a huge body of research and other evidence connecting tobacco advertising with children's smoking, some of which is outlined in this section. The section also quotes the ever-growing evidence that the tobacco industry is quite deliberately targeting children.

7.1.3 The tobacco industry claims that none of the academic research proves that advertising causes children to smoke: they claim that the proven associations may result from the greater attention paid to advertising by smokers, and by those who for independent reasons are intending to or have a propensity to smoke - i.e., that the direction of causation may be the reverse of what commonsense suggests. While this may be a plausible way of explaining away some of the simpler findings, it stretches the imagination to breaking point with other well established findings, including some quoted below. **In a matter so vital to the health and lives of so many young people, it is in any case irresponsible to wait for absolute proof.** As the Medical Research Council observed of the initial findings about the health effects of smoking (in a conclusion to its 1957 report that was suppressed by the Government in the published version):

> *The evidence now available is stronger than that which in comparable matters is commonly taken as a basis for definite action.*[2]

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1 *Reducing the Health Consequences of Smoking - 25 years of Progress*, US Surgeon General, 1989

2 Cabinet Home Affairs Committee paper GEN 588/2, 23.4.57

(Much the same was said by the Select Committee on Health - *see section 9.2.3.*) **Delay in acting on tobacco advertising now is as culpable as failing to act on smoking itself in the 1950s.**

7.2 ACADEMIC RESEARCH

7.2.1 Growing numbers of academic studies demonstrate that cigarette advertising predisposes children to smoking and reinforces the habit in those who have started.

- Children can recognise and identify cigarette advertisements which do not show brand names or where the brand name has been obscured.
- Children assign images to cigarette brands, such as glamour or toughness or "being cool".
- Children who pay attention to cigarette advertising are more likely to change their views in favour of smoking.
- Children who approve of cigarette advertising are *twice as likely* to become smokers as children who disapprove.
- Children as young as six associate sponsoring cigarette brands with motor racing.

7.2.2 The volume of such research should not be underestimated nor the strength of its findings. It is, of course, always possible in such a subject to say that the findings fall short of absolute proof of causation, and some of the work is designed only to find significant correlations, but the cumulative effect is persuasive to an extent far beyond what elsewhere is treated as more than adequate grounds for action. The following paragraphs pick out some key findings.[1]

7.2.3 A study of 848 children aged 11-14 by the Advertising Research Unit at the University of Strathclyde found that:

> *Smokers tended to be more adept at recalling, recognising and identifying cigarette advertisements. This suggests they tend to pay more attention to cigarette advertising. Moreover, this greater awareness and appreciation was independent of other important predictors of under-age smoking . . . These findings . . . indicate that cigarette advertising is reinforcing under-age smoking . . . Promotional devices which help determine and reinforce adult cigarette brand preferences have an even greater effect on under-age smokers.* [2]

7.2.4 The introduction to the same paper refers to previous research:

> *There is a growing body of evidence indicating that children are*

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1 Much of the evidence up to that date is summarised in the Cancer Research Campaign's useful booklet *From the Billboard to the Playground* (November 1991).

2 Aitken PP and Eadie DR *British Journal of Addiction* (1990) **85**, 399-412

receptive to cigarette advertising (Aitken, 1988). For example, many children can identify edited or cryptic cigarette advertisements which do not show brand names (Chapman & Fitzgerald, 1982; Aitken et al., *1987a; Goldstein* et al., *1987) and many can identify cigarette brand imagery in 'brand-stretching' advertisements for services and other products which do not show health warnings or mention 'cigarettes' (Aitken, Leathar & O'Hagan, 1985).*

Under-age smokers tend to be more adept than non-smokers at recognising and identifying cigarette brand imagery (Chapman & Fitzgerald, 1982; Aitken et al., *1987a; Goldstein* et al., *1987). In a study conducted in Australia, under-age smokers were nearly twice as good as non-smokers at identifying edited cigarette advertisements and brand slogans (Chapman & Fitzgerald, 1982). This suggests they tend to be more aware of cigarette advertising.*

Under-age smokers also tend to have more positive attitudes towards cigarette advertising (O'Connell et al., *1981; Alexander* et al., *1983; Aitken, Leathar & Squair, 1986a) and tend to be more appreciative of specific examples of cigarette advertising (Charlton, 1986; Potts, Gillies & Herbert, 1986).*

We have suggested that these findings indicate that under-age smokers are getting some kind of pleasure, reward or reassurance out of cigarette advertising (Aitken, Leathar & Squair, 1986b; Aitken, 1988). In other words, cigarette advertising is reinforcing under-age smoking.

(For references, see original article.)

7.2.5 In a study of 6000 children aged 10-12 who were interviewed twice at a year's interval:

> ***children who approved of cigarette advertising were twice as likely to become smokers*** *[during the ensuing year]* ***as children who disapproved****, with the smoking behaviour of those who were ambivalent about advertising falling between that of the two other groups . . . Children [who already smoked] who disapproved of cigarette advertising were more likely to quit than those who approved of it.*[1]

7.2.6 The effect of advertising was graphically demonstrated by a study of the rates at which American teenagers took up smoking at each year of age from 10 to 20 in each year from 1944 to 1988. This study drew on self-reports by over 102,000 respondents to major surveys conducted in six years from 1970 to 1988. It showed that against a background of steady, gently declining or at worst gently rising rates of smoking initiation for each age group of male and female teenagers, there was a major increase in smoking uptake by younger girls (especially at ages 15 and 16) in the late 1960s and early 1970s. This coincided with and was almost certainly caused by the start in 1967 of huge advertising campaigns, mainly in women's magazines, for the newly introduced brands of cigarette

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[1] Alexander *et al.*, *International Journal of Epidemiology*, 1983, 12, pp.59-66 (emphasis added)

targeted specifically at women. (This was when Virginia Slims introduced the slogan "You've come a long way, baby".) Boys were not affected, nor were older teenage girls. The increase in initiation rates continued until the mid-1970s, peaking at about the same time as the sales of these brands peaked. The authors of the study conclude:

> *We have demonstrated that tobacco advertising has a temporal and specific relationship to smoking in girls younger than the legal age to purchase cigarettes. Our findings add to the evidence that tobacco advertising plays an important role in encouraging young people to begin this life-long addiction before they are old enough to fully appreciate its long-term health risks.* [1]

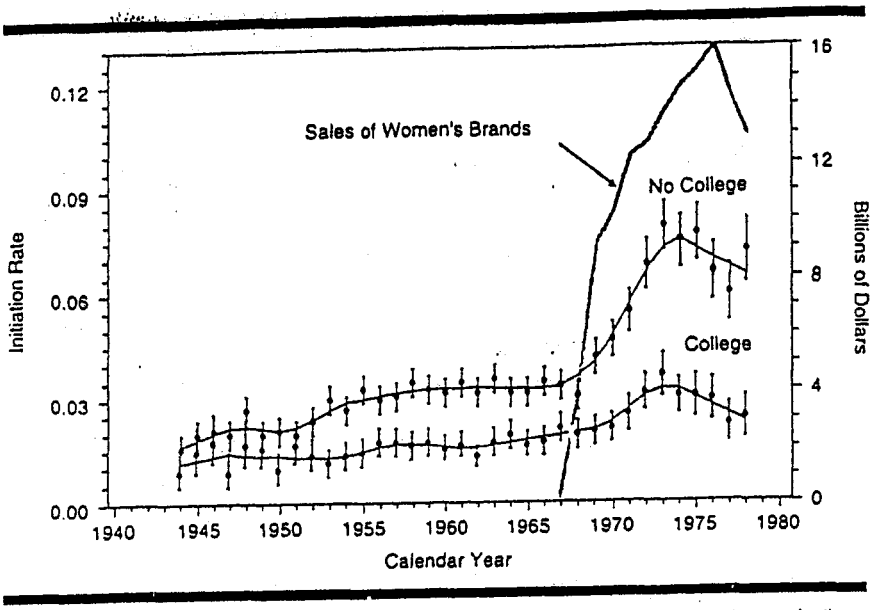

Fig 4.—Left ordinate, trends in initiation rates for 10- to 17-year-old girls during each calendar year for those who ultimately did and did not attend college. Right ordinate, combined sales in billions of dollars for Virginia Slims, Silva Thins, and Eve cigarettes.

GRAPH 7.1[2]

7.2.7 An associated study examined by similar means the rates of smoking initiation among white Americans aged 10-24 between 1907 and 1981 (there were insufficient blacks in the sample to produce robust results), and reported that:

> *a steep rise in incidence of smoking in white male adolescents occurred during the second decade of this century when mass marketing techniques were applied to cigarette sales and the US mobilised for World War I. A rapid rise in incidence of smoking in white female adolescents is noted in the late 1920s and 1930s, coinciding with the early efforts to target women with tobacco*

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1 Pierce JP *et al.*, *JAMA* 1994; **271**: 608-611

2 Reproduced from the original article

advertising [such as the "Blow some my way" and "Reach for a Lucky - instead of a sweet" campaigns]. *A dramatic increase in incidence of smoking for white male adolescents occurred during World War II. The incidence declined precipitously among white male adolescents, beginning in the late 1940s, and continuing through to 1980. In contrast, the incidence of smoking among white females remained constant through the 1950s and early 1960s, and increased at the very end of the 1960s and early 1970s. This increase in female incidence coincided with targeting of young women by advertising campaigns linking smoking with a slender female figure and the women's liberation movement . . . The historical changes in initiation of cigarette smoking . . . and their temporal association with gender-specific marketing and promotional activities, lend support to a link between cigarette advertising and promotional activities and initiation of cigarette smoking by adolescents and young adults.*[1]

7.2.8 Another study by the same Dr John Pierce, of the University of California at San Diego, used data from the 1993 California Tobacco Survey's interviews with 3,536 adolescents aged 12 to 17 (the legal age for being sold tobacco in the USA being 18). This found a strong correlation between receptivity to tobacco advertising and susceptibility to smoking. The former was measured by recognition of tobacco advertising messages, having a favourite tobacco advertisement (the Joe Camel ads - *see section 7.9* - were the most popular, especially with younger ages), ability to name a brand they would prefer to purchase, ownership of tobacco promotional items and willingness to use such items (which are more common in the USA than here). Susceptibility was measured by the adolescent's relative willingness to say that they might try a cigarette soon or smoke one if offered it by a friend and by their exposure to family and peer smoking. The study found that the group of never-smokers who were most receptive to advertising were almost four times more likely to be classed as susceptible than those with the lowest receptivity score. Dr Pierce said that the results showed that:

> *marketing has an effect on children before they begin to smoke . . . It is not that children see an ad and start smoking, but seeing the ads and handling the cigarette packs and the promotional gifts lessens their resistance, weakens their resolve, so that later on they will be somewhat more willing to accept a cigarette from a peer when it is offered.*[2]

7.2.9 A study of smokeless tobacco use (principally tobacco pouches for sucking, use of which is prevalent in the USA) used Californian data and concluded that:

> exposure to other smokeless tobacco users was the largest predictor of both current use and susceptibility to use smokeless tobacco. However, peer approval and exposure to tobacco advertising were also both significant predictors for use and susceptibility.[3]

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1 Burns D *et al, Tobacco Control* 1995; **4**(suppl 1): S2-S8

2 Influence of Tobacco Marketing and Exposure to Smokers on Adolescent Susceptibility to Smoking, *Journal of the National Cancer Institute*, 1995; **87**:1538-45.

3 Choi WS *et al, Tobacco Control* 1995; **4** (suppl 1): S57-S63

7.2.10 Another recent study looked at 602 New York schoolchildren (grades 7 and 8, i.e., aged about 12-13) and their exposure to cigarette advertising (using self-reported attention to advertisements weighted by their reading of periodicals containing advertising and the level of such advertising in each periodical). The study examined many other variables but found that

> *The two most important predictors of cigarette smoking were friends' smoking status and exposure to cigarette advertising . . . Adolescents with high exposure to cigarette advertising were significantly more likely to be smokers, according to several measures of smoking behavior, than were those with low exposure to cigarette advertising.*[1]

7.2.11 The tobacco industry and its allies have sought to counter the claim that advertising predisposes children to start smoking by reference to a report for OPCS by Eileen Goddard and to research by a company called the Children's Research Unit. *For answers to these claims, see sections 20.1 and 20.6.*

7.3 MARKET RESEARCH AND REPORTS

7.3.1 Studies have repeatedly shown that children who smoke choose the brands that are most heavily advertised, whereas adults pay attention also to other factors such as price. A study in 1995 for the BMA showed similar results to those found by earlier studies in 1990 and 1992, as summarised in the following table. (Note that in the surveys children but not adults were allowed to name more than one brand, so that the percentages are not directly comparable, only the relative popularity of brands)[2]:

Brand	Advertising Spend & Share of Voice*	Percent of Smokers aged 15+	Percent of Smokers aged 11-14
Benson & Hedges	45%: £18.7mn.	1st: 22%	1st: 61%
Silk Cut	25%: £10.4mn.	2nd: 12%	3rd=: 30%
Rothmans	9%: £3.8mn.	**	9th: 5%
Marlboro	5%: £2.1mn.	8th: 5%	3rd=: 30%

* i.e., share of total spending on top ten brands ** not in top ten: less than 3%.

7.3.2 The second ranking brand for under-age smokers was Embassy, whose advertising spend in the year was only £1.0 mn (2%). However, in earlier years its advertising spend had been much greater, ranking up to second.

7.3.3 The 1990 study found that the four most heavily advertised brands were precisely the four brands smoked most often by under-age smokers, while for adults these four brands ranked first, second, fifth and tenth, while the fourth most popular adult brand was Berkeley, with 12% of smokers, although at that time it was virtually unadvertised.

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1 Botvin GJ *et al, Public Health Reports* **108**:2, 217-224

2 Sources: *Media Register* for advertising spend; TGI for adult smokers' brand preferences; MORI for under-age smokers' brand preferences. (Note incidentally that the major TGI market survey includes 15-year-old smokers - an indication, perhaps, of their commercial importance.)

7.3.4 The 1992 study found comparable results. Children aged 11-14 unequivocally preferred four out of the top five most heavily advertised brands. Adult smokers were much less influenced by advertising in their choice.

7.3.5 In fact, the same phenomenon of children buying the most heavily advertised brands has been noted all round the world. In the USA, the three most heavily advertised brands, Marlboro, Camel and Newport, have a total market share of 35% but account for 86% of the teenage market.[1]

7.3.6 Cigarette advertisements have greater Impact on young people than other advertisements. A study by MEAL[2] shows that 90% of 15- to 24-year-olds can name some cigarette advertising, as against a typical 50% for other types of advertising. As *Marketing* comments: "Even if they aren't the ones being targeted, they are certainly the ones remembering the ads."

7.3.7 The same report shows that over three years the average level of recall (all ages) of cigarette advertising campaigns has risen from 12% to 23%. Top scoring brand was Silk Cut (37% recall), followed by Benson & Hedges (33%), Benson & Hedges Superkings (26%), Silk Cut Extra Milds and Ultra Lows (25%), Marlboro (23%). Rothmans Royals and Embassy No 1 were down at 15% in 9th place after other varieties of Benson & Hedges and Marlboro.

7.4 THE GOVERNMENT'S VIEW

7.4.1 The Government's position is described at length in section 6 - *see especially section 6.13*. The important thing here is that it agrees that advertising does have an effect on consumption: Tom Sackville, Junior Health Minister, said so explicitly in answer to a Parliamentary Question in November 1993:[3]

> *The Government believe that tobacco advertising does have an effect on consumption. This is why successive governments over the last 22 years have controlled tobacco advertising by a system of voluntary agreements.*

But he had to admit in the same answer that:

> *The Government have not made any estimate of the effect of tobacco advertising on teenagers compared to the effect on the population as a whole.*

7.4.2 This acceptance of the effectiveness of advertising is underlined by the Government's (reluctant) acceptance of the Department of Health's own internal (Smee) expert report - *see section 8.1.*

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1 US Centers for Disease Control & Prevention, in *BMJ*, 10.9.94
2 Reported in *Marketing*, 17.11.94
3 *Hansard*, 16.12.93, col W813

TESTIMONY FROM THE TOBACCO INDUSTRY AND ITS ALLIES

7.5 Introduction

7.5.1 The industry claims - absurdly - that tobacco advertising does not induce children and adolescents to start smoking. Commonsense as well as academic studies dictate otherwise. Why, after all, did the Government ban cigarette advertising on TV and force the industry to agree not to place advertisements within 200 metres of schools?

7.5.2 Besides, one does not have to look closely to see even the tobacco industry and its friends letting the truth slip out. For example, the Tobacco Manufacturers Association's spokesman, Brendan Brady, said on TV:

> *Every industry has to recruit new customers. We recruit new customers once they're over the age of 16. Of course they see the advertising before that age; of course, they see people smoking before that age. They make up their - their decisions* [sic] *before that age. But* [he went on lamely] *we're not interested in that market under the age of 16 . . .* [1]

7.5.3 The magazine of the advertising industry, *Campaign*, has called on the tobacco industry "to be straight about ads" and to stop trying to defend the view that advertising does not affect children:

> *People working in the ad industry are shooting themselves in the foot. It's a bit like a publisher defending a libel action by claiming that nobody read the magazine or newspaper. All advertising is about encouraging people to try and/or buy more of a product so it is ridiculous to claim that tobacco ads are an exception to the rule.*[2]

See also section 13.2.

7.5.4 Further evidence of the vulnerability of children to advertising came in a study released by the research company Milward Brown, which showed that children aged 8-15 are three times more responsive to (any) advertising than those over the age of 35.[3]

7.5.5 The cynicism of the industry is revealed starkly in the testimony of Dave Goerlitz, who used to model for the all-action advertisements for Winston cigarettes in the USA. Speaking on television, he recalled:

> *We knew that our market was young boys . . . Rock climbing represented the ultimate in heroism, in machismo . . . In most of our ads we never even had a cigarette. We weren't selling cigarettes - we were selling an image - an image to young boys . . . I spent an awful lot of time with the tobacco executives. You don't work with them for seven years and do over 40 ad campaigns where you don't know the theme of what your job is supposed to be. I was at the top of Mount Evans up in Denver,*

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1 BBC Breakfast News, 16.5.91
2 *Campaign* editorial, 10.11.95
3 *Campaign*, 10.11.95

Colorado, and I certainly felt the effects of my smoking addiction, not being able to breathe. It was apparent to me that I was one of the very few, because most people weren't smoking, including the R J Reynolds executives, and I asked the RJR executives why they weren't smoking - I thought it quite odd - and he turned to me and he said 'We don't smoke this shit, we just sell it.' And I laughed and he said 'We reserve the right to smoke for the young, the poor, the black and the stupid.'[1]

7.6 The "Reg" Campaign

7.6.1 In the UK, a campaign in 1992-93 for Regal cigarettes featured a gormless middle-aged and balding individual who "smokes 'em because my name's on 'em" (his thumb covered the letters AL of "Regal" on the packet he holds). Other advertisements in the series offered weak jokes *(Reg on trainspotting: "There's one"; Reg on television: "No I'm not. I'm on a poster")* at the level of playground humour. The editorial director of *Campaign* wrote when the Reg adverts won most of the *Campaign* poster awards for 1992:

> *My only reservation about them is that they obviously have a very powerful appeal to young people and might encourage some of them to take up smoking - and, as a smoker, I wouldn't wish that on anyone.*[2]

7.6.2 That appeal to the young was borne out by a survey[3] conducted for the Health Education Authority, which found that:

- 91% of teenagers but only 49% of adults had noticed the campaign
- More boys aged 9 and 10 liked the campaign than adults
- Most adults did not identify with the campaign but saw it as appealing to young people
- Young smokers particularly liked the campaign, identified with the humour, and said it gave them a reason to continue smoking
- In the north of England, where the campaign ran and where Embassy Regal is the most popular teenage brand, smoking prevalence rose during the campaign, especially among boys aged 14-15, whereas in the south where it did not run prevalence remained stable.

7.6.3 The Reg campaign was significant also for dramatically demonstrating the failure of the "voluntary agreement" on advertising - *see section 15.6.*

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1 *Tobacco Wars*, First Tuesday, Yorkshire Television, 1992

2 Bernard Barnett, *Campaign*, 23.10.92

3 *An Investigation of the Appeal and Impact of the Embassy Regal "Reg" Campaign on Young People:* Health Education Authority, 1993; *Cigarette advertising and children's smoking: why Reg was withdrawn:* Hastings *et al.*, BMJ 1994;**309**:933-7

7.7 The Industry's Market Research

7.7.1 Abroad the industry is less mealy-mouthed than here. In Canada the BAT subsidiary Imperial has been forced in a court case to reveal documents which prove that it was deliberately pitching its marketing at 12-year-olds. For example, one target group for its Player's Filter and Player's Light brands was 12-17-year-old English-speaking "men".[1] One of the documents - "Project 16" - reveals why they need to get children hooked so young:

> *Serious efforts to learn to smoke occur between ages 12 and 13 in most cases. The adolescent seeks to display his new urge for independence with a symbol, and cigarettes are such a symbol . . . However intriguing smoking was at 11, 12 or 13,* ***by the age of 16 or 17 many regretted their use of cigarettes for health reasons and because they felt unable to stop smoking when they want to.*** [2]

7.7.2 Another study, "Project Plus/Minus", concluded that young people just starting to smoke

> *. . . almost universally assume these risks* [to their health] *will not apply to themselves because they will not become addicted. Once addiction does take place, it becomes necessary for the smoker to make peace with the accepted hazards . . . The desire to quit seems to come earlier now than before, even prior to the end of high school . . . However, the desire to quit, and actually carrying it out, are two quite different things, as the would-be quitter soon learns.* [3]

7.7.3 The (Canadian) Imperial Tobacco Ltd's 1988 marketing plan states:

> *If the last ten years have taught us anything, it is that* ***the industry is dominated by the companies who respond most effectively to the needs of younger smokers.*** [4]

7.7.4 The same court case brought to light papers from the Canadian subsidiary of the giant American tobacco company R J Reynolds. Dr Joseph DiFranza of Massachussetts University Medical Centre, in a paper to the 9th World Conference on Tobacco and Health in Paris in 1994, said:

> *Let us look . . . at the mechanism whereby tobacco advertising could cause children to use tobacco. Three major developmental tasks of adolescence are to 1) develop an identity as a man or woman, 2) establish independence from parents, and 3) gain acceptance by peers and the opposite sex. Research conducted under contract with tobacco companies have* (sic) *identified these areas of psychological vulnerability among potential adolescent smokers* [he refers to the "Project 16" report - *see section 7.7.1*].

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1 *The Observer*, 10.11.91, quoting the company's 1988 marketing plan - *see also section 7.7.3.*

2 Report for Imperial Tobacco Ltd. Montreal, Quebec: Kwechansky Marketing Research Inc: 1977. Project 16 (RJR-MacDonald Inc and Imperial Tobacco v. Attorney General of Canada) *(emphasis added)*

3 Report for Imperial Tobacco Ltd. Montreal, Quebec: Kwechansky Marketing Research Inc: 1982. Project Plus/Minus (RJR-MacDonald Inc and Imperial Tobacco v. Attorney General of Canada)

4 RJR-MacDonald Inc and Imperial Tobacco v. Attorney General of Canada *(emphasis added)*

Tobacco advertising is then carefully crafted to exploit the psychological vulnerabilities of adolescents.

According to RJR MacDonald:

> *Very young starter smokers chose Export A because it provides them with an instant badge of masculinity, appeals to their rebellious nature, and establishes their position amongst their peers. . .*
>
> *Export smokers will be perceived as . . . characterized by their self-confidence, strength of character and individuality which makes them popular and admired by their peers.* [1]

RJR MacDonald identifies the target group for their Tempo brand as individuals who are

> *extremely influenced by their peer group.* [2]

These marketing plans are devoid of reference to the taste, quality or economy of the products and are devoted entirely to promoting the "psychological benefits" to be enjoyed by adolescents who smoke particular brands. . .

We thus have a plausible mechanism by which advertising causes children to smoke. Research identifies the psychological vulnerabilities of adolescents. Advertising then portrays tobacco use as the solution for the developmental problems of adolescence. Some youths who are exposed to these messages from a very early age come to accept that notion that tobacco use will provide these "psychological benefits". When they later face the challenges of adolescence it appears that the risks of tobacco use (which are perceived to be remote) are outweighted [sic] *by the immediate psychological benefits. The addiction to nicotine remains long after the psychological benefits are gone.* [3]

7.7.5 Further leaked documents from RJ Reynolds in the USA confirm that the same policies were being pursued there. In 1973, despite it being illegal to sell tobacco to under-18s in most states, a memorandum about tackling the "youth market" argued:

> *Realistically, if our Company is to survive and prosper, over the long term, we must get our share of the youth market. In my opinion this will require new brands tailored to the youth market . . .*

and suggested studying "current youth jargon" and things high school students valued to

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1 RJR MacDonald: Export family strategy document, March 22, 1982 (RJR-MacDonald Inc and Imperial Tobacco v. Attorney General of Canada)

2 J Walter Thompson: Report to RJR-MacDonald: Third Family Creative Direction Recommendation, 1984 (RJR-MacDonald Inc and Imperial Tobacco v. Attorney General of Canada)

3 DiFranza J: *The Effects of Tobacco Advertising on Children* (unpublished)

find "a good brand name and image theme".

> *[A] new brand aimed at the young smoker must somehow become the 'in' brand and its promotion should emphasize togetherness, belonging and group acceptance, while at the same time emphasizing individuality and 'doing one's own thing . . .' The teens and early twenties are periods of intense psychological stress, restlessness and boredom. Many socially awkward situations are encountered. The minute or two required to stop and light a cigarette, ask for a light, find an ashtray. . . gives one something to do with the hands, eyes, etc. and something to talk about in a situation where otherwise one might simply have nothing to do or say . . .*
>
> *The fragile, developing self-image of the young person needs all of the support and enhancement it can get. Smoking may appear to enhance that self-image in a variety of ways. If one values, for example, an adventurous, sophisticated, adult image, smoking may enhance one's* self image . . .
>
> *The smoking-health controversy does not appear important to the group because, psychologically, at eighteen, one is immortal. Further, if the desire to be daring is part of the motivation to start smoking, the alleged risk of smoking may actually make smoking attractive. Finally, if the 'older' establishment is preaching against smoking, the anti-establishment sentiment discussed above would cause the young to want to be defiant and smoke.*[1]

7.7.6 In an even more blatant indication that the tobacco industry knows that it must get children hooked before they reach the legal age at which they can be sold tobacco, another RJ Reynolds Tobacco Company (RJR) paper from 1976 said:

> *Evidence is now available to indicate that the 14 to 18 year old group is an increasing segment of the smoking population. RJR* ***must soon*** *establish a successful* ***new*** *brand in this market if our position in the industry is to be maintained over the long term.* [2]

7.8 Placement of Cigarettes in Films

7.8.1 In the USA huge sums are paid to get cigarette brands "placed" in films watched by children. Philip Morris paid $42,500 to have Marlboro featured in *Superman II*, in which (contrary to the comic-book characterisation) Lois Lane is a smoker[3]. They also paid $350,000 to have another brand featured in the James Bond movie *Licensed to Kill*. In *Beverley Hills Cop*, Eddie Murphy holds up a pack of Lucky Strikes and says "These cigarettes are very popular with the children"; and in *Who Framed Roger Rabbit?* detective Eddie Valiant is offered Lucky Strike cigarettes by a teenage boy and Camel

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1 Claude Teague, RJR, *Research Planning Memorandum on Some Thoughts About New Brands of Cigarettes For the Youth Market*, 2.2.73.

2 "Planning Assumptions and Forecast for the Period 1977-1986 for R.J. Reynolds Tobacco Company," stamped "secret," 15.3.76. [Emphasis in the original.]

3 *New York State Journal of Medicine*, July 1985

cigarettes by the cartoon character Betty Boop[1]. **None of these references to smoking and cigarettes has any significance for the plot: they are paid advertising aimed mainly at children.**

7.8.2 Documents leaked from Brown and Williamson, the US subsidiary of the British company BAT, show that they spent at least $700,000 in the early 1980s on getting their cigarettes placed in films. Of this, most went to Sylvester Stallone, who signed a letter dated 28 April 1983 saying:

> *As discussed, I guarantee that I will use Brown & Williamson tobacco products in no less than five feature films. It is my understanding that Brown and Williamson will pay a fee of $500,000.*

7.8.3 This is one of many documents about using films to promote cigarettes now published on the Internet by the University of California at San Francisco[2].

7.9 The Joe Camel Campaign

7.9.1 The huge American company RJ Reynolds has been running for some years a highly successful campaign for its Camel cigarettes in the USA featuring a cartoon character known as Joe Camel - a cool jazz saxophonist - who through advertising and a huge range of associated merchandise was shown in one study to have achieved higher levels of recognition among young children than Mickey Mouse. The campaign was denounced not only by the US Surgeon-General and the American Medical Association but also by papers such as *Advertising Age*, which wrote:

> *Old Joe subtly encourages children to smoke... The company has crossed the divider between its legal right to advertise and its unique social responsibility to the general public.* [3]

7.9.2 Sales of Camel cigarettes have risen sharply among the young: before the advent of Joe Camel, only 0.5% of teenage smokers smoked Camels; two years later 32.8% chose the brand, representing additional sales worth $476 million a year. The effect on adult smokers' brand choice was if anything negative: the adult market share stayed at about 3-4%.[4]

7.10 Smokeless Tobacco

7.10.1 Another example of the power of advertising over children is provided by the US Tobacco Company's reversal of a 24-year decline in the use of smokeless tobacco in sachets (in US parlance, spitting tobacco). In the mid-1970s they introduced candy-flavoured varieties with reduced nicotine (to reduce initial side-effects) along with an aggressive youth-oriented marketing campaign, including free samples and advertisements that gave instructions for first-time users. Other brands were positioned as follow-on choices, leading to the strongest, the slogan for which was "Sooner or later it's Copenhagen".

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1 *Tobacco & Youth Reporter*, Spring 1989

2 The letter is indexed 2406.03 and the Internet address is http://www.library.ucsf.edu/tobacco

3 *Advertising Age*, 13.1.92

4 DiFranza J *et al.*, RJR Nabisco's Cartoon Camel Promotes Camel Cigarettes to Children: *JAMA* 1991; **266**:3149-3153

7.10.2 The result was an epidemic of spitting tobacco use by American youth. The average starting age for use of US Tobacco's products is now 10. Only the advertising and marketing campaign can explain how (for example) in one area use of spitting tobacco by nine-year-olds rose from 3% to 33% between 1976/7 and 1981/2: there was no peer pressure or adult example, since the use of the product had fallen to negligible proportions in many areas where it suddenly became popular.[1]

7.11 Advertising aimed at Young Men

Given the controls under the voluntary agreements on advertising in young women's magazines *(see section 4.5.4)* the industry has apparently found it valuable to advertise heavily in so-called style magazines read by young men. For example, the spend by Marlboro and Silk Cut in the four main titles (Arena, Esquire, FHM and GQ) doubled between the year to October 1993 and the year to October 1994.[2]

7.12 Cryptic Advertising

7.12.1 Barry Day, vice-chairman of McCann-Erickson Worldwide and one of the best known names in international advertising, has written:

> *I BELIEVE that all advertising must in some way* ***reassure****...*
> *I BELIEVE an ad should be a* ***reward****.*[3]

7.12.2 It is at least plausible that the cryptic advertisements widely adopted by cigarette advertisers in the UK work insidiously but effectively on children by offering them the reward of deciphering the hidden messages in (for example) the Silk Cut adverts: if they can understand and recognise them, they join an adult conspiracy or club. Often, indeed, children are quicker to recognise and understand such advertising than adults. Some of the findings of the Strathclyde team *(see section 7.2.3)* support this hypothesis.

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1 *The Health Consequences of Using Smokeless Tobacco: a report of the Advisory Committee to the Surgeon General*: National Institutes of Health: 1986: NIH 866-2874; Connolly et al., The Re-emergence of Smokeless Tobacco: *New England J. Med.*1986;**314**: 1020-1027; Hunter *et al.*, Longitudinal patterns of cigarette smoking and smokeless tobacco use in youth: the Bogalusa Heart Study: *Am. J. Public Health* 1986;**76**:193-5

2 *Media Week*, 2.12.94

3 Day b, *100 Great Advertisements*, 1978

8: THE EFFECT OF ADVERTISING AND OF BANNING ADVERTISING

8.1 THE SMEE REPORT

8.1.1 In October 1992 the Department of Health published for consultation a report[1] from their Chief Economic Adviser, Dr Clive Smee. Contrary to the self-interested claims of the tobacco industry, this official study confirmed commonsense expectations about the effects of advertising in increasing tobacco consumption and of controls or bans on advertising in reducing it. A detailed summary of his report is given in sections 8.1.4-8.1.9, but the key findings are:

- Countries with stronger controls on advertising have lower consumption of tobacco.
- In individual countries, "the balance of evidence" based on study of the relationship between advertising spending and consumption over time shows that "advertising does have a positive effect on consumption".
- In the four countries with bans on advertising where there was enough detailed evidence for proper study, the effect of the bans (excluding other factors) was to produce "significant" drops in consumption:

Country	Date of ban	Drop in consumption
Norway	1975	9% *
Finland	1977	6.7%
Canada	Jan 1989	4%
New Zealand	Dec 1990	5.5%

* Another "model" showed a 16% drop.

NB: The results from New Zealand and Canada were very early after their bans were introduced, and later results are reported in the "country" sections below.

8.1.2 The report - in part highly technical - is of considerable significance and led to Government admissions of the effect of advertising *(see sections 6.5, 6.13)*. It reviews all the key studies, looking in turn at the indirect evidence and the quantitative direct evidence. It finds that the strongest evidence comes from the effect of actual bans.

8.1.3 Unsurprisingly, the Smee report was bitterly attacked by the tobacco and advertising industries. The Tobacco Advisory Council (now the Tobacco Manufacturers Association) commissioned a detailed academic critique from Dr Laurence Hagan of Henley Marketing

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[1] *Effect of Tobacco Advertising on Tobacco Consumption: a discussion document reviewing the evidence*, Economics & Operational Research Division, Department of Health, 1992

Dynamics International, published in January 1993. The Advertising Association published a comprehensive critical report the same month. Most of the argument, particularly in the former, was intensely technical, while the commonest line of public attack was to make much of the failure of Dr Smee's own study to detect a relationship between advertising and consumption *(see section 8.1.7)* while implying, falsely, that this was the fundamental finding of the report.

Detailed Summary of Smee Report

8.1.4 **Indirect and Circumstantial Evidence:** Advertising, the report says, could plausibly increase smoking by any or all of many methods, for example by persuading children or adults to start, smokers to smoke more or not to quit or quitters to start again. Sports sponsorship "may cultivate . . . positive attitudes" and "brand advertising may lead some people to start smoking even if the [tobacco] firm does not intend this result". In particular, Smee reviews the many studies showing correlations between awareness or approval of advertising and children's smoking habits, but concludes cautiously that it is not possible to prove that the one causes the other. He notes that one study showed that 44% of smokers (but only 26% of non-smokers) agreed that "Smoking can't be really dangerous or the Government would ban cigarette advertising" *(see section 1.5)* and the implication that "a ban would itself send a powerful health message".

8.1.5 **Quantitative Direct Evidence:** Smee examines three types of study that look for links between advertising and consumption: (a) international comparisons between countries with weaker or stronger controls over advertising; (b) single country studies of the effect of changes in advertising expenditure over time; and (c) examinations of the effect of actual advertising bans. He notes that there are severe technical problems with the first two types of study (availability of data, how to model the possible effects of advertising, etc.) and that actual bans, which present fewer difficulties of interpretation, are "perhaps most important of all", producing relatively unambiguous evidence.

8.1.6 International Comparisons: Two major studies have found positive correlations between the strength of controls and tobacco consumption, but Smee points to uncertainty about the "direction of causation": is consumption reduced by advertising bans or is it anti-smoking attitudes that bring about both the bans and the fall in smoking?

8.1.7 Time Series Analyses: Smee reviews 19 key studies from the UK, USA and elsewhere, which looked for a correlation between advertising spending and subsequent tobacco consumption. Dr Smee's team themselves tested two models, one producing negative and one ambiguous results. However, 18 of the 19 studies found a positive effect of advertising on consumption, albeit (given that the studies typically tested more than one model of the relationship) 5 of these found negative effects also and one study found only negative effects. Overall, however, there was a heavy preponderance of positive results: 68 statistically significant and 103 insignificant positive correlations against 2 significant and 39 insignificant negative results. If advertising had no effect on overall sales, equal numbers of positive and negative results would be expected. Therefore *"the balance of evidence thus supports the conclusion that advertising does have a positive effect on consumption".*

8.1.8 The Effect of Actual Advertising Bans: Smee found four countries which had introduced advertising bans and recorded adequate data to allow proper analysis. *(Up-to-date details for each country are given in sections 8.3 to 8.6).*

Norway: Smee carried out the first full econometric study of the 1975 Norwegian

Tobacco Act, testing two models. One suggested a long-run cut in consumption of 9%, the other 16%, with the "great majority" of this effect due to the advertising ban since the other measures in the Act were "minor".

Finland: A detailed study of the Finnish advertising ban found that it produced a 6.7% reduction in cigarette consumption.

Canada: The ban in January 1989, Smee found, had already produced a 2.8% drop in consumption, which was likely to grow to 4% in the long term.

New Zealand: Of the 7½% immediate drop in sales in the six months following the December 1990 ban, Smee attributed 5½% to the ban and the rest to other factors.

8.1.9 **Summing up, Dr Smee said the evidence from each of these four countries "indicates a significant effect . . . [The bans were] followed by a fall in smoking on a scale which cannot reasonably be attributed to other factors".**

8.2 INTERNATIONAL COMPARATIVE STUDY

8.2.1 The more recent of the two studies referred to in section 8.1.6 was published in the *British Journal of Addiction* in 1991 and is worth quoting. It reported a detailed study of tobacco consumption per adult in 22 countries of the OECD between 1960 and 1986. The authors concluded that:

> *. . . tobacco advertising restrictions have since 1973 increasingly been associated with lower tobacco consumption . . . In 1986 either a 35% inflation-indexed increase in real tobacco prices, or legislation to end tobacco promotion in those countries without a total ban, would have lowered average consumption by 6.8% and both together, by 13.5%. Across the OECD, if in 1986 all governments had raised tobacco product prices relative to income to Irish levels, and had banned all tobacco promotion, tobacco products consumption per adult would have fallen by 40% in that year.*[1]

8.2.2 Against such measures of what would be possible - and the achievements of other countries reported in the next section - the Department of Health's targets for the year 2000 do not look ambitious.

> In the following sections, evidence is given from several countries with advertising bans. Note that the figures given are the latest available to ASH, not the earlier and adjusted figure used by Smee.

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[1] Laugesen M and Meads C, Tobacco advertising restrictions, price, income and tobacco consumption in OECD countries, 1960-1986 - *BJA* (1991) **86**, 1343-1354. (After some errors in their data were pointed out, Laugesen and Meads produced corrected calculations which served "to confirm our original conclusions and to demonstrate how robust these conclusions are" - *BJA* (1992) **87**, 1599-1601.)

8.3 NEW ZEALAND

8.3.1 Most countries that have introduced bans on advertising have failed to monitor their effects closely, and in some there were simultaneous other changes (e.g., in taxation) which confuse the statistics. *In New Zealand neither problem occurs.* They introduced their ban in mid-December 1990. It has been closely monitored and there were no significant confounding factors. *(On sports sponsorship, see section 12.8.3.)* The following paragraphs and graphs are based on official data from the Public Health Commission, part of the Ministry of Health. **They demonstrate that the advertising ban has been accompanied by significant falls in both the amount smoked (per head of population and per smoker) and in the number of young people smoking, where the contrast with the UK is striking.**

8.3.2 It is significant that New Zealand has achieved the results described below despite starting from a more advanced position in tobacco control than we currently have in the United Kingdom. Before the advertising ban came into effect there in mid-December 1990 the controls in force in New Zealand were:

- no radio advertising *[here cigars and pipe tobacco may still be advertised on radio]*
- no television advertising *[same here]*
- no cinema advertising *[same here - under the voluntary agreement]*
- minimal controls over shop-front advertising *[same here until recently]*
- no outdoor advertising *[here billboards account for about a quarter to a third of all tobacco advertising - see section 11.1]*
- warnings required on press and magazine advertising, and content controlled *[same here - under the voluntary agreement]*
- strong and changing warnings on packets *[same here]*
- no controls on sponsorship *[same here].*

There is no reason why the United Kingdom should not equal or even exceed the achievement in New Zealand. All it needs is the Government's backing.

Consumption

8.3.3 Consumption has fallen steadily since the advertising ban, at a rather faster rate than previously: in the two years prior to the ban it took ten weeks on average for consumption to fall by 1%; in the two years after the ban it took only six weeks. It is already below the UK's 1,838 cigarettes per adult in 1994[1] - but our consumption is already below that in New Zealand in the last year before their advertising ban. The trends are illustrated in the following table; *see also graph 8.1.*

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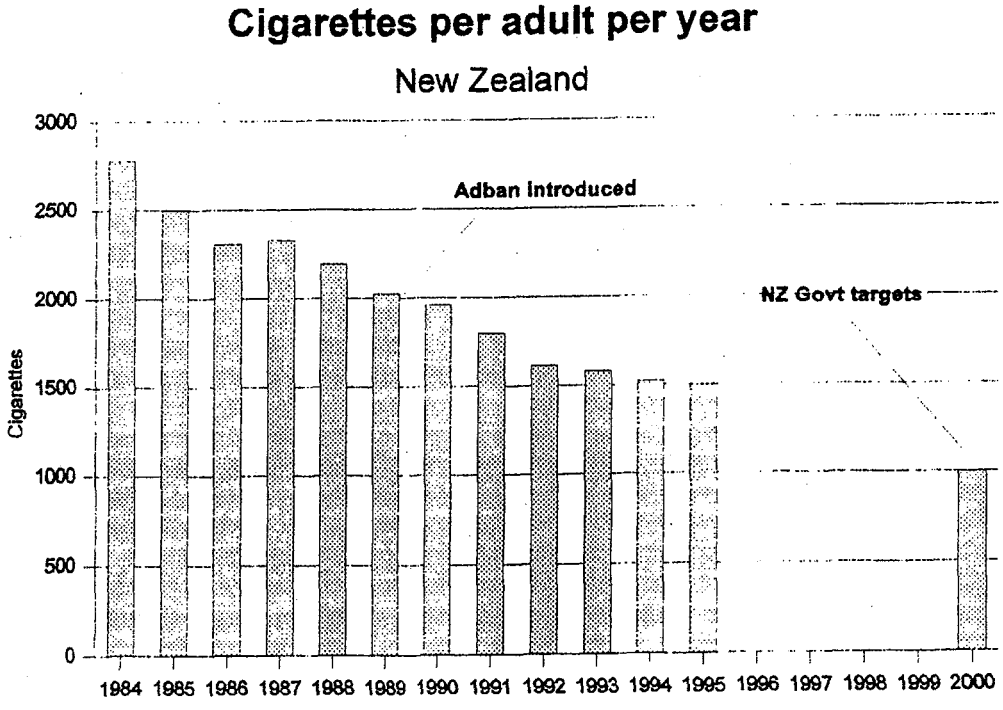
[1] 85,156 mn cigarettes *(Customs and Excise annual report 1994/95)* for an adult (16+) population of 46,319,300 *(OPCS)*.

Cigarette-equivalents (incl handrolling tobacco) per adult (age 16+) per year			
1985	2493		
1986	2304	-7.6%	
1987	2327	+1.0%	
1988	2190	-5.9%	*(see note)*
1989	2024	-7.6%	*(see note)*
1990	1957	-3.3%	
1991	1796	-8.2%	First year of ban
1992	1613	-10.2%	
1993	1579	-2.1%	*(see note)*
1994	1520	-3.7%	*(see note)*
1995	1500		NZ Dept of Health target
2000	1000		NZ Dept of Health target

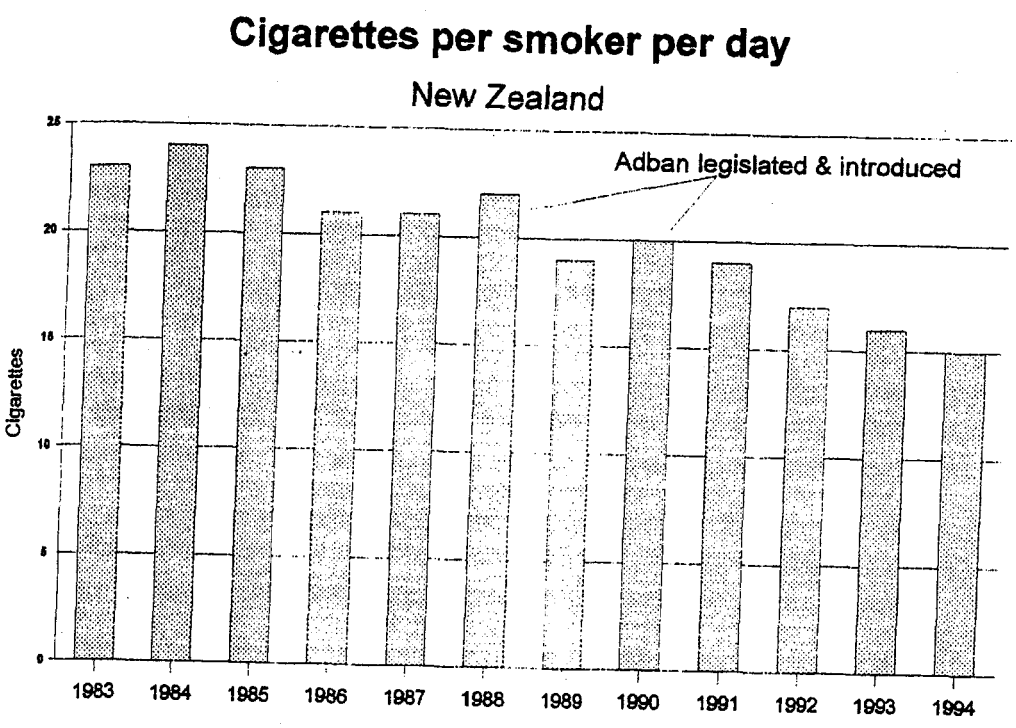
NOTE: The figures for 1988 and 1989 have been corrected from 2317 and 1877 respectively to correct for an abnormal withdrawal of cigarettes from bond in December 1988 in anticipation of a pre-announced tax increase in January 1989. The lower rate of fall in 1993 and 1994 is partly explained by an increase in real income per head and partly by the lower priority given to tobacco control following a change of government.



GRAPH 8.1

8.3.4 Consumption per smoker shows a similar steady fall *(see table and graph 8.2)*:

Cigarettes per smoker per day: 1983-1994: New Zealand			
1983	23	1989	19
1984	24	1990	20
1985	23	1991	19
1986	21	1992	17
1987	21	1993	16
1988	22	1994	15



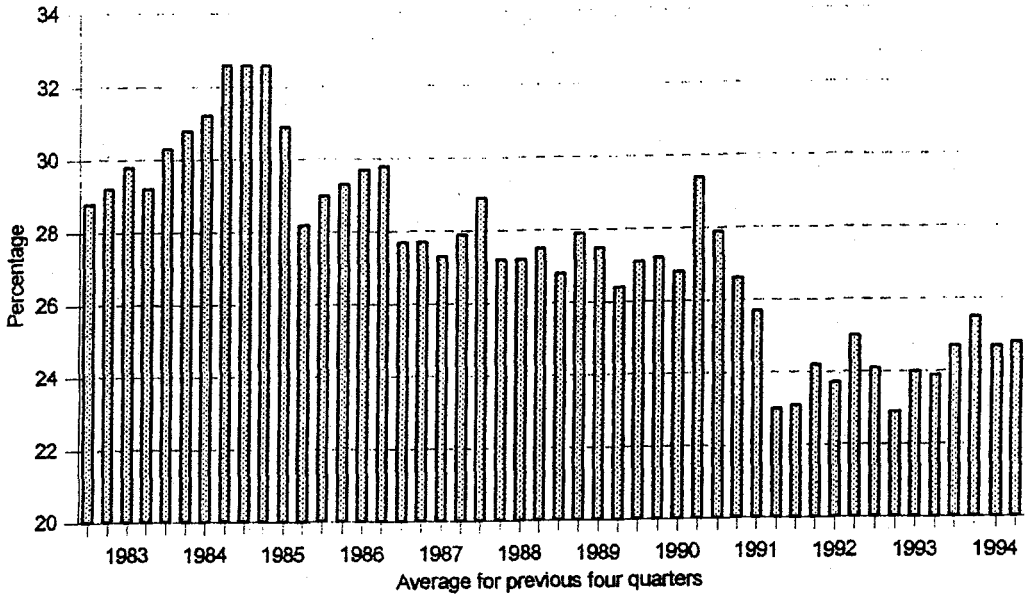
GRAPH 8.2

Prevalence

8.3.5 The following graph and table show the prevalence of smoking of New Zealand's 15-19-year-olds, as tested in quarterly surveys that reach 1,000 subjects every year. (The figures are for the twelve months to date, not for the last quarter only.) From the time the adban became effective in December 1990, when prevalence was 26.8%, it has (after a transitional blip) fallen to 24.8% in the first quarter of 1995. In the year 1990 the average prevalence was 26.8%; in the year 1994 24.7%. This fall of almost 8% in the proportion of teenage smokers in New Zealand is in stark contrast to the rise in the UK.

Smoking Prevalence at age 15-19

New Zealand



GRAPH 8.3

Prevalence of smoking by 15-19-year-olds: 1983-95: New Zealand				
Year to:	1st quarter	2nd quarter	3rd quarter	4th quarter
1983		28.8	29.2	29.8
1984	29.2	30.3	30.8	31.2
1985	32.6	32.6	32.6	30.9
1986	28.2	29.0	29.3	29.7
1987	29.8	27.7	27.7	27.3
1988	27.9	28.9	27.2	27.2
1989	27.5	26.8	27.9	27.5
1990	26.4	27.1	27.2	26.8
1991	29.4	27.9	26.6	25.7
1992	23.0	23.1	24.2	23.7
1993	25.0	24.1	22.9	24.0
1994	23.9	24.7	25.5	24.7
1995	24.8			

8.3.6 Adult prevalence has remained unchanged since the ban at about 27%. (In a paradoxical attempt apparently to persuade politicians not to continue with anti-smoking measures the tobacco company W D & H O Wills has been circulating a graph purporting to show that prevalence has already fallen to 21%, close to the Government's target of 20% for the year 2000, but the Government's survey and the largest commercial one continue to show a steady 27%.) Officials believe that adult prevalence would have fallen if the price of hand-rolling tobacco had been brought into line with that for manufactured cigarettes: instead there has been a switch by adult smokers to roll-your-own cigarettes.

8.4 CANADA

8.4.1 Canada has pursued for many years a strong policy against tobacco, using high and rising taxes, controls and then a total ban on advertising and other methods to control the smoking epidemic. Because many factors have been in play it is difficult to attribute any measured part of their success to the advertising ban. The position is made the more complex by the partial reversal in 1994 of their previous high-tax policy after timid controls failed to stem a flood of smuggled re-imports of cigarettes from the USA and by the 1995 finding of the Supreme Court of Canada that the Tobacco Products Control Act (TPCA) of 1988 was unconstitutional.

8.4.2 The TPCA was the Act under which Canada banned all tobacco advertising and required large, stark health warnings on packets, in black and white in a framed box taking up a third of the front and back of the packet. The tobacco industry will use this victory to discourage hesitant politicians everywhere from taking the necessary steps to control tobacco. However, the Canadian court finding was on narrow grounds that would find no counterpart in the UK. Even the Canadian tobacco industry announced immediately after the ruling that it would continue to print the warnings on packets and would not resume advertising until it had consulted the government.

8.4.3 The basis of the ruling was that the Canadian constitution guarantees freedom of expression, to companies as well as individuals, "subject to such reasonable limits prescribed by law as can be demonstrably justifiable in a free and democratic society". To meet this requirement, the Canadian government had to prove to the Court (a) that the purpose of their curtailment of the tobacco manufacturers' freedom of expression was "pressing and substantial", (b) that there was a rational connection between the objective and the means adopted, (c) that the means was the least drastic available, and (d) that it was proportional to the ills it was addressing.

8.4.4 The Court found that cutting tobacco use *was* a pressing and substantial cause, and that there *was* the necessary rational connection. However, by 5 votes to 4 they ruled against the government on the question whether the TPCA's total ban on advertising and its requirement of unattributed warnings were the least drastic means available. They did not find that there *were* other, less drastic means, only that the government had failed to convince them that there was none. (Having so found, they did not address point (d) above.)

8.4.5 In December 1995 the Canadian government responded to the court case by proposing new legislation reinstating the ban on advertising along with tighter restrictions on promotional activities and sponsorship of sport and cultural events. There will be controls on youth access to tobacco, on packaging and labelling, and on tobacco product constituents and emissions.[1] If a new Act is challenged, the Government will be entitled

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1 *Washington Post, Wall Street Journal, Financial Times* and *Daily Telegraph*, 12.12.95

to introduce (as they were not in the recent case) evidence that became available after the 1988 TPCA was passed. Soon after this announcement, the tobacco companies said they would resume advertising in January 1996.[1]

8.4.6 In any case, the record of reductions in consumption and prevalence in Canada provides evidence in favour of a package of strong policies, including a ban on advertising: it must, after all, be borne constantly in mind that an advertising ban alone (like any other single measure alone) is quite inadequate to control tobacco.

8.4.7 The graph and table illustrate the combined effect of rising real price, the advertising ban and other controls on prevalence and consumption - and the effect of the reduction of price in 1994 when emergency steps had to be taken when smuggling had been allowed to get out of control.

Consumption, prevalence and price: 1980-94: Canada

	Daily cigarette consumption per adult[2]	Adult prevalence of regular smoking[3]	Real price (1994 Canadian $)[1]
1980	7.72	41	2.12
1981	7.85	45	2.13
1982	7.90	42	2.22
1983	7.52	41	2.48
1984	7.29	39	2.64
1985	6.75	39	2.98
1986	6.62	35	3.37
1987	6.28	34	3.49
1988	6.11	36	3.62
1989	5.85	36	4.07
1990	5.66	35	4.44
1991	5.25	33	5.53
1992	5.17	33	5.65
1983	4.94	29	5.65
1994	5.33	30	4.06

1 *Wall Street Journal*, 20.12.95

2 Statistics Canada, with adjustments 1990-94 for highest credible level of contraband by Non-Smokers' Rights Association, using work by Linquist Avey Macdonald Baskerville Inc. (includes hand-rolling tobacco at 1 gram = 1 cigarette)

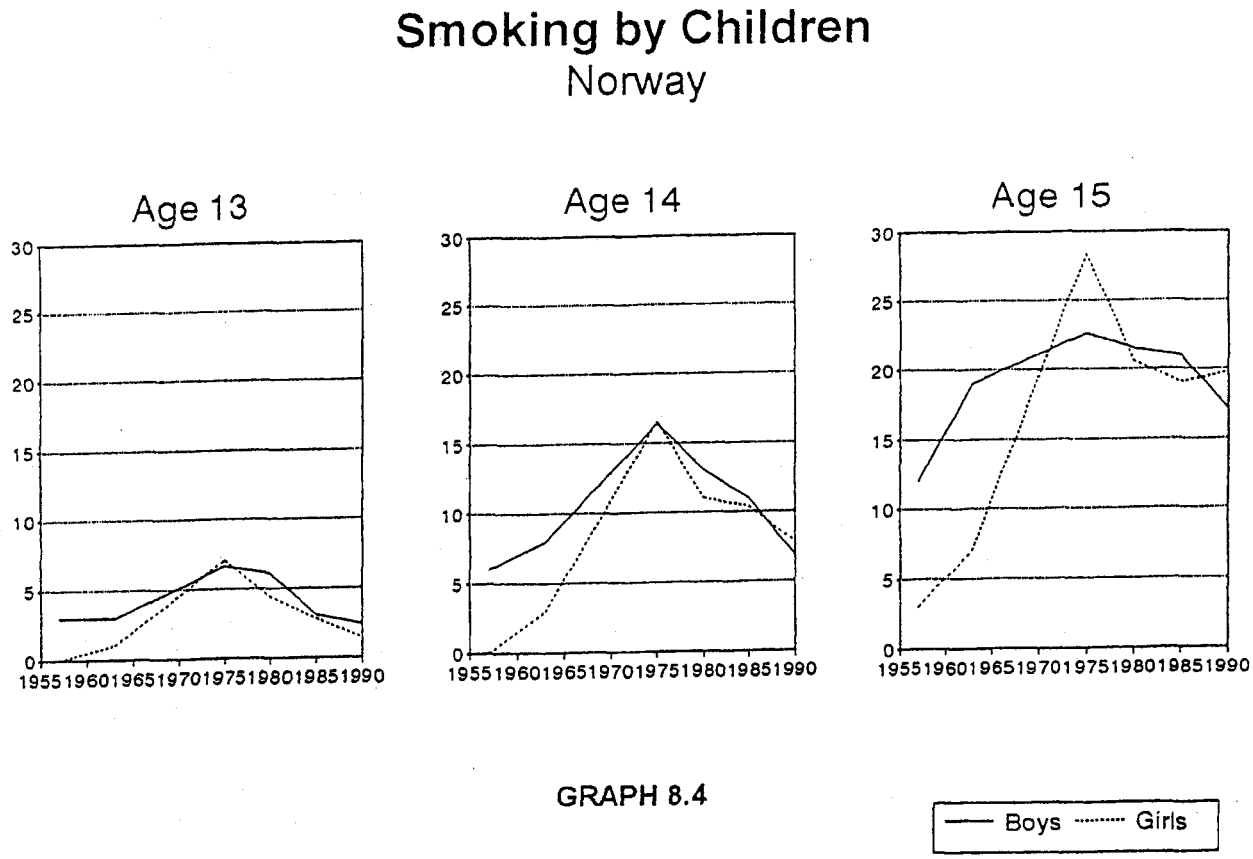
3 Gallup Canada Inc.

8.5 NORWAY

8.5.1 In Norway, a ban on advertising was introduced in 1975. During the 1970s there was no significant change in the level of health education and the real price of cigarettes was if anything falling. Prevalence of smoking by children showed a sharp reversal in 1975 from steady advance to steady decline, which has continued to date. The effect has been similar among older teenagers. Overall prevalence among 13-15 year olds and among 16-19 year olds has declined as follows:

	Daily smokers aged 13-15	Daily smokers aged 16-19	
1973	n/a	38.3%	
1975	17%	37.6%	Ban introduced
1980	14%	27.4%	
1985	11.5%	22.6%	
1990	10%	22.3%	
1994	n/a	20.7%	

The figures[1] are plotted in detail in *graphs 8.4 and 8.5* and adult prevalence in *graph 8.6.*

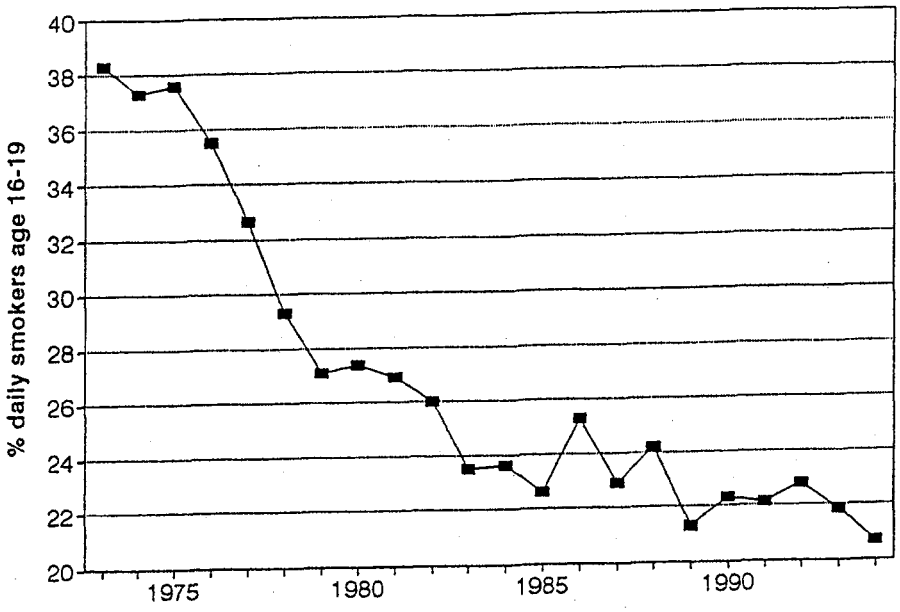


GRAPH 8.4

[1] All figures in this section are provided by Norwegian official National Council on Tobacco and Health.

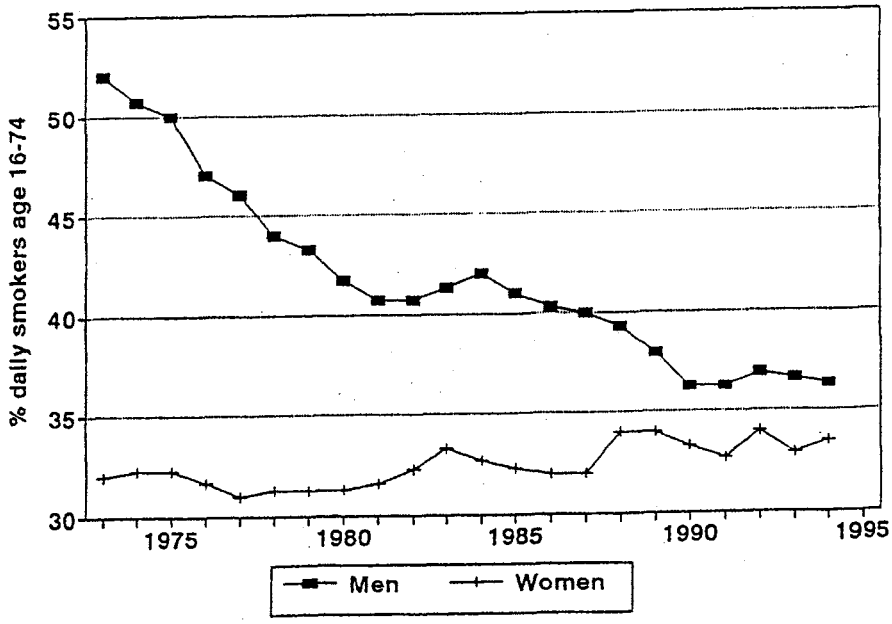
Youth Smoking Prevalence in Norway

(NB: sharp decline after adban in 1975)



GRAPH 8.5

Adult Smoking Prevalence in Norway



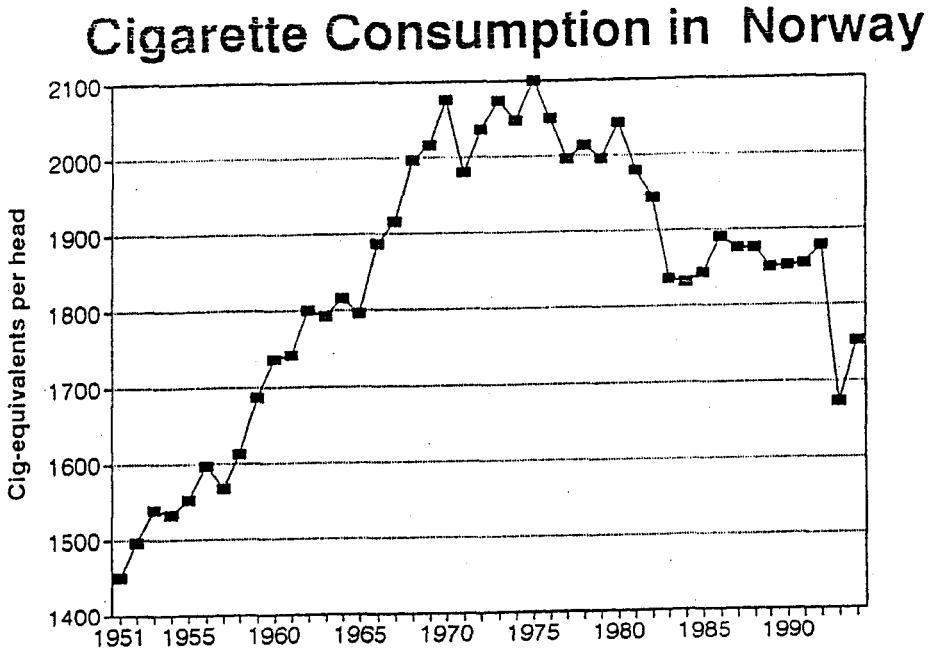
GRAPH 8.6

8.5.2 There was also a sharp increase in the proportion of daily smokers saying they will certainly or probably not be smokers in 5 years' time, from 10% in 1975 to 25% in 1980 and 33% in 1989. In the event, prevalence among adult men fell quite steeply in the years immediately after the ban and has declined further since, but prevalence among adult women, after an initial fall, has remained steady - *see graph 8.6.* One factor at play here is that over half of Norwegian daily smokers use hand-rolling tobacco, which is much cheaper and has a higher nicotine content than manufactured cigarettes: three smokers of manufactured cigarettes try to quit for every two of hand-rolled.

8.5.3 The effect is noticeable also in overall consumption of cigarettes (including roll-you-own), as is shown in *graph 8.7* and in the following table:

Cigarette consumption per adult per year: 1950-94: Norway			
1950	1478	1975 (ban starts)	2100
1955	1552	1980	2044
1960	1735	1985	1842
1965	1796	1990	1851
1970	2076	1994	1751

8.5.4 It is worth noting that this sharp drop in consumption was achieved despite the real price falling both before and after the ban: the index was 104 in 1961, 101 in 1975 and 93 in 1980. The 8% price fall in the five years following the ban would normally be expected to produce a rise in consumption of about 4%: in fact there was a drop of 2.7%. Another adverse factor in Norway has been the steady but dramatic fall in spending on anti-smoking health education from an average of 9 mn krone in 1975-80 to only 825,000 krone in 1994.



GRAPH 8.7

8.5.5 *The tobacco industry persists in making false claims that cigarette consumption in Norway has risen since their advertising ban was introduced.*[1] *Such claims are based on quoting figures only for* **manufactured** *cigarettes, whose sales have risen at the expense of roll-your-own tobacco - largely as a result of changes in relative taxation: the fall appears when both types of cigarette are taken into consideration - or else on ignoring the growth in population, which has produced variable but broadly static annual figures for gross consumption at the same the as the quoted reduction in per capita consumption.* [Compare the similar tobacco industry claims about the Netherlands - *see section 20.5.*]

8.6 FINLAND

8.6.1 In Finland legislation to ban tobacco advertising was introduced in 1975 and came into effect in 1978. The ban was not total: (a) foreign publications, which have a wide circulation in Finland, were not affected, and (b) indirect advertising was not covered - a loophole that the industry exploited progressively during the 1980s. By the early 1990s 50% of 12-year-olds and 60% of 14-18-year-olds reported having seen tobacco advertising during the previous month. Other factors influencing smoking during the 1980s were the relaxation of anti-smoking educational campaigns and the strong economic growth accompanied by a declining real price of tobacco. In 1993 a new Act was passed which banned all indirect advertising with effect from March 1995. (It also banned sales to under-18s, banned oral snuff, and legislated for smoke-free workplaces.)

Consumption

8.6.2 The effect of the two Acts on tobacco consumption is shown clearly by *graph 8.8.* The 1975 advertising ban produced a fall in consumption of 6.7% (according to econometric analyses)[2]; the slow decline in the following years was sharply accelerated when the 1993 Act was introduced.

Tobacco consumption* per head per year: 1960-94: Finland[3]			
1960	2220	1980	2090
1965	2214	1985	2037
1970	2245	1990	2038
1975	2435	1994	1681

* measured in cigarettes plus cigars plus grams of pipe and hand-rolling tobacco

8.6.3 The tobacco industry have claimed that consumption rose by 17% between 1978 and 1989[4]. Such an increase is not reflected anywhere in the official Finnish statistics. There was an insignificant increase between the two years in sale of manufactured cigarettes, but this was offset by a sharp fall in sales of loose tobacco for hand-rolling and pipes.

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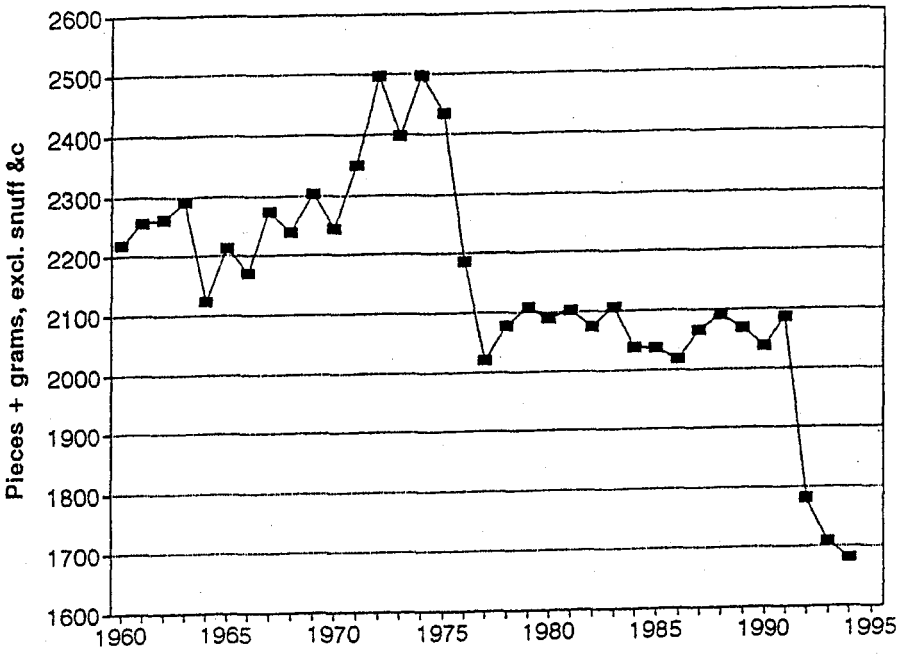
1 *Hear the Other Side*, no 4: Tobacco Manufacturers Association, 1992
2 Pekurinen M: *Economic Aspects of Smoking,* 1989
3 Statistics Finland, 1995
4 Tobacco Manufacturers Association *Hear the Other Side* no. 4, 1992

Finland: Tobacco Consumption per Head



GRAPH 8.8

Prevalence

8.6.4 The effect of Finnish tobacco control measures on prevalence has been less marked, but rates have declined steadily in men (whose rate is now comparable with that in the UK) while the level for women has remained roughly steady but substantially lower than here. The decline has been shared by young smokers.

Daily Smokers: 1970-95: Finland[1]					
	Overall prevalence	Men	Women	Men aged 15-24	Women aged 15-24
1970	n/a	44%	16%	n/a	n/a
1975	n/a	46%	23%	n/a	n/a
1978/79	27%	36%	18%	35%	26%
1989/90	26%	33%	20%	29%	24%
1995	24%	29%	19%	23%	23%

[1] 1970,1975: *Tupakkapoliittisen Työryhmän Muistio*, Työryhmämuistio 1976: STM 13, Helsinki, 1976 (report of Ministry of Health committee); 1978-95: *Health Behaviour among Finnish Adult Population, Spring 1995,* National Public Health Institute, Helsinki, 1995

8.7 ICELAND

8.7.1 Advertising has been banned in Iceland since 1971; surveys of 12-16 year olds in Reykjavik (where 40% of the entire age-group live) carried out in the years following the ban showed a very clear trend:

Prevalence of Smoking: 1974-86: Iceland		
	All smokers - %	Daily smokers - %
1974	32	23
1978	23	17
1982	19	15
1986	13	9

8.8 SINGAPORE

8.8.1 A ban on advertising was introduced in 1971. A 1984 Government survey showed that only 9% of young men aged 15-19 smoked, cf. 30% of men aged 50-59. (Almost no girls and few women smoke.) Overall prevalence was reported by UPI in 1992 at the low figure of 16%, although even this was up from 13% in 1987.[1]

8.9 ITALY

8.9.1 Italy introduced a ban in 1962. It provides an example of "how not to do it": the ban was motivated at least in part by a wish to protect the state tobacco company, which at that time had a monopoly. The penalties for breach of the ban were so puny that the law was ignored and the penalties were regarded as part of the cost of advertising. In 1983, the penalties were raised, but the law still allows parallel or indirect advertising, so that the foreign tobacco companies (but not the state monopoly) simply switched their budgets into other types of promotion: sponsorship, for example, and immense"indirect" advertising campaigns for Camel adventure holidays and Marlboro helmets for racing drivers[2]. The value of such indirect advertising in 1990 was £27 million, but almost as much - £25 million - was spent in the first half of 1991 alone.[3]

8.9.2 The Italian ban has been so badly managed that even the tobacco industry seem to have stopped quoting it as an example of the ineffectiveness of bans. Moreover, the real price of tobacco fell by more than half (from 244 to 117 on an index taking 1980 as 100) between 1960 and 1983 while real income rose at the same time[4]. However, even in Italy, after rising from 85,000 tonnes in 1963 to 104,000 tonnes in 1983, sales of tobacco fell after the enforcement of the ban by 11.2% to 92,000 tonnes in 1990[5]. (Even the

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1 UICC Globalink, 12.6.92

2 ASH has a videotape of an Italian TV commercial for Marlboro motor racing helmets that plainly operates mainly as an advertisement for cigarettes.

3 Estimate by Professor Maria Modolo of Perugia University, speaking on BBC television's *Public Eye*, BBC2, 25.10.91

4 *Measuring health care 1960-83*, OECD policy studies no. 2; *Main economic indicators historical series 1964-83*, OECD; and *Annuario statistico Italiano*, Instituto di Statistica, Rome

5 *Smoking Prevention* no. 15, BASP, Brussels, January 1992.

Tobacco Manufacturers Association admit a 5% reduction in consumption between 1983 and 1989[1].)

8.10 PORTUGAL

8.10.1 Portugal introduced an advertising ban in 1983, but its effects have not been adequately monitored. However, it seems to have helped hold at bay the increase in smoking among women - who still have the lowest rate in the EU despite increases in recent years. There was, however, an alarming increase in smoking among women aged 15-24 between 1985 (17%) and 1988 (31%), perhaps indicating the inevitable cultural spread of fashions across international frontiers.

Daily Smokers: Portugal: 1977-94[2]

%	Total	Men	Women	Men aged 15-24	Women aged 15-24
1977	23	48	3	55	14
1980	22	46	1		
1983	24	41	9		
1984	23	38	10	40	17
1985	22	36	9	35	17
1987	19	34	5	45	31
1988	28	46	12		
1989/90		43	11		
1991/92		40	12		
1994		38	15		

8.11 AUSTRALIA

8.11.1 Australia introduced a country-wide ban under the Commonwealth Tobacco Advertising Prohibition Act of 1992. The ban takes effect by stages but phases out all advertising by the end of March 1996. "Before and after" comparisons will be difficult if not impossible not only owing to this phased introduction but also because several states had bans previously (Victoria 1987, South Australia 1988, Canberra 1990, Western Australia 1990) and because there were commonwealth bans on TV and radio advertising from 1976 and on press advertising from 1989. While these measures were being introduced, moreover, the tobacco industry stepped up its spending on the remaining forms of advertising, including sports sponsorship *(see section 12.8.4)*, point-of-sale advertisements and promotions.

---

1 Tobacco Manufacturers Association *Hear the Other Side* , no 2, 1992

2 To 1988: Conselho de Prevenção do Tabagismo; remainder: EU Eurobarometer surveys.

8.11.2 Nevertheless, the effectiveness of these restrictions is attested by the tobacco industry itself. *Tobacco International*, an industry journal, reviewing 1991/92 as a "more than disappointing" year for the Australian tobacco industry, stated:

> *There has been* ***a down-turn in consumer demand related to the restrictions on advertising and promotion****, anti-smoking propaganda, and escalating prices as a result of increases in taxes . . .* [1]

8.11.3 In June 1994 Philip Morris launched a legal action seeking to overturn the advertising ban on grounds of infringement of freedom of commercial speech, alleging that the restrictions "deny [them] the right to communicate on political, public and commercial issues".[2]

8.11.4 Australia's recent determined application of policies to combat smoking is reflected in the figures for smoking prevalence and tobacco consumption. Male prevalence was 72% in 1945 and female prevalence peaked at 33% in 1976. The highest consumption per capita was in 1964 (3,443 grams per person aged 15 and over); in 1975 it was still 3.287 grams. Subsequent figures are shown in the following table.

Prevalence and Consumption per head: 1975-93: Australia[3]

	Male prevalence %	Female prevalence %	Tobacco consumption per capita: grams
1980	41	31	2,869
1981			2,790
1982			2,801
1983	40	31	2,621
1984			2,522
1985			2,449
1986	33	29	2,375
1987			2,238
1988			2,182
1989	30	27	2,091
1990			2,099
1991			1,940
1992	28	24	1,938
1993			1,719

---

1 *Tobacco International*, 1.10.92 (emphasis added). This revealing article is quoted again in section 17.15.

2 *Smoking Prevention* no 25, BASP, August 1994; *The European*, 24-30.6.94

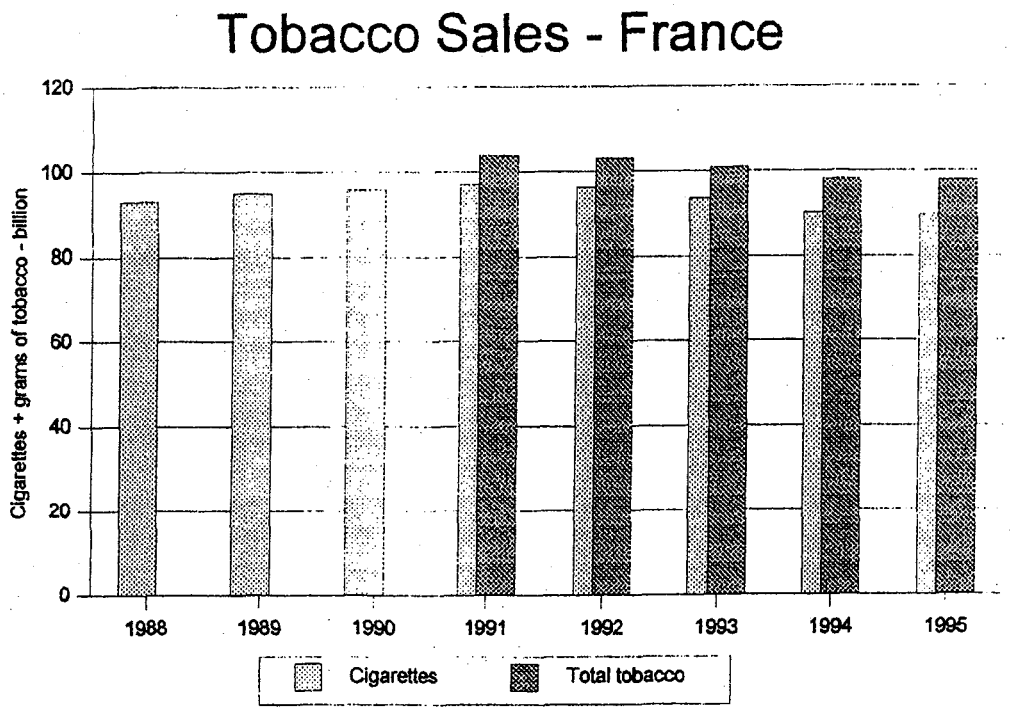
3 *Tobacco in Australia: Facts and Issues*, Quit, Victoria, 1995

8.12 FRANCE

8.12.1 Under the 1991 *loi Évin* almost all advertising was banned from January 1993. *(On sponsorship, see section 12.8.2.)* Spending on advertising dropped from 540 mn francs in 1992 to 53 mn francs in 1993 and only 20 mn francs in the first nine months of 1995. The early effects may be seen in the recent drop in consumption after a run of increases from at least 1968 until 1991, during which 23-year period only six years saw small falls.[1]

Tobacco Sales: 1988-95: France		
Year	All tobacco*	Cigarettes (bn.)
1988		93.0
1989		94.9
1990		95.8
1991	103.87	97.1
1992	103.06	96.3
1993	100.90	93.6
1994	98.08	90.1
1995 (nine months)	73.30 (annual rate: 97.70)	67.1 (annual rate: 89.5)

*cigarettes plus loose tobacco, counted at 1 gram = 1 cigarette.



GRAPH 8.9

[1] Comité National contre le Tabagisme, citing statistics from Seita (French tobacco company, recently privatised).

8.13 SWEDEN

8.13.1 Tighter legal controls to control tobacco were legislated in 1993 and 1994, though the final ban on direct advertising came into effect only in July 1994 and it built on previous tight controls. Sales of cigarettes[1] have fallen sharply, partly from the publicity that legislation brings, and in the following table (which excludes Sweden's large consumption of oral moist snuff) the figure for 1994 of course reflects only six months of the complete ban on direct advertising:

Tobacco Consumption: 1990-94: Sweden			
Year	Smoking tobacco consumption kg. per capita*	Manufactured cigarette consumption per capita*	Total cigarette consumption (mn.)
1990	1.19	1,507	10,614
1991	1.18	1,486	10,541
1992	1.22	1,548	10,966
1993	0.99	1,227	8,723
1994	0.98	1,218	8,710

* per head of population age 15 and older

8.13.2 Part of the sharp decrease in 1993 is artificial, owing to stocking at the end of 1992 in anticipation of a known tax increase in January 1993.

8.13.3 Adult prevalence, which was between 25.1% and 25.9% from 1989 to 1992, fell by 1994 to 22.7%[2].

8.14 THE EFFECT OF INTRODUCING ADVERTISING

8.14.1 If advertising increases consumption, rather than merely switching customers between brands as the tobacco industry claims *(see section 13)*, then countries where there is little or no advertising (perhaps because of a sleepy local industry or protective trade measures) which subsequently suffer an irruption of imports from transnational tobacco companies with accompanying hard-sell advertising would be expected to show a substantial increase in the overall size of the market, perhaps concentrated particularly in the younger age groups. This is in fact exactly what happened in Taiwan and in South Korea.

Taiwan

8.14.2 In Taiwan, the barriers to imports of US brands were removed in 1987. In that year, *per capita* consumption jumped by 10% over 1986 levels. This huge increase was completely out of proportion to any increases over the previous five years in Taiwan. The cumulative increase from 1982 to 1985 was only 14%, while 1986 had seen a 3.8%

---

1 Swedish Tobacco Company statistics.
2 National Bureau of Statistics, Sweden

decline.[1] A market research firm commented in a 1988 profile of the Taiwanese tobacco market on the "boom in sales in 1987" and added on the subject of advertising:

> *There has recently been considerable controversy surrounding advertisers' targeting of the non-traditional consumer groups of women and young consumers, and this targeting could be one factor behind the growing number of women and young people who are smoking. . .*
>
> *Taiwan's increasing Westernisation will also stimulate sales, with the smoking population growing as more women and young consumers are persuaded to smoke. On the other hand it is likely that tighter restrictions on the advertising and sale of cigarettes will be imposed which will to some extent hamper growth.*[2]

South Korea

8.14.3 US brands were allowed into South Korea in 1988. Total consumption that year rose by 6% over 1987. In the single year from 1988 to 1989 the prevalence of smoking among male teenagers rose from 18.4% to 29.8%, and among female teenagers from 1.6% to 8.7%.[3]

8.14.4 There are some confounding factors but they explain only a small part of these huge increases. (For example, any previous black market in smuggled US brands would be eliminated by legal imports, reducing the size of the true increase in consumption - but not affecting the increases in prevalence. Disposable incomes were also rising at the time, but this also can account for only a small part of the increases.) Overall, these two examples show the power of advertising to increase the size of the market for tobacco.

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1 Profile of Taiwanese market from E.R.C. Statistics, 1988

2 Profile of Taiwanese market from E.R.C. Statistics, 1988

3 *Trade and Health Issues: Dichotomy between U.S. Tobacco Export Policy and Antismoking Initiatives*, US Government Accounting Office, May 1990 (GAO/NSAID-90-190)

9: SUPPORT FOR A BAN ON TOBACCO ADVERTISING

9.1 General Public

Public opinion polls have consistently found strong support for a ban on tobacco advertising for many years. For example:

- A survey in 1990[1] showed that 64% of the public agreed - 31% "strongly" - that all cigarette advertising should be banned. Only 16% disagreed.
- A Mintel survey[2] in August 1991 found 61% of the British public in favour of a ban.
- An EU Eurobarometer survey published in February 1992[3] showed 71% support in the UK for a ban on tobacco advertising. There was 73% public support across the whole European Community.
- A Consumers' Association survey of 2,000 adults in March 1993 found 59% in favour of a total ban and only 28% against. 66% were in favour of a ban if point-of-sale advertising and sponsorship were excluded.[4]
- NOP has for several years found similar levels of support for the government not allowing cigarette advertising. In 1994 58% wanted a ban, 36% were opposed to one[5].

9.2 Parliament

9.2.1 Before the clear support shown by the votes on the Kevin Barron Bill *(see section 4.3.2)*, Parliament had already shown its support for a ban on tobacco advertising in a report[6] of the Health Select Committee, published in January 1993, on the draft EU Directive on the subject *(see section 19)*. The Committee did not produce a unanimous report *(see section 4.2.3)*, but what was notable was not only the call for an immediate ban from the majority but the degree of agreement from the whole committee on the effects of advertising and the need for Government action. The recommendation drafted by the Committee chairman, Mrs Marion Roe, but rejected by the majority was for a new voluntary agreement to be concluded by October 1993 under which all tobacco advertising other than at point of sale would be eliminated by the year 2000.

9.2.2 The Committee said in its (majority) report:

> *The Government cannot continue to procrastinate on the issue of an advertising ban on the grounds that it is awaiting a level of proof about its effectiveness which is in the nature of things*

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1 *British Social Attitudes*, 8th report

2 *The Observer*, 18.8.91

3 Statement from European Commission offices, 3.12.91; ASH has on file a document entitled *L'opinion publique Européenne et l'interdiction de la publicité pour les produits du tabac*, (2.2.92) which gives detailed results.

4 *Which?* March 1993

5 Unpublished surveys in ASH's possession.

6 *The European Commission's Proposed Directive on the Advertising of Tobacco Products*, Health Committee's Second Report of 1992-93, HMSO, December 1992

unobtainable. If Ministers wish to nail their colours to the mast of "free expression" they should do so explicitly. and not continue to dally over the health issues. In order for it to achieve the very demanding targets set out in The Health of the Nation *it is our belief that the Government cannot afford to ignore the potential of a statutory advertising ban as one amongst a group of measures which will ensure that those targets are met. We therefore recommend that the Government adopt as its policy the total elimination of tobacco advertising other than at point of sale . . . We recommend that the Government support the Directive.*

9.2.3 However, the following quotations come from the section of the report which was unanimously adopted:

> *It is clear that if the Government is to achieve its aim of reducing smoking, it must find ways of making an impact on the young which it has so far failed to do. . .*
>
> *. . . the unanimity of support for a ban from the public health sector cannot be ignored by the Government . . . It seems likely that the frustration of the anti-smoking lobby is provoked, at least in part, by the demand from the Government for a quality of proof for the effectiveness of an advertising ban which appears far in excess of that which underpins many other policy initiatives. Indeed we accept that the burden of proof for the contention that tobacco advertising increases tobacco consumption has been met by the evidence provided to the Committee.*
>
> [The effect of the Norwegian ban on teenage smoking - *see section 8.5* - provides] *further evidence that the Government cannot afford to ignore, and which supports the commonsense and widespread view . . . that the most baleful effect of tobacco advertising is that it depicts smoking as a socially acceptable or even desirable habit, and helps to persuade children that smoking cannot really be dangerous.*

9.2.4 It is evident from their report that the Committee - and the expert Parliamentary Office of Science and Technology which advised them - were particularly impressed with the effect on teenage smoking rates of the Norwegian ban and of the introduction of advertising into Taiwan and South Korea *(see section 8.14)*.

9.2.5 Both the Labour and Liberal Democrat parties are committed to introducing a ban and have said as much repeatedly in policy statements and from the Front Bench in (for example) debates on Kevin Barron's Private Member's Bill *(see section 4.3)*.

9.3 Health, Medical and other Organisations

9.3.1 All the leading British and international medical and health organisations that have studied the problem of smoking have called for a total ban by legislation on the promotion of tobacco, as have many non-health bodies. Supporting organisations are far too numerous to list in full but they include:-

World Health Organisation
International Union against Tuberculosis and Lung Disease
International Union against Cancer
Consumers International *(formerly International Organisation of Consumers' Unions)*

British Cardiac Society
British Dental Association
British Dietetic Association
British Heart Foundation
British Lung Foundation
British Medical Association
British Nutrition Foundation
British Thoracic Society
Bureau of European Consumer Unions (BEUC)
Cancer Research Campaign
Chartered Society of Physiotherapists
College of Health
Conservative Medical Society
Consumers Association
Faculty of Public Health Medicine
Health Education Authority
Health Promotion Agency for Northern Ireland
Health Promotion Authority for Wales
Health Visitors Association
Imperial Cancer Research Fund
National Association of Health Authorities and Trusts
National Asthma Campaign
National Council of Women
National Consumer Council
Public Health Alliance
Quit
Royal College of Physicians
Royal College of Surgeons of England
Royal College of General Practitioners
Royal College of Physicians of Edinburgh
Royal College of Surgeons of Edinburgh
Royal College of Physicians and Surgeons of Glasgow
Royal College of Obstetricians and Gynaecologists
Royal College of Psychiatrists
Royal College of Radiologists
Royal College of Pathologists
Royal College of Nursing
Royal College of Midwives
Royal Institute of Public Health and Hygiene
Royal Pharmaceutical Society
Society of Health Education and Health Promotion Specialists
Stroke Association (formerly Chest Heart & Stroke Association)
Trade Union Congress

9.3.2 All 14 Regional Directors of Public Health signed a letter to *The Times*[1] calling for a ban. They wrote:

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[1] *The Times*, 8.11.91

Tobacco advertising and sponsorship is the immediate challenge. There is now substantial international evidence from Canada, New Zealand and Norway to demonstrate that the banning of advertising and sponsorship of tobacco products significantly reduces the smoking rates in adults and, more particularly, in children.

The tobacco companies are currently using the media to argue their case in the guise of freedom of speech. It is our contention that they have abused that freedom by influencing our children to smoke. Voluntary agreements past and present have been ineffective in reducing this blatant threat to the health of young people.

9.3.3 Three months later, they wrote another letter, this time to *The Independent*[1], commenting on the then Secretary of State's suggestion that a ban was possible in "five or six years" if other efforts to reduce smoking were failing to meet the Government's targets:

> *On present trends, in England in six years from now, 120,000 of today's nine-year-old children will have started smoking and will find it difficult or impossible to kick the habit; and at least half a million more people will have developed smoking-related diseases from which they will suffer and die. The time for government action is now . . .* [They should] *ban tobacco advertising. No other action could do as much to benefit the nation's health . . .*
>
> *Nothing will do as much to encourage people to work for the Health of the Nation as action by the Government to ban the advertising of tobacco.*

9.3.4 Sir Michael Atiyah, President of the Royal Society, has also expressed strong support for a ban:

> *It* [the Government] *appears to accept the claims of the tobacco companies that advertising only affects market share and not total consumption. This highly implausible argument is not accepted by the scientific and medical community, and it hardly does justice to the skills and sophistication of the modern advertising industry.* [If the argument were academic, the Government's caution would be acceptable] *but when thousands of lives are at stake, it is utterly irresponsible.*[2]

9.4 Support from the Advertising Industry

9.4.1 There are many respected figures in the advertising world who have gone on record as being opposed to tobacco advertising. Often their agencies have refused to take tobacco companies as clients and they have not suffered as a result. Among many others they include:

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1 *The Independent*, 29.2.92
2 *The Guardian*, 25.2.93

David Abbott and Adrian Vickers:	Chairman & Deputy Chairman of Abbott Mead Vickers BBDO
Tim Delaney:	Creative Director of Leagas, Delaney
Rupert Howell:	Managing Partner, Howell Henry Chaldecott Lury
John Hegarty:	Creative Director, Bartle Bogle Hegarty

Their agencies are among those that refuse all tobacco accounts.

9.4.2 When five leading public relations practitioners were asked by *PR Week*[1] if there were any clients whose PR they would refuse to handle, all five mentioned tobacco companies.

9.4.3 An editorial in *Marketing*, a trade publication, calls on "leading advertising bodies" such as the Institute of Practitioners in Advertising and the International Advertising Association to "reconsider the question of tobacco ad bans". It dismisses the arguments against a ban one by one: the "legal product" argument - *see section 17* - "misses the point. If the cigarette were to be launched today it would be strangled at birth"; the "brand-switching" argument - *see section 13* - is "equally unconvincing"; the idea that a ban would be "the beginning of the end of freedom of commercial speech" - *see section 17* - "is scaremongering. We all know that all freedoms are hedged in by responsibilities." *Marketing* sees the issue as one of ethics:

> *By defending the undefendable on the grounds of "principle" the ad industry is sticking to yesterday's attitudes, thereby confirming the public's worst suspicions and undermining the very freedom it is supposedly trying to preserve.*[2]

9.4.4 A leading article in *Campaign*, the advertising trade weekly, at the time of the latest Voluntary Agreement *(see section 4.5)* referred to the fact that it might well not remove the threat of a permanent ban and said:

> *Some media owners have privately indicated that they would prefer a ban - with a moratorium of, say, 12 months - to the uncertainty.*[3]

9.5 Support from Other Advertisers

9.5.1 In a panel of marketing directors and managers drawn from the UK's top 300 advertisers,

> 62% favoured a total ban on advertising of tobacco
> 69% expected a ban to be enforced within 10 years.[4]

9.6 Expectation of a Ban

9.6.1 The advertising and marketing trade press have been acknowledging for years that a ban on tobacco advertising is likely - and that tobacco company executives privately agree. As long ago as February 1990, the head of account management at Lowe Howard-Spink, Nick Mustoe, was quoted as saying:

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1 *PR Week*, 21.4.95
2 *Marketing*, 5.11.92
3 *Campaign*, 20.5.94
4 *Marketing*, May 1990

I think the writing is on the wall. Banning television ads is the first step towards restricting print ads.[1]

9.6.2 Three months later, the same paper reported that Alistair Tempest, director-general of the European Advertising Tripartite in Brussels, was saying:

Tobacco advertisers are living on borrowed time.

and that John Ritchie, deputy chairman of Collett Dickenson Pearce (which handles the Benson & Hedges account) "concedes it is only a matter of time before press and poster ads disappear".[2]

9.6.3 In October 1990, *Media Week* suggested in relation to a ban on tobacco advertising that "*inevitable* is probably the relevant word".[3] Seven months later, *Campaign* reported that:

the consensus is that [the draft directive] *will go through, sooner or later . . . It seems the cigarette manufacturers themselves have tacitly admitted defeat, if the growing marketing activity in other fields is anything to go by. Stories of dedicated database building, and cunning schemes to exploit existing loopholes in the sponsorship and product endorsement regulations are increasingly commonplace . . . The success of these remedies will be determined to a great extent by how free the EC leaves legislation on sponsorship by tobacco companies . . .*[4]

9.6.4 *Marketing Week* joined the chorus of resignation:

Despite tobacco companies' confidence that the latest EC proposal . . . will be defeated, many privately acknowledge that a ban on above-the-line promotion is a matter of time . . . Tobacco companies will probably win this battle but they will undoubtedly lose the war . . . Sooner or later cigarette advertising will disappear . . .[5]

9.6.5 A leading article in *Campaign*, having dismissed suggestions that the press would be severely jeopardised by a ban *(see section 11.3.6)*, stated:

The brutal truth is that those who wish to retain tobacco advertising are fighting a losing battle.[6]

9.6.6 After the defeat of Kevin Barron's Private Member's Bill *Campaign* denounced the new voluntary agreement as "a facile compromise" and predicted:

. . . the idea of a total ban will not go away. Indeed, it is probably only a matter of time before the pressure builds again. In fact, it is possible to argue that the new code of conduct represents the

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1 *Campaign*, 9.2.90
2 *Campaign*, 25.5.90
3 *Media Week*, 12.10.90
4 *Campaign*, 24.5.91
5 *Marketing Week*, 28.6.91
6 *Campaign*, 24.1.92

worst kind of compromise for both pro- and anti-tobacco advertising lobbies. And , in the long term, it may not be enough to remove the threat of a permanent ban. Some media owners have privately indicated that they would prefer a ban - with a moratorium of, say, 12 months - to the uncertainty.[1]

If a ban is as inevitable as the tobacco and advertising industries seem to think, then why is the Government hesitating?

[1] *Campaign*, 20.5.94

10: THE POSITION ABROAD: OTHER EU COUNTRIES AND OTHER COUNTRIES WITH ADVERTISING BANS

10.1 EU countries with bans

Everywhere in the European Community there is a ban on television advertising of all tobacco products, as required by the EU Broadcasting Directive. Five European Union countries have already introduced legal bans on tobacco advertising *(for the other EU countries, see section 10.2)*[1].

FINLAND - which introduced a ban on direct advertising in 1978 and extended it to indirect advertising in 1994 - *see section 8.6*

FRANCE - which banned direct and indirect advertising with effect from 1.1.93; the ban covers sponsored events save that broadcasting of sponsored motor sports from countries which permit it is allowed - *see section 12.8.2.* In an important development involving Peter Stuyvesant Travel, who advertised holidays using a tobacco-associated logo and design, the Paris Court of Appeal on 22 March 1995 found a senior manager from Rothmans Tobacco guilty of breaching the law despite an elaborate structure of part-owned companies designed to separate the advertising campaign from the tobacco company.[2] *See also section 8.12*

ITALY - where a ban on direct advertising came in in 1962 but was not enforced until 1983 - *see section 8.9*

PORTUGAL - where a ban (save on point of sale advertising) was introduced in 1983, but an exception was made of sponsorship of world or European championship motor sports in 1987 (due to expire in 1996 but likely to be renewed) - *see section 8.10*

SWEDEN which, after previous partial bans (e.g., since 1975 there has been no advertising on billboards), brought in a complete ban on all direct advertising in July 1994 - *see section 8.13*

10.2 Other EU Countries

The situation in other EU countries is varied, although **television advertising of all tobacco products has been banned everywhere in the EU since October 1991**, as required by the EU Broadcasting Directive[3]. Other controls are as follows:

AUSTRIA Under a voluntary agreement advertising may not target the young or any other group of the population. There is a restriction on the volume of press advertising, and advertising is not permitted on

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1 Unless otherwise stated, the source for information on all EU countries in this section is *Tobacco and Health in the European Union - an Overview* and (for Austria, Finland and Sweden) *Smoking Prevention no 27*, March 1995, both from the European Bureau for Action on Smoking Prevention, Brussels.

2 *Smoking Prevention* no 28, BASP, Brussels, June 1995

3 Directive 89/552/EEC.

radio or TV, in the cinema before 6 pm, or on domestic public transport. Untipped cigarettes may not be advertised.

BELGIUM

Tobacco advertising is banned (under decrees of 1982 and 1990) except on billboards and in the press (other than papers directed at young people). Some indirect advertising (using tobacco brandnames etc. attached to everyday goods) has been banned since 1990, but sponsorship and indirect advertising for services (travel agents, concerts etc) continues. Newspaper advertisements may not exceed half a page; only one billboard advertisement may be displayed in a single visual field; and advertisements are limited to packshots and basic information.[1]

DENMARK

Tobacco advertising is legally banned on local radio. Under a voluntary agreement it is banned on radio, in the cinema, in publications for young people, and in sports publications or sports pages of other papers. There are voluntary limitations on the imagery used in advertising, including indirect advertising, and health warnings are required.

GERMANY

Tobacco advertising is legally banned on radio and the law also bans certain themes. Under a voluntary agreement no advertising appears in youth publications, sports centres or public service vehicles and there are limitations on imagery and themes, the size of press and billboard advertisements, the frequency of their appearance in the press, their proximity to schools etc.

GREECE

Tobacco advertising is legally banned on radio, in the cinema if children are admitted, in sports and youth centres, hospitals etc. Health warnings are required and there are controls on other forms of advertising.

IRELAND

Tobacco advertising is legally banned on radio, on posters, in the cinema and in youth publications and is controlled in the press. There are regulations restricting spending on advertising and sponsorship to real 1985 levels and no new event may be sponsored. Advertisements are strictly limited to pack shots on a plain background plus brandnames and emblems etc. Coupons, gifts, cut-price offers etc. are banned[2].

Ireland favours a complete ban but cannot effectively introduce one while the UK (whose publications circulate widely there) refuses to follow suit.

LUXEMBOURG

Tobacco advertising is banned by law on radio, in the cinema, in youth publications and in some other minor media. Indirect advertising is banned except in connections with products related to smoking.

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[1] Source for final sentence: *Legislative Responses to Tobacco Use*, World Health Organisation, Netherlands 1991

[2] Source for final sentence: *Legislative Responses to Tobacco Use*, World Health Organisation, Netherlands 1991

Luxembourg favours a complete ban but cannot effectively introduce one while publications from neighbouring countries circulate widely there.

NETHERLANDS — Tobacco advertising is legally banned on radio. Under a voluntary agreement advertising aimed at people under 18 is banned, as is major billboard advertising, advertising near schools and in youth magazines, cinema advertising (from 1996), and sports sponsorship (except for motor sports). Health warnings are required.

After the 1989 agreement was concluded, the Government commissioned an independent consultant to assess the effectiveness of the voluntary controls. His report, published in October 1991, was scathing, noting that spending had doubled since the agreement in January 1989, that the ban on radio and TV advertising had been circumvented by sponsorship and indirect advertising, and that the codes had been respected neither in the spirit nor the letter.[1]

In 1994 the latest voluntary agreement came into effect. Yearly evaluations were arranged between government and the industry. The first of these led to strong criticism in Parliament since the industry were exploiting loopholes in the code to get at young people, and Parliament called for stricter controls. The Health minister, Else Borst, herself a doctor, suggested that a ban on selling to minors and a heavy reduction in the number of points of sale might be an effective way of reducing smoking by young people, but she refused to support the proposed EU Directive *(see section 19)*.

UK Health Ministers have not infrequently claimed that *"the two European countries with the best record for reducing smoking in recent years - the Netherlands and the UK - both favour the voluntary approach."*[2] On this, *see section 20.5*.

SPAIN — By law, radio advertising is permitted only for two years after their launch for new low-tar and low-nicotine brands. Under voluntary agreements advertising in youth publications is banned, spending on press advertising is limited, health warnings are required, and there are other minor restrictions. Some "autonomous communities" (provinces) have stricter restrictions on regional press and billboard advertising.

10.3 Bans outside the EU

Outside the European Community the following countries are among those that have introduced bans:

NORWAY — banned all tobacco advertising in 1975, with excellent results,

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1 *Smoking Prevention* no 22, BASP, October 1993.

2 Dr Brian Mawhinney, as Minister of Health, Department of Health press release, 7.2.94.

especially for prevalence of smoking among teenagers - *see section 8.5.* The law was strengthened in 1995 with an explicit ban on indirect advertising, promotional products, premiums, accessories with tobacco brand logos etc.[1]

ICELAND — banned advertising from 1.1.85 - *see section 8.7.*

CANADA — banned all tobacco promotion including sponsorship with effect from 1.1.89. *(On the results and the Supreme Court's overturn of the ban following a legal challenge by the tobacco industry, see section 8.4.)*

NEW ZEALAND — banned all advertising of tobacco in 1990 - *see section 8.3.* On sponsorship of sport, *see section 12.8.3.*

AUSTRALIA — A total ban on tobacco advertising and sponsorship came into effect in 1995 following extensive bans in individual states, including Victoria, New South Wales, Western Australia and the Capital Territory - *see section 8.11, which covers also an industry legal challenge to the ban.* On sponsorship of sport, *see section 12.8.4.*

10.4 There have been total bans in many other countries dating from more than five years ago. These include Singapore *(see section 8.8)*, Brazil, Argentina, Sudan, Jordan, Mozambique, Algeria and Zambia. In addition, the former Warsaw Pact countries have all had bans for political rather than health reasons, although in many of these countries American cigarettes are now being promoted as a symbol of liberation.

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[1] *Tobacco International*, March 1995, p.7

11: THE ARGUMENT FROM THE ECONOMIC EFFECT OF AN ADVERTISING BAN

The reason for supporting an advertising ban is not economic: it is to improve the nation's health. This needs always to be stressed. Nevertheless, it has to be recognised that several interests may feel threatened by an advertising ban. This section examines the validity of their worries.

11.1 How much is spent on tobacco advertising?

11.1.1 Wildly varying estimates are quoted for the value of tobacco advertising in the UK - no doubt because "the tobacco manufacturers have formally stated that they will not cooperate in the production of these estimates".[1] (The tobacco industry is believed to be the only user of poster advertising that refuses to disclose its levels of spending.) The scale of uncertainty about poster advertising in particular can be judged from three estimates quoted in a single article[2]: the TMA suggested £15-£20 million, the Advertising Association £12 million, and poster contractors a range from £25 to £50 million. Another article[3] said that tobacco provided about 10% of the poster industry's revenue, amounting to about £26 million, £12 million of which came from Imperial Tobacco.

11.1.2 However, the following appear to be reasonable estimates[4]:

	1992	1993	1994
Press	£48.9 mn	£38.5 mn	£47.5 mn
Posters	£28.0 mn	£25.0 mn	£15-20 mn
Radio	£132,000	£38,000	£431,000
Cinema	£2,000	nil	nil
TOTAL	£77.0 mn	£63.5 mn	<£67.9 mn

11.1.3 With sponsorship *(on which see section 12)*, direct mail, point of sale material, merchandising, special events and other "below the line" methods of promoting sales, tobacco advertising and promotion is estimated to total about £100 mn a year. (The decline in traditional advertising is thought to result from a planned switch of emphasis into such "below the line" methods, partly because they are less provocative at a time when advertising is under fire, partly to prepare for a possible partial ban, and partly for purely commercial reasons.

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1 *Media Register*
2 *Marketing Week*, 20.5.94
3 *Marketing*, 17.2.94
4 Source: MEAL except posters: anonymous well-placed source in the industry

11.1.4 It is worth noting in passing that in the USA, where spending on tobacco promotion has to be reported in detail to the Federal Government, annual expenditure runs at above $6,000 million - about £3,800 million - for a population just over four times as large as ours.[1]

11.1.5 The three main potential losers from an advertising ban, apart from the tobacco industry itself, are the advertising industry, the press, and the employees of the tobacco companies.

11.2 The advertising industry

11.2.1 Tobacco accounts for "little more than 1% of the $50 bn. (£28.9 bn.) spent on advertising in the EC in 1990".[2] Since 1990 advertising spending in the European Union has risen in real terms[3], so that the removal of tobacco advertising should be absorbed easily.

11.2.2 In the UK, total advertising spending has risen from £8.5 bn in 1991 to £10.2 bn in 1994 (£8.1 bn to £9.0 bn in real (1990) terms).[4] If the 1994 estimate above of £67.9 million is correct, then tobacco accounts for only 0.7% of the total UK advertising spend. Moreover, the Advertising Association together with the European Advertising Tripartite have produced an estimate that the total is continuing to rise: press advertising by 8.2% in 1994 and by 9.0% in 1995, and advertising in other non-television media by 15.9% in 1994 and 11.8% in 1995.[5]

11.3 The press

11.3.1 Tobacco advertising revenue - *see section 11.1.2* - is marginal for all but a tiny number of publications: an estimate for 1988 (when advertising for tobacco in the press was much greater than now) suggested that it averaged 2.1% of total display advertising revenue, i.e., excluding classified advertising. *Campaign*[6] quoted these *Media Register* figures for the percentage of display advertising revenue coming from tobacco:

Popular dailies:	1.7%	Colour supplements:	5.2%
Middle market dailies:	1.7%	General weeklies:	4.6%
Quality dailies:	0.1%	General monthlies:	3.8%
Popular Sundays:	3.4%	Women's weeklies:	6.5%
Middle market Sundays:	1.2%	Women's monthlies:	1.0%
Quality Sundays:	0.2%	Business magazines:	1.5%

11.3.2 These potential losses are tiny compared with the fall in press advertising revenue due to the recession, which was 8.7% in real terms between 1989 and 1990 and a further 10.4% from 1990 to 1991.[7] As the recession abates, advertising is growing in volume *(see section 11.2.2)* and the small loss from a tobacco advertising ban will be comparatively easily absorbed.

11.3.3 The ban would not take effect for at least a year after the necessary legislation was

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1 Federal Trade Commission, reported in SCARC alert 13.10.95
2 *Financial Times*, 20.5.91
3 Advertising Association press release, 28.6.95
4 Advertising Association press release, 5.7.95
5 Advertising Association press release, 5.7.95
6 *Campaign*, 15.6.90
7 *Advertising Statistics Yearbook*, 1992

passed, so that publications would have had good time to seek alternative sources of revenue.

11.3.4 Many women's weeklies, to take the most vulnerable group as an example, already manage well without any tobacco advertising, either as a matter of policy or under the terms of the Government/industry voluntary agreements - *see sections 4.5.4 and 15.*

11.3.5 John Mellon, the Chief Executive of the magazine publishers IPC, part of Reed International, has said:

> *It* [tobacco advertising] *only represents around 4% of our total revenue - about £6 mn. a year. Tobacco advertising is only the 15th highest spending sector for magazines, so its importance to the industry as a whole should not necessarily be overplayed.* [1]

11.3.6 A leading article in *Campaign*[2] dismissed arguments from the European Publishers' Council that a ban on tobacco advertising "would so change the economics of publishing that the 'free' press as we know and love it would be under threat". (This argument was explicitly made in a *Daily Telegraph* leader[3] and that newspaper is a leading member of the EPC.) *Campaign* said:

> *Whether this is a moral or a commercial argument, it is so overstated that it loses all credibility. Worse, the statistics offered by the EPC do little to support it.*

It reports that those statistics show that even bans on both tobacco and alcohol advertising (the latter an unlikely prospect) would reduce the net profit margin of newspapers by one percentage point to 8.7% and of magazines by 2.6 percentage points to 4.1%:

> *Clearly life would be a lot tougher for publishers if the ban went ahead, but to suggest that the "freedom" of the press would be impaired as a result . . . is scaremongering . . .* ***The brutal truth is that those who wish to retain tobacco advertising are fighting a losing battle.*** *The EPC and its members would be better off using their energy to develop new areas of business and new sources of revenue . . .* [4]

11.3.7 Lessons may be drawn from the past. Ray Bridges, Advertisement Director of *Radio Times* has given us the following information, which admittedly concerns only a single publication acting in isolation but which we see as indicative. In 1969, *Radio Times* dropped tobacco advertising as a matter of policy, losing 20% of its £4 mn advertising revenue. By the following year they had more than covered the loss, with revenue at £4.5 mn., incidentally with some small increase in the number of advertising sales staff. Geoffrey Cannon has written: "I was editor of Radio Times in 1969 when the then BBC chairman, Charles Hill, banned tobacco advertising in the magazine. Our colour was cut and profits hurt but we handled the loss and three years later had the highest circulation

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1 *The Observer*, 6.10.91
2 *Campaign*, 24.1.92
3 *Daily Telegraph*, 4.6.91
4 *Campaign*, 24.1.92 - emphasis added

of any magazine in Europe." [1] The move was planned at least six months in advance, which gave time to adjust. A full year's notice is the minimum that would be provided after the planned legislation was passed.

11.3.8 There is a slow trend towards refusing tobacco advertisements: for example, British Airways has banned them from its in-flight magazines.[2] Such moves are to be encouraged: before the Canadian ban, the major newspapers there introduced their own voluntary bans.

11.4 The poster industry

11.4.1 Tobacco, with an estimated £15-20 mn spend on poster advertising in 1994, is second only to the car industry in its use of this medium, providing about 10% of the industry's income. However, it is declining as a proportion and has been for some years, partly because the industry has worked hard to develop new business in anticipation of a ban on tobacco advertising.[3]

11.4.2 After the latest voluntary agreement, Alan Simmons, the managing director of Concord, one of the largest outdoor poster firms, paradoxically said "the ban on advertising near schools could actually prove beneficial" because it would return to the free market for letting at premium rates good sites previously let at discounted long-term rates to the tobacco companies.[4]

11.4.3 ASH has been informed by Peter Waddell, the chairman of a major poster buying company, that the poster industry in Ireland recovered well from losing its tobacco accounts. It was given a mere three months' notice of the Irish Government's January 1980 ban on tobacco advertising on hoardings. There was an immediate adverse effect on the industry - a fall in revenue in real terms in 1980 of 15%. However, by the following year this had been precisely reversed: revenue was by then 15% up on the 1979 figure and has grown steadily since. The industry has probably become more competitive, offering clients a better service as a result.

11.4.4 Likewise, the 1981 voluntary agreement's reduction in tobacco poster advertising did not result in any loss of employment in the industry - again helped by the adequate notice given.

11.5 Tobacco industry and ancillary employment

11.5.1 Direct tobacco industry employment in the UK has fallen by 76% from 34,100 in 1971 to 8,000 in 1993[5] - very largely through automation: consumption fell by only 23%[6] - and that fall was offset for the industry by increased exports. The threat to jobs is probably still greater from rapidly advancing automation than from the decline in the market that can be expected from an advertising ban, whose effects would be small by comparison.

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1 *Marketing*, 4.5.95
2 *Campaign*, 31.3.95
3 *Marketing Week*, 20.5.94
4 *Campaign*, 13.1.95
5 Central Statistical Office Census of Employment, in *Hansard*, 5.12.95, col. W160.
6 1971: 122.4 bn cigarettes *(TAC in Wald* et al, *Smoking Statistics, Oxford, 1991)*; 1992/93: 94.1 bn cigarettes *(Customs and Excise annual reports)*

11.5.2 The *macro-economic* effect on employment would be negligible: even if a 7% cut in consumption is achieved (which is towards the optimistic end of the spectrum *(see section 8.1)* - and results eventually in a 7% cut in employment, that amounts to under 600 jobs across the country. If the companies were to diversify, the macro-economic effect would be offset. Similarly, if consumers who quit smoking spent their money on less capital-intensive home-produced goods, there might well be a positive effect on overall employment: a report that examined the probable effects of a 40% cut in consumption in line with the Government's *Health of the Nation* target *(see section 1.12)* concluded that the most likely effect would be an overall *increase* of jobs in the total economy of about 150,000 - *see section 11.6.4.*

11.5.3 The *micro-economic* effects of a ban would be local: it could produce marginal job losses but only on a small scale such as is nowadays commonplace. (If a hypothetical 7% reduction in employment were confined to the main centres for the industry - Belfast & Nottingham - it might add up to 300 job-losses in each town, but if the companies switched to exports, a market that is expanding, any effect could be offset.)

11.5.4 **Of course, according to the tobacco industry, there should be no effect on employment, since advertising has no effect on the size of the market!** However, in order to have their cake and eat it, they allege that an advertising ban

> *would sweep away UK tobacco companies' ability to defend their markets against cheap imports and could cost tobacco jobs . . . and up to a further 70,000 employed indirectly in the retail trade.*[1]

The fallacies in this scaremongering are obvious: (a) if the UK market is so vulnerable to cheap imports, when the UK industry is among the most efficient in the world, what the TMA is implicitly defending is its excessive profits, at risk in an open market; and (b) the figures for jobs at risk are the totals employed in the industry and in ancillary jobs, the latter being only partly engaged in tobacco business. If the risk is from imports rather than a decline in sales, these jobs at least will be largely safe.

11.6 Tobacco distribution

11.6.1 Distribution of tobacco is shared between the manufacturers themselves and general distributors, with an element of "cash and carry". Leaving aside the manufacturers, those involved are only partly dependent on tobacco distribution and a marginal decline in volume will have an even more marginal effect on their trade.

11.6.2 CTNs (confectioners/tobacconists/newsagents) are alleged to be particularly dependant on the tobacco trade:

> *It* [an advertising ban] *would hit the corner shop hard.*[2]

11.6.3 However, a research paper by the National Association of Health Authorities and Trusts suggests that the tobacco companies have overstated their case. The paper's own research in the Sandwell Health Authority area concludes that jobs in retail outlets will be

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1 TMA press release, 13.5.94

2 John Wood, Lowe Group advertising agency, consultant to Imperial Tobacco, in the *Sunday Telegraph*, 24.1.93

"largely unaffected as a consequence of any further decline in the demand for tobacco". It emphasises that the decline in overall tobacco sales will not be rapid enough to jeopardise jobs and that the effect on retailers will be offset as smokers who quit shift their expenditure to other products.[1]

11.6.4 Moreover, whatever the transitional difficulties from a decline in smoking, the economic effect cannot be assessed without taking account of the jobs that would be *created* by the alternative ways money was spent by smokers who quit or cut down. An authoritative report on this was published in 1995[2] which suggested that a 40% reduction in cigarette consumption would actually on the most likely scenario create an additional 155,000 jobs. On only one of the four scenarios they could envisage did the total number of jobs in the economy decline, and then only by 22,000 (the total number of tobacco-dependent jobs being taken as equivalent to 84,000 full-time positions). The likely effect of an advertising ban would be much less than the 40% cut in consumption these estimates are based on.

11.7 The effect of a ban on the tobacco market

11.7.1 At present the UK market for cigarettes is dominated by two companies - Gallaher and Imperial - which between them command 77% of the market.[3] (BAT does not sell in the UK.) In this monopoly situation competition is limited and profits are high.

11.7.2 The effect of a ban on advertising would probably be that competition between tobacco companies and brands would become sharper and would switch initially to price *(see sections 6.14 and 20.4)*, much as happened, for example, in Australia after their ban came into effect. This would place cut-price and own brands at an advantage, since they already make little use of advertising. (Tobacco control advocates would then look to the Government for offsetting tax increases.)

11.7.3 The major tobacco companies tend to allege that price competition would favour imports. Either this is an admission that they are uncompetitive (which is highly unlikely) or it is a move to protect their own very large profits. Initially the two dominant companies in the UK market were slow to introduce cut-price brands and chose not to supply cigarettes for own brands. Now, however, many own brands in the UK are manufactured by independent companies such as the Manchester Tobacco Company, and there is no reason why the major British tobacco companies should not move into this market: it is possible that they have begun to do so, although concrete evidence is hard to find. The major companies have, however, introduced their own cut-price brands - including Gallaher's Berkeley, which is the third largest brand in the market, achieved with minimal advertising.

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1 NAHAT Research Paper Number 3: *Curing the tobacco economy*, 1991

2 *Tobacco and Jobs*, Buck D, Godfrey C, Raw M and Sutton M, Society for the Study of Addiction and Centre for Health Economics, York University, 1995

3 *Tobacco Journal International*, April 1995

12: SPONSORSHIP OF SPORT AND OTHER EVENTS

12.1 Introduction

12.1.1 Sponsorship of sport by tobacco companies is a method of advertising cigarettes and other tobacco products, primarily on television. It provides them at a low cost with substantial publicity which they could not otherwise obtain either at all (because of the ban on tobacco advertising on television) or for anything like that price. Other countries have introduced bans on tobacco sponsorship and a ban could be brought in in the UK without any significant disruption or loss to sport.

12.1.2 The tobacco companies also sponsor arts and popular events: *on these see section 12.10.*

12.2 Extent of sponsorship

12.2.1 Sports receiving sponsorship from tobacco companies currently or recently include cricket, rugby league, ice hockey, golf, polo, equestrianism, angling, greyhound racing, yachting, motor racing, motor cycling, snooker, billiards and darts.

12.2.2 On other hand, sports that do not take tobacco money include athletics, swimming, association football (although one minor league club accepts sponsorship from a snuff manufacturer) and rugby union (although they did so until 1988). It is also worth noting that recent Olympic Games have been promoted as smoke-free.

12.2.3 The total value of sports sponsorship was estimated by Mintel in 1994 at £400 mn a year and growing at 11.5% that year[1]. But tobacco sponsorship is worth only about £7.5 mn and cannot grow in real terms under the provisions of the voluntary agreement *(see section 4.6).* It provides at most under 3% of total commercial sponsorship of sport.[2]

12.2.4 Moreover, the number of tobacco sponsorships is falling. RSL - Research Services Limited is a market research body whose sponsorship research division Sportscan produces six-monthly reports on sports sponsorship. The number of new and continuing tobacco "involvements" in sports sponsorship they report has been declining in recent years:[3]

	Jan - June	July-Dec
1991	19	28
1992	22	29
1993	13	23
1994	13	12
1995	17	

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1 *Independent on Sunday*, 22.5.94. (RSL Sportscan estimated a lower figure - £265 mn - of which they reckoned £8 mn or about 3% came from tobacco companies.)

2 These figures and most of the analysis exclude sponsorship of motor racing - *see sections 12.2.7 and 12.9.*

3 RSL Sportscan via private communications. International contracts, e.g., many for motor sport, are excluded.

12.2.5 Spending by tobacco companies on sport is limited under the voluntary agreement *(see section 4.6)* and the following table shows how tobacco industry spending on sports sponsorship has fallen not only as a percentage of total commercial sponsorship of sport but also as a percentage of the maximum allowed under the sports voluntary agreement since 1986:[1]

Tobacco Sponsorship of Sport: 1986-94

Year ended March	Limit under voluntary agree-ment £ 000	Actual spending £ 000			Advert-ising as % of total	Total as % of limit	Sports sponsor-ship from all sources £ 000	Tobacco sponsor-ship as % of all sponsor-ship
		Fees	Advertis-ing, pro-motion	Total				
1986	8 252	5 635	2 617	8 252	32	100	146 000	5.7
1987	8 582	5 887	1 812	7 699	24	90	164 000	4.7
1988	8 881	5 523	388	5 911	7	67	182 000	3.2
1989	9 580	5 004	325	5 329	6	56	200 000	2.7
1990	10 357	6 596	657	7 253	9	70	223 000	3.3
1991	11 210	6 878	752	7 630	10	68	238 000	3.2
1992	11 662	8 294	687	8 981	8	77	239 000	3.8
1993	11 884	9 523	880	10 403	8	88	250 000	4.2
1994	12 157	7 287	289	7 576	4	62	265 000	2.9

12.2.6 The totals in the table do not include the spending on Formula 1 motor racing, under the provision in the agreement that it does not count expenditure on sports where the majority of the events take place outside the UK. *On Formula 1, see section 12.9.*

12.2.7 The £7.5 mn. from tobacco is under a quarter of the industry's gross revenues (after deduction of tax) from illegal sales to under-16s - *see section 4.2.6.* The same sum could be raised by a hypothecated tax of under 0.2 pence per packet of 20 cigarettes.

12.3 Sports sponsorship is advertising

12.3.1 The Tobacco Manufacturers Association has claimed that sponsorship provides "an opportunity for the sponsor to re-invest socially in the community in which it trades - to the benefit of the sporting body concerned, the followers and participants of the sport and the quality of the event itself".[2] But the tobacco companies have sometimes provided more honest testimony, as the following quotations make clear:

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1 Source for figures in table: 1986-92: *Hansard*, 10 .5.94, col W91; 1993-94: *Hansard*, 7.12.95, col. W375, and information direct from Department of National Heritage

2 *Support for Sport*, TMA, 1994

Sports sponsorship . . . is a form of advertising which enables us to introduce glamour and excitement.[1]

Basically it [viz, sponsorship] *is part and parcel with the marketing of your product. It is one of a range of tools. No-one hands over big cheques just to give themselves a warm fuzzy feeling.*[2]

We [Marlboro] *are the number one brand in the world. What we wanted* [in sponsoring Formula One motor racing] *was to promote a particular image of adventure, of courage, of virility . . .* [3]

[Philip Morris see motor racing sponsorship as] *the only appropriate vehicle for simultaneous international communication with our consumers, whatever their language and politics.*[4]

We're **not** *in the sports business. We* **use** *sports as an avenue for advertising our products.*[5]

I must be absolutely frank - I could not quite get it squared with my conscience . . . I felt unhappy about it, and felt unhappy about the rather covert and subtle advertising of tobacco that takes place - sponsorship of sporting events and that type of thing. So I felt myself relieved of a certain burden when I was freed from my connection with the tobacco industry.[6]

Motor racing tangilizes [sic] *our advertising and reinforces brand loyalty.*[7]

We saw Formula 1 as a cost-effective opportunity of increasing our brand awareness worldwide.[8]

They [sponsors] *might not be able to reach a market sector with a new product. We identify opportunities. They've got to see a tangible return.*[9]

12.3.2 The Government already acknowledges this through the Inland Revenue, which allows firms to set off their expenditure on sponsorship against tax because it is spent "wholly and exclusively for the purpose of trade". One tax guide to potential sponsors in 1985 stressed:

It is important that advertising is seen to be the sole objective of the payment.[10]

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1 Michael Whitehead, Gallaher International, February 1986

2 Cynthia von Maerestetten, vice-president, corporate affairs, Rothmans, June 1987

3 Aleardo Buzzi, Philip Morris, *Newsweek*, March 1983

4 Aleardo Buzzi, Philip Morris, *Autosport*, June 1987

5 Wayne Robertson, R J Reynolds (RJR-Nabisco), September 1989

6 Lord Dunleath, chairman, Carreras Rothmans (Northern Ireland) until 1983, in the Northern Ireland Assembly, 20.3.85

7 John Hogan, for Marlboro, *The Guardian*, 19.7.95

8 David Beck, Rothmans, *Sunday Telegraph*, 16.7.95

9 Richard West, Williams Formula 1 team director, referring to Rothmans' backing with "a large proportion"of the team's £25 mn annual cost - *Sunday Telegraph*, 16.7.95

10 Association for Business Sponsorship of the Arts, 1985. The law applies identically to sponsorship of the arts as to sponsorship of sport.

12.4 Sponsorship and Children

12.4.1 The association of sport and smoking is especially dangerous as sports stars are often the heroes of the young who seek to emulate them. A study conducted by the Advertising Research Unit of the University of Strathclyde involved individual interviews with 726 children aged from 6 to 17 conducted at the time that John Player Special as well as Marlboro was sponsoring Formula 1 motor racing. The study found that:

> *Only 9% of the primary school children named Marlboro or John Player Special as sponsoring motor racing. Nevertheless, 47% of them* [offered an array of nine cigarette advertisements] *pointed to advertisements for these brands (which did not refer to motor racing) as being liked by "someone who likes excitement and fast cars". This suggests that associations between brand names (or their visual clues) and exciting sports can be elicited by simple advertisements. That such associations can be elicited even in children of primary school age is a cause for concern.*[1]

12.4.2 It is this sort of association, lodged in the mind at an early age, that can lead insidiously to children "having relatively less negative views about smoking", which, as a recent Advertising Association publication reported, is one of the most important factors associated with starting to smoke.[2]

12.4.3 In a 1989 survey 64% of 9-15 year-olds said that they had "often" or "sometimes" seen cigarette advertising on television.[3] Since there has been no cigarette advertising on television since 1965, this must be at least in part due to tobacco-sponsored sport being seen on the screen.

12.4.4 The voluntary agreement on advertising tries ineffectively to shield young people from tobacco promotion: for example, it says:

> *No heroic figures, personality cult, pastime or fashion trend should be featured in advertisements in a way that would appeal to those who are adventurous or rebellious, particularly the young. . . Advertisements should not associate smoking with sport or with active or outdoor games.*[4]

12.4.5 The agreement on tobacco sponsorship, however, provides a royal road around any such limitations. Indeed, it is clear that even the Department of Health finds the sports sponsorship agreement unsatisfactory: not only did the then Secretary of State, Virginia Bottomley, in her (leaked) memorandum to the Cabinet of 5 November 1993 propose that it should be renegotiated *(see section 6.13)*, but in giving evidence to the Health Committee in October 1992 she gave the clearest indication that she was unhappy with the current agreement.[5] The new 1995 version of the agreement is so little different from its predecessor that these reservations must be presumed to continue.

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1 P P Aitken, D S Leathar & S I Squair, *Children's awareness of cigarette brand sponsorship of sports and games in the UK*, Health Education Research (1986) 1:3, 203-211.

2 *Ads and Fags*, Advertising Association, 1994, quoting Goddard, *Why do children start smoking?* (OPCS, 1990) - *see section 20.6.*

3 *Beating the Ban*, Health Education Authority, 1990

4 Cigarette Code paras. 21, 26.

5 See Health Committee (1992-93) second report: *The European Commission's Proposed Directive on the Advertising of Tobacco Products*, minutes of evidence, page 32, questions 91-94. Mrs Bottomley was referring to the previous version of the sports sponsorship agreement, but the new (1995) version is substantially the same.

12.5 Television Coverage

12.5.1 As the study quoted above sets out, it is almost certainly through television coverage that the associations between cigarette brands and sports become established. The value for the sponsor lies precisely in the television coverage gained by high-profile events, and that value is multiplied for cigarette manufacturers by the fact that they are legally barred from advertising on television in the normal way throughout the European Union and in many other countries, including the USA.[1]

12.5.2 The ITV companies have a long-standing agreement made under the auspices of the Independent Television Companies Association (of which the franchise-holding companies are the members) under which they refrain from televising sports events with tobacco sponsorship. The ITCA general secretary was quoted as saying when the agreement was made: "We feel this is a stance that is appropriate for us as public service broadcasters . . . We do not think sport and tobacco ought to be associated. If sport wants to be associated with tobacco, then we are saying OK, but do not expect television coverage."[2] In correspondence with ASH following the latest award of new franchises, the companies confirmed their intention to maintain this policy. However, in December 1995 it was announced that ITV had secured the rights to broadcast Grand Prix motor racing, the sport most heavily sponsored by tobacco, from 1997.

12.5.3 By contrast with ITV's present practice, the BBC continues to give extensive coverage to tobacco-sponsored events. In 1994, according to RSL Sportscan, the BBC broadcast 182 hours of tobacco-sponsored sport, covering ten events.[3] This compares with 211 hours (ten events) in 1993, 179 hours (ten events) in both 1992 and 1991, 227 hours (eleven events) in 1990 and a peak of 382 hours in 1985. The total will fall in 1995 as the Benson and Hedges cricket coverage was transferred to a Sky satellite channel. Coverage of tobacco-sponsored sport by satellite channels poses severe problems involving international regulation - *see section 12.6.7.*

12.5.4 The analysis, however, completely excludes motor racing, which is one of the most obvious tobacco-sponsored sports: RSL have informed us that there were, for example, 47½ hours of motor-racing on television in 1993. Tobacco logos are on the screen for between 3 minutes and 25 minutes in each hour of sports broadcasting, the highest values being for motor-racing.[4] Such exposure is worth tens of millions of pounds - several times the cost of sponsorship to the industry.

12.5.5 The BBC has laid down guidelines for its producers which require care not unnecessarily to focus on the static advertising signs at such sports events - they cannot, of course, avoid the signs on players' clothing or on racing cars *(see section 15.5.2)* - and it says it "will not sign new contracts to cover tobacco-sponsored sports events which it has not

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1 On one occasion when a technicians' strike threatened to black out coverage of the rugby league cup final, John Player, its then sponsors, insisted that the match be postponed: "No television coverage, no match, said John Player", as a director of the advertising agency Saatchi and Saatchi put it. (Fynn, A E *Cigarette advertising and health education: use and abuse of the media in Health Education and the Media*, ed. Leathar, Hastings & Davies, Pergamon Press, 1981.)

2 *The Independent*, 25.2.87

3 Source: RSL Sportscan, July-December 1995, which gives the figures behind the following breakdown: (a) Imperial Tobacco (Hanson Industries): Embassy snooker: 71 hours; Embassy darts: 18 hours; Regal rugby league: 7 hours; (b) Gallaher: Benson & Hedges cricket: 26 hours; Benson & Hedges snooker: 27 hours; Benson & Hedges golf: 10 hours; Silk Cut rugby league: 8 hours; Silk Cut equestrianism: 6 hours; (c) Rothmans: Dunhilll golf: 8 hours; (d) other: 1 hour. The total excludes BBC regional coverage of Welsh and Scottish snooker (Regal) and angling (Embassy). It also excludes motor racing- *see section 12.9.*

4 *Tobacco and the BBC*, Health Education Authority, 1992

previously covered"[1] - but they are happy to renew their contracts for events they have televised in the past. After the House of Commons National Heritage Committee recommended that coverage of tobacco-sponsored sport should be dropped by the terrestrial TV channels *(see section 12.6.7)*, the BBC issued a statement:

> *While tobacco sponsorship remains lawful, the BBC will continue to strike a balance between the concerns of those who wish to minimise the links between sport and tobacco and the appetite of many viewers to continue to watch major sporting events.*

12.6 Opposition to Tobacco Sponsorship

12.6.1 Sportsmen and sportswomen often resent the association of their pursuit of fitness, health and physical prowess with smoking - a habit which inhibits performance immediately and leads for many to crippling illnesses and death. Sebastian Coe said in 1987 when the current voluntary agreement was introduced: "Tobacco is an inappropriate sponsor of sport".[2] Alan Smith, the Test and County Cricket Board's Chief Executive, wrote to ASH "I rather doubt personally whether a new tobacco sponsor would ever again be acceptable to TCCB" if Gallaher (Benson & Hedges) dropped out.[3] Under the terms of their sponsorship of the "Regal" Trophy, Hanson Industries' Imperial Tobacco requires that 200 cigarettes be put out in the dressing room for every player at every match. We understand that many of the players feel insulted and sickened by this practice, but they are of course inhibited from speaking out by their terms of employment.

12.6.2 In a television documentary in 1991[4] Nigel Mansell was seen on camera being briefed by a PR man and then repeating exactly his script in praise of Philip Morris's sponsorship of Grand Prix racing, but if he is happy being manipulated in this way we suspect he is untypical. By contrast, Stirling Moss has said: "I think the [Formula 1] drivers today are paid too much and young people ought to realise just how dangerous smoking is".[5]

12.6.3 In March 1992, a number of sports personalities, including J P R Williams, Brian Clough, Adrian Moorhouse and Nick Allott, joined stars from the arts world in putting their names to a "Tobacco-Free Charter" which called for a ban on tobacco sponsorship and which was delivered to the Prime Minister. Other sports stars opposed to smoking include Gary Lineker, Paul Gascoigne, Peter Roebuck, Tessa Sanderson, Sebastian Coe, Will Carling and Graham Gooch. *(See further in section 12.11).*

12.6.4 Maurice Lindsay, chief executive of the Rugby Football League, which derives about £2 mn a year from tobacco sponsorship, has said:

> *Of course, it doesn't sit well if you are looking at the development of youth in sport . . . It is hard to deny that there is considerable merit in removing tobacco from our lives.*[6]

12.6.5 Public opinion, moreover, is strongly against tobacco sponsorship of sport. In an NOP poll carried out in November 1994, 30% of the public disapproved and an additional 26%

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1 Producers' Guidelines, BBC 1993
2 *Daily Telegraph*, 20.1.87
3 Letter dated 26.2.90
4 *Public Eye*, 25.10.91
5 *Shropshire Star*, 8.7.94, reporting a press conference at the House of Commons
6 To the National Heritage Select Committee: *Yorkshire Evening Post*, 29.4.94

disapproved strongly against only 20% who approved and a mere 6% who approved strongly. Even among smokers, 44% disapproved and only 37% approved.[1]

12.6.6 In March 1993 the Sports Council adopted a new policy on tobacco sponsorship: the Council declared itself against tobacco sponsorship of sport, offered to help governing bodies of sport to find non-tobacco company sponsors when existing tobacco sponsorship contracts expire, and decided to work for the phased withdrawal of all sponsorship of sport by tobacco companies.[2] This policy contrasts with that of the Central Council for Physical Recreation, which has given the impression of embracing tobacco sponsorship without qualm or hesitation.

12.6.7 In July 1994, the Select Committee on National Heritage produced a report[3] notably hostile to tobacco sponsorship of sport, and recommended that terrestrial channels should cease covering such events and that the Government should discuss with other governments controls on satellite broadcasting coverage of sponsored sport. The Government declined to take any action.[4]

12.7 Alternative Sponsors

12.7.1 Sports have experience already of needing to find new sponsors when existing ones - not least tobacco sponsors[5] - fail to renew their contracts and some are on record as not expecting undue difficulty in finding new backers, albeit unsurprisingly they tend to say that they would not welcome the prospect. For example:

Snooker: "If we had to replace our tobacco sponsors, we believe we could do so . . ." - David Harrison, Chief Executive, World Professional Billiards and Snooker Association (WPBSA).[6]

Cricket: Benson and Hedges Tournament: "We get a number of inquiries asking when a contract comes to an end. I expect we would be able to sell the Benson & Hedges again to a new sponsor." - Peter Smith, Test & County Cricket Board.[7]

Motor Racing: Michael Horst, vice-president of corporate affairs, Philip Morris (Marlboro), is reported to "admit that the removal of corporate or brand images would lead to an enforced evacuation from sport in general, and the Philip Morris subsidiary, General Foods, incorporating Kraft and Jacobs-Suchard, could decide part of the vacuum was worth filling".[8]

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1 Unpublished survey in ASH's possession

2 Letter from David Pickup, Sports Council Director-General, to Director of ASH, 6.5.93

3 Fourth Report of the National Heritage Committee (session 1993-94): Sports Sponsorship and Television Coverage, HMSO

4 Government Response to the Fourth Report *etc.*, HMSO, December 1994

5 For example, Rothmans ended their sponsorship of Grand Prix snooker in 1992, Carrolls theirs of the Irish Golf open tournament after 1993, Davidoff Cigars withdrew from sponsoring the Cowdray Park Gold Cup polo event in 1991. RJR-Nabisco announced in 1993 the withdrawal of its Camel brand's backing for Formula 1 motor racing and Philip Morris announced that it would not renew its sponsorship of women's tennis in the USA when the "Virginia Slims" contract expired in 1994.

6 *Yorkshire Post*, 17.5.91

7 *Yorkshire Post*, 17.5.91

8 *Glasgow Herald*, 20.1.91

12.7.2 It is also claimed (for example, by a former deputy chairman of Saatchi and Saatchi, Alex Fynn[1]) that sports sell themselves too cheaply to tobacco companies and other sponsors. If sports realised their value, this also would mitigate any worries about a ban on tobacco sponsorship.

12.7.3 Moreover, the National Lottery is now producing huge new sums for sport, vastly greater than the totals provided by tobacco sponsorship, while the Foundation for Sports and the Arts, set up in 1991 by agreement between the Government and the football pools companies, has a budget of about £50-£60 mn a year and one of its main purposes is to help sports and arts events seeking funding. Consequently it is well placed to help replace tobacco sponsorship.

12.8 France, New Zealand, Australia

12.8.1 Entirely contrary to Tobacco Manufacturers Association's claim that "Where tobacco sponsorship has been banned, total funding for sport has been dramatically reduced"[2], sport has not suffered any more than transitional difficulties where bans have been enacted. It is anyway very difficult to see how a ban could lead to a dramatic reduction when tobacco supplies only 3% or so of the total income from sponsorship. Lessons can be drawn from France, New Zealand and Australia, where bans have been successfully implemented.

12.8.2 In France, tobacco sponsorship of sport was already heavily restricted by the *loi Veil* of 1976 before the total ban came in with the *loi Evin* in 1993. A year after that law was passed in January 1991, the president of the French Automobile Federation was still declaring that there would be no difficulty in finding new sponsors for motor sport, but by the end of the year, encouraged by the tobacco industry, he was taking a diametrically opposite view, and there were threats that the French 1993 Grand Prix would be cancelled. As a result, the French Government voted a fund of 450 mn francs to replace tobacco sponsorship of motor sports. They also legislated to legalise television coverage of foreign Grand Prix races complete with tobacco advertising. The French law bans "indirect sponsorship". *(See sections 8.12 and 10.1).*

12.8.3 In New Zealand the wide-ranging Smoke-Free Environments Act, passed in 1990, included provisions to ban tobacco advertising and sponsorship and to set up a Health Sponsorship Council, a government-funded body to offer replacement funding to groups that were previously supported by tobacco companies. Existing contracts were allowed to continue until mid-1995 - a two-year extension of the original deadline to bring New Zealand into line with Australia, where the legislation was passed more recently. The current funding of the Health Sponsorship Council is NZ$4.4 mn - a reduction on the original NZ$6 mn. There is an exemption for tobacco-sponsored "international sporting events" that involve at least three countries, including New Zealand, and take place in at least two countries, and other minor exemptions.[3] *(See sections 8.3 and 10.3.)*

12.8.4 In Australia most states introduced bans on some forms of tobacco advertising between 1987 and 1991, and four of them (Victoria, South Australia, Western Australia and the Australian Capital Territory) created funds, from a small proportion of tobacco taxation, to promote health, in part by replacing tobacco sponsorship of sport. The 1989 national

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1 *Daily Mirror*, 8.7.94

2 Tobacco Manufacturers Association, *Support for Sport*, 1994

3 For example, the Minister of Health may agree exceptions for participants in "any competition of international significance" who are not residents of New Zealand.

ban on advertising in newspapers and magazines was followed in 1992 by a ban on most remaining forms of tobacco advertising. including sponsorship. The latter is being phased in by early 1996. The law provides a Ministerial power to grant exemptions for events of national or international significance (e.g., Formula 1 motor-racing); and there is no control over televised events from abroad. *(See sections 8.11 and 10.3.)*

12.9 Formula 1 Motor Racing

12.9.1 The principal problems that have been experienced in introducing bans on tobacco sponsorship relate to Formula 1 motor racing. The sport clearly has a unique appeal to tobacco companies, in that it allows them to circumvent the bans on television advertising for tobacco that are widespread across the world and even some outright advertising bans. This prize has induced them to pour tens of millions of pounds a year into the sport - available figures are never more than estimates, but a total of £90 mn a year has been reported[1], while Philip Morris alone was reported as spending £100 mn a year on motor sport, including Formula 1, in 1993.[2]

12.9.2 The 16 Grand Prix races each season are held in 14 countries, of which Australia, Canada, France, Italy and Portugal have tobacco advertising bans. A large part of the sponsorship money is spent in the UK, since several of the major teams are based here, including Benetton (Mild Seven - Japanese Tobacco Company), Williams (Rothmans) and McLaren (Marlboro - Philip Morris).

12.9.3 The huge investment has not necessarily benefited the sport. It has raised the entry price[3] and thereby reduced the number of competing teams - from 39 at one time to 26 in 1993. And doubts have been raised about the standards of conduct in the sport, to the extent that in May 1995 Philip Morris's President, Walter Thomas, warned the sport of the need to improve its image if the money was to continue to flow:

> *Grand Prix racing has lost its vision and is in danger of becoming less than a first-class sport. We define sport as something that encompasses honesty, integrity, character, dignity, competition and achievement.*[4]

Honesty, integrity, character and dignity are of course qualities with which the tobacco industry desperately needs to associate itself since they are so lacking in its own conduct.

12.9.4 The solution for tobacco control seems to be progressively to increase restrictions on the use of Grand Prix racing for tobacco promotion, barring the use of insignia on cars and clothing and at the trackside in one country after another, so that progressively the sport is less attractive to tobacco sponsors while still attractive to other sponsors (of whom there are many). Health is not to be subordinated to continuation of easy income to a sport, however popular, and there is no certainty that the sport would in any case be harmed in the long term by a withdrawal of tobacco money.

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1 *Evening Standard*, 9.6.93

2 *Daily Express*, 27.5.95

3 A revealing article in the *Daily Telegraph* (14.6.93) reported that whereas Marlboro McLaren were then paying Ayrton Senna $23 mn, lesser known drivers had themselves to pay to be able to drive - perhaps as much as $2 mn. a season.

4 *Daily Express*, 27.5.95

12.10 Non-sports sponsorship

12.10.1 Sponsorship of "high culture" events has been described by Sir William (now Lord) Rees-Mogg as:

> *a selective form of high quality advertising*

and Peter Taylor, journalist and author of the best known overall study of the tobacco issue, *The Smoke Ring - tobacco, money & multinational politics*[1], has pointed out that:

> *When tobacco companies sponsor the arts, they buy not television exposure but prestige and respectability.*

12.10.2 In the case of the arts, few sponsored events are televised but the sponsor still gains a significant amount of advertising through the arts organisations' publicity.

12.10.3 Current and recent tobacco sponsorship of such events includes the Benson & Hedges Gold Awards for photography, Silk Cut City Jazz, and support of the National Youth Theatre by Hanson (Imperial Tobacco). Other ventures into buying respectability include the Camel cigarettes sponsorship of Kingston University's Interior Design and Furniture Product Design degree show in 1994, the annual Gallaher Business Challenge Awards in Northern Ireland and Gallaher's sponsorship of the Ulster Orchestra. In the past tobacco companies have also sponsored the Welsh National and Glyndebourne operas and the Philharmonia Orchestra. However, this accounts for a very small proportion of tobacco sponsorship. The potential for increased sponsorship by tobacco companies in this area is very great and would be fully exploited if, for example, a ban on advertising failed to include sponsorship.

12.10.4 Sponsorship crosses over into promotion with events such as the Marlboro Lights "Lighten Up Comedy Tour", which was focused on student venues. (Free cigarettes were handed out when the event featured on the "Fringe" of the Edinburgh festival in 1995.[2]) Similarly, the leading maker of cigarette papers, Rizla, has sponsored a new comedy magazine, *Deadpan*.[3] Moreover, throughout the UK tobacco companies are actively sponsoring events with a view to influencing carefully identified audiences.

12.10.5 For example, the tobacco companies sponsor events that particularly appeal to a younger audience. Both Philip Morris and Gallaher have sponsored "disco road shows" to promote their Marlboro and Silk Cut brands respectively. Outside the United Kingdom, Gallaher have also exploited the appeal of music to the young by promoting their own record label under the name of their brand of cigarettes, Benson & Hedges. Currently, the expenditure on such events appears to be low. However, it is extremely worrying that the tobacco companies have ventured into this area of sponsorship at all, clearly in an attempt to circumvent potential restrictions in other areas.

12.11 The Tobacco-Free Charter

Several dozen personalities from the arts and sport signed a Charter calling for an end to tobacco sponsorship and delivered it with a letter to 10 Downing Street on March 5 1992. Signatories included Sir Roy Shaw and the late Paul Eddington (who presented

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1 Sphere, 1985
2 *The Scotsman*, 15.8.95
3 *PR Week*, 17.3.95

the Charter) and Sophie Aldred, Nick Allott, Thelma Barlow, David Batty, Helena Bonham-Carter, Dora Bryan, Craig Chalmers, Julie Christie, Brian Clough, Richard Dodds, Peter Dods, Margaret Drabble, Peter Duncan, Fiona Fullerton, Peter Gabriel, Bob Geldof, Chris Gray, Muriel Gray, Tony & Leonie Hadley, Don Henderson, Bernard Hill, Patricia Hodge, John Hurt, Derek Jacobi, Miriam Karlin, Felicity Kendal, Cleo Laine, Rula Lenska, Richard Lester, Graham Marshall, Ian McGeehan, Sir Ian McKellen, Spike Milligan, Kenny Milne, Mark Moncrieff, Adrian Moorhouse, Bill Oddie, Nicholas Parsons, Claire Rayner, Miriam Richardson, Tony Robinson, Prunella Scales, Sandie Shaw, Antony Sher, Tony Stanger, Ringo Starr, Miriam Stoppard, Janet Suzman, Roger Taylor, Iwan Tukalo, Derek Turnbull, Roger Waters, Fay Weldon, Timothy West, Toyah Wilcox, Derek White, J P R Williams, and Dougie Wyllie.

13: THE BRAND-SWITCHING ARGUMENT

13.1 The tobacco companies claim that their huge outlay on advertising (estimates vary, but it is probably about £100 mn. a year *(see section 11.1)* is directed solely at brand-switching. Brandswitching is naturally part of the purpose of advertising, but the claim as made is unsustainable.

13.2 It was described by David Abbott of the leading British agency Abbott Mead Vickers BBDO *(see section 9.4.1)* as "so preposterous it is insulting" and by the late Emerson Foote, sometime chairman of the major US advertising agency McCann-Erickson Inc, as

> *complete and utter nonsense. The industry know it is nonsense . . . I am always amused by the suggestion that advertising, a function that has been shown to increase consumption of virtually every other product, somehow miraculously fails to work for tobacco products.*[1]

13.3 Paul Baker (director of OHAL, the marketing and media planning specialists) has said:

> *In some cases - notably cigarettes and alcohol - it is politically desirable for* [advertising to have no effect on total sales] *but in most others it is political suicide for the advertising industry to believe it to be true . . . Surely, this is one of the effects that advertisers want their advertising to have?*[2]

13.4 The brandswitching argument is often associated with a claim that tobacco is a "mature market", in which there are no new customers to recruit. This is total nonsense. No other industry that had penetrated only 30% of its potential market would claim that the market was "mature" (as with, say, the market for soap). Even where little or no increase in the number of users is possible, frequency or volume of use can be increased.

13.5 More importantly, there is a constant stream of potential new customers coming into the market as our children reach the ages of 12-15 when most smokers start on the habit. The industry has been recruiting a higher proportion of them recently, but still about three in every four escape.

13.6 The claim that the only purpose of tobacco advertising is brandswitching would mean that the industry, where the market is dominated by two huge companies (Gallaher with 40% and Hanson (Imperial) with 37%[3]), was spending immense sums merely to bat a few smokers (notoriously brand-loyal) back and forth between them.

DETAILS OF CALCULATION for market leaders:

Smokers in UK	14 000 000
Say 7% switch brand p.a.[4]	980 000

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1 JAMA 1981; **245**:18;16671668

2 In a letter in *Marketing* 24.11.94

3 *Tobacco Journal International*, April 1995

4 This generous estimate is taken from a press release from the Tobacco Manufacturers Association (13.5.94). (Another study ASH has suggests only about 2% switch each year.) The TMA claim that in addition 26% of smokers regularly smoke more than one brand, which with the brandswitchers makes up a £3 bn market, justifying the £50 mn

Of whom about 38.5% will switch to another brand of the same manufacturer[1]	377 300
leaving a total of smokers switching manufacturer of only	602 700
If total advertising and promotional spending is £100 mn pa, each smoker who switches brand costs the manufacturer	£166
which after tax relief at 25% is a net cost of	£124
But each smoker spends[2] on average only	£740
of which tax takes about 75%	£555
leaving a net increase in retail takings of only	£185
of which probably at least 25% goes to the retailer and distributor:	£46
leaving for the manufacturer only	£139

which includes labour, materials and other production costs, marketing costs and all overheads.

13.7 No sensible businessman would contemplate spending £124 to add £139 pa to his gross revenue: the profit element in that revenue would be very small and the return on the investment would take years. Besides, how many converts would stay loyal to their new brand?

13.8 Another way of looking at the matter is suggested by the TMA. They say that a 1% market share is equivalent to £100 mn sales revenue, and that some brands gained as much as 4% or 5% of the market in 1980s by advertising. But of each £100 mn gross revenue, £75 mn will disappear in tax, roughly £10 mn will be accounted for by in-house brand-switches, and a further £6 mn to the retailer. Of the remaining £9 mn, most will go on materials, manufacturing, distribution and other overheads. The net profit from the very heavy advertising costs incurred by the leading brands (e.g., approximately £18.7 mn in 1994 for Benson & Hedges[3]) are still not a good business proposition.

13.9 In any case, it would not matter even if the *intentions* of the manufacturers in advertising were purely, as they claim, to promote brandswitching. **What matters is the effect of their actions, and the effect of advertising is to recruit new customers, as it for all other products.** Those new customers are schoolchildren and young people: almost no-one starts smoking as an adult. They are seduced by advertising that suggests that smoking is adult, sophisticated, attractive or otherwise desirable. The health risks, if considered at all, seem very remote at that age - or even act as a "macho" lure.

13.10 Examples of the power of advertising to increase the market for cigarettes are quoted in *section 8.14*.

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they claim is spent on advertising. It is difficult to see why these stable smokers of more than one brand should be included in the equation: if they were not set in their brand choices they would undoubtedly be included in the brandswitching 7%.

1 Average of market share of the two dominant companies.

2 Based on average consumption of 271 packs per year (calculated from OPCS General Household Survey figures) and an average price approximately 95% of the price of premium brands following the November 1995 Budget.

3 Register MEAL.

14: "ADVERTISING HELPS PROMOTE NEW LOW-TAR BRANDS"

14.1 It is argued by the tobacco and advertising industries that advertising has a vital role in promoting (allegedly safer) low-tar/low-nicotine brands, particularly those newly introduced to the market. For example, the International Advertising Association has claimed:

> *Tobacco advertising bans tend to prevent or hamper the spread of information about new features such as filtered and lower-tar cigarettes.*

14.2 Apart from the fact that under the proposed Bill (as under the draft European Directive), advertising will still be allowed inside specialist retailers' premises, where smokers (but not children) will be able to see any useful information, experience shows the industry's argument is in any case unfounded.

- In 1988, after 13 years with no advertising, the average tar level in cigarettes in Norway was 13 mg. In Sweden, with advertising, it was 15 mg.[1]

- Similarly, Denmark, with advertising, took to low-tar cigarettes more slowly than Norway, without - *see table below.*

- In 1984, a new low-tar brand was launched in Norway without advertising. In one year it won 6% of the market![2]

- Finland banned advertising in 1978. In the next 10 years, cigarettes yielding less than 10 mg were introduced and were taken up by 36% of smokers.[3]

14.3 The adoption of low-tar cigarettes has little to do with advertising. It is a function of health education combined with the sort of legislation now springing from the European Community whereby the maximum permitted tar yields are progressively lowered. (The UK's old High Tar group originally included tar yields of over 29 mg per cigarette; this had been reduced to 18 mg per cigarette by 1986; and under an EC directive adopted in May 1990 the *maximum* tar yield was reduced on 1.1.93 to 15 mg and from 1.1.98 will be further lowered to 12 mg. It will then be only 2 mg above the UK's 1986 Low Tar limit.)

14.4 It should, besides, be borne in mind that lower-tar cigarettes are not necessarily safer, both because smokers tend to smoke them "harder" so as to extract the maximum of nicotine and "taste", and because low tar levels do not mean low levels of carbon monoxide and other dangerous ingredients of the smoke. The factors leading to heart disease in particular are little affected.

/ TABLE . . .

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1 Swedish National Board of Health and Welfare, 1989, personal communication.

2 Bjartveit K, *Fifteen years of comprehensive legislation: results and conclusions*, in Tobacco and Health 1990: The Global War - proceedings of the seventh world conference on tobacco and health, April 1990.

3 Piha, T and Heloma, A: *The Finnish Experience of Tar Regulation,* in *Smoking Prevention* no. 8, BASP, 1990

Cigarette Condensate and Market Share of Mild Cigarettes[1]				
	DENMARK		NORWAY	
	Mean content of condensate per cigarette	Market share of cigarettes with 0-15 mg tar	Mean content of condensate per cigarette	Market share of cigarettes with 0-15 mg tar
	mg.	%	mg.	%
1970	30.0	-	27	1
1975	31.0	-	24	0
1976	30.2	4	23	1
1977	29.3	-	23	2
1978	28.9	-	22	5
1979	28.2	10	21	9
1980	26.0	11	20	13

[1] Mørck HI *et al*, Nord. Med. 1982; **97**: 134-146, quoted in Bjartveit K, *Fifteen years of comprehensive legislation: results and conclusions*, in Tobacco and Health 1990: The Global War - proceedings of the seventh world conference on tobacco and health, April 1990.

15: "A VOLUNTARY AGREEMENT[1] IS MORE FLEXIBLE AND EFFECTIVE"

15.1 Supported by Government and Industry Alike

15.1.1 This claim of flexibility and effectiveness has long been the customary line of both the Government and the tobacco industry.

> *We have consistently taken the view that the right way to control tobacco advertising and promotion is through a continuation of the successful system of voluntary agreements. Although complex, the system is comprehensive in its coverage and has always been honoured by the Industry.*
>
> Baroness Hooper, junior Health Minister[2]

> *We maintain one of the most advanced, long-standing, comprehensive and effective systems of voluntary controls over tobacco advertising in Europe.*
>
> Virginia Bottomley, Secretary of State for Health[3]

15.1.2 The latest voluntary agreement was described by Virginia Bottomley, then Secretary of State, as

> *a sensible strengthening of existing controls*[4]

and by Tom Sackville, the Parliamentary Under-Secretary at the Department of Health, as

> *provid*[ing] *reassurance as to the value of a system of voluntary controls on tobacco advertising in delivering an effective level of health protection.*[5]

15.1.3 Even more positively, Baroness Cumberlege, Parliamentary Secretary of State for Health, said when the monitoring committee COMATAS produced its eighth annual report:

> *Voluntary agreements provide an effective way of controlling tobacco advertising and promotion. Today's report confirms the Government's view that this is* ***the best way*** *to regulate the industry.*[6]

15.1.4 Like the Government, the tobacco industry has always favoured voluntary agreements

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1 A summary of the current Voluntary Agreements is given in *section 4.4*.
2 In a letter of 11.6.91 to ASH
3 *Hansard*, 22.10.92, col. 602.
4 Department of Health press release 21.12.94
5 Department of Health press release, 13.5.94
6 Department of Health press release, 18.7.95 (emphasis added)

over statutory controls. The following quotation is from a policy instruction sent by BAT to all its subsidiary companies round the world in June 1970:

> *We believe . . . that legislation is worse for the industry than self-imposed restraints. Voluntary restrictions present the industry in a more favourable light than the imposition of legal controls or prohibitions and all the bad publicity for the industry which they engender. . . We also believe that* [we] *may derive benefit from offering to accept voluntary restrictions at a significantly earlier stage than the moment when legislation is the only alternative . . . It might in certain circumstances not be harmful at all. For example, if one of the normal advertising media were to be replaced by effective merchandising aimed directly and solely at the consumer. . . this might be less likely than TV, Radio, Cinema and Press advertising to aggravate the opponents of smoking . . . The first step . . . is for the industry in each country . . . to agree a voluntary advertising code which defines certain restrictions in the CONTENT of advertisements (e.g., no health claims, no appeals to the young, etc.) . . .*[1]

15.1.5 The first voluntary restrictions were adopted by the British tobacco industry in 1962, in the wake of the report of the Royal College of Physicians. In the face of moves to ban cigarette advertising on television, they undertook to exclude certain themes from their "commercials", and were then quickly pressed by the Government to extend their undertaking to other media *(see section 4.1.2)*. The first negotiated agreement followed in 1971, and the system of successive voluntary agreements, tightening (or sometimes slackening) the controls has grown from there.

15.1.6 **The system is convenient for both sides, Government and industry. The only losers are health and public morality.**

15.1.7 The **Government** avoids a confrontation with a major industry, closely backed by its allies in advertising. (The avoidance of conflict especially suits Conservative administrations, since some tobacco companies consistently make large contributions to Conservative Party funds.) It avoids the need for controversial and time-consuming legislation, complex subsequent regulations and potential problems of implementation. It also manages to sit on the fence over the fundamental issue of the morality of promoting an addictive and deadly drug like any other consumer good.

15.1.8 The **industry** gains the (colourable) reputation for responsibility the BAT document foresaw, and it avoids the intrusion of statutory controls. It has the opportunity to make concessions where it hurts least, and can use its superior knowledge of its own affairs to mislead the Government and dress up concessions as worth more than they are. It can sometimes take advantage of "friendly" Ministers to claw back past concessions. It compromises the Department of Health by drawing the guardians of public health into an arrangement to perpetuate tobacco advertising and in some sense give a health check to what is allowed, and puts itself in the position of a social partner rather than a pariah.

15.1.9 The tobacco industry has positively promoted the idea of "voluntary codes" as an alternative to the European advertising ban *(see section 19)*. At a meeting of the European Association of Advertising Agencies attended by representatives of the

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[1] G C Hargrove: Smoking and Health, 12.6.70

international tobacco companies and held in Berlin on 19 September 1991 they discussed the need "to promote better self-regulatory systems" and "to aim at the convergence of the spirit of the different existing systems of self-regulation" but noted that "a Community-wide code of practice on tobacco advertising, which included all the restrictive provisions conceded in any one Member State, would not be acceptable to the manufacturers!"[1] The industry's lobbyists subsequently (3 April 1992) persuaded the EU's Economic and Social Committee (ECOSOC) to reject the ban: the Committee recommended limited legislation for two years to allow the industry to introduce a régime of self-regulation as a potential alternative solution:

> *The Committee hopes and trusts that the European tobacco industry will draw up and accept self-regulation arrangements which function to everyone's satisfaction.*[2]

15.2 A Defective Concept

15.2.1 Voluntary agreements or unilateral undertakings are, however, open to many powerful criticisms, summarised in the British Medical Association's reaction to the 1994 agreement, which it dismissed as a "fig leaf . . . which merely sanctions tobacco advertising while pretending to control it".[3]

15.2.2 If it is wrong to advertise cigarettes in some media (e.g., TV) or in some places (e.g., in sight of schools), why is it acceptable to advertise them in other media (e.g., in the *TV Times*) and in other places (e.g., on hoardings on children's routes to school but not visible from schools)? **Either there is no ethical objection to promoting tobacco, or its promotion should be banned outright.**

15.2.3 The voluntary agreements are negotiated in secret between the Government and the tobacco industry. No independent health interests are represented (not that any self-respecting health organisation would wish to be tainted by participation). They are not subject to Parliamentary scrutiny. The industry refuses to allow publication of research commissioned by the monitoring committee - and even refuses to allow publication of details of their advertising spending[4] - in stark contrast to the USA, where spending is reported by law and published in great detail by the federal government *(see section 11.1.4)*.

15.2.4 Even the name "voluntary agreements" is a misnomer: they are voluntary only in the sense of not being statutory, and every concession of any worth has to be wrung from the industry by a game of threat and bluff. **Without the threat of legislation** (which Sir Norman Fowler reportedly used to obtain the ban on cinema advertising and which strengthened the hand of Virginia Bottomley in 1994), **the Government has no cards. If they are willing to threaten it, they might as well use it.**

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1 Minutes of EAAA Tobacco Advertising Committee, meeting on 19.9.91 held at the offices of Axel Springer Verlag, Berlin, in ASH files.

2 ECOSOC Opinion, ENVI/313, 23.9.92

3 *Marketing Week*, 20.5.94

4 "Information provided by the tobacco industry to assist in monitoring the voluntary agreement on tobacco products advertising and promotion is commercial in confidence." - John Horam, junior Health Minister, *Hansard*, 6.12.95, col. W223

15.3 Ineffectiveness

15.3.1 The agreements in any case regulate only style and media, not the amount of advertising, and there is no evidence that the restrictions have limited its effectiveness. Indeed, the reverse may well be true: a leading article in an advertising industry weekly called the latest Voluntary Agreement "the worst kind of compromise" and concluded:

> *It is arguable that the more you restrict advertisers and agencies, the more inventive they become. Previous tobacco curbs turned a very dull advertising sector into something far more powerful. There is every danger that this could happen again with the latest curbs, in which case the new code will ultimately be counter-productive.*[1]

15.3.2 Certainly, the Government when challenged has had to admit that it can point to no research to demonstrate their effectiveness. Asked by Jerry Hayes MP in a Parliamentary Question what research the Department of Health had carried out "into the effects of the voluntary agreements on tobacco advertising and sponsorship", the junior Health Minister, John Horam, could reply only by referring to the monitoring committee, COMATAS *(see section 4.5.7)*, whose terms of reference are to monitor compliance with the agreements, not to study their effects.[2]

15.4 Breaches

15.4.1 **On the whole it is untrue that there are widespread breaches of the voluntary agreement by the industry. Why should the manufacturers breach it when they can walk round it?** However, there is a record of persistent breaches in the way that point of sale (especially shop front) material is displayed by retailers, and whenever campaigners have looked for such breaches they have found them. In the COMATAS report for 1994, 28 out of 36 complaints, including 10 of the 11 acknowledged breaches of the agreements and 5 of the 6 inadvertent breaches, resulted from a single monitoring exercise by Solihull Health Education Services.[3] Much the same happened in earlier years, when Dr Jennie Mindell contributed similarly high proportions of the complaints, first from Oxford and then (when she moved house) from Nottingham.[4]

15.4.2 A more serious failure by the industry to ensure that others apply the agreements was uncovered when a London doctor, Bruce Guthrie, carried out a survey of poster advertising in four inner London boroughs over six months in 1992-93. The provision that posters should not be placed where they were clearly visible from schools etc. was breached for no less than 14 or 66% of the 22 schools which had hoardings in "forbidden" positions.[5]

15.4.3 In 1995 Dr Guthrie repeated his survey[6] in Newcastle upon Tyne where he found 20 schools with poster sites within 200 metres of the main school entrance or clearly visible from its grounds, on which the current voluntary agreement debars cigarette advertising *(see section 4.5.4)*. Over a period of six months he found tobacco advertisements on

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1 *Campaign*, 20.5.94
2 *Hansard*, 6.12.95, col. W223
3 *BMJ* 1995; **310**:124
4 *Tobacco Control* 1993; **2**:209-214
5 *BMJ* 1994 **308**:658, 5.3.94
6 *BMJ* 1995 **311**:1501, 2.12.95

eight or 40% of those 20 sites. Dr Guthrie commented that the improvement from 66% to 40% failure was probably due to the intervening drop in spending on poster advertising rather than to any increased commitment by the industry to observing the restrictions to which they had agreed.

15.5 Flexibility equals Loopholes

15.5.1 The advertising industry's attitude towards the Agreements was clearly expressed by Alasdair Ritchie, chief executive of TBWA Holmes Knight Ritchie:

> *Whatever people do to ban something, our industry is clever enough to find something else.*[1]

Similarly, Alexandra Taylor, the creative director for the Silk Cut campaign at the then Saatchi and Saatchi agency, said of the ban on humour:

> *It's crazy. . . I will be briefing my teams to be as shocking and provocative as possible - and, in fact, the public seems to respond better to more serious subjects*[2]

while Jaspar Shelbourne, of J Walter Thompson, was reported as saying that agencies would find a way round the new regulations: humour would simply join the other no-go areas, which are already a regulatory minefield:

> *It will now become a game of cat and mouse with the authorities . . . We have already been working within a straitjacket . . . The public should not be able to notice a drop in the creative standards of tobacco advertising.*[3]

15.5.2 The much-praised "flexibility" of the voluntary system lies mainly in allowing the tobacco industry to evade its apparent provisions. The UK agreements are not concerned with principle. Nor is there yet any sign that the introduction of a reference in the 1994 version to observing the "spirit" of the agreement will make any difference. The agreements represent the small concessions the industry is willing to make in order to buy off the (usually unreal) threat of legislation. All past experience has been that they are trickily worded and legalistically interpreted so as to maintain the maximum freedom to advertise. Here are some examples:

●1 The voluntary agreement seems to protect young women (aged 16-24) from cigarette advertising by requiring that no advertisement be placed in magazines whose primary readership is women in that age range. Tobacco advertisers nevertheless reach many million such women by using the major-circulation magazines that don't fall within the tight definition in the agreement. After the restrictions were first introduced, they increased their spend on cigarette advertising in women's magazines by 10% in real terms.[4]

●2 In order to avoid exploitation of televised sport by sponsors, the agreement requires that tobacco brand names may not be displayed immediately behind any "set

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1 *Marketing*, 19.5.94
2 *Campaign*, 20.5.94
3 *Campaign*, 20.5.94
4 *Smoke Still Gets in Her Eyes*, ASH, 1991

playing position". The monitoring committee (COMATAS), on which half the places go to the industry, has held that there is "no set playing position" in the game of indoor bowls, and therefore brand logos may after all be displayed behind the customary position from which players bowl, in full view of the TV cameras.

●3 The 1986 agreement required that there should be no tobacco advertising posters "in close proximity to and clearly visible and identifiable from within buildings or boundaries of schools, places of education or playgrounds predominantly used by young people under 18 years of age . . ." Extraordinarily, this wording was interpreted by COMATAS as referring only to school playgrounds. The 1991 version, in correcting this, produced a narrower definition than the natural meaning of the original wording.

●4 The sports voluntary agreement requires that "house or brand names or symbols" should not be displayed on participants' or officials' clothing or equipment if they are "likely to come within the scope of the television cameras". In motor racing in the UK, such symbols are still common, slightly modified to provide an excuse. For example, the Marlboro chevron is ubiquitous, but without the name.

●5 The 1992 agreement provided for a 50% reduction in shop-front advertising over five years. But the reduction - it emerged - was to be measured by the *number* of items, not by their area. This was a small concession for the industry as the amount of clutter on shops was becoming counter-productive. Shops soon began to lose the small signs that had accumulated over the years in favour of fewer but much larger and more effective signs. Moreover, the announcement of the concession served to fend off on the floor of the Commons a ban on all shop-front advertising that had won a large majority in the Standing Committee on Andrew Faulds' private member's Bill, now the Children and Young Persons (Protection from Tobacco) Act 1991.

●6 Before offering in 1985 to put health warnings on all new shop facias and canopies, the industry expanded hugely the number of such signs without warnings. Many of these have remained in place to the present (though they are now to be removed).

●7 When the industry agreed to halve their poster advertising, they chose a base year when spending was unnaturally high due to a competition war.

15.6 <u>"Reg"</u>

15.6.1 The weakness of the voluntary agreement was dramatically demonstrated by the total failure of the Advertising Standards Authority to deal with the "Reg" campaign for Regal cigarettes *(see section 7.6)*. The Cigarette Code (part of the agreement) included at that time the provision that:

> *Advertisements should not be designed, written, or published in such a way as to make it likely that they will appeal more to those under 18 than to the public at large.*

15.6.2 ASH complained twice - in July and September 1992 - about the campaign's appeal to schoolchildren but these complaints were rejected without argument or examination: the campaign has been "carefully assessed by us in accordance with our normal copy clearance procedures prior to its launch. Each individual advertisement was scrutinised

to ensure conformity with the Code".[1] When the HEA produced their research that proved what had been obvious all along, the ASA still did not uphold their complaint but mildly concluded that "further use of the campaign would be unwise" and so suggested to Imperial Tobacco that it should be discontinued.[2] By that time the campaign had been running for over eighteen months.

15.6.3 Finally, showing how extraordinarily out of touch the ASA (not to speak of the advertising agency, Lowe Howard-Spink, and the tobacco company itself) were with public feeling, the ASA gave advance approval to a further final advertisement in the campaign, bidding Reg's cheeky and unvanquished farewell: the headline "A farewell address" was placed over a photograph not of Reg but of his suitcase, which bore a label with the address "Dunadvertisin, Bognor Regis, BYE 2U"

15.6.4 The effect was to cock a snook at the arguments of the health community and at the voluntary controls. *Campaign* said in a leading article that it was "ill-conceived", that it did

> *no favours to the Government's official line that the so-called voluntary restrictions are continuing to work effectively* [and that it] *undermine*[d] *the entire credibility of the Advertising Standards Authority and of the advertising industry's claim to be able to regulate itself effectively. . . The last thing the industry needed at this delicate time* [the Kevin Barron Bill was progressing through the Commons] *was to shoot itself in the foot. Unfortunately Lowes, Imperial and the ASA have conspired to do precisely that, and the sound of the explosion is likely to echo and re-echo in their own ears for a long time.*[3]

15.7 Conclusion

15.7.1 Voluntary agreements and the allied approach of self-regulation are potentially satisfactory when the aim is to control fringe operators and outlaw undesirable practices in an otherwise legitimate field of activity - as with mainstream advertising and the Advertising Standards Authority. Tobacco promotion, whether through sponsorship, advertising or any other method, is the promotion of an addictive and deadly drug. It is untrue that most methods of promoting tobacco are acceptable with only a few fringe practices needing to be policed: the whole activity is immoral and the public are demanding that it be outlawed.

15.7.2 Rather, what the voluntary agreements achieve is to cast an aura of legitimacy and official respectability over the deliberate fostering of increased use of tobacco. By compromising the position of the Government, the voluntary agreements grant legitimacy to tobacco advertising: they declare that it is socially acceptable, subject to its observing the undemanding rules set out in the agreements. In turn, then, tobacco advertising legitimises the whole tobacco industry, whose business is making profits from addiction, disease and death. By contrast, a ban on advertising and sponsorship raises questions about the congruence of the industry's activities and the values of the community as a whole.

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1 Letter from ASA to ASH, 15.7.92
2 ASA Monthly Report, December 1993
3 *Campaign*, 18.2.94

16: "A BAN IS WANTED TO PROTECT STATE TOBACCO MONOPOLIES"

16.1 It is often asserted that support for a ban by other European countries is based on a wish to protect uncompetitive state monopoly tobacco industries from competition with the transnational giants from (mainly) the USA and UK. It is true that the Italian ban in 1962 was at least in part motivated by a desire to protect the Italian industry from heavy marketing campaigns by foreign competitors *(see section 8.9)*. However, it is plainly untrue that the campaign now is motivated by such wishes. (Even if it were, it would not negate the health arguments for a ban on advertising.) The following are the main points against this argument.

16.2 Tobacco advertising bans have been introduced in more than 20 countries across the world, few of which have tobacco state monopolies. The bans are supported for reasons of health - just as in the UK.

16.3 The suggestion is that a monopoly does not need to advertise. Experience suggests the contrary. Even where one company has a monopoly of the market (rather than just of production) in a country, advertising is still carried on a huge scale. For example, in Kenya BAT subsidiaries for years had an effective monopoly - yet they continued to spend US$10 mn a year on advertising and even more on promotions. (BAT claimed that they were seeking to promote brand-switching from cheap to expensive brands: that leaves unexplained the very widespread advertising for cheap brands.)[1]

16.4 The implication is also that state monopolies welcome advertising bans. Not so: the French ban on advertising was opposed by the French monopoly cigarette manufacturer, Seita. Indeed, Seita immediately attempted to get round the ban by buying the use of an established junior fashions brand name - Chevignon - for a new brand of cigarettes, so as to trade off their advertising; they were forced to retreat from this provocation by the ensuing public outcry. Rather, the French ban was sought by a group of eminent doctors - the "Five Wise Men" - concerned with the health of the nation. It was one element in a comprehensive health package including tobacco tax rises, restrictions on smoking in indoor public places (brought into force in November 1992) and measures against alcoholism.

16.5 In any case the French manufacturer Seita, since privatised, has been losing market share to imports and has a vested interest in continuing a strong advertising campaign to resist further loss of market share - especially if the only effect of advertising is to induce smokers to switch brands!

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[1] Chapman, S, *Tobacco Control in the Third World - A Resource Atlas*, IOCU, 1990

17: THE ARGUMENT FROM FREEDOM OF SPEECH

17.1 The industry and its "front men" in advertising and the press are putting increasing emphasis on the claim that an advertising ban is a denial of freedom of speech. The European Publishers' Council ran in 1992 a £30 mn. campaign under the slogan "Stop the EC taking liberties". The tobacco companies have promoted similar expensive advertising campaigns throughout the EU to oppose the proposed EU Directive *(see section 19)* and have played on the theme of freedom - long a favourite one in the USA - in opposing regulation of tobacco and smoking generally: a Philip Morris campaign in 1995 warned: "The passion to regulate down to the finest detail of people's lives can lead to infringements of personal liberty".[1]

17.2 In the UK the Tobacco Advisory Council (now the Tobacco Manufacturers Association) stated of a major campaign launched in October 1992 that

> *The Industry believes it will stimulate debate on the issues of tobacco advertising and commercial freedom of speech . . . In concentrating on the commercial freedom of speech issue, the tobacco industry believes that the campaign will strike a chord with other commercial sectors concerned that should the proposals to ban tobacco advertising become law then their ability to do business will be damaged.*[2]

17.3 The industry talks of tobacco being a "legal product" which it should therefore (a complete *non sequitur*), be legal to advertise. Thus *The Times* said in a leader:

> *To permit the sale of a commodity while banning information about it would be a preposterous step, an affront to our supposed new culture of choice and freedom of information.*[3]

(The idea of cigarette advertising as conveying much information is an odd one!) To defend their right to uninhibited freedom of commercial speech the European advertising industry is threatening legal action - *see section 19.4.8.*

17.4 The House of Commons Health Committee *(see sections 4.2.3 and 9.2)* referred to the "legal product" argument in their report:

> *It would be manifestly impossible at present to make the consumption of tobacco illegal. It is argued therefore that because tobacco is legal to sell it should be legal to advertise. To accept this argument is to accept that we are caught in a Catch 22: that we can only outlaw tobacco advertising if we outlaw its sale and consumption, and that because it would be impossible to do the latter it must be impossible to do the former. . . There seems to be some danger that the Government is allowing itself*

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1 *New York Times*, 28.11.95
2 *Hear the Other Side*, [no. 1], Tobacco Advisory Council, 1992.
3 *The Times*, 21.1.93

to be caught on the horns of a largely imaginary dilemma.[1]

On this line of argument, *see also section 17.14.*

17.5 **Denial of freedom of speech:** There are of course many precedents for restrictions on freedom of speech in the interest of some greater good. At one end of the spectrum, incitement to riot, to racial hatred and the like are banned; at the other are the restrictions on what exactly advertisers of some goods may say - for example, the British Codes of Advertising and Sales Promotion (February 1995) include ten codes of rules for specific types of advertising - for alcoholic drinks, motoring, health and beauty products, slimming products, employment and business opportunities, financial services and so on.

17.6 There are other specific precedents that limit for similar reasons the promotion of other goods. For example:

- Prescription medicines are not allowed by law to be advertised to the general public.[2]

- Under the British Codes of Advertising and Sales Promotion, no advertisement to the lay public is allowed in respect of a long list of diseases and conditions, including cataracts, glaucoma, kidney disease, VD, tuberculosis, heart disease, hypertension, diabetes, cancer, epilepsy and so on.

- Tobacco advertising on television is now banned throughout the European Community under the Broadcasting Directive (89/552/EEC). *See also section 4.1.8.*

It is ironic that it is (properly) illegal to advertise cures for cancer but quite legal to advertise and promote the agent that causes it.

17.7 It was even the Government's announced intention to ban advertising for baby milk formula in order to promote breast-feeding, in line with the policy of the World Health Organisation. As *Campaign*[3] reported, it was Virginia Bottomley, as Secretary of State for Health, who objected to the draft Regulations proposed by Gillian Shepherd, then Secretary of State for Agriculture. There can be little doubt that her motivation was the avoidance of an uncomfortable precedent for a ban on tobacco advertising. Even so, the resulting Infant Formula and Follow-On Formula Regulations, 1995, ban all advertising of infant formula except in publications distributed through the healthcare system. (Maybe tobacco advertising should be allowed only if handed out to children at school!)

17.8 The justification for such bans on advertising lies in Article 10 of the European Convention of Human Rights:

1. *Everyone has the right to freedom of expression . . .*

2. *The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic*

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1 *The European Commission's Proposed Directive on the Advertising of Tobacco Products*, Health Committee's Second Report of 1992-93, HMSO, December 1992

2 Medicines (Labelling and Advertising to the Public) Regulations 1978

3 *Campaign*, 24.6.94

society . . . for the protection of health . . .

17.9 The thought is not new. John Stuart Mill in *On Liberty* wrote:

> *The only purpose for which power can be rightfully exercised over any member of a civilised community, against his will, is to prevent harm to others . . .*
>
> *Acts, of whatever kind, which, without justifiable cause, do harm to others, may be, and in the more important cases absolutely require to be, controlled by the unfavourable sentiments, and, when needful, by the active interference of mankind. The liberty of the individual must be thus far limited: he must not make himself a nuisance to other people.*
>
> *As soon as any part of a person's conduct affects prejudicially the interests of others, society has jurisdiction over it, and the question whether the general welfare will or will not be promoted by interfering with it, becomes open to discussion . . . Whenever, in short, there is a definite damage, or a definite risk of damage, either to an individual or to the public, the case is taken out of the province of liberty, and placed in that of morality or law.*

17.10 The conduct of the manufacturers and advertisers of cigarettes affects prejudicially the interests of smokers and potential smokers. It is therefore open to discussion whether interfering with that liberty will or will not promote the general welfare. The evidence (as rehearsed in this document) shows that there is a definite risk of damage to the individual and definite damage to the public. Thus, for the libertarian J S Mill, the case is made for tobacco advertising to be treated not as a matter of liberty but (given the imperviousness of the industry to the arguments of morality) as a matter of law.

17.11 Besides, it has to be asked how valuable is the freedom of speech involved in promoting a dangerous drug for profit and in the process corrupting the language by using words like "mild", "smooth" and "luxury" to describe it? What would we think of an advertising campaign for glue that concentrated on its aromatic qualities? Glue has uses other than for glue-sniffing, cigarettes none: they kill when used as their makers intend.

17.12 The country most concerned to protect free speech is probably the USA, yet even there the law is well established in a number of Supreme Court judgements that the First Amendment's protection for free speech is extended to "commercial speech" (such as advertising) only on strict conditions.

17.13 First, commercial speech on behalf of a legal activity loses First Amendment protection if it is shown to be misleading. Even if it is not misleading, a restriction of commercial speech is justified

> *if it seeks to implement a substantial governmental interest, directly advances that interest, and reaches no further than necessary to accomplish the given objective.*[1]

17.14 It has been argued by some that the proper course for the Government is to act directly

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[1] Central Hudson Gas v. Public Service Commission of New York, 447 U.S. 557 (1980)

against tobacco - by banning it, for example - rather than to try to ban advertising. The US Supreme Court has dismissed that proposition also. They held that because government has the power to prohibit something, it is

> *permissible for the government to take the less obtrusive step of allowing the conduct, but reducing the demand through restrictions on advertising . . .* [To rule out] *restrictions on stimulation of . . . demand . . . would require more than we can find in the First Amendment.*[1]

17.15 In fact, the argument about freedom of speech is often on the other foot. There is evidence that the tobacco industry uses its advertising "muscle" to minimise adverse editorial coverage in the press. In an industry journal[2] an article reviewing the situation in Australia *(see also section 8.11.2)* said:

> *. . . the anti-smoking campaign throughout Australia reached unprecedented heights and received unlimited support from the electronic and print media, both of which,* ***now barred by the federal government from publishing tobacco product advertising, have no need to consider or appease the feelings of an advertiser.***

17.16 In the USA, Philip Morris has threatened to withdraw all advertising from magazines that seek to refuse advertisements that appeal to children etc.[3] In the UK, where the press take tobacco advertising but TV and radio do not, the campaign for an advertising ban has received noticeably fairer and friendlier coverage in the latter.

17.17 Similarly, those women's magazines that do not take tobacco advertising (mainly because of the effects of the voluntary agreement - *see section 4.5.4*) have been shown to give better coverage to the health risks of smoking than those that do.[4]

17.18 Moreover, when the campaign against tobacco advertising tried to place an advertisement on billboards, one of the main poster site owners, British Transport Advertising, refused to take the advert, saying first that it was "too political" and when this was reported threatening to sue on the grounds that what they actually said was that the advert related to a "socially sensitive" subject in a way that "might give offence" - presumably to their tobacco clients. One of the posters eventually displayed (by another company) was covered up - by a tobacco advertisement - after only three hours.[5]

17.19 In 1994 the top five UK poster contractors refused to display posters for Death cigarettes, the niche-marketing speciality of the tiny Enlightened Tobacco Company, whose advertising trades on its honesty about the health risks of smoking. Alex Ward, sales director of Maiden Outdoor Advertising, said:

> *The ads were a little bit controversial, so we had to take a*

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1 Posadas de Puerto Rico Associates v. Tourism Co., 478 U.S. 328 (1986) The principle was reinforced in June 1993 when the Supreme Court rejected a challenge by a North Carolina radio station to federal regulations prohibiting broadcasting in states that forbid lottery advertising of advertisements for other states' lotteries - *Advertising Age*, 28.6.93.

2 *Tobacco International*, 1.10.92

3 *Advertising Age*, 20.11.95

4 Unpublished study by the BMA.

5 *British Journal of Addiction*, (1992) **87**,1509-1511

responsible attitude to them. I wouldn't block them out of the market, but the copy they're using seemed to appeal to a younger audience.[1]

Unlike, presumably, the Reg adverts *(see sections 7.6 and 15.6)*. What, of course, the poster industry was doing was avoiding giving offence to its second biggest customer, the mainstream tobacco industry. So much for freedom of speech.

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[1] *Campaign*, 15 April 1994

18: "IT'S THE THIN END OF THE WEDGE"

18.1 Opponents of the ban claim that it will be the thin end of a wedge, leading on to further bans and controls over advertising. They speak in alarmist tones of "Eurocrats" planning advertising bans extending from tobacco to food, alcohol, pharmaceuticals, financial services, toys, fast cars and so on.

18.2 The answer to these objections is that it is **not true** that a ban on tobacco advertising will lead inevitably or even logically to such further bans.

(a) A distinction must be drawn between a **ban** on advertising (as proposed for tobacco) and **regulation** of it. All the serious proposals currently under discussion for other products (with the possible exception of those about alcohol, which on a high estimate still kills only a quarter as many people as tobacco) are about *regulating* (or harmonising European *regulation* of) advertising, *not* about introducing bans. There are already many rules, both in the UK and in elsewhere, governing the claims that advertisers may make and the methods they use, but little uniformity from country to country.

(b) There is overwhelming public support for a ban on tobacco advertising, while the other proposals have very low public profiles.

(c) **Tobacco is in a class of its own in the damage it does:**

It kills when used exactly as intended by those who make it and sell it.

It has no safe level of use.

It inflicts vastly more damage on public health than any other product, killing (for example) nine times as many people as all forms of accidental death put together *(see section 1.2)*.

Its principal appeal is to children and young people, whose judgement of long-term health risks is immature.

It induces addiction, so that although two out of three smokers wish to quit, often rapidly after starting to smoke, they find it difficult or impossible to do so.

There is a long delay before the damage appears, which makes self-deception about its effects easier.

18.3 The tobacco industry and its friends have tried hard to suggest that tobacco is just another danger of modern life, talking of diesel fumes and fatty foods as if they were comparable risks: Michael Leach of the Tobacco Advisory Council wrote of "an EC advertising ban, whether on tobacco, alcohol, clotted cream or Black Forest gateau". *This is deliberate, self-interested confusion and obfuscation.*

18.4 **So far from a ban on tobacco advertising being a dangerous departure, it is a classic public health reform.**

19: THE DRAFT EUROPEAN DIRECTIVE

19.1 What the Directive proposes

19.1.1 The European Union draft Directive on tobacco advertising was published by the Commission on 6 June 1991. (An earlier draft that fell far short of a total ban had been rejected during 1990, being acceptable neither to those preferring "voluntary" measures nor to those seeking a ban.) Its provisions, including some subsequent amendments, are as follows:

Article 1 defines advertising widely, including

> *advertising which, while not specifically mentioning the product, tries to circumvent the advertising ban by using brand names, trade marks, emblems or other distinctive features of tobacco products.*

It defines tobacco products to include those for smoking, sniffing, sucking and chewing.

Article 2 says that

> *all forms of advertising for tobacco products shall be banned in the territory of the Community.*

It bans the use of tobacco brands and trademarks to advertise other goods (e.g., Marlboro clothing and Camel boots) and it bans the use by tobacco products of brands and trademarks established by other products. *(On the latter, see section 16.4).* An amendment proposed by the Commission itself would allow advertising for *non*-tobacco products to continue to use brandnames or trademarks that are also *tobacco* brandnames or trademarks so long as (a) the brand or trade mark was first registered for non-tobacco products and (b) the turnover from tobacco products (even by a different company) is no more than half of the turnover on non-tobacco goods under the relevant brand or trade mark. This would allow the brandnames Dunhill, Cartier and Yves-St-Laurent to continue to be used for cigarettes but would not open the door to any new exemptions.

The Article also bans free distribution of tobacco products.

Article 3 allows advertising at the point of sale inside tobacco sales outlets (defined in Article 1 as specialist retailers only).

Article 4 requires that persons or organisations with a legitimate interest must have the opportunity to take legal action against breaches of the ban.

Article 5 allows more stringent control of tobacco advertising by Member States if they wish.

Article 6 requires legislation by Member States to take effect by a prescribed date. [The original draft suggested 1 January 1993 - now patently impossible. In any case an adequately long period is needed before implementation to allow publications and the advertising and poster industries to prepare and adjust. The earliest realistic target is now probably January 1998.]

19.1.2 Further amendments will be necessary to deal with imported publications that contain tobacco advertising. Ideally, these should exempt publications where (a) less than a set percentage of the circulation is in the EU and (b) the actual number of copies imported is below a set figure, representing broadly the number of copies that would justify a separate edition. This is the approach adopted in the UK draft Bill *(see section 5.8.2)*.

19.2 The Legal Basis for the Directive

19.2.1 The legal basis of the Directive is the Single European Act 1986 which amended the Treaty of Rome in preparation for the establishment of the Single Market on 1 January 1993. It placed the European Commission under a duty to propose measures of harmonisation, so as to remove obstacles to trade between countries within the single market. Under Article 100A(3), these have to be based on *a high level of health protection*.[1]

19.2.2 The draft Directive is being considered at a time when a ban on direct tobacco advertising (and in most cases indirect also) has already been enacted in five Member States (Finland, France, Italy, Portugal and Sweden) while others have tough legal controls short of a full ban - *see section 10.2*. Trade in publications and advertising material is therefore threatened unless its regulation can be harmonised. The draft Directive is based on the high level of health protection provided by the existing advertising bans.

19.2.3 The EU has already banned tobacco advertising on television and in a move supported by the UK Government it has banned not just advertising but production and marketing of oral moist snuff. The present proposal follows these precedents and breaks no new ground. Department of Health lawyers have confirmed in evidence to the House of Commons Select Committee on Health that it is entirely legitimate to use Article 100A in this way. In the Committee's report (March 1992) *(see sections 4.2.3 and 9.2)* the lawyers are quoted as advancing three main arguments for its use:

> *First, the proposal can be regarded as equalising the conditions of competition within the Community . . . The effect . . . is to harmonise the laws in Member States* [on the basis of] *a high level of health protection . . .* [A ban is permissible] *where this is the only way in which a proper level of protection can be ensured . . . Secondly, having regard to the advertising services; the proposal establishes a Community-wide system for the advertising of tobacco products . . . A ban on tobacco advertising can amount to harmonisation . . . Thirdly, the proposal will facilitate trade in goods which carry advertising: for example, magazines. Non-harmonised rules on advertising affect the physical movement of goods across borders by requiring the product to be altered to take account of diverging national*

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[1] The use of Article 100A in this way is not dependent on the possible use by member states of Article 36, which allows for derogation by states for reasons including health from the general provisions for a free market enshrined in the Treaty. (It was this provision that the UK used to justify its ban on oral moist snuff - Skoal Bandits and the like - before the EU decided in November 1991 to ban it throughout the Community.) However, there is ample evidence to justify use of Article 36 should the need arise - i.e., should this Directive be rejected. The then Social Affairs Commissioner, Mrs Vassou Papandreou, who was responsible for the draft Directive, expressly warned of this danger following the meeting of Health Ministers on November 13 1992, saying that countries with bans would be entitled to impose import controls on foreign publications that carried tobacco advertising.

legislations.

19.2.4 The European Parliament's Legal Committee rejected a challenge to the legitimacy of using Article 100A.

19.3 The Procedure for Approval of the Directive

19.3.1 The European Parliament has consistently supported a total ban on tobacco advertising despite some of the most intense lobbying ever by the tobacco industry, and the Parliament endorsed this demand (for example) in approving the third action plan for Europe Against Cancer on 1 March 1995.[1]

19.3.2 In the Council of Ministers, the Directive is subject to a "qualified majority" voting procedure. Member states have weighted votes, roughly in proportion to their populations. In theory 62 votes are needed out of the total of 87 in order to adopt the Directive. However, there is a formal political decision that means that decisions commanding bare majority approval against strong opposition from states mustering a total of 23, 24 or 25 votes, will be avoided if at all possible: the Council must "do everything in its power to reach a satisfactory solution" commanding at least 65 votes.

19.4 The Balance of Support

19.4.1 The draft Directive has been considered by the Council of (Health) Ministers at each of its six-monthly meetings since May 1991 but no agreement has been reached, despite various informal compromise drafts put forward by the rotating Presidency states. For example, the Council had before it at the meeting in December 1995 a revised version tabled by the Spanish presidency that would have banned only "cross-border" advertising of cigarettes. Such forms of advertising include those in publications distributed in more than one EU country and broadcasting received in more than one member state. Designed to comply with rising demands for subsidiarity, it was not formally on the agenda and (like some previous redrafts proposed by then current presidencies) did not replace the Commission's draft. Once again no agreement was reached. *There is, however, a substantial prospect that compromise on these lines may be the only way forward unless there is a complete change of policy on the part of (in particular) the UK.*

19.4.2 The following states are broadly in favour of the Directive:

Austria	4 votes
Belgium	5 votes
Finland	3 votes
France	10 votes
Ireland	3 votes
Italy	10 votes
Luxembourg	2 votes
Portugal	5 votes
Spain	8 votes
Sweden	4 votes

[1] The EC's Economic and Social Committee, which brings together representatives of employers, trade unions and some other interests, has also discussed the draft Directive. Under the influence of the tobacco industry, it proposed limited legislation banning radio advertising and outlawing so-called "aggressive" advertising, but postponing a total ban for two years to allow a *régime of voluntary restraint* to be tested - ECOSOC Opinion ENVI/313, 23.9.92

19.4.3 The following states are currently hostile to the Directive:

Denmark	3 votes
Germany	10 votes
Greece	5 votes
Netherlands	5 votes
United Kingdom	10 votes

19.4.4 Thus the total of votes for the Directive is 54, eight short of the formally required total. Greek policy on the directive has wavered and was in favour in June 1994[1]: it is quite possible that they may return to backing a ban. However, in view of the political decision referred to above the position is that converting Greece and either Denmark or the Netherlands will be insufficient (and indeed there is likely to be grave doubt about approving a ban over the opposition of both the UK and Germany, even if they were isolated).

19.4.5 The Danish government is firmly opposed to the Directive despite some Parliamentary support for one. The Netherlands are not expected to change their view, despite a strongly critical official report on their "voluntary agreement" régime *(see section 10.2)*. There is no chance of Germany changing its views, despite the support for the Directive of the Health Ministers of all the individual *Lander*.

19.4.6 **The conversion of the UK vote is therefore crucial if the required total of 65 votes is to be attained.** Even with the UK, the return of Greece to the fold will be needed.

19.4.7 The presidency of the EU will be held by Italy for the first half of 1996, by Ireland for the second half. In 1997 it will go to the Netherlands and then Luxembourg, in 1998 to the UK and then Portugal.

19.4.8 The European advertising industry is reported to be so concerned that the blocking minority will fail that it is now intending to take legal action to thwart the ban. A meeting was to be held in Amsterdam in October 1995 involving the Institute of Practitioners in Advertising and similar bodies from other member states to discuss action in either the European Court of Justice in Luxembourg or the Court of Human Rights in the Hague. Their claim in the former would be that the draft Directive is *ultra vires* since it is properly regarded as a public health measure and therefore a matter for the individual member states (or else for unanimous decision); in the former they would claim a breach of freedom of speech.[2] Similar action was prefigured by the Council of European Community Cigarette Manufacturers prior to the December 1995 meeting of the Council of Ministers.[3]

19.5 The Diversion of the Common Agricultural Policy

19.5.1 Some opponents of the Directive have suggested that the European Commission is illogical in proposing a ban on advertising tobacco while supporting its cultivation through the Common Agricultural Policy to the tune of about £914 mn (1,132 mn ECUs) in 1995 (estimated £909 mn or 1,087 mn ECUs in 1996).[4]

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1 *BMJ*, 11.6.94
2 *Campaign*, 20.10.95
3 Personal communication from Andrew Hayes, European Cancer Leagues representative in Brussels
4 *Hansard*, 19.6.95, col. W82

19.5.2 It may be illogical, but that does not mean that the proposal to ban tobacco advertising is either illegitimate or unsupportable. It is neither of those things.

19.5.3 Nor is there any need for the anti-smoking lobby in Britain to divert substantial effort into arguments about the CAP. The UK Government has already declared its opposition to these extraordinary subsidies and is doing its best to reform this aspect of the CAP. Useful if modest reforms, agreed during 1992, have now been implemented, reducing the previous cost of the CAP tobacco regime by about a third. Further reforms are likely to follow.

19.5.4 The present issue is whether the Government is going to help save future generations of young people from addiction to tobacco by a ban on its promotion and advertising.

19.5.5 **Those who try to divert the argument into discussion of the CAP are almost certainly more interested in defending tobacco advertising than in attacking the agricultural policy.**

20: COMMON INDUSTRY POINTS AND ANSWERS

20.1 Children's Research Unit

20.1.1 The Children's Research Unit, run by Glen Smith, is a commercial market research organisation. It has done a series of studies for the tobacco industry on the causes of children starting smoking. These are of very questionable worth, being based entirely on questionnaires administered to children, who are apparently presumed to have some infallible insight into their own motivations and to report it with unerring accuracy. Few if any people of any age, asked why they took up a habit, will attribute their behaviour to advertising, but that does not mean that advertising is not a material influence.

20.1.2 In the Advertising Association's *Ads and Fags* (February 1994) the CRU is quoted as saying that 36% of Norwegian 15-year-olds were smokers in 1990: this is seriously wrong. The official Norwegian National Council on Tobacco and Health gives figures of 17% for boys and 20% for girls in 1990[1] - cf. 25% boys & 25% girls in England in 1990 (and 26% of boys and 30% of girls in 1994).[2]

20.2 Michael Stewart

Michael J Stewart is often quoted as an independent expert. In fact he is a long-time consultant to the tobacco industry: ASH has a copy of a signed note by him on an Abbey Management Services compliments slip saying: "I am a private consultant, and the tobacco industry paid me to conduct and publish the paper you refer to". This does not, of course, mean that he is dishonest, but it does mean that he is scarcely independent.

20.3 Smee's Negative Conclusion

20.3.1 The industry often claims that the Smee report *(see section 8.1)* found no correlation between spending on advertising and consumption. The Advertising Association (so often the mouthpiece for the tobacco companies) claimed in *Ads and Fags* (February 1994) that:

> *the Smee Report tried to estimate the effect of an advertising ban in the UK, and concluded that if there was an effect, it would be statistically insignificant.*

This is a severe distortion. The Smee report did *not* try to estimate the effect an advertising ban might have in the UK: it tried to measure the effect of marginal changes in spending on advertising on the subsequent consumption of tobacco. The mathematical model the Smee team devised did not show a correlation, but the majority of similar studies they reviewed did find such a correlation: there were 68 statistically significant positive correlations and only 2 negative *(see section 8.1.7)*. Smee also reported that two major international comparative studies found a correlation between the strength of controls on advertising and levels of consumption.

20.3.2 However, the Smee report looked in addition at four countries where bans had been

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1 K E Lund at 8th World Conference, Buenos Aires

2 Diamond A and Goddard E, *Smoking among secondary schoolchildren in 1994*, HMSO, 1995

introduced for undoubted health reasons and found that "in each case the banning of advertising was followed by a fall in smoking on a scale which cannot reasonably be attributed to other factors": Norway: 9%; Finland: 6.7%; Canada: 4%; New Zealand: 5.5%. The Advertising Association notably failed to address these findings.

20.4 The Risk of a Price War

20.4.1 Another disingenuous argument voiced by friends of the tobacco industry is that if there was a ban on advertising the companies would be forced to compete on price, and that the lowered prices and special offers would lead to more people smoking more tobacco rather than the reverse. For example, the then Secretary of State included the point in her arguments against a ban in the leaked memorandum to the Cabinet - *see section 6.14.*

20.4.2 It is certainly true that price affects consumption. But the amount the companies would save by not advertising, at £100 mn, is enough only to reduce the average price per pack of 20 by 2.5p at the most. Moreover, of course, the Government has the solution in its hands: it should raise the tax on tobacco to absorb the cash the industry would no longer be devoting to advertising and promotion.

20.5 The Superior Performance of the Netherlands and the UK

20.5.1 Figures are often quoted for the Netherlands that exclude roll-your-own cigarettes, but owing to changes in relative taxation there has been from time to time a considerable switch in that country between manufactured cigarettes and roll-you-own tobacco. Figures for *manufactured* cigarette consumption alone can therefore be quoted which suggest falsely that the Netherlands has achieved (with a weak voluntary agreement on advertising - *see section 10.2*) a dramatic decline in smoking.

20.5.2 For example, Stephen Dorrell when junior health Minister claimed that the Netherlands achieved a 41% drop in cigarette consumption between 1975 and 1987[1] and the Advertising Association has made the same claim[2]. But that drop measures only the fall in consumption of manufactured cigarettes, ignoring the offsetting growth (stimulated by changes in differential taxation) in hand-rolled cigarettes, which cut the overall fall to a mere 10%. The record of the Netherlands since 1967 is shown in *graph 20.1.* (In the same period the UK achieved a reduction of about 29%, mainly as a result of tax increases.)

20.5.3 UK Health Ministers have not infrequently claimed that *"the two European countries with the best record for reducing smoking in recent years - the Netherlands and the UK - both favour the voluntary approach."*[3] The claim that the Netherlands and the UK have out-performed other EU countries is an odd one. It is presumably partly based on the misunderstanding referred to in the previous paragraph, but it is worth further examination.

20.5.4 Despite another 10% fall since 1987, Dutch consumption per head remained at a high 2,465 cigarettes per head in 1993 (cf. the UK figure of 1838 per head in 1994) *(see footnote to section 8.3.3).* In an EU "league table" on that measure, the UK was 5th and the Netherlands 13th out of 14 (Luxembourg included with Belgium). In terms of

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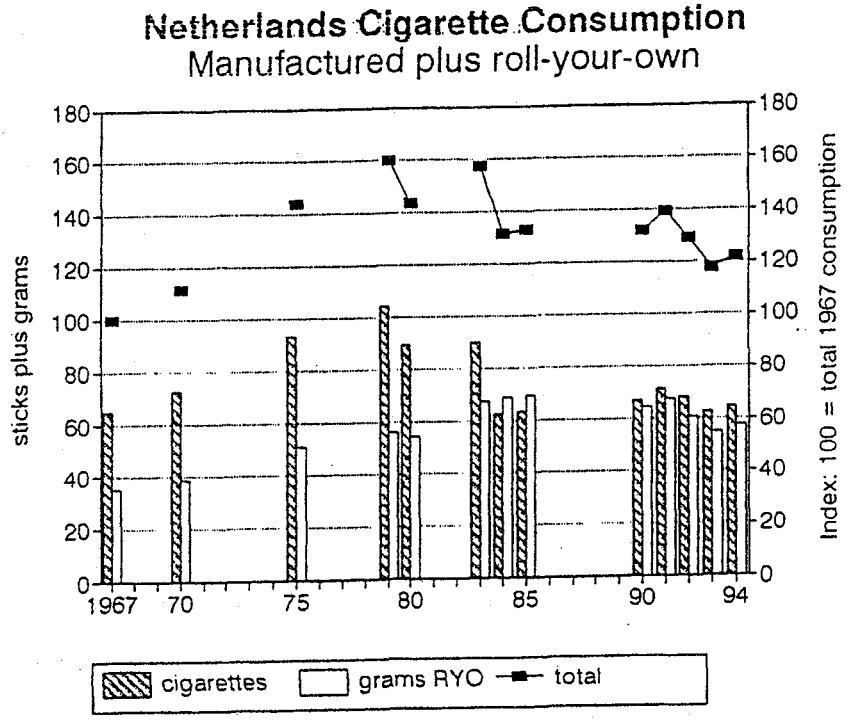
1 *Hansard*, 28.11.90

2 Ads and Fags (February 1994)

3 Dr Brian Mawhinney, as Minister of Health, Department of Health press release, 7.2.94 - *see section 6.8*

percentage reduction in consumption per head since 1987, the UK was 5th and the Netherlands 8th out of 13 (Luxembourg as before, and no earlier figures available for a united Germany). In terms of adult prevalence in 1992, in the Netherlands it was 34% (12th out of 15), in the UK 28% (6th equal).

20.5.5 None of these measures can be precise, however: the statistics are of variable quality and do not always measure quite the same thing: in particular, the consumption per head figures do not consistently include handrolling tobacco where it is not of major significance. Indeed, the UK's consumption figures for this period present difficulties and have been "smoothed" for the purpose of these comparisons.[1] However, it is noteworthy that an official Netherlands report on their voluntary agreement in 1991 was scathing about its effectiveness *(see section 10.2)*, that adult prevalence there has been at 33% or above since 1988 (33% in 1994), and that total consumption, consumption per head and consumption per smoker all rose in 1994.[2]



GRAPH 20.1

20.6 The OPCS Study *"Why do Children Start Smoking?"*

20.6.1 The tobacco industry and its allies have often quoted in their defence an official study[3] which listed the factors most closely associated with starting to smoke. They were: being

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1 These comparisons are based on the country profiles produced by BASP in *Tobacco and Health in the European Union: an overview*, Brussels, 1994, and in *Smoking Prevention* no 27, March 1995. The UK figure for consumption per head in 1993 has been corrected to "smoothe" the Customs and Excise consumption figures for 1992/93 and 1993/94 (which were almost certainly respectively too high and too low) to produce a figure for 1993 only just below that for 1994.

2 Prevalence from annual polls of a 20,000 sample by the Dutch Foundation on Smoking and Health (Stichting Volksgezonheid en Roken - "Stivoro"); consumption figures from Dutch Central Bureau of Statistics.

3 Eileen Goddard (for the Office of Population Censuses and Surveys): *Why do Children Start Smoking?* HMSO, 1990

a girl, having siblings who smoked, having parents who smoked, living with a lone parent, having relatively less negative views about smoking, not intending to stay in full-time education after the age of 16, and thinking about being a smoker in the future. One polemic proclaims:

> *Advertising does not appear anywhere in the list as a key factor in smoking initiation.*[1]

20.6.2 However, the study specifically states that it was unable to deal adequately with advertising:

> *It had been hoped that the survey might throw some light on the extent to which cigarette advertising is instrumental in encouraging children to start smoking. This is clearly a very difficult area to research, and* ***it was not possible in a survey which was largely devoted to other aspects of starting to smoke to do anything other than touch on the subject.*** (Emphasis added)

20.6.3 Nevertheless:

> *The data lend some support to the view that tobacco advertising promotes smoking among young people . . . even such imprecise measures as were used on this study suggest that controlling for current smoking experience, greater awareness of cigarette advertising is associated with a slightly increased likelihood of starting to smoke in the future. However, the effect appears to be small in comparison with some of the influences on children, such as the example set by parents and siblings.*

20.6.4 The chapter reporting the survey's questions on advertising starts by saying:

> *These limited questions can only deal with the subject in a rather superficial way*

and goes on to say:

> *Other research studies have dealt with the topic in greater detail*

and cites the work of Phil Aitken and the Strathclyde team who have found a consistent relationship between children taking notice of cigarette advertisements and their starting smoking - *see section 7.2.3.*

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[1] *Ads and Fags*, Advertising Association, 1994

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ASH
Action on Smoking and Health

February 1998

ASH Briefing on "Brand-stretching"

Brand-stretching, that is, the use of tobacco brand names on non-tobacco merchandise or services, has been used by the tobacco industry for many years as a means of promoting cigarettes when faced with a ban on direct tobacco advertising. The examples which follow show the extent to which the tobacco industry will go in order to circumvent restrictions on tobacco promotion. This has serious implications for European nations as governments draft their domestic legislation to conform with the EU Directive on tobacco advertising.

Rationale

Brand-stretching has nothing to do with the diversification of the tobacco industry. Most of the multi-national tobacco companies already have separate divisions dealing with non-tobacco products. For example, Philip Morris owns General Foods which includes many well-known brands such as Maxwell House, Kraft, etc. The objective of tobacco brand-stretching was made quite clear in a 1979 document from BAT:

> *Opportunities should be explored by all companies* [ie in the BAT group] *to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifiers.... The principle is to ensure that tobacco lines can be effectively publicised when all direct lines of communication are denied.*[1]

A similar strategy was set out by RJ Reynolds, manufacturers of Camel cigarettes, in a document which sought ways to circumvent the French law which bans both direct and indirect advertising. The document, attributed to Worldwide Brands, another Reynolds subsidiary, recommended a *"creative approach to legal matters"* to achieve *"a balance between legal risks and desired benefits"*. The document recommended using cigarette brand names for "lifestyle" products such as clothing, shoes, and watches. Most revealingly, the document stated that expenditure for such promotions would increase through legal and financial channels that must be *"hermetically separated from the tobacco company"*.[2]

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[1] "Future communication restrictions in advertising" BAT, 1979.

[2] Dorozynski, A. British Medical Journal, 1996: 312: 599

Types of brand-stretching

One of the earliest examples of brand-stretching or indirect advertising was in Norway where, following a ban on tobacco advertising in 1975, advertisements for Camel boots started to appear in magazines and newspapers. The ads were identical to those that had previously advertised Camel cigarettes. The Government acted quickly and deemed the ads to be a breach of the law. They were subsequently only permitted once the characteristic lettering of the word "Camel" and the Camel trademark were dropped.

In October 1997, ASH complained to the Advertising Standards Authority about a similar campaign in the British press. The ad, for Camel boots, featured the distinctive logo and lettering of Camel cigarettes and portrayed the characteristic rugged, outdoor imagery associated with the brand. ASH argued that the advertisement was promoting cigarettes as well as boots but that it was essentially a promotion for the Camel *brand* which is a cigarette brand. ASH believes that the advertisement should, therefore, be subject to the same controls as tobacco advertising. Under the terms of the Cigarette Code, which defines restrictions on style and content of cigarette ads, the advertisement for Camel boots would be prohibited. However, the ASA ruled that because the ad for Camel boots contained no references to cigarettes in a way that promoted smoking, it did not breach the advertising codes.[3]

Other early examples of brand-stretching occurred in Belgium and France following tobacco advertising restrictions. Until 1982, indirect advertising did not exist in Belgium but, following the regulation of tobacco advertising, advertisements for Marlboro lighters and matches started to appear. A judge ruled the campaign illegal and said that it was clear that the intention was to promote cigarettes. He added:

> *"People are not stupid. They immediately identify the tobacco brand promoted through lighters or matches."*[4]

A similar initiative can be seen with the recent promotion for Rizla cigarette papers. Imperial Tobacco acquired the company in January 1997 and has spent considerable sums promoting the brand. Activities include the Rizla Rolling Road-Show, which tours UK music festivals, and the sponsorship of night clubs. For such a low value product, the scale of promotion is immense. Rizla has even launched its own website on the Internet with the clear intention of targeting a youth audience. A spokesman for the company admitted that the web site

> *"is an ideal way to reach people such as students, who are very much our target audience".* [5]

Another well-known brand which has benefited from indirect advertising is the world's leading cigarette brand, Marlboro. The Marlboro Classics range of clothing is designed to reflect the "Wild West" imagery associated with the Marlboro brand. It was initially a loss leader for Philip Morris, the manufacturer of Marlboro, but is now

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[3] Communication from the Advertising Standards Authority, 20/2/98
[4] BASP newsletter no 9. June 1990
[5] Cook, N. Rizla papers brand manager, cited in: Tobacco marketing's last gasp? Revolution Feb. 1998

the second-largest mail order brand in the USA and there are 1,000+ Marlboro Classics stores throughout Europe and Asia.[6] [7]

Cigarette brand names have also been associated with holidays, shops, cafes, music, and even public service messages in countries as diverse as France, India, Malaysia, Thailand, Ukraine and the USA.[8]

Who controls brand-stretching?

In order to side-step laws governing tobacco advertising, the tobacco industry has attempted to dissociate itself from indirect advertising by the establishment of quasi-independent companies which have sole responsibility for promoting non-tobacco products using cigarette brand names. An example is that of Worldwide Brands Inc, set up by RJR Nabisco Holdings, which owns the Camel trademark outside the tobacco sector. The company claims to have no direct legal or financial relationship with any RJ Reynolds tobacco operation. According to WBI, the company's business is "brand diversification" and has been marketing fashion accessories using the Camel brand name for 20 years. [9]

Case study: Malaysia

Over the past decade, the Malaysian government has implemented a number of tobacco control measures including raising taxes, banning smoking in most public places, and setting maximum limits for tar and nicotine in cigarettes. The Control of Tobacco Products Regulations 1993 also prohibited all direct advertising. However, indirect advertising is still allowed.

The tobacco industry quickly exploited the indirect advertising loophole and Malaysia has now become a showcase of tobacco brand-stretching. Research in 1996 revealed that four of the top ten advertisers in Malaysia had a cigarette brand in their names: Peter Stuyvesant Travel, Benson & Hedges Bistro, Dunhill Accessories and Salem Cool Planet.[10]

BAT, which owns the licence for Benson & Hedges cigarettes outside the UK, was one of the first to test the indirect advertising route. Faced with a declining market share, the company opened the Benson & Hedges Bistro in Kuala Lumpur and advertised the cafe on television. Two years later, sales of Benson & Hedges cigarettes had stabilised and the Benson & Hedges Bistro was one of the most frequently recalled TV commercials. BAT is now developing a range of coffee products also carrying the B&H logo, which may be extended to other countries. The official BAT policy is that the gold-coloured coffee-house and coffee brands are entirely separate from the company's tobacco operations. However, the shop's manager sees the situation differently:

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[6] Direct marketing - Marlboro, Marketing 4 Sept. 1997
[7] Malaysia tobacco companies find ways to skirt the bans. New Straits Times 7 May 1996
[8] Zain, ZM . Circumvention of bans on direct tobacco advertising. Unpublished, 1997
[9] Harbottle, F. Letter in Marketing, 15 January 1998
[10] New Straits Times 7/5/96

"Of course this is all about keeping the Benson & Hedges brand name to the front. We advertise the Benson & Hedges Bistro on television and in the newspapers. The idea is to be smoker-friendly. Smokers associate a coffee with a cigarette. They are both drugs of a type." [11]

The net effect of indirect advertising has been to undermine the law and other tobacco control measures to the extent that the number of smokers in Malaysia is increasing by around 3% per year. The Government has now recognised the problem and the Health Minister has said that the country must "work toward banning indirect advertisements of tobacco products".

Case study: France

Under the 1991 *loi Evin* all tobacco advertising, both direct and indirect, was banned with effect from January 1993. The law bans the marketing of brand name derivatives, except those produced before 1990 by companies without legal or financial links with tobacco manufacturers. In 1995, the French national tobacco control organisation, CNCT, sued Europromotion, a company which advertised Peter Stuyvesant Travel, modelled on the cigarette brand logo. CNCT was able to show that the travel agency was linked to the tobacco brand of the same name and successfully argued that the advertising campaign was a "blatant case of indirect advertising for tobacco". Despite this and other prosecutions, the tobacco companies have persisted in trying to advertise their products in France through indirect advertising.[12]

Effect of brand-stretching

The tobacco companies argue that products and services bearing tobacco brand names should not be subject to any tobacco control legislation because they are not selling cigarettes but other services. However, the examples from Malaysia and France show clearly that the prime motive behind the use of tobacco brand diversification is the continued promotion of the product for which the brand name became recognised, ie cigarettes.

Tobacco promotional merchandise has become widespread in the USA and is very popular with children. Money spent by the tobacco industry on promotional merchandise increased from 7.7% of its advertising budget in 1990 to 25.8% in 1994. Recent research has shown that schoolchildren who wear clothing emblazoned with cigarette names are four times more likely to smoke than other children. Researchers found that 32 per cent of the children surveyed owned promotional merchandise such as T-shirts and baseball caps.[13]

The impact of Marlboro brand-stretching was demonstrated clearly in a survey of cinema goers in Norway where limited indirect advertising is permitted. The poll

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[11] Nuki, P. Tobacco firms brew up coffee to beat ad ban. Sunday Times 18 January 1998
[12] Peter Stuyvesant push fuels ire of French group. Wall Street Journal, 9 April 1997
[13] Bonn, D. Tobacco promotion bans will work. The Lancet p1831, 20-27 December 1997

revealed that 50 per cent of visitors thought that they had seen an advertisement for cigarettes after the screening of an ad for Marlboro clothing.[14]

Future developments

A recent development from brand-stretching is "image-stretching". Not content with using brand names and logos, the tobacco companies are now actively promoting the imagery associated with particular brands. Thus, in Malaysia, BAT has been enticing people to participate in its Benson & Hedges "Golden Dreams" programme, a TV programme about the aspirations of selected individuals. In Thailand, a new canned coffee beverage called M Coffee is adorned with the cowboy imagery associated with Marlboro.[15] In Europe, cigarette companies have been building brand recognition by the use of colour. Thus, Silk Cut has become synonymous with purple, Benson & Hedges with gold, and so on. The tobacco companies have also begun to publish life-style magazines to encourage brand loyalty. One of the first to use this format was Rothmans with its *Rendevous with Raffles* magazine. Its circulation now stands at around 100,000.[16]

To date, tobacco advertising on electronic media has been fairly limited. This reflects a voluntary agreement by the tobacco companies in the UK not to advertise until the law has been clarified. However, websites promoting tobacco already exist. For example, the West brand in Germany has its own site and an indirect promotion for Lucky Strike has been created through a website called Circuit Breaker based in California. Other forms of electronic media are also being exploited by the tobacco industry. Benson & Hedges, which recently sponsored Hogzone, a British night club tour, used interactive kiosks alongside lightshows and promotional gifts to attract young customers. A spokeswoman for Benson & Hedges' sales promotion agency, Ignis, commented:

> *"It was a new presentation of the Benson & Hedges brand... The electronic medium is very important in appealing to a youth audience. In the absence of a web site, the kiosks are a way tobacco companies can use new media and reach that youth audience. They can also do it in a fairly elliptical way, rather than forcing it down people's throats."*[17]

Examples of tobacco promotion websites
www.rizla.co.uk (Rizla cigarette papers)
www.circuitbreak.com (Lucky Strike)
www.clark.net/pub/k2/cameltrophy (Camel Trophy Adventure)
www.west.de (Sports in association with West)
www.asiaconnect.com.my/bates/retail/ (B&H Bistro in Malaysia)
www.tobacco.org/Resources/tobsites.html (General site listing tobacco sponsorships)

[14] Norway puffs away on unadvertised tobacco. Wall Street Journal (Europe) 10/6/97
[15] Hamann, S. Tobacco Control Policy Research Network, Thailand. Personal correspondence, 1997
[16] Cobb R. Striking up a relationship. Marketing, 6 June 1996
[17] Whitaker, S. quoted in: Tobacco marketing's last gasp? Revolution, Feb. 1998

European Union Directive

Under the current draft of the EU Directive on tobacco advertising, many of the examples of indirect advertising cited above should be prohibited. The Directive covers:

> "any form of commercial communication with the aim, or direct or indirect effect, of promoting a tobacco product, including advertising which, while not specifically mentioning the tobacco product, tries to circumvent any advertising ban by using brand names, trademarks, emblems or other distinctive features of tobacco products."

However, the Directive *does* permit brand-stretching provided that the appearance is clearly distinct from that of any tobacco product. Article 3.2 of the Directive states:

> Paragraph 1 [banning all forms of tobacco advertising] shall not prevent the Member States from allowing a brand name already used in good faith both for tobacco products and for other goods or services traded or offered by a given undertaking or by different undertakings prior to to be used for the advertising of those goods or services.
>
> However, this brand name may not be used except in a manner clearly distinct from that used for the tobacco product, without any further distinguishing mark already used for a tobacco product.[18]

The future of brand-stretching therefore rests on the definition of "clearly distinct". Given the inadequacy of the UK voluntary agreement to control tobacco advertising as demonstrated with the example of the Camel boots ad, cited above, this wording is inadequate as it still allows the brand name to be used. However, under Article 5, the Directive allows individual member states to go further than the minimum requirements currently set out in the draft text. Article 5 states:

> This Directive shall not preclude Member States from laying down, in accordance with the treaty, such stricter requirements concerning the advertising or sponsorship of tobacco products as they deem necessary to guarantee the health protection of individuals.

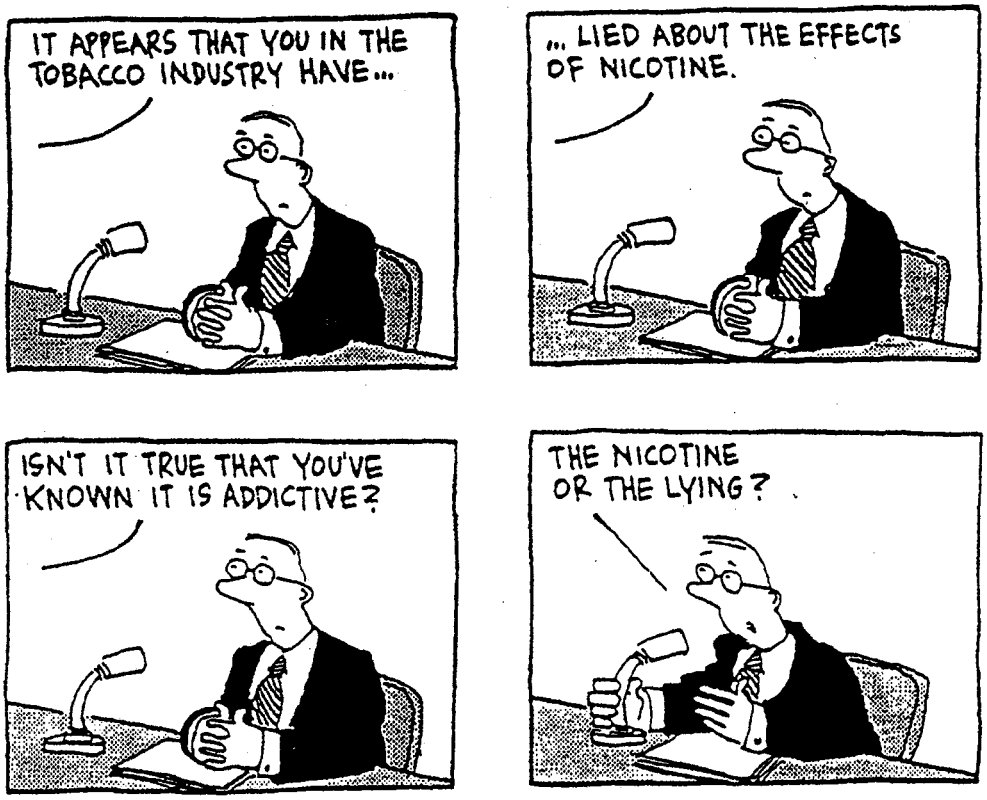
The Government should therefore be urged to adopt stronger measures in order to prevent the exploitation of potential loopholes in the Directive by the tobacco industry.

---

[18] EU Draft Directive, 20/1/98

Tobacco Explained

The truth about the tobacco industry ...in its own words



25 June 1998

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Cartoon by Dan Wasserman reproduced with permission of the Los Angeles Times Syndicate

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Summary

Thousands of internal tobacco industry documents released through litigation and whistleblowers reveal the most astonishing systematic corporate deceit of all time. ASH has undertaken a survey of the documents, extracted 1,200 relevant and revealing quotes, and grouped these together under common themes. A subset of these are set out in this compendium and the full collection is held in chronologies available on the ASH web site.

Chapter 1 Smoking and health Publicly the industry denied and continues to deny that it is clear that smoking causes lung cancer - yet it has understood the carcinogenic nature of its product since the 1950s. It is now clear that the industry's stance on smoking and health is determined by lawyers and public relations concerns.

Chapter 2 Nicotine and addiction Until recently the industry has denied its product is addictive. Most recently it has used a definition of addictiveness so broad that it encompasses shopping and the Internet. Internally, it has known since the 1960s that the crucial selling point of its product is the chemical dependence of its customers. Without nicotine addiction there would be no tobacco industry. Nicotine addiction destroys the industry's PR and legal stance that smoking is a matter of choice.

Chapter 3 Marketing to children The companies deny that they target the young. The documents reveal the obvious - that the market of young smokers is of central importance to the industry. Many documents reveals the companies' pre-occupation with teenagers and younger children - and the lengths they have gone to in order to influence smoking behaviour in this age group.

Chapter 4 Advertising The industry maintains that advertising is used only to fight for brand share and that it does not increase total consumption - academic research shows otherwise. The documents show that advertising is crucial in nurturing the motivation to smoke by creating or projecting the positive values, such as independence, machismo, glamour or intelligence, erroneously associated with the product.

Chapter 5 Cigarette design The documents show that the companies initially hoped to make safer cigarettes, but then abandoned the enterprise when it recognised that this would expose their existing products as 'unsafe'. The industry has deliberately promoted 'low-tar' cigarettes knowing that they would offer false reassurance without health benefits. It has manipulated nicotine and introduced additives to change the delivery of nicotine. It recognises the cigarette as a drug delivery device.

Chapter 6 Passive smoking The industry is challenged by passive smoking in two way. First, measures to protect non-smokers will reduce the opportunities to smoke and contribute to its social unacceptability. Second, the 'freedom to smoke' arguments are confounded if non-smokers are harmed. The industry has refused to accept the now overwhelming consensus regarding the harm caused by passive smoking - instead it has denied and obfuscated, and sought to influence debate by buying up scientists on a spectacular scale.

Chapter 7 "Emerging markets" Faced with reducing levels of smoking in the West and an insatiable need for money, the companies have moved aggressively into developing countries and Eastern Europe. The documents reveal an arrogance and fanaticism that has imperialist echoes.

Two views of the tobacco industry

Taken together the documents challenge the tobacco industry's cosy explanation of itself - as the supplier of a legal product used for widely-enjoyed social habit by adults who are fully aware of the risks and choose to take them to experience the pleasures.

Instead a much darker explanation emerges: it is a predatory industry whose market dynamics demand that it recruits young people. It does this by deploying vast promotional expenditures to create, communicate and amplify a set of positive values associated with the product. Once the glamour phase subsides, nicotine addiction takes over making the customer dependent on the product and securing a profitable cash flow. Trapped by nicotine addiction, the smoker is subject to a variety of sub-lethal illness which culminate in a one in two probability of death through smoking-related disease. The smoker's death means a replacement customer must be found - and the cycle begins again.

Facts and realities the tobacco industry must accept

Justification for taking strong measures against the tobacco industry must be based on facts and realities that command wide assent. Ten 'facts and realities' justified by the tobacco industry's own documents, are set out below. The industry should now be required to admit these:

1. That smoking causes many kinds of cancer, heart disease and respiratory illnesses which are fatal for many sufferers. The industry still does not publicly accept that smoking causes lung cancer.
2. That annual premature death toll caused by smoking in the UK is in excess of 100,000 and that the risk of premature death to a long term smoker is approximately 1 in 2.
3. That nicotine is the most important active ingredient in tobacco; that the tobacco companies are in the drug business; the drug is nicotine and that the cigarette is a drug delivery device. The industry maintains it is a simple consumer goods industry.
4. That nicotine is physiologically and psychologically addictive, in a similar way to heroin and cocaine - rather than shopping, chocolate or the Internet. The overwhelming majority of smokers are strongly dependent on nicotine and that this is a substantial block to smokers' quitting if they choose to. The industry still maintains that nicotine is not addictive in the sense used here.
5. That teenagers (13-18) and children (<13) are inherently important to the tobacco market and that companies are competing for market share in these age groups. The industry maintains that its business is only focussed on adults.
6. That advertising increases total consumption as well as promoting brand share. The industry flatly denies this.
7. That advertising is one (of several) important and interlocking ingredients that nurture smoking behaviour among teenagers and children. The industry denies its advertising influences the smoking behaviour of children.
8. That current formulations of low tar cigarettes create false health reassurance and offer little or no health benefit. The industry has either not publicly accepted this or argued that it never claimed any health benefits.
9. That passive smoking is real public health hazard, including causing childhood diseases such as asthma, bronchitis, cot-death and glue ear, and is a cause of lung cancer and heart disease in adults. The industry has mounted a major disinformation campaign in this area.
10. That the tobacco industry has the normal duty of any manufacturer to ensure that it does not market a defective product and that its products are as safe as possible.

What should be done?

The Government's Scientific Committee on Tobacco and Health (SCOTH) reported in March 1998. A key recommendation was:

> The Government should require of the tobacco industry:
>
> a. reasonable standards in the assessment of evidence relating to the health effects of the products it sells
>
> b. acceptance that smoking is a major cause of premature death, and
>
> c. normal standards of disclosure of the nature and magnitude of the hazards of smoking to their customers, comparable to that expected from other manufacturers of consumer products.
>
> Independently of specific governmental regulations, tobacco manufacturers should comply with these requirements. *Report of the Scientific Committee on Tobacco and Health, March 1998, page9.*

ASH Recommendations

1. The Government and tobacco industry should explain if and how they intend to act on the SCOTH recommendation. As a minimum, the Secretary of State should write to the Chief Executives of the companies operating in the UK, asking them to accept the facts and realities set out above.
2. There is no ready-made machinery to hold companies to account for their corporate behaviour in the UK. However, we believe the Secretary of State should initiate an inquiry, similar to the inquiry into the mis-selling of pensions, in which an industry that has systematically deceived the public and acted improperly, is thoroughly investigated.
3. An appropriate Select Committee in Parliament should consider holding a 'truth session' on tobacco to establish the facts and realities set out below and supported by the documents referenced herein. The appropriate Select Committee could question Ministers and tobacco Chief Executives to establish a factual basis, accepted by Parliament, for UK tobacco policy. It is vitally important that the basic *modus operandi* of the tobacco industry is understood in Parliament while it considers the Government's White Paper on tobacco policy.
4. On the basis of the information herein and the vast and authoritative literature regarding tobacco, the Government should subject the contents of tobacco products and smoke to strict legally binding regulatory control. The documents show that tobacco is uniquely hazardous and that tough policies should be advanced in the forthcoming White Paper and supported internationally through a WHO convention.

About this report

This report is a summary of documents collected by ASH that are now in the public domain. The documents have been collected and reviewed by an independent researcher, Andrew Rowell, and fashioned into a number of chronologies, comprising over 1,200 extracts. This document is a compendium of the most telling quotes from these chronologies with additional summarising and contextual information. Editing and editorial by Clive Bates and Pauline Doyle of ASH.

This report is designed to be an Internet product. The definitive version of this report, which will be updated from time to time, is only available on the Internet. The compendium and the chronologies are available and can be down-loaded from the ASH web site http://www.ash.org.uk

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1 Smoking and health

"A demand for scientific proof is always a formula for inaction and delay and usually the first reaction of the guilty ...in fact scientific proof has never been, is not and should not be the basis for political and legal action"

An example of (private) candour from a scientist at the tobacco company BAT [1]. (S J Green 1980)

1.1 Summary

At the beginning of the fifties, research was published showing a statistical link between smoking and lung cancer. At the same time the tobacco industry's own research began to find carcinogens in smoke and began to confirm the relationship between smoking and cancer. This posed a serious problem for the industry: whether to admit to the health problems and try and find marketable solutions, or whether to basically deny everything.

In the face of mounting damning evidence against their product, the companies responded by creating doubt and controversy surrounding the health risks, whilst at the same time by responding to the growing public concern by putting filters on cigarettes and promising research into the health effects of smoking. They lulled the smoking public into a false sense of security, because, whilst this had the hallmarks of responsible companies acting in the public interest, it was actually a public relations strategy to buy time, at the expense of public health.

Many of the internal documents reveal that the industry was trying to look responsible in public, but privately was out to convince the public that smoking was not harmful. Despite decades of evidence to the contrary, and millions of deaths caused by tobacco, the industry still largely maintains that the case against the cigarette is unproven.

- In the early fifties, research is published showing a statistical link between smoking and lung cancer. At the same time the industry's own research begins to find carcinogens in smoke and starts to confirm the relationship between smoking and cancer.
- By the late fifties industry scientists had privately accepted the association between smoking and lung cancer, believing it to be one of cause and effect. Thirty years later, the majority of the industry still publicly denies the causation theory – with one exception – the US manufacturer Liggett, who broke ranks in 1997, much to the dismay of the other tobacco majors.
- Beginning in the late fifties, and certainly by the mid-sixties, industry scientists were urging their executives to admit to the problem and solve it, arguing that there were commercial opportunities to exploit. Research was undertaken into the "safe cigarette" (see separate section), but it soon fell under the influence of the lawyers, who successfully argued that a company could not produce a "safe" product, because this would imply that its other products were dangerous.
- One all-encompassing fear of the American companies that had repercussions on their British counterparts was the threat of litigation. This affected what the companies researched in private and what they said in public.

- In the US, industry research was taken over by the lawyers and then most in-house research facilities were closed down, or in the case of Philip Morris, partly secretly moved to Germany. American companies pressurised their British counterparts not to publish incriminating research. As one memo says: "Ignorance is bliss".
- By the early sixties, lawyers for the industry recognised the health problem – and put forward the radical step of a voluntary warning on packs to be used as a safety device in case of litigation. This was accepted as the way forward by the late sixties.
- By the early seventies, internally the industry began to reassess their inflexible attitude on causation, as they believed it was damaging their credibility. The lawyers' rigid attitude on causation has dismayed many industry scientists, but the industry maintains that the causation theory is unproven.
- Publicly the companies' overriding policy has been to argue that they are not qualified to comment on the health consequences of smoking, but when they do so to create confusion and "keep the controversy open". This has been done by, on the one hand denying the existing evidence, whilst on the other demanding absolute proof of causation and calling for more research. This research, much of which has been covertly funded by the tobacco industry, is designed to look at other causes of cancer and to water down the evidence linking smoking and disease. For example, the industry statements are peppered by fudging comments such as "no clinical evidence", "no substantial evidence", "no laboratory proof", "unresolved", and "still open". Nothing has been "statistically proven", "scientifically proven", "or "scientifically established". There is no "scientific causality", "conclusive proof", or "scientific proof".
- It is still the case in 1998 that tobacco company representatives will not give a straightforward 'yes' to the question 'does smoking cause lung cancer, yes or no?'

1.2 What is known - key facts on smoking and health

- In the UK, the Health Education Authority estimates that 121,000 people per year die prematurely as a result of smoking (1995 figure)[2].
- Causes are divided as follows:
  - 38% Cancer (of which two thirds are lung cancers)
  - 34% Heart and circulation disease
  - 28% Respiratory illness
- This death toll is six times higher than the total (19,892) arising from road accidents (3,647), poisoning and overdoses (1,071), all other accidental deaths (9,974), murder and manslaughter (448), suicide (4,175), and HIV infection (577) in the UK[3] (1996 figures).
- One in two long-term smokers will die prematurely as a result of smoking - half of these in middle age.[4]
- The average loss of life expectancy among those that die prematurely from smoking in developed countries is 16 years of life.[5]
- World-wide, approximately 3 million die prematurely per year as a result of smoking - on current trends this would rise to 10 million per year by 2030. In the European region of the WHO, 1.2 million people die prematurely each year.[6]

- Cigarette smoke contains over 4,000 chemicals, many are known to be toxic, carcinogenic or mutagenic.[7]

1.3 What the industry knew and what it said

1.3.1 Early-mid 1960s: the birth of the problem

Independent research shows there is a problem

Dr. Richard Doll and Professor Bradford Hill publish an article in the *BMJ*, which states that there is a:

"real association between carcinoma of the lung and smoking." [8] (1952)

The US journal *Cancer Research* publishes details of experiments undertaken by Dr. Ernest Wynder on mice, which show that 44 per cent of animals whose skin was painted with smoke condensate developed cancerous tumours. Wynder notes that the

"suspected human carcinogen has thus been proven to a carcinogen for a laboratory animal." [9] (1996)

Tobacco companies seem to accept it

"Studies of clinical data tend to confirm the relationship between heavy and prolonged tobacco smoking and incidence of cancer of the lung." [10] (RJR, 1953)

Respond with public relations

Companies are advised they need a two-pronged PR attack to "get the industry out of this hole." [11] (Hill and Knowlton,1953)

Leading PR firm Hill & Knowlton are hired:

"We have one essential job -- which can be simply said: Stop public panic … There is only one problem -- confidence, and how to establish it; public assurance, and how to create it . . . And, most important, how to free millions of Americans from the guilty fear that is going to arise deep in their biological depths - regardless of any pooh-poohing logic - every time they light a cigarette". [12] (Hill and Knowlton, 1953)

Tobacco companies start the denials

The US tobacco industry responded to the public concern by producing the 'Frank Statement to Cigarette Smokers', which sets the tone for the next few decades:

"Distinguished authorities point out:

1. That medical research of recent years indicates

many possible causes of lung cancer.

2. That there is no agreement among the authorities regarding what the cause is.
3. That there is no proof that cigarette smoking is one of the causes.
4. That statistics purporting to link smoking with the disease could apply with equal force to any one of many other aspects of modern life. Indeed the validity of the statistics themselves are questioned by numerous scientists."[13] (TIRC, 1954)

...but take care to avoid commitments

An early draft of the Frank Statement, includes the following text, which is struck out before publication:

"We will never produce and market a product shown to be the cause of any serious human ailment ...The Committee will undertake to keep the public informed of such facts as may be developed relating to cigarette smoking and health and other pertinent matters." [14] (Tobacco Industry Research Committee, December, 1953)

UK Government accepts there is a problem in 1954

"I have come to the conclusion that the statistical evidence does point to a causal relationship between tobacco smoking and lung cancer, but that there are important qualifications. There is no precise evidence of how tobacco smoking causes lung cancer or indeed of the extent to which one causes the other." [15] (Minister of Health, 1954).

Industry public denials continue

"there still isn't a single shred of substantial evidence to link cigarette smoking and lung cancer directly." [16] (RJR, 1954)

1.3.2 Mid-late 1950s: what about the honest response?

Industry scientists accept privately there is a problem and want to tackle it...

Alan Rodgmen, a chemist for RJ Reynolds, argues that:

"Since it now well-established that cigarette smoke does contain several polycyclic aromatic hydrocarbons, and considering the potential and actual carcinogenic activity of a number of these compounds, a method of either complete removal or almost complete removal of these compounds from smoke is required." [17] (Cited in *Dirty Business*, 1998)

Using a code word for cancer, scientists discuss a causal link to smoking

An internal BAT memo describes work underway at BAT's laboratories in Southampton, using code words for lung cancer "ZEPHYR" :

"As a result of several statistical surveys, the idea has arisen that there is a causal relationship between ZEPHYR and tobacco smoking, particularly cigarette smoking. Various hypothesis have been propounded one of which is that 'tobacco smoke contains a substance or substances which may cause ZEPHYR'."[18] (BAT, 1957)

US tobacco industry scientists agree that smoking causes lung cancer

BAT scientists visited the US for a study tour that included visits to Philip Morris, American Tobacco, Liggett and several research institutions. They found a consensus:

"With one exception the individuals with whom we met believed that smoking causes lung cancer; if by 'causation' we mean any chain of events which leads finally to lung cancer and which involves smoking as an indispensable link." [19] (BAT, 1958)

...and some see this as a business opportunity

"Evidence is building up that heavy smoking contributes to lung cancer", writes a scientist at Philip Morris, who then articulates the benefits for the company if only they could find the..

"intestinal fortitude to jump on the other side of the fence admitting that cigarettes are hazardous. 'Just look what a wealth of ammunition would be at his disposal' to attack the other companies who did not have safe cigarettes." [20] (Philip Morris, 1958)

Meanwhile, the public denials continue

Imperial Tobacco: "I state that in our considered opinion there is no proof at all that smoking causes lung cancer and much to suggest that it cannot be the cause." [21] (Imperial Tobacco, 1956)

1.3.3 Early-mid 1960s: enter the lawyers

Industry consultants admit cigarette smoking is cancer causing and promoting

Consulting firm Arthur. D. Little, working for the US Liggett company reviews the results of seven year's research work;

"There are biologically active materials present in cigarette smoking. These are

a) cancer causing

b) cancer promoting

c) poisonous

d) stimulating, pleasurable and flavourful."[22] (Arthur D. Little, 1961)

Worried tobacco scientists want to find a solution

Alan Rodgman, a research chemist with RJ Reynolds writes that the company is publicly denying a link between smoking and cancer in public, whilst the company's own research shows there is a link.

"What would be the effect on this company of not publishing these data now, but being required at some future date to disclose such data, possibly in the unfavourable atmosphere of a lawsuit? ...It is recommended that the Company's management recognise that many members of its Research Department are intensely concerned about the cigarette smoke-health problem and eager to participate in its study and solution." [23] (RJR, 1962)

UK and US evidence accumulates

The Royal College of Physicians issues the first major report on "Smoking and Health", which concludes:

"Cigarette smoking is a cause of lung cancer and bronchitis ... cigarette smoking is the most likely cause of the recent world-wide increase in deaths from lung cancer." [24] (RCP, 1962)

First Report of the US Surgeon-General, "Smoking and Health", concludes:

"Cigarette smoking is causally related to lung cancer in men; the magnitude of the effect of cigarette smoking far outweighs all other factors." [25] (US Dept. of Health, 1964)

Lawyers suggest warnings to offset against liability

"I have no wish to be tarred and feathered, but I would suggest the industry might serve itself on several fronts if it voluntarily adopted a package legend such as 'excessive use of this product may be injurious to health of susceptible persons' ...This is so controversial a suggestion - indeed shocking- that I would rather not try to anticipate the arguments against it in this note but reserve my defence." [26] (Brown and Williamson, 1963)

Lawyers must be put in charge

The strategy became increasingly defensive and early talk of safer cigarettes and scientific solutions to the problem gave way to denial and a legal approach:

"The main power on the smoking and health situation undoubtedly rest with the lawyers .. the U.S. cigarette manufacturers are not looking for means to reduce the long-term activity of cigarettes." [27] (P Rogers, G Todd, 1964)

The public denials continue

Following the US Surgeon General's report of January 1964, a Philip Morris director dismissed the findings:

"We don't accept the idea that there are harmful agents in tobacco." [28] (Philip Morris, 1964)

1.3.4 Mid-late 1960s: but fixing the problem means admitting it

Lawyers arguing to "research the disease" not tobacco

According to a memo taken by Brown and Williamson, Janet Brown an attorney with American Brands argued in favour...

"of the long established policy to 'research the disease' as opposed to researching questions more directly related to tobacco... first, we maintain the position that the existing evidence of a relationship between the use of tobacco and health is inadequate to justify research more closely related to tobacco, and, secondly, that the study of the disease keeps constantly alive the argument that, until basic knowledge of the disease itself is further advanced, it is scientifically inappropriate to devote the major effort to tobacco." [29] (B&W, 1968)

And there's a agreement to scale down in-house research

Philip Morris Vice President Helmut Wakeham, writes about a 'gentleman's agreement,' under which the companies had agreed to refrain from conducting in-house biological experiments on tobacco smoke:

"We have reason to believe that in spite of gentlemans [sic] agreement from the tobacco industry in previous years that at least some of the major companies have been increasing biological studies within their own facilities." [30]. (Philip Morris, undated c. 1965)

Respond by creating controversy and contradiction

18 October: Carl Thompson from Hill and Knowlton writes a letter on the best angles for the industry magazine, *Tobacco and Health Research*:

"The most important type of story is that which casts doubt in the cause and effect theory of disease and smoking. Eye-grabbing headlines were needed and "should strongly call out the point - Controversy! Contradiction! Other Factors! Unknowns!" [31] (Hill and Knowlton, 1968)

Focus tobacco industry research on denying problems

Helmut Wakeham, Head of Research and Development of Philip Morris, writes:

"Let's face it. We are interested in evidence which we believe denies the allegations that cigarette smoking causes disease." [32] (Philip Morris, 1970)

...and continue the public denials

"No case against cigarette smoking has ever been made despite millions spent on research ...The longer these tests go on, the better our case becomes." [33]. (Philip Morris, 1968)

1.3.5 Early-mid 1970s: denial and denial of responsibility

Gallaher accepts that the "smoking beagles" prove beyond reasonable doubt that smoking causes lung cancer

The General Manager of Research at Gallaher Limited writes a memo to the Managing Director regarding the work that Auerbach had undertaken on beagles:

"We believe that the Auerbach work proves beyond all reasonable doubt that fresh whole cigarette smoke is carcinogenic to dog lungs and therefore it is highly likely that it is carcinogenic to human lungs ... the results of the research would appear to us to remove the controversy regarding the causation of the majority of human lung cancer ... to sum up we are of the opinion that the Auerbach's work proves beyond reasonable doubt the causation of lung cancer by smoke." [34] (Gallaher, 1970)

... but Gallaher publicly denies these findings in 1998

Gallaher responded to the revelation of document above in March 1998 in a press release:

"Gallaher considered this published research. The internal memo, now made public, was an initial reaction. Gallaher subsequently discounted the views expressed in that memo."[35] (Gallaher, 1998)

No explanation is offered for why Gallaher does not accept this work - or the conclusion of its top research scientist. Imperial Tobacco, followed up with more fudge:

"Any document like this has to be seen in the context of the many, many documents on the subject. One would need to look at all of them to put things in context."[36] (Imperial Tobacco, 1998)

Two months after the beagles - the Mouse House is closed

RJ Reynolds Biological Research Division, employed in the "Mouse House" is abruptly closed. One of the leading scientists recalls:

"We felt we were on the road to making a discovery of a cause and effect relationship to a clinical disease ... I think the company's lawyers felt that the type of work we were doing was potentially damaging to the company itself and policy was that that wouldn't happen and that was the Legal Department's policy." [37] (RJR scientist, speaking on BBC TV, 1993)

Evidence is so great it is time to change tack on causation

A "strictly confidential" internal BAT document says

"While in the past it has seemed good sense for the industry to contest the validity of all the evidence against smoking (and may still be necessary to avoid damages in lawsuits), there is little doubt that the inflexibility of this attitude is beginning to create in some countries hostility and even contempt for the industry among intelligent, fair-minded doctors ...it is thought that we should reconsider our basic answer on causation."[38] (BAT, 1970)

...the "we are not doctors" stance is not working

Dr Green from BAT writes :

"I believe it will not be possible indefinitely to maintain the rather hollow 'we are not doctors' stance and that, in due course, we shall have to come up in public with a more positive approach towards cigarette safety."[39] (BAT, 1972)

...and it was only ever PR anyway...

A memo from Fred Panzer of the US Tobacco Institute says:

"It is my strong belief that we now have an opportunity to take the initiative in the cigarette controversy, and turn it around. For twenty years, this industry has employed a single strategy to defend itself on three major fronts - litigation, politics and public opinion. While the strategy was brilliantly conceived and executed ...it is not - nor was it intended to be - a vehicle for victory. On the contrary, it has always been a holding strategy, consisting of

- Creating doubt about the health charge without actually denying it.
- Advocating the public's right to smoke, without actually urging them to take up the practice.
- Encouraging objective scientific research as the only way to resolve the question of health hazard."[40] (Tobacco Institute, 1972)

Meanwhile the public denial continues

"It is our opinion ... that the repeated assertion without conclusive proof that cigarettes cause disease - however well-intentioned- constitutes a disservice to the public." [41] (Brown and Williamson, 1971)

1.3.6 Mid-late 1970s: recognition that there is no easy way out

We have retreated behind impossible demands for "scientific proof"

"The industry has retreated behind impossible demands for 'scientific proof' whereas such proof has never been required as a basis for action in the legal and political fields ...It may therefore be concluded that for certain groups of people smoking causes the incidence of certain diseases to be higher than it would otherwise be ...A demand for scientific proof is always a formula for inaction and delay and usually the first reaction of the guilty." [42] (BAT, 1976)

Publicly: "we are not doctors"

Imperial Tobacco shrugs and stands by the 'we are not doctors' ploy:

"As a company we do not make, indeed we are not qualified to make, medical judgements. We are therefore not in a position either to accept or to reject statements made by the Minister of Health." [43] (Imperial Tobacco UK, 1975)

So the denials continue

"None of the things which have been found in tobacco smoke are at concentrations which can be considered harmful. Anything can be considered harmful. Apple sauce is harmful if you get too much of it." [44] (Philip Morris, 1976).

1.3.7 1980s: dig in and brazen it out

Industry wrestles with its credibility gap

A secret BAT document shows that:

"The company's position on causation is simply not believed by the overwhelming majority of independent observers, scientists and doctors ...The industry is unable to argue satisfactorily for its own continued existence, because all arguments eventually lead back to the primary issue of causation, and at this point our position is unacceptable ...our position on causation, which we have maintained for some twenty years in order to defend our industry is in danger of becoming the very factor which inhibits our long term viability ...On balance, it is the opinion of this department that ...we should now move to position B, namely, that we acknowledge 'the probability that smoking is harmful to a small percentage of heavy smokers'.... By giving a little we may gain a lot. By giving nothing we stand to lose everything." [45] (BAT, 1980)

Whilst the evidence accumulates

Another authoritative report from the US Surgeon General:

"Cigarette smoking is the chief, single, avoidable cause of death in our society, and the most important public health issue of our time."[46] (Report of Surgeon-General 1982)

...but the public denials continue

"The view that smoking causes specific diseases remains an opinion or a judgement, and not an established scientific fact."[47] (Tobacco Institute of Hong Kong, 1989)

1.3.8 1990s: blanket denial

Damning legal opinion

US Judge Sarokin rules in the tobacco case *Haines v. Liggett Group* that:

"All too often in the choice between the physical health of consumers and the financial well-being of business, concealment is chosen over disclosure, sales over safety, and money over morality. Who are these persons who knowingly and secretly decide to put the buying public at risk solely for the purpose of making profits and who believe that illness and death of consumers is an apparent cost of their own prosperity. As the following facts disclose, despite some rising pretenders, the tobacco industry may be the king of concealment and disinformation."[48] (1992)

*We don't smoke that s****

An actor promoting RJ Reynolds products asks an RJR executive why he does not smoke. He is told:

"We don't smoke that s***. We just sell it. We just reserve the right to smoke for the young, the poor, the black and the stupid." [49] (Cited in, *First Tuesday*, ITV 1992)

Ex- industry scientist says its time for the truth

Anthony Colucci, a former scientist with RJ Reynolds, states:

"I'm a scientist who says: 'It's about time they quit this charade. I'm sick and tired of the way they distort and ignore the science. It's time for them to tell the truth ... They had a responsibility early on to tell what their own researchers were finding out. Instead, they ignored it and made a mockery of it. I think it's time for the tobacco industry to say: This stuff kills people. We know that. Smoke at your own risk." [50] (1992)

But the denials continue into 1998 and under oath

Murray Walker, Vice President and Chief Spokesperson for the Tobacco Institute, testifying at the Minnesota Trial:

"We don't believe it's ever been established that smoking is the cause of disease." [51] (Murray Walker 1998)

Geoffrey Bible, Chairman of Philip Morris, testifies at the Minnesota trial:

"I'm unclear in my own mind whether anyone dies of cigarette smoking-related diseases." [52] (Cited in Pioneer Press 1998)

...and fudging continues in the press

John Carlisle of the Tobacco Manufacturers Association gives is questioned in a magazine:

Question: **Does it [smoking] cause lung cancer?**

John Carlisle: **There's no shortage of statistics: it's extraordinary the amount of research that has gone into our product and the many and varied opinions that people hold about it."**[53] (UK TMA, 1998)

..and to the BBC the industry still will not give a straight answer

Following the release of a 1970 memo showing that Gallaher accepted that smoking caused lung cancer, John Carlisle of the TMA is interviewed on BBC Radio's flagship *Today* programme.

Question: **"What would it take to convince you that tobacco can be harmful, Mr Carlisle, if this doesn't?**

John Carlisle: **"Well, I ... one cannot pull out just one report which has been leaked to a national newspaper and say this is the evidence we have been waiting for."**

Apparently Mr. Carlisle has not noticed numerous reports of the Royal College of Physicians and US Surgeon General, and is still waiting for evidence.

Question: **"But Mr. Carlisle this is absolutely conclusive evidence that, apart from what the research shows, that Gallahers has concealed conclusive knowledge about the harmful effects of tobacco for all those 30 years."**

John Carlisle: **"[...]There is no such thing as conclusive evidence when you are talking about such a vast subject."**[54]

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2 Nicotine and addiction

"...the entire matter of addiction is the most potent weapon a prosecuting attorney can have in a lung cancer/cigarette case. We can't defend continued smoking as 'free choice' if the person was 'addicted'."[1]

The Tobacco Institute in 1980, revealing why the industry consistently refuses to accept that nicotine is addictive - its legal defences would be wrecked and its 'freedom to smoke' arguments would be defeated.

2.1 Summary

Beginning in the early sixties, industry documents discuss the addictive nature of nicotine, and recognise that the primary reason for people to continue smoking is nicotine addiction. The documents show that the industry believes nicotine to be a drug. "We are in the business of selling nicotine - an addictive drug" one lawyer wrote as far back as 1963. The documents are peppered with statements about the pharmacological or psychopharmacological effects of nicotine - its effect on the brain or central nervous system.

Publicly the industry has maintained that nicotine is not addictive – culminating in Congressional hearings in 1994 when seven Chief Executive Officers of American tobacco companies all testified that nicotine is not addictive. The industry has always said publicly that nicotine was important for taste or flavour – not addiction.

By the early seventies, industry lawyers were worried that the "free choice" argument the industry was using to defend smoking was being negated on the grounds of addiction, and could have implications for litigation against the industry.

In the seventies and eighties, industry researchers investigated the addictiveness of nicotine, on, amongst others, monkeys and rats. In the experiments, animals became dependent on nicotine – but the lawyers normally took over the control of the results.

In the US, the industry, knowing that without nicotine cigarettes would not be a viable product, became terrified that the Food and Drug Administration would regulate cigarettes as a drug, and hence regulate tobacco and nicotine content. In the early eighties BAT at least, was considering becoming involved in the marketing of other nicotine delivery systems, but decided against the move because it feared that it might heighten the chances of FDA regulation.

In the late nineties, as many internal documents showing that cigarettes are addictive reach the public domain, the companies have responded by trying to fudge and change the definition of addiction - which they now apply to such activities as shopping or the Internet. In 1997, Liggett broke ranks and became the first company to admit that "smoking is addictive". Many companies still openly deny that nicotine is addictive.

2.2 What is known - key facts about nicotine addiction

- A UK Government scientific committee said in March 1998: "*Over the past decade there has been increasing recognition that underlying smoking behaviour and its remarkable intractability to change is addiction to the drug nicotine. Nicotine has been shown to have effects on brain dopamine systems similar to those of drugs such as heroin and cocaine.*" (SCOTH, 1998)[2]
- "*Dependence on nicotine is established early in teenagers' smoking careers, and there is compelling evidence that much adult smoking behaviour is motivated by a need to maintain a preferred level of nicotine intake...*" (SCOTH, 1998, Ibid.)
- Withdrawal from smoking can be observed as causing irritability, difficulty in concentrating, anxiety, restlessness, increased hunger, depression and a pronounced craving for tobacco. The fact that this can be attributed to *nicotine*, rather than behavioural aspects of tobacco use is shown by the consistent finding that withdrawal symptoms are relieved by nicotine replacement (patches, gum etc) but not by a placebo (patches, gum etc that do not contain nicotine).[3]
- Despite a high proportion (c. 70%) of smokers that say they would like to quit, cessation rates are low - two studies showed less than 5% of those attempting to stop maintained complete abstinence for 6 months. Only a third managed to abstain for 2 days. Nicotine replacement therapy approximately doubles the chance of successful cessation.[4]
- There is no universally accepted definition of addiction and the scope of characteristics included varies, but the WHO gave a reasonable definition in 1969: "*A state, psychic and sometimes also physical, resulting from the interaction between a living organism and a drug, characterised by behavioural and other responses that always include a compulsion to take the drug on a continuous or periodic basis in order to experience its psychic effects, and sometimes to avoid the discomfort of its absence. Tolerance may or may not be present.*"[5]
- Smokers are compelled to smoke by addiction to nicotine but the harm is largely done by the 4,000+ other chemicals in the tar and gases produced by burning tobacco. It is this combination that makes tobacco so deadly.

2.3 What the industry said and what it knew

2.3.1 Early to mid 1960s:

What the chief scientist said

Sir Charles Ellis, from BAT

"...smoking is a habit of addiction ...nicotine is ... a very fine drug."[6](BAT, 1962)

What the lawyers said

17 July: Addison Yeaman from Brown and Williamson:

"Nicotine is addictive. We are, then, in the business of selling nicotine, an addictive drug."[7] (B&W, 1963)

Tobacco industry scientists

"The habitual use of tobacco is related primarily to psychological and social drives, reinforced and perpetuated by the pharmacological actions of nicotine on the central nervous system." [8] (Research for BAT, 1963)

2.3.2 Mid-late 1960s:

What the BAT scientists said

"It may be useful, therefore, to look at the tobacco industry as if for a large part its business is the administration of nicotine (in the clinical sense)." [9] (BAT, 1967)

"Smoking is an addictive habit attributable to nicotine and the form of nicotine affects the rate of absorption by the smoker." [10] (BAT, 1967)

What the Philip Morris scientists found and said

RD Carpenter from Philip Morris writes a report on "RJ Reynold's Biological Facilities" stating that:

"Reynolds has developed an inhalation smoking device [which] is being used to expose rats to cigarette smoke ...the rats have become habituated to the smoke." [11] (Philip Morris, 1969)

The Vice President for R&D explains 'why one smokes':

"the primary motivation for smoking is to obtain the pharmacological effect of nicotine. In the past, we at R&D have said that we're not in the cigarette business, we're in the smoke business. It might be more pointed to observe that the cigarette is the vehicle of smoke, smoke is the vehicle of nicotine, and nicotine is the agent of a pleasurable body response." [12] (Philip Morris, 1969)

2.3.3 Early-Mid 1970s:

What the scientists said at their conferences

"Sir Charles [Ellis of BAT] started the meeting by saying that he had first brought out the concept that we are in a nicotine rather than tobacco industry." [13] (BAT, 1971)

William Dunn Jr. of Philip Morris:

"The cigarette should be conceived not as a product but as a package. The product is nicotine ...Think of

the cigarette pack as a storage container for a day's supply of nicotine ...Think of a cigarette as a dispenser for a dose unit of nicotine. Think of a puff of smoke as the vehicle of nicotine ..Smoke is beyond question the most optimised vehicle of nicotine and the cigarette the most optimised dispenser of smoke." [14] (Philip Morris, 1971)

Scientists recognise that without nicotine there is no industry

"If, as proposed, nicotine is the *sine qua non* of smoking, and if we meekly accept the allegations of our critics and move toward reduction or elimination of nicotine in our products, then we shall eventually liquidate our business. If we intend to remain in business and our business is the manufacture and sale of dosage forms of nicotine, then at some point we must make a stand." [15] (RJR, undated)

Lawyers warn that free choice arguments may be undermined

February: Ernest Pepples, B&W's counsel:

"Addiction - Some emphasis is now being placed in the habit-forming capacities of cigarette smoke. To some extent the argument revolving around "free choice" is being negated on the grounds of addiction. The threat is that this argument will increase significantly and lead to further restrictions on product specifications and greater danger in litigation." [16] (B&W, 1973)

Industry scientists find more evidence

"Monkeys can be trained to inject themselves with nicotine for its own sake, just as they will inject other dependence-producing drugs e.g. opiates, caffeine, amphetamine, cocaine …. The absorption of nicotine through the lungs is as quick as the junkie's 'fix'." [17] (B&W's research review, 1973)

Experiments on rats showed that:

"dependence of nicotine is related to the stressfulness of the situation." [18] (B&W, 1974)

2.3.4 Mid –late 1970s:

What the marketing people worried about

August: An advertising conference undertaken for B&W examines the goals of how to

"market an ADDICTIVE PRODUCT in an ETHICAL MANNER." [19] (1977)

'Socially acceptable' replacements

A 1979 BAT document assesses the role of addiction and its importance in any search for a product that would replace tobacco[20]:

for tobacco must be addictive

"We are searching explicitly for a socially acceptable addictive product involving:

- a pattern of repeated consumption
- a product which is likely to involve repeated handling
- the essential constituent is most likely to be nicotine or a direct substitute for it
- the product must be non-ignitable (to eliminate inhalation of combustion products and passive smoking)."(BAT, 1979)

High profits arise because the customer is dependent on the product

"We also think that consideration should be given to the hypothesis that the high profits additionally associated with the tobacco industry are directly related to the fact that the customer is dependent upon the product."

"Looked at another way, it does not follow that future alternative 'Product X' would sustain a profit level above most other product/business activities unless, like tobacco, it was associated with dependence."

Ethical problems of addiction recognised

"That being the case, one must question the ethics and practical possibilities of society/medical opinion permitting the advent of the new habituation process." (BAT, 1979)

2.3.5 Early-Mid 1980s:

What the scientists said

Dr Green, from BAT:

"It has been suggested that cigarette smoking is the most addictive drug. Certainly large numbers of people will continue to smoke because they can't give it up. If they could they would do so. They can no longer be said to make an adult choice." [21] (BAT, 1980)

A memo by BAT scientists:

"BAT should learn to look at itself as a drug company rather than as a tobacco company." [22] (BAT, 1980)

What the industry scientists found

Victor DeNoble of Philip Morris undertook experiments on rats who had nicotine injected directly into their hearts. The results showed that the rats would administer a further dose of nicotine by pushing a lever.

"Nicotine has properties of a drug of abuse. It has properties of drug addiction ...This [The results]

was completely contradictory to the industry's position that nicotine is in cigarettes for taste. We know they [the rats] pressed the lever because of the drug effects on the animals brain. We also know from studies that if the substance was cocaine or morphine or alcohol the rates would continue to press the lever. We found the same in nicotine." [23] (Philip Morris, quoted on *Dispatches*, Channel 4, 1996)

2.3.6 Mid to late 1980s:

Too uncomfortable to quit

"Why do people smoke?....to relax; for the taste; to fill the time; something to do with my hands. [...] But, for the most part, people continue to smoke because they find it too uncomfortable to quit."[24] (Philip Morris, 1984)

What the US Surgeon General declared

The US Surgeon General officially declares that:

"cigarettes and other forms of tobacco are addicting". The pharmacological and behavioural processes are "similar to those that determine addiction to drugs such as heroin and cocaine." [25] (1988)

Industry responds with denials

The Tobacco Institute argues: "claims that cigarettes are addictive contradict common sense ... An escalation of antismoking rhetoric ... without medical or scientific foundation."[26](TI, 1988)

2.3.7 The 1990s

What the industry said privately

"Different people smoke for different reasons. But the primary reason is to deliver nicotine into their bodies. Nicotine is an alkaloid derived from the tobacco plant. It is a physiologically active, nitrogen containing substance. Similar organic chemicals include nicotine, quinine, cocaine, atropine and morphine." [27] (Philip Morris, circa. 1993)

Publicly, nicotine adds taste and feel

Brennen Dawson, Vice President, Tobacco Institute says "Nicotine is essential. It has taste. It has what's called a mouth feel." [28] (1994)

Tobacco CEOs say it's not

US tobacco CEOs testify under oath before Congressional Health and

addictive under oath

Environment Subcommittee:

Thomas Sandefur, Chief Executive of Brown and Williamson says: "I do not believe that nicotine is addictive."

William Campbell from Philip Morris: "I believe nicotine is not addictive."

James Johnston, RJ Reynolds: "And I too believe that nicotine is not addictive."[29] (1994)

...but once free the obvious may be stated

After stepping down, Ross Johnson, ex-Chief Executive of RJ Reynolds, is asked by the Wall Street Journal whether nicotine is addictive:

"Of course it's addictive. That's why you smoke the stuff."[30] (Cited in Wall Street Journal 1994)

But the industry keeps up its outward pretence...

Martin Broughton, Chief Executive BAT: "We have not concealed, we do not conceal and we will never conceal ... we have no internal research which proves that smoking ... is addictive."[31] (1996)

A Philip Morris Position Statement:

"Those who term smoking an addiction do so for ideological -- not scientific -- reasons."[32] (1996)

...until the weight of evidence is too great and a fudge must be found...

To an editorial in *the Observer,* which argued that nicotine is addictive, Dr Chris Proctor from BAT responded:

"Addiction is an emotive subject and it is certainly possible to define the term broadly enough to include smoking....the public's understanding has changed significantly over recent decades....the current definition is more colloquial, reflected in terms like 'chocaholic' and 'Addicted to love' as in a recent movie. This colloquial definition is all inclusive and certainly applies to the use of many common substances that have familiar pharmacological effects to cigarettes, such as coffee, tea, chocolate and cola drinks."[33] (BAT, 1998)

...everything's addictive!

When asked in a magazine interview, John Carlisle of the TMA (UK) adopts the new fudging approach:

Question: "Is nicotine addictive?

Carlisle: The definition of addiction is wide and varied. People are addicted to the Internet. Others are addicted to shopping, sex, tea and coffee. The line I would take is that tobacco isn't addictive but habit forming."[34] (TMA, 1998)

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3 Marketing to children

If the last ten years have taught us anything, it is that the industry is dominated by the companies who respond most to the needs of younger smokers.

(Imperial Tobacco, Canada)

3.1 Summary

Publicly the tobacco companies have always maintained that they do not target youth, but the market logic of selling to teenagers is overpowering - teenagers are the key battleground for the tobacco companies and for the industry as a whole. Their response has been that peer pressure is the most important aspect in children smoking. But internal documents sharply contradict this, by showing that they set out to aggressively advertise to youth, and even manipulate peer pressure to make people smoke their brand.

The industry knows that very few people start smoking in the teenage years, and if you can "hook" a youngster early on they could well smoke your brand for life. Indeed, independent surveys show that approximately 60 per cent of smokers start by the age of 13 and fully 90 per cent before the age of 20. This is the paradox of the cigarette industry – it is both socially and legally unacceptable to advertise to under-age teenagers and children – yet it is to this precise age group that it has to advertise to in order to survive.

The documents show that the tobacco industry:

- Examined young people as young as *five* – some studies did not even set a lower age limit. As one executive says "they got lips, we want them".
- Thought about using honey and comic strip, as well as advertising, to entice youngsters to smoke.
- Looked at ways of preventing teenagers from quitting.
- Undertook studies how to manipulate pubescent/teenage anxieties into making people smoke. Examined the attitudes, aspirations, and lifestyles of the young and how to exploit them. One document says the company needs to "Create a Living Laboratory".

The documents also show that:

- Marketing executives set out to present cigarettes as part of adulthood initiation - an illicit pleasure, which like sex, is one of a few initiations into the adult world.
- Advertisers set out to equate cigarettes with rebellion, self-expression, self-confidence, independence, freedom, adult identity, masculinity for boys and femininity for girls.
- Two of the most successful advertising campaigns: Marlboro's Cowboy and RJ Reynolds' Old Joe Camel pitched their appeal directly to youth.
- The companies advertised in sports magazines and sponsored motor racing as new ways to market to youth

3.2 What is known - key facts about marketing to children

- Cigarette advertising reaches children as young as three. In one study six year olds were as familiar with Joe Camel as Mickey Mouse. Other studies have found that Joe Camel appeals more to kids than adults.
- Children were most aware of the cigarette brands which are most frequently associated with sponsored sporting events on TV.
- Nine year old children are receiving the positive message from cigarette advertisements at the age when they are most likely to try their first cigarette.
- The most commonly remembered brands by 11 year olds are the most heavily advertised.
- In one study, a third of the 10- and 11-year-olds and more than half of the secondary school children were able to name cigarette brands and sponsored sports.
- Advertising campaigns targeted at older teenagers and young adults are likely to present qualities which younger teenagers find attractive.
- Teenagers consume the cigarettes which most dominate sports sponsorship.

The great fallacy promoted by the industry is that by avoiding marketing that is childish, they are somehow avoiding an appeal to children. In fact, advertising to children and teenagers works precisely because it identifies smoking with adulthood. The teenage years are a time of great aspiration and insecurity, smoking can become a badge or signifier of certain positive values - these are remorselessly nurtured by tobacco industry marketing.

3.3 What the industry said and what it knew

'Hitting' the youth market

1957: A Philip Morris Executive writes that **"hitting the youth can be more efficient even though the cost to reach them is higher, because they are willing to experiment, they have more influence over others in their age group than they will later in life, and they are far more loyal to their starting brand."**[1]

The cowboy – out to capture youth's fantasy

Late 50's: Philip Morris starts using the Cowboy image on its commercials, because the image **"would turn the rookie smokers on to Marlboro .. the right image to capture the youth market's fancy ..a perfect symbol of independence and individualistic rebellion"**

As one executive who worked on Marlboro recalled **"When you see teenage boys - people the cigarette companies aren't supposed to be targeting in the first place – going crazy for this guy, you know they're hitting their target**[2].

Virginia slims slogan doubles teen smoking

1968: Philip Morris produces Virginia Slims, a cigarette targeted exclusively at women, running the slogan: "You Have Come Along Way Baby". Within six years of the Slims launch, the percentage of teenage women who smoked had nearly doubled[3].

Youth share

1969: 23 May: A report for Philip Morris identifies that over 15 per cent of female smokers aged 15, and 23 per cent of male smokers aged 15, smoke Marlboro[4].

A cigarette means I am no longer my mother's child

Autumn: A draft report to the Board of Directors of Philip Morris states:

"a cigarette for the beginner is a symbolic act. I am no longer my mother's child, I'm tough, I am an adventurer, I'm not square … As the force from the psychological symbolism subsides, the pharmacological effect takes over to sustain the habit"[5]

Lower age limit keep at 14

1971: 7 April: An internal RJR document outlines that:

"the lower age limit for the profile of young smokers is to remain at 14"[6].

RJR recognises the need to appeal to youth

1973: 2 February: Claude Teague, Assistant Chief in R&D at RJ Reynolds, writes a paper: "Some Thoughts About New Brands of Cigarettes for the Youth Market":

"At the outset it should be said that we are presently, and I believe unfairly, constrained from directly promoting cigarettes to the youth market … if our company is to survive and prosper, over the long term we must get our share of the youth market…Thus we need new brands designed to be particularly attractive to the young smoker, while ideally at the same time appealing to all smokers … Perhaps these questions may be best approached by consideration of factors influencing pre-smokers to try smoking, learn to smoke and become confirmed smokers."

RJR analyses the psychology of youth smoking

Teague continues:

"thus a new brand aimed at the young smoker must somehow become the 'in' brand and its promotion should emphasise togetherness, belonging and group acceptance, while at the same time emphasising individuality and 'doing one's own thing'. The teens and early twenties are periods of intense psychological stress, restlessness and boredom. Many social awkward situations are encountered. The minute or two required to stop and light a cigarette, ask for a light, find an ash tray, and the like provide something to do during periods of awkwardness and boredom …The fragile, developing self-image of the young person needs all of the support and enhancement it can get …This self-image enhancement effect has traditionally been a strong promotional theme for cigarette brands and should continue to be emphasised … a careful study of the current youth jargon, together with a review of currently used high school American history books and like sources for valued things might

be a good start at finding a good brand name and image theme. This is obvious a task for marketing people, not research people"[7].

Need to counter programmes designed to stop young smoking

14 February: A Confidential Memo from B&W's Assistant General Counsel, outlines:

"salient problems now facing the cigarette industry", which includes "increased educational programmes to prevent young, non-smokers taking up the practice of smoking."[8]

Use comic strip

12 April: A RJR document articulates that:

"In view of the need to reverse the preference for Marlboros among younger smokers, I wonder whether comic strip type copy might get a much higher readership among younger people than any other type of copy. It would certainly seem worth testing a heavy dose of this type of copy in a test market to get a research reading on percentage of readership and copy recall."[9]

Study as young as 12

18 May: The Philip Morris Marketing Research Department highlight how a

"probability sample of 452 teen-agers ages 12-17" finds that 13 per cent smoke an average of 10.6 cigarettes per day and how "the data from the study are consonant with the findings of other such studies, both at Philip Morris and without."[10]

Increase share of young as they represent tomorrow's cigarette business

30 September: A RJR marketing plan for 1975 outlines "Key Opportunity Areas" to

"Increase our young adult franchise ... in 1960, this young adult market, the 14-24 age group, represented 21% of the population ... they will represent 27 % of the population in 1975. They represent tomorrow's cigarette business. As this 14-24 age group matures, they will account for a key share of the total cigarette volume -- for at least the next 25 years ...Thus our advertising strategy becomes clear for our established brands: Direct advertising appeal to the younger smokers ... For Winston, we've followed this strategy in developing the new 'candid' advertising campaign .. it is especially designe [sic] to appeal to young adults .."

Young smokers are of pre-eminent importance

September: A B&W document, entitled "The New Smoker" outlines how the

"The younger smoker is of pre-eminent importance: significant in numbers, 'lead in' to prime market, starts brand preference patterning... But frustrating to reach: values and behaviour at variance with rest of the population, sceptical, intense peer pressure, public policy difficulties ... Study the Market and Customer,

maintain a continuing dialogue with the 'New' Smoker ..behaviour patters - what they do; Attitudes- what they think; Directions - where they're headed; ... Explore and Implement; Create a 'Living Laboratory" [11].

Direct advertising to appeal to young

26 November: An internal RJR document outlines its primary "Marketing Goals" for 1975. These include

"Increase our Young Adult Franchise: 14-24 age group in 1960 was 21% of the population; in 1975 will be 27%. As they mature, will account for key market share of cigarette volume for next 25 years ... We will direct advertising appeal to this young adult group without alienating the brand's current franchise"[12].

Target 15 year olds

12 December: A B&W document highlights that the

"Target audience for the sampling effort on KOOL King Size" includes both Men and Women in the 15-24 age group."[13]

Young adult smokers means young smokers

24 January: An internal B&W memo outlines that

"when describing market categories and target audiences we use references such as 'young smokers', 'young market' 'youth market' etc ...in the future when describing the low-age end of the cigarette business please use the term 'young adult smoker' or 'young adult smoking market'"[14].

Marlboro's growth rate due to young smokers

A report by a Philip Morris researcher Myron E. Johnston to the head of Research at Philip Morris, Robert B. Seligman outlines that:

"Marlboro's phenomenal growth rate in the past has been attributable in large part to our high market penetration among young smokers ... 15 to 19 years old . . . my own data, which includes younger teenagers, shows even higher Marlboro market penetration among 15-17-year-olds ... Marlboro smokers, being on the average considerably younger than the total smoking population, tend to have lower than average incomes .. the decline in the popularity of Marlboro Red among younger smokers will probably continue and , thus, further reduce its rate of growth"[15].

Rationalise smoking – repress health concern

1976: March: B&W's Advertising Objective for Viceroy is to

"Communicate effectively that Viceroy is a satisfying, flavourful cigarette which young adult smokers enjoy, by providing them a rationalisation for smoking, or, a

repression of the health concern they appear to need"[16].

Establish brand for 14-18 year olds to maintain position

15 March: A RJR document outlining "Planning Assumptions and Forecasts for the period 1976-1986" outlines that:

"Evidence is now available to indicate that the 14-18-year old group is an increasing segment of the smoking population. RJR-T must soon establish a successful new brand in this market if our position in the industry is to be maintained over the long term"[17].

Philip Morris increases 14 year olds

12 August: An internal RJR memo entitled "Share of Smokers by Age Group", includes "Younger Smokers":

"From a Corporate standpoint, Philip Morris posted a 4 point gain among 14-17 year old smokers (RJR and B&W each lost 2 points)."[18]

Opportunities from young starters

1977: 7 March: A B&W document highlights how the

"third major opportunities for KOOL Super Lights gains could come from full taste 85 smokers and from starters. Young (age 16-25) males account for a disproportionate amount of both these segments ... KOOL has the highest attraction rate (along with Marlboro) for new starters in the full taste menthol and non-menthol segments"[19].

Position brand to appeal to lifestyle – then let nicotine take over

25 March: A working paper prepared for Imperial Tobacco (Canada) recognises the transition from glamour to addiction.

"At a younger age, taste requirements and satisfaction in a cigarette are thought to play a secondary role to the social requirements. Therefore, taste, until a certain nicotine dependence has been developed, is somewhat less important than other things"[20]

Learn how smoking begins,

The purpose of Project 16 (Imperial Tobacco Canada) is outlined:

"Since how the beginning smoker feels today has implications for the future of the industry, it follows that a study of this area would be of much interest. Project 16 was designed to do just that - to learn everything there was to learn about how smoking begins, how high school students feel about being smokers, and how they foresee their use of tobacco in the future."

Peer pressure is important at 11, but may want to

The summary of the findings of Project 16 are that:

"There is no doubt that peer group influence is the

quit by 17

single most important factor in the decision by an adolescent to smoke ...Serious efforts to learn to smoke occur between ages 12 and 13 in most case [sic] ....However intriguing smoking was at 11, 12 , or 13, by the age of 16 or 17 many regretted their use of cigarettes for health reasons and because they feel unable to stop smoking when they want to. By the age of 16, peer pressure to initiate others to smoking is gone." [21]

Marlboro dominates youth

1979: A Philip Morris memo states that:

"Marlboro dominates in the 17 and younger age category, capturing over 50 percent of the market"[22].

Today's teen is tomorrow's regular customer

1981: A Philip Morris researcher Myron E. Johnston sends a memo to Robert B. Seligman, then Vice President of research and development at Philip Morris in Richmond:

"It is important to know as much as possible about teenage smoking patterns and attitudes. Today's teenager

Teens make initial brand choice

is tomorrow's potential regular customer, and the overwhelming majority of smokers first begin to smoke while in their teens ....it is during the teenage years that the initial brand choice is made: At least a part of the success of Marlboro Red during its most rapid growth period was because it became the brand of choice among teenagers who then stuck with it as they grew older ...We will no longer be able to rely on a rapidly increasing pool of teenagers from which to replace smokers through lost normal attrition. . . Because of our high share of the market among the youngest smokers, Philip Morris will suffer more than the other companies from the decline in the number of teenage smokers".

The report analyses data for smokers as young as 12[23].

Joe Camel ads reach children as young as three

The *Journal of the American Medical Association* finds that adverts for Joe Camel are effective in reaching children. In one study more than half of the children aged three to six who were presented with a variety of products matched the Joe Camel logo with a photo of a cigarette. Six year olds were found to be nearly as familiar with Joe Camel as Mickey Mouse. The study finds that when children were shown Joe Camel adverts, 96 per cent correctly identified the brand, compared with only 67 per cent of adults.[24].

Starters disbelieve the dangers until addicted

A report for Imperial Tobacco of Canada states:

"Starters no longer disbelieve the dangers of smoking, but they almost universally assume these risks will not apply to themselves because they will not become addicted. Once addiction does take place, it becomes

necessary for the smoker to make peace with the accepted hazards. This is done by a wide range of rationalisations ...The desire to quit seems to come earlier now than before, even prior to the end of high school. In fact, it often seems to take hold as soon as the recent starter admits to himself that he is hooked on smoking. However the desire to quit, and actually carrying it out, are two different things, as the would-be quitter soon learns ...the single most commonly voiced reasons for quitting among those who had done so was ...sports." [25]

Then sports are a reason for quitting

RJR explains clearly why tobacco companies are inevitably drawn to youth marketing

1984: A RJR report, entitled "Young Adult Smokers: Strategies and Opportunities" states that:

"Younger adult smokers have been the critical factor in the growth and decline of every major brand and company over the last 50 years. They will continue to be just as important to brands/companies in the future for two simple reasons: The renewal of the market stems almost entirely from 18-year-old smokers. No more than 5 percent of smokers start after age 24. The brand loyalty of 18-year-old smokers far outweighs any tendency to switch with age ... Once a brand becomes well-developed among younger adult smokers, ageing and brand loyalty will eventually transmit that strength to older age brackets ... Brands/companies which fail to attract their fair share of younger adult smokers face an uphill battle. They must achieve net switching gains every year to merely hold share... Younger adult smokers are the only source of replacement smokers... If younger adults turn away from smoking, the industry must decline, just as a population which does not give birth will eventually dwindle."

[The only thing not explained here is how the smoking behaviour and brand loyalty of 18 year olds is created - only by reaching them at an earlier age.]

Young are critical to our long term performance

The report continues... "Younger adult smokers are critical to RJR's long term performance and profitability ....because of the sensitivity of the younger adult smoker market, brand development / management should encompass all aspects of marketing mix and maintain a long-term, single minded focus to all elements - product, advertising, name, packaging, media, promotion and distribution ...Marlboro's key imagery was not masculinity, it was younger adult identity/belonging - the brand for average younger adults, popular and acceptable among younger adult friends, not 'too different'."[26]

Motor racing is a fast, trendy sport for the young

November: Gordon Watson, General Manger of BAT in Hong Kong on sponsorship of the Macau Grand Prix :

"We're not handing out money for nothing. We have gone into this very thoroughly and the entire JPS publicity is built around motor racing, seen as a fast, exiting, trendy sport for the young and, if you like, the young at heart. That's who we are aiming at in the local market and early indications are that we're on target".[27]

Smoking is for grown-ups

RJR runs a series of adverts aimed at telling children that smoking is for "adults":

"We don't advertise to children ..First of all, we don't want young people to smoke. And we're running ads aimed specifically at young people advising them that we think smoking is strictly for adults ..Kids just don't pay attention to cigarette ads, and that's how it should be."[28]

Children most aware of brands with greatest sports sponsorship

A study published in the *Health Education Journal* finds that:

"children were most aware of the cigarette brands which are most frequently associated with sponsored sporting events on TV ...This demonstrates that the TV sports sponsorship by tobacco manufacturers acts as cigarette advertising to children and therefore circumvents the law banning cigarette advertisements on TV"[29].

Need brands to appeal to young

Minutes from a meeting of BAT's Tobacco Strategy Review Team reveal, under "Competition with Marlboro/ Brand Strategies":

"Marlboro is particularly strong in attracting young smokers and it was important to have brands which appealed to this group ..It was agreed that, in competing against Marlboro, the market segment at which a particular Group brand was being directed should be carefully defined and all aspects of the promotion and marketing should be clearly targeted on the chosen customer group"[30].

Target 13 year olds

An internal RJR memo examines "Project LF Potential Year 1 Marketing Strategy",

"Project LF is a wider circumference non-menthol cigarette targeted at younger adult male smoker (primarily 13-24 year old Marlboro smokers)."[31].

60% start smoking by 13 years - 90% before they are 20

A study into Tobacco Advertising and Consumption by Joe Tye, Kenneth Warner and Stanton Glantz remarks that:

"Approximately 60 per cent of smokers start by the age of 13 and fully 90 per cent before the age of 20. These

statistics translate in to the need for more than 5,000 children and teenagers to begin smoking every day to maintain the current size of the smoking population."[32]

Industry dominated by companies who respond to young – need to re-establish image

~1987/ 88: Imperial Tobacco's (Canada) marketing plan states:

"If the last ten years have taught us anything, it is that the industry is dominated by the companies who respond most to the needs of younger smokers. Our efforts on these brands will remain on maintaining their relevance to smokers in these younger groups in spite of the share performance they may develop among older smokers …. Re-establish clear distinct images for ITL brands with particular emphasis on relevance to younger smokers. Shift resources substantially in favour of avenues that allow for the expression and reinforcement of these image characteristics".

The document defines "target groups" for various brands as "men 12-17" and "men and women 12-34".[33]

Welcome Joe Camel

1988:RJR introduce Joe Camel, a new cartoon character. A survey, commissioned by the US Centre For Disease Control finds that the highest increase in youth smoking between 1980-1988 is the year that Joe Camel is introduced[34].

Joe Camel appeals more to kids than adults

1991: A study in *The Journal of the American Medical Association* finds that Joe Camel appeals far more to children than adults. Thirty per cent of three year olds and 91 per cent of six year olds knew that Joe Camel was connected with cigarettes . The researchers found that: "Old Joe, the cartoon character promoting Camel cigarettes had the highest recognition rate among the tested cigarette logos …Market researchers believe that brand awareness created in childhood can be the basis for product preference later in life. It has been shown that children prefer the brands they see advertised …The children in this study demonstrated high recognition rates of brand logos for products that are targeted to both children and adults …cigarette advertising no longer appears on television and very young children cannot read. Yet by the age of 6 years, Old Joe is as well recognised as Mickey Mouse"[35].

Sponsorship is designed to stop teens quitting

Another study published in *The Journal of the American Medical Association*, finds:

" …The tobacco industry's sponsorship of sporting events, such as the Camel Superiors motorcycle race, should be seen in relation to its need to discourage teenagers from quitting.

…Our study provides further evidence that tobacco advertising promotes and maintains nicotine addiction among children and adolescents. A total ban of tobacco

"advertising and promotions, as part of an effort to protect children from the dangers of tobacco, can be based on sound scientific reasoning"[36].

Old Joe must go In response, the journal *Advertising Age*, publishes an editorial saying that "Old Joe must go"[37].

RJ Reynolds' James Johnston responds that

"advertising is irrelevant to a young person's decision to smoke"[38]

So much evidence that sponsorship is advertising that affects kids A review of "Direct Tobacco Advertising and its Impact on Children" in *the Journal of Smoking Related Diseases* concludes that

"There is now so much evidence that children identify sports sponsorship and brand-stretching as cigarette advertisements, and that advertisements aimed at adults have an even greater effect on under-age children, that statements from the tobacco industry that it does not advertise to children are irrelevant."[39]

I was a scam – selling an image to young boys Dave Goerlitz, lead model for RJ Reynolds for seven years, says his marketing brief was to "attract young smokers to replace the older ones who were dying or quitting ...I was part of a scam, selling an image to young boys. My job was to get half a million kids to smoke by 1995"[40].

Candy cigarettes Polish customs stop lorries carrying "Marlboro candy cigarettes", intended for East European children[41].

Reg getting through to kids 1993: A survey undertaken by the Centre for Social Marketing, University of Strathclyde, and published in the *BMJ* finds that Embassy's Regal Reg campaign "was getting through to children more effectively than it was to adults and held most appeal for teenagers, particularly 14-15 years old smokers. It clearly contravened the code governing tobacco advertising, which states that advertising must not appeal to children more than it does to adults, and it may have had a direct impact on teenage smoking"[42].

Reg dropped Imperial Tobacco drops the Embassy Regal "Reg" campaign[43].

Joe is attractive to kids Ex Philip Morris executive said:

"You don't have to be a brain surgeon to work out what's going on. Just look at the ads. Its ludicrous for them to deny that a cartoon character like Joe Camel is attractive to kids"[44].

Average age An article published by the US Department of Health and Human *Services Morbidity*

start smoking is 14 and heavily advertised brands are the most smoked

and Mortality Weekly Report states "**Approximately three million US adolescents are smokers, and they smoke nearly one billion packs of cigarettes each year. The average age at which smokers try their first cigarette is 14 ½ years, and approximately 70% of smokers become regular smokers by age 18 years ...Of the 1031 current smokers aged 12-18 years interviewed in 1993, 70% reported they usually brought their own cigarettes ..Marlboro, Camel and Newport were the most frequently purchased brands for 86 % of the adolescents ... The three most commonly purchased brands among the adolescent smokers were the three most heavily advertised brands in 1993. In 1993, Marlboro, Camel and Newport ranked first, second, and third, respectively, in advertising expenditures**".[45]

Smoking is for grown-ups says Philip Morris

Philip Morris runs adverts aimed at "informing" children that smoking is for adults:

"**No one should be allowed to sell cigarettes to minors. Minors should not smoke. Period. That is why Philip Morris developed a comprehensive programme to prevent sales of cigarettes to minors**".[46]

Advertising greater factor in encouraging kids to smoke than peer pressure

1995: A study carried out by the University of California finds that tobacco advertising is a stronger factor than peer pressure in encouraging under 18 children to smoke. One of the authors, Dr. Pearce, says: "**It is not that children see an ad and start smoking, but seeing the ads and handling the cigarette packets and the promotional gifts lessens their resistance, weakens their resolve, so later on they will be somewhat more willing to accept a cigarette from a peer when it is offered.**"[47]

Peer pressure versus advertising

Rance Crain, Editor-in-Chief, *Advertising Age*:

"**Cigarette people maintain peer pressure is the culprit in getting kids to start smoking and advertising has little effect. That's like saying cosmetic ads have no effect on girls too young to put on lipstick. Don't brand preferences start forming early on?.**"[48]

They got lips, we want them

Terence Sullivan a sales rep in Florida for RJ Reynolds:

"**We were targeting kids, and I said at the time it was unethical and maybe illegal, but I was told it was just company policy**".

Sullivan remembers someone asking who exactly were the young people were that RJR were targeting, junior high school kids or even younger.

The reply was "**They got lips? We want them**".[49]

Liggett accepts that it markets to youth

March: US tobacco company, Liggett, becomes the first company to acknowledge that the tobacco industry markets to 'youth', which means "**those under 18 years of age, and not just those 18-24 years of age.**"

Liggett also promises to "scrupulously avoid any and all advertising and marketing that would appeal to children and adolescents".[50]

Boys twice as likely to smoke if racing fans

November: The Cancer Research Campaign reveals that boys are twice as likely to become regular smokers if they are motor racing fans: "This is damning evidence that tobacco sponsorship encourages young boys to take up smoking and that sponsorship encourages brand recognition."[51]

Marketing is causally related to smoking

February: A study published in the *Journal of the American Medical Association* provides "the first longitudinal evidence to our knowledge that tobacco promotional activities are causally related to the onset of smoking"[52]. According to the authors it "provides clear evidence that tobacco industry advertising and promotional activities can influence non-susceptible never-smokers to start the process of becoming addicted to cigarettes ... our data establish that the influence of tobacco promotional activities was present before adolescents showed any susceptibility to become smokers ... we estimate that 34 per cent of all experimentation in California between 1993 and 1996 can be attributed to tobacco promotional activities"[53].

We don't track 14 year olds today

March: Andrew J. Schindler, President and CEO of RJ Reynolds testified at the Minnesota trial. Shown RJR documents that had targeted children, he said:

"I'm embarrassed for the company. We don't track 14-to 17-year-olds today. I think it is wrong, frankly stupid and unnecessary. It certainly doesn't happen today. We shouldn't be discussing 14-year-olds in any way, shape or form"[54].

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4 Advertising

I am always amused by the suggestion that advertising, a function that has been shown to increase consumption of virtually every other product, somehow miraculously fails to work for tobacco products.

Emerson Foote, former Chairman of McCann-Erickson, which handled US$20m of tobacco industry accounts expressing incredulity at the claim that tobacco advertising has no impact on the number of cigarettes smoked and, hence, the harm caused.

4.1 Summary

The first cigarette advertisements unashamedly pushed either reduced risk, health reassurance or even health "benefits" of smoking a specific product. By the forties, these were being criticised for being deceptive – and by the fifties the most successful advert of the modern era, the Marlboro Man, had been born.

In the sixties, manufacturers were using adverts to deny that their products caused cancer.

The tobacco industry has repeatedly asserted that banning advertising would be an infringement of "commercial free speech", but has never answered the criticism that much of its advertising was misleading.

The industry maintains that the only reason for advertising is to make current smokers switch brands, it does not effect overall consumption, nor entice youngsters to start smoking – the undeniable evidence that the industry targets youth is in a separate section.

As cigarettes adverts were banned on television, first in the UK and then in the US, companies looked to sponsorship of arts and sport to circumvent the bans. They have adopted the same line for sponsorship as advertising – it does not affect overall consumption.

The industry also introduced "brand stretching" as ways of circumventing bans on advertising and sponsorship in the early 1980's and still uses the concept to this day. Earlier this year BAT announced a new Formula One racing team, to be called British American Racing.

In June 1998, the European Union will pass a directive banning tobacco advertising, sponsorship and promotion in a staged phase-out by 2006.

4.2 What is known - key facts on advertising and smoking

- The most comprehensive study of the link between advertising and tobacco consumption was published in 1993 by Chief Economic Adviser to the Department of Health, Dr. Clive Smee. After reviewing 212 'time series' correlating advertising spend and total tobacco consumption, Smee concluded *"The balance of evidence thus supports the conclusion that advertising does have a positive effect on consumption."* Smee also examined in detail the effects of tobacco advertising bans in four countries and found that banning advertising resulted in reductions in consumption of 4%-9% in the countries surveyed. He concluded: *"In each case the banning of advertising was followed by a fall in smoking on a scale which cannot be reasonably attributed to other factors."* [1]

- A meta-analysis of econometric findings from time series research found a positive association between advertising expenditure and cigarette consumption. The study showed that a 10% increase in advertising expenditure would lead to a 0.6% increase in consumption.[2]
- The US Surgeon General in his 1989 report highlighted the difficulties in designing studies that prove the point definitively, but concluded: "*the collective empirical, experiential and logical evidence makes it more likely than not that advertising and promotional activities do stimulate cigarette consumption.*" The Surgeon General suggests seven ways in which tobacco advertising operates to encourage smoking:[3]

US Surgeon General - how advertising affects consumption

1. By encouraging children or young adults to experiment with tobacco and thereby slip into regular use
2. By encouraging smokers to increase consumption
3. By reducing smokers' motivation to quit
4. By encouraging former smokers to resume
5. By discouraging full and open discussion of the hazards of smoking as a result of media dependence on advertising revenues
6. By muting opposition to controls on tobacco as a result of the dependence of organisations receiving sponsorship from tobacco companies
7. By creating through the ubiquity of advertising, sponsorship, etc. an environment in which tobacco use is seen as familiar and acceptable and the warnings about its health are undermined.

4.3 What the industry said and what it knew

Physicians and athletes

1929: Lucky Strike advertisements claim that

" 20,679 physicians have confirmed the fact that Lucky Strike is less irritating to the throat than other cigarettes" and that "Many prominent athletes smoke Luckies all day long with no harmful effects to wind or physical condition[4].

Nose and throat

1939: "Philip Morris - a cigarette recognised by eminent medical authorities for its advantages to the nose and throat"[5].

Throat irritation

1942: The latest Philip Morris advert says : "Inhaling need not mean throat-irritation for you"[6].

More doctors

1946: 23 December: RJ Reynolds runs an advert in *Life Magazine* "More Doctors Smoke Camels Than Any Other Cigarette"[7]

No irritation

1949: The latest Camel advert says: " Not one case of throat

irritation due to smoking Camels!"[8].

Deceptive advertising

1950: March The US Federal Trade Commission declares RJRs' adverts to be false and deceptive. For example, claims that smoking Camels

"renews and restores bodily energy" were "clearly false and deceptive, there being in tobacco smoke no constituent which could possible create energy"[9].

Massive female and young adult market

United States Tobacco Journal concludes:

"A massive potential market still exists among women and young adults, cigarette industry leaders agreed, acknowledging that recruitment of these millions of prospective smokers comprises the major objective for the immediate future and on a long term basis as well"[10].

Health protection

1952: Lorillard advertises Kent by stating:

"If you think you are among those sensitive smokers - if you worry about the harmful effects of smoking ...No other cigarette approaches such a degree of health protection and taste satisfaction."[11]

Enter the Marlboro Cowboy

The Marlboro Cowboy is chosen to advertise Marlboro cigarettes, "because he is close to the earth. He's an authentic American hero. Probably the only one. And it worked".

The advertising agent responsible said "We asked ourselves what was the most generally accepted symbol of masculinity in America."[12]

Deceptive advertising

1958: The US House Government Operations Committee says the industry has "deceived" the public through their advertising of filter-tip cigarettes:

"Unfortunately, the much publicised health protection - that is, less nicotine and tar - was an unpublicised causality. The filter cigarette smoker is, in most cases, getting as much or more nicotine and tar from the filter than he would get from the regular cigarette the advertisers have persuaded him to abandon - for his health's sake"[13].

FTC Unfair and Deceptive advertising

22 June: The US Federal Trade Commission publishes its proposed "Trade Regulation Rule for the Prevention of Unfair or Deceptive Advertising and Labelling of Cigarettes in Relation to the Health Hazards of Smoking .." "To allay anxiety on the ... hazards of smoking, the cigarette manufacturers have made no effort whatever, and have spent nothing, to inform the consuming public of the mounting and now overwhelming evidence that cigarette smoking is habit-forming, hazardous to health, and once begun, most

difficult to stop. On the contrary, the cigarette manufacturers and the Tobacco Institute have never acknowledged, and have repeatedly and forceful denied, that smoking has been shown to be a substantial health hazard"[14].

TV ads banned 1965: 1 August: Cigarette advertising is banned on the television in Britain.[15]

Warnings US cigarette labelling law passes Congress, requiring health warnings on packets.[16]

Smoking is the hallmark of integrity ~1965: A "strictly confidential" report by two scientists Francis Roe, an independent tobacco consultant, and M C Pike, states:

"Advertising aims to do precisely the opposite from that which we suggest parents, doctors and teachers should be doing: [...] Ultimately, it is hardly to anybody's advantage to ignore the true facts of the relationship between smoking and health, and the government should be pressed to take action at least against this type of advertising"[17].

Ads should say no scientific evidence of causation 10 November: B&W's Vice President, J.W. Burgard, writes to Tiderock Corporation, B&W's PR company:

"I think we should give immediate attention to the possibility of running ads stating, in effect, that there is no scientific evidence of a causal relationship between smoking and lung cancer"[18]

Project Truth: Defending Free Speech October: Advertising Agency Post-Keyes-Gardener starts work on Project Truth for B&W, an advertising campaign aimed at decision makers, shifting the argument from undercutting the science to one of "rights". Under the heading "Who's Next?" the Agency prepares an ad and booklet saying:

"The cigarette industry is being maliciously, systematically lynched. Who is to say it won't happen elsewhere? ...Its more than cigarettes being challenged here. It's freedom. We will continue to bring to the American people the story of the cigarette and any other legal product based upon truth and taste. We believe that free speech and fair play are both the heritage and promise in our society of free and responsible enterprise"[19]

TV ads banned 1971: 1 January: Cigarette advertising is banned from television in the US[20]

Advertising effects sales 1972: November: A study by the Centre for Industrial Economic and Business Research at the University of Warwick into "Advertising and the Aggregate Demand for Cigarettes: An Empirical Analysis of a UK Market" concludes that: "Our results suggest that advertising has had a statistically significant effect on the expansion of sales .. The

ability of advertising to influence decisions not only in the current period but also in future periods causes the ten per cent increase in it [advertising] to lead to an eventual 2.8 per cent increase in sales"[21].

Sponsorship no effect

1976: 23 March: Imperial: "Our experience is that sponsorship has no effect on the total size of the cigarette market"[22].

Resist restrictions

December: A BAT Board Plan on Smoking and Health stipulates that "we should resist restrictions on media advertising but should recognise at the same time that an intransigent attitude could hasten a total ban".[23]

Editors silenced by ad spend

1978. A survey shows that advertising expenditures also prevent hostile editorial comment. "In magazines that accept cigarette advertising, I was unable to find a single article, in seven years of publication, that could have given readers any clear notion of the nature and extent of the medical and social havoc being wreaked by the cigarette smoking habit ... advertising revenue can indeed silence the editors of American magazines".[24]

Beam into a banned country

May: BAT executives attend a five day conference on marketing. "As advertising bans tend to fall unevenly on countries within regions, companies should explore the opportunities to co-operate with one another by beaming TV and radio advertising into a banned country"[25].

Explore non-tobacco products to communicate house name

...Opportunities should be explored by all companies so as to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifies. This is likely to be a long-term and costly operation, but the principle is nevertheless to ensure that cigarette lines can be effectively publicised when all direct forms of communication are denied"[26].

Activities young people aspire to

Imperial's "Player's Filter Creative Guidelines" for the year stipulate that:

"the activity shown should be one which is practised by young people sixteen to twenty years old, or one that those people can reasonably aspire to in the near future."[27]

Portrait award

Chairman of Imperial Tobacco, Andrew Reid, explains the reasons behind his company's sponsorship of the "Imperial Tobacco Portrait Award":

"For a number of years we have felt strongly committed to supporting the arts because the cultural life of this country has greatly influenced the way in which we, as a nation, have developed. It also gives us in the tobacco

industry an opportunity to make contacts outside the industry - an activity which greatly enhances the everyday running of our business."[28]

Targeting the black community

A marketing plan for RJR outlines that:

"The majority of blacks ... do not respond well to sophisticated or subtle humour in advertising. They related much more to overt, clear-cut story lines"[29].

Kim sports wear

The Kim Top line range of sportswear, is launched just before Wimbledon. The US tennis star, Martina Navaratilova wins Wimbledon in Kim colours[30].

Smoky Rambo

April: The actor Sylvester Stallone agrees to smoke B&W cigarettes in five upcoming movies, including Rhinestone Cowboy, Godfather III, Rambo, 50/50 and Rocky IV, for $500,000. B&W later terminates the contract due to disappointing results[31].

Cinema pull-out

8 November: B&W discuss pulling out of the practice of placing cigarettes in movies because, in part,

"the use of any cigarette by a movie hero advertises all cigarettes. So let the competitors help advertise our brands in this way"[32].

Rationale for sports sponsorship

September: Wayne Robertson, RJR:

"We're in the cigarette business. We're not in the sports business. We use sports as an avenue for advertising our products .. We can go into an area where we're marketing an event, measure sales during the event and measure sales after the event, and see an increase in sales."[33]

No influence unless you are a smoker

March 1986: Clive Turner, Tobacco Advisory Council, states the not-so-obvious:

"Certainly no tobacco advertising is concerned with encouraging non-smokers to start or existing smokers to smoke more and it seems blindingly obvious that, unless you are a smoker, tobacco advertising or sponsorship has absolutely no influence whatsoever in persuading or motivating a purchase"[34]

Rise in consumption due to advertising

April 1987: Leading industry journal, *Tobacco International*, runs an article on cigarette consumption in Greece which states:

"the rise in cigarette consumption is basically due to advertising."[35]

An oversight

July 1987: Philip Morris notices the hostage to fortune and responds, saying that

"the tobacco industry's position in advertising is that it may influence the choice of one brand over another but has no effect on consumption ...I am sure the statement in question was merely an oversight, but in the current climate of attempts to ban tobacco advertising in nearly

all our major markets, it is certainly not helpful if critics can quote a tobacco industry trade journal to support their claims."[36]

Sporting denial

A. Buzzi from Marlboro:

"There are some people who ..believe that the backing of sport by consumer product companies such as Philip Morris is equivalent to advertising. We do not believe this to be the case at all." [37]

Fuzzy feeling

C Von Maerestetten from Rothmans:

"No one hands over big cheques just to give themselves a warm fuzzy feeling".[38]

Sales increase by 84 %

Lotus team manager, Peter Warr, talks about the effect of RJR's investment in the Lotus Formula One team:

"The Brazilian market was a small one for Camel but since the Brazilian Grand Prix its sales have increased by 84 per cent"[39].

Shallow insult

1988 David Abbott, Chairman of ad agency Abbott Mead Vickers, says:

"I think arguments like shifting brands are just insulting in their shallowness. There is no other category where you can spend between £70 million and £100 million and not have an effect in protecting or increasing the market. I think advertising has certainly slowed down the rate of decline. It has certainly helped to introduce new smokers, be they women or be they in the Third World. The other thing about cigarette advertising, I do think it makes it more difficult for health education in that it makes the Government's attitude more ambivalent."[40]

Cigarette industry talks complete nonsense

October: Advertising Executive Emerson Foote, former Chairman of the Board of McCann-Erickson, which handled $20 million in tobacco accounts:

"The cigarette industry has been artfully maintaining that cigarette advertising has nothing to do with total sales. This is complete and utter nonsense. The industry knows it is nonsense. I am always amused by the suggestion that advertising, a function that has been shown to increase consumption of virtually every other product, somehow miraculously fails to work for tobacco products"[41].

How do you sell death?

Fritz Gahagan, once a marketing consultant for five tobacco companies offers insight into his business:

"The problem is how do you sell death? How do you sell a poison that kills 350,000 people per year, a 1,000 people

a day? You do it with the great open spaces ... the mountains, the open places, the lakes coming up to the shore, They do it with healthy young people. They do it with athletes. How could a whiff of a cigarette be of any harm in a situation like that? It couldn't be - there's too much fresh air, too much health - too much absolute exuding of youth and vitality -that's the way they do it."[42]

Joe Camel

RJR launches a $75 million a year promotional campaign, the cartoon "Joe Camel", said to "appeal younger, male smokers, who had been deserting Camel in droves"[43].

Cigarettes are a Licence to Kill

July: At the opening hearing of the US Subcommittee of the Committee on Energy and Commerce of the House of Representatives, it is disclosed that the cigarette companies spread "their message in ways that do not appear even to be advertisements such as paying to have cigarettes in the movies ...for example, Philip Morris paid $42,000 in 1979 to have Marlboro cigarettes appear in the movie 'Superman II' and paid $350,000 last year to have the Lark cigarette appear in the new James Bond movie 'Licence to Kill' ...Philip Morris told us in 1987 and 1988 it supplied free cigarettes and other props for 56 different films."[44]

Express feminine independence

December: An American advertising account executive for a leading feminine cigarette brand states

"we try to tap the emerging independence and self-fulfilment of women, to make smoking a badge to express that."[45]

6000 logos

A study published in the *New England Journal of Medicine* finds that during the 1989 Marlboro Grand Prix in the US on 16 July 1989 which was broadcast for 94 minutes, the Marlboro logo was seen or mentioned 5933 times, on 49 per cent of the air-time.[46]

Turned round free fall

May 1992: Due to the Joe Camel campaign, Camel's share of sales among 18- to 24 year olds has increased from 4.4% to 7.9%. One analyst says

"Before the [Joe Camel] campaign, the brand was in free fall. The turnaround has been miraculous"[47].

$8 billion

Tobacco companies spend $8 billion a year on advertising, promotions and sponsorships in America and Europe[48].

Nothing to do with the young

8 May: Clive Turner, Tobacco Manufacturers Association:

"Advertising is all about which company gets the biggest market share. It's nothing to do with persuading young people to smoke"[49].

Committed to banning

Tessa Jowell, UK Minister of State for Public Health, speaking after the Queen's speech announces that the government intends to ban tobacco advertising:

advertising

"The Government is fully committed to banning tobacco advertising. This is an essential first step in building an effective strategy to deal with smoking"[50].

Nothing to reduce consumption

Gareth Davies, Chief Executive of Imperial Tobacco, says of Labour's proposed advertising ban:

"Obviously I am very much against anything that tries to reduce consumption of a legal product that is used by adults ...an advertising ban will do nothing to reduce consumption"[51].

Threat to circumvent an ad-ban

A spokesperson for Gallahers responds to the Government's announcement on tobacco advertising:

"There are plenty of ways of marketing products without advertising. We have strong brands that we have built up over the years and they will continue to be promoted"[52].

Simply ludicrous

20 May 1997: Clive Turner, Executive Director of the Tobacco Manufacturers' Association:

"Can you really imagine that a non-smoker watching a piece of sponsored sport is then going to rush out and start smoking? It's ludicrous to make such a suggestion. The Government's prime objective is to reduce consumption. If a ban on advertising comes, that objective will not be reached. It's as simple as that."[53]

Joe goes

July: RJ Reynolds drops the cartoon, Joe Camel, from its advertising[54].

30 violations

15 August 1997: The Committee for Monitoring Agreements on Tobacco Advertising and Sponsorship finds 30 direct breaches of the industry's voluntary advertising code[55]

Use of coffee to promote cigarettes

1998: 18 January: It is revealed that BAT is thinking of circumventing the EU ban of cigarette advertising and sponsorship by legally promoting their cigarette brand names in new ranges of coffee products. The scheme is already being tested in Kuala Lumpur. Says the shops manager in the Malaysian capital:

"Of course this is all about keeping the Benson and Hedges brand name to the front. We advertise the Benson and Hedges Bistro on television and in the newspapers. The idea is to be smoker-friendly. Smokers associate a coffee with a cigarette. The are both drugs of a type."

BAT confirms it is also looking at selling Lucky Strike clothing, John Player Special Whiskey and Kent travel.[56]

EU votes for a ban

13 May 1998: The European Parliament votes to ban all tobacco advertising, sponsorship and promotion in stages by 2006 and thereby ensures the advertising directive will pass. The tobacco industry announces that it will mount a legal challenge to the directive [57]

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5 Cigarette design: additives, low-tar and 'safe' cigarettes

Should we market cigarettes intended to re-assure the smoker that they are safer without assuring ourselves that indeed they are so or are not less safe? [...] Are smokers entitled to expect that cigarettes shown as lower delivery in league tables will in fact deliver less to their lungs than cigarettes shown higher?"

BAT in 1977 expressing worries about marketing low-tar cigarettes, which the industry knew offered false health reassurance without real health benefits.[1]

5.1 Summary

By the late fifties, through the sixties and seventies, the industry scientists were grappling with trying to find a "safe cigarette". The challenge was to reduce tar levels for health reasons, whilst maintaining similar or raised nicotine levels to keep customers hooked. Scientists struggled with the problem that, although they should reduce nicotine on health grounds, too little nicotine would help people wean themselves off cigarettes. By the late seventies, scientists were concerned that nicotine would have to be reduced so low that most smokers would stop smoking tobacco... but that threat never materialised.

By the mid-sixties, concern over the health effects of tobacco was so great that the tobacco companies begin looking at alternative nicotine delivery systems. Industry consultants and scientists warned that because of carcinogens produced by the burning of tobacco, it would never be possible to find a completely "safe" cigarette. By the seventies, the scientists believed that they could still partially solve the problem and that a "safe" cigarette was still the key to the industry's future.

Also beginning in the mid-sixties, Philip Morris begins using ammonia in its cigarette production. Ammonia transforms nicotine from a bound state to a free one, where it can be more rapidly absorbed by the smoker. Ammonia technology is now widely used through the industry.

By the late sixties companies were consciously defining "health orientated" cigarettes which had reduced biological activity compared to those termed "health reassurance", which were marketed to reassure the customer about their health claims but actually offered no significant health benefit.

By the early seventies companies were discussing 'compensation', whereby a smoker adjusts their smoking pattern in order to get a specific level of nicotine – therefore a smoker using a low tar product "compensates" for the low nicotine delivery by smoking more, an effect not replicated in the official machine measurements. By the end of the decade, industry researchers were even postulating that "the effect of switching to a low tar cigarette may be to increase, not decrease, the risks of smoking".

By the mid-seventies, scientists at the US company Liggett had developed a cigarette with a significantly reduced health hazard – however the research was taken over by the lawyers and the product was never marketed.

By the early eighties, other company researchers were told they could never market a "safe cigarette" because that would imply that other cigarettes were dangerous.

In the eighties and early nineties, B&W even started examining growing genetically engineered tobacco designed to double the nicotine in the plant.

In the nineties tobacco companies have repeatedly denied manipulating the levels of nicotine in cigarettes.

5.2 What is known - key facts on low tar and safe cigarettes

- It is impossible to remove or avoid the harmful substances that are created by the burning of dried organic material such as tobacco. The 'safe' cigarette - at least one that is smoked - is impossible.
- Compared to regular brands on the market today, low tar cigarettes do not deliver significant health benefits - despite much lower official tar yields. Smoking behaviour is determined largely by the smoker's need to consume nicotine and maintain a satisfactory blood/nicotine level. With low tar cigarettes, smokers can adopt a range of 'tricks' to ensure they take in the nicotine they need, even if the cigarette is supposed to be low in tar and nicotine when smoked by a machine. Since tar intake is closely linked to nicotine intake, the tar exposure also increases. This effect is known as 'compensation' and has been extensively documented in the scientific literature[2,3] and well understood by the tobacco industry for over twenty years.
- The addition of alkali such as ammonia increases the availability of 'free nicotine' and increases the nicotine 'hit' (and hence addictiveness) for a given nicotine content.
- There are around 6,000 additives that are permitted to be added to cigarettes in the UK. These are mostly approved as food additives. Though they are likely to break down to different products when burnt, there is no separate testing under conditions of combustion and inhalation.

5.3 What the tobacco industry said and what it knew

5.3.1 Mid-Late 1950s: scientists recognise the problem

In the beginning the scientists and the lawyers were optimistic

A scientist at Liggett remarks:

"if we can eliminate or reduce the carcinogenic agent in smoke we will have made real progress." [4] (Liggett, 1954)

A Hill and Knowlton memo quotes a tobacco company lawyer as saying

"Boy! Wouldn't it be wonderful if our company was first to produce a cancer-free cigarette. What we could do to the competition." [5]

Whoever is first to reduce tar will take the market

A Philip Morris scientist acknowledges the health problem:

"Evidence is building up that heavy smoking contributes to lung cancer."

He then recommends an...

"all-synthetic aerosol to replace tobacco smoke, if necessary ... I know this sounds like a wild programme, but I'll bet that the first company to produce a cigarette claiming a substantial reduction in tars and nicotine ... will take the market."[6] (Philip Morris,1958)

But there is a big problem if nicotine is reduced

Even at this early stage, the underlying imperative of nicotine is understood and factored into product design thinking. A BAT scientist writes:

"Reducing the nicotine per cigarette might end in destroying the nicotine habit in a large number of consumers and prevent it ever being acquired by new smokers."[7](BAT, 1959)

5.3.2 Early-Mid 1960s: the search for the safe cigarette

Scientists discuss reducing carcinogens in smoke

Senior Philip Morris scientists look into the possibility of a

"'Medically Acceptable Cigarette', which will take seven to ten years because it will require a major research effort, because carcinogens are found in practically every class of compounds in smoke."[8] (Philip Morris, 1961)

And manipulating levels of nicotine

It is clear that the companies regarded the product as a drug delivery device, which could deliver nicotine according to a design. The nicotine level of B&W cigarettes

"...was not obtained by accident ...we can regulate, fairly precisely, the nicotine and sugar levels to almost any desired level management might require."[9](BAT, 1963)

PR strategy and safe cigarette strategy in conflict

The PR problem with safer cigarettes is that they are an admission that what came before was more dangerous - something that was denied:

"When the health question was first raised we had to start by denying it at the PR level. But by continuing that policy we had got ourselves into a corner and left no room to manoeuvre. In other words if we did get a breakthrough and were able to improve our product we should have to about-face, and this was practically impossible at the PR level."[10](BAT, 1962)

Begin looking at other products for nicotine delivery

BAT begins the search for a new form of nicotine delivery - Project Ariel - which uses a water-based nicotine aerosol:

"The main objective of Ariel is to achieve the physiological response of normal cigarettes, and it was suggested that the line of attack [should be] a close comparison of the chemical state of nicotine in the tobacco extract and the smoke."[11](BAT, 1964)

5.3.3 Mid to late 1960s:

Maximum nicotine minimum tar

Head of R&D at B&W tours UK research laboratories:

"Their approach seems to be to find ways of obtaining maximum nicotine for minimum tar." [12] (BAT, 1965)

Ammonia used to increase nicotine 'hit'

By increasing the alkalinity, ammonia makes more of the nicotine 'free' and therefore increases the effect of a given quantity of nicotine in the cigarette. According to RJ Reynolds, Philip Morris begins using ammoniated sheets this year and concludes:

"increased use of the sheet periodically from 1965 to 1974. This time period corresponds to the dramatic sales increase Philip Morris made from 1965 to 1974"[13]. (RJR, undated)

BAT notes the importance of pH

A report by BAT's Research Department found that

"nicotine retention appears to be dependent principally on smoke pH and nicotine content"[14].

We have a problem – there will never be a safe smoke

Consultants to BAT conclude that a completely safe cigarette is unlikely:

"Because known carcinogens are produced from such a wide variety of organic materials during the process of pyrolysis, it is most unlikely that a completely safe form of tobacco smoking can be evolved." [15] (F Roe, M Pike, 1965 or 1966)

'Low tar' cigarettes may give low readings on machine, but high doses to smokers

The Canadian Tobacco Industry accepts low tar readings on machines:

"human smokers differ greatly in the frequency and intensity of their puffing and the amount of each cigarette they smoke. Thus there may be little relation between the figures reported from the machine and the actual exposure of any given smoker with any given cigarette"[16]. (1969)

Health reassurance versus health benefits

D R Green from BAT expounds what will become a key distinction - cigarettes that appear less harmful versus cigarettes that are less harmful:

"Although there may, on occasions, be conflict between saleability and minimal biological activity, two types of product should clearly be distinguished, viz: A health-

image (health reassurance) cigarette. A health-orientated (minimal biological activity) cigarette, to be kept on the market for those customers choosing it."[17](S.Green 1968)

5.3.4 Early – Mid 1970s:

Safe smoking is still the future

"The 'safer' cigarette is in my view the key to the industry's future."[18] (BAT 1971)

Make nicotine more effective

Liggett researches adjusting pH levels with the

"eventual goal of lowering the total amount of nicotine while increasing the effect of the nicotine."[19](Liggett, 1972)

We can reduce tar and 'reassure' customers cigarettes are healthy

"Manufacturers are concentrating on the low TPM [total particulate matter] tar and Nicotine segment in order to create brands ...which aim, in one way or another, to reassure the consumer that theses brands are relatively more "healthy" than orthodox blended cigarettes."[20](BAT 1971)

Let the Government make the health claim

A BAT document on "Smoking and Health", says that

"the industry should however never put itself in the position that by offering to publish tar/nicotine figures it is implying that some cigarettes are 'safer'. If there is to be any suggestion of this, it must come from the government."[21](BAT, 1970)

'Marketable' cigarettes versus 'safer' cigarettes

"This is what our management really expects R&D to do. Things like marketable low tar and nicotine cigarettes ...The question as to whether such cigarettes are really safer does not matter ... even our Health people wonder whether low tar and nicotine cigarettes are a good idea. I think the researches going on into the smoker's response to such modified cigarettes comprise genuine inquiry in the smoking and health field, examining what I call the 'involuntary moderation' concept of a safer cigarette."[22](BAT 1971)

5.3.5 Mid to late 1970s:

'Light' does not actually mean less

"Marlboro Lights cigarettes were not smoked like regular Marlboros. In effect, the Marlboro 85 smokers in this study did not achieve any reduction in smoke intake by

smoking a cigarette (Marlboro Lights)."[23](Philip Morris 1975)

And lower nicotine levels might wean smokers off the habit

"There is a danger in the current trend of lower and lower cigarette deliveries - i.e. the smoker will be weaned away from the habit. If the nicotine delivery is reduced below a threshold 'satisfactory' level, then surely smokers will question more readily why they are indulging in an expensive habit."[24](BAT 1977)

So we will just manipulate the pH

"As the pH increases, the nicotine changes its chemical form so that it is more rapidly absorbed by the body and more quickly gives a 'kick' to the smoker."[25](J McKenzie 1976)

And just carry on reassuring the customer

A marketing paper for BAT states:

"All work in this area should be directed towards providing consumer reassurance about cigarettes and the smoking habit. This can be provided in different ways, e.g. by claiming low deliveries, by the perception of low deliveries and by the perception of 'mildness'."[26](P Short 1977)

However filters are just a con

B&W's lawyer:

"In most cases, however, the smoker of a filter cigarette was getting as much or more nicotine and tar as he would have gotten from a regular cigarette. He had abandoned the regular cigarette, however, on the grounds of reduced risk to health."[27](E Pepples 1976)

And we are conning people about low tar

One tobacco scientist concludes

"the effect of switching to low tar cigarette may be to increase, not decrease, the risks of smoking."[28](P Lee for BAT, 1979)

And is it really ethical anyway

A scientist at Liggett asks:

"Is it morally permissible to develop a safe method for administering a habit-forming drug when, in so doing, the number of addicts will increase?" [29] (Liggett, 1978)

5.3.6 Early to Mid 1980s:

Independent evidence

A study in the *American Journal of Public Health* finds that if smokers block the holes of low-tar cigarettes, this could increase toxic by-products of smoke by up to 300 per cent.

[30] This illustrates smokers' pronounced control over nicotine administration and their ability to achieve high doses from 'low' cigarettes. (*American Journal of Public Health*, 1980)

Lawyer say can't have a safe cigarette

A scientists employed by Philip Morris on the safer cigarette programme, recalls that:

"They lawyers said we couldn't say it - we couldn't make a 'safe cigarette' because that implies that the cigarettes the manufacturers make aren't safe, and that would make the company liable so the programme was shelved." [31] (Cited *Dispatches*, Channel 4 1996)

Surgeon General recognises the task is impossible

The Surgeon General concludes that there is

"no such thing as a safe cigarette."[32](J Richmond 1981)

Need to make low tar cigarettes more attractive

"B&W will undertake activities designed to generate statements by public health opinion leaders which will indicate tolerance for smoking and improve the consumer's perception of ultra low 'tar' cigarettes (5 mg or less). The first step will be the identification of attractive scientists not previously involved in the low delivery controversy who would produce studies re-emphasizing the lower delivery, less risk concept."[33](B&W 1982)

Need to counter-act claims that low tar cigarettes are bogus

"Compensatory smoking - This is also a particularly tricky subject. On the one hand it is commercially sensitive. On the other, it must be in the interest of the industry to get data and speak out against those who claim that the low delivery programme is misleading in that smokers compensate for the low deliveries."[34](BAT, 1983)

And carry on smoke manipulation

"we can disturb the status quo either directly or indirectly ... addition of nicotine/salts/derivatives to the blend, increase/decrease nicotine availability through pH manipulation." [35] (BAT 1984)

5.3.7 Mid-Late 1980s:

'Safe cigarettes' killed off at BAT

Patrick Sheehy, the head of BAT, objects to a proposal for a safe cigarette:

"I cannot support your contention that we should give a higher priority to projects aimed at developing a 'safe' cigarette (as perceived by those who claim our current

product is 'unsafe') either by eliminating, or at least reducing to an acceptable levels, all components claimed by our critics to be carcinogenic."

[...]

"In attempting to develop a 'safe' cigarette you are, by implication in danger of being interpreted as accepting that the current product is 'unsafe' and this is not a position that I think we should take."[36] (BAT, 1986)

Stop quitters quitting

"Quitters may be discouraged from quitting, or at least kept in the market longer, by either of two product opportunities noted before. A less irritating cigarette is one route (Indeed, the practice of switching to lower tar cigarettes and sometimes menthol in the quitting process tacitly recognises this). The safe cigarette would have wide appeal, limited mainly by the social pressures to quit." [37] (Creative Research Group, 1986)

5.3.8 1990s:

Low tar advertising is misleading

"It has been argued for several years that low tar and ultra-low tar cigarettes are not really what they are claimed to be ... the argument can be constructed that ULT advertising is misleading to the smoker ..Smokers of low yield cigarette adjust their smoking manoeuvre to obtain some desired level of nicotine and therefore concomitantly increase their tar intake." [38] (RJR, c. 1990-91)

Carry on controlling nicotine

RJ Reynold's stated goal is to

"develop a viable process for the total control of nicotine in product." The 'Basis' behind this is "It is in the best long term interest for RJR to be able to control and effectively utilise every pound of nicotine we purchase."[39] (RJR 1991)

FDA: Evidence companies control nicotine

US FDA Commissioner, David Kessler says that there is

"mounting evidence"

that tobacco companies control levels of nicotine[40]. (P Pringle 1998)

BAT claims it does not manipulate

The fact that the tobacco companies are manipulating nicotine brings the greatest threat of all - that regulatory agencies such as the FDA will start to treat the product like a drug and regulate every aspect of its production and marketing.

nicotine

BAT denies doctoring cigarettes, stating that

"There is no way we add anything to enhance the nicotine."[41] (BAT 1995)

The CEO of RJ Reynolds:

"We do not increase the level of nicotine in any of our products to 'addict' smokers."[42] (RJR, 1998)

BAT admits its "Light" products may not be any safer

The tactic adopted to market 'low-tar' cigarettes was and remains to avoid explicit health claims, and to rely on the implicit health claims created by the mandatory machine-measured tar and nicotine yields - even though these are thoroughly misleading as measurements of health impact.

"We have been taking note of public health concerns by developing "lighter" products, but "we cannot promote these products as 'safer' cigarettes because we simply don't have sufficient understanding of all the chemical processes to do so."[43] (BAT,1997)

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6 Passive smoking

All allegations that passive smoking is injurious to the health of non-smokers, in respect the social cost of smoking as well as unreasonable demands for no smoking areas in public places, should be countered strongly.

BAT recognising the threat posed by passive smoking, in 1982.

6.1 Summary

At the beginning of the seventies, the industry recognised ETS as an increasing problem for the industry.

By the late seventies, the industry started forming smokers' rights organisations, and setting up front groups to defeat proposed restrictions on smoking at work or in public places. The companies have maintained that they are defending the freedom of choice, but these organisations have really operated as tobacco industry proxies. Where there is a division between the interests of smokers and the interests of tobacco companies (cessation, nicotine addiction, warnings etc) these groups have favoured their paymasters.

By the late seventies, industry research showed that there were harmful constituents in smoke – whilst denying there was any problem in private, they tried to reduce the quantity and composition of side-stream smoke (the smoke given off at the end of a burning cigarette). Some low side-stream products entered the market in the late nineties.

Just as the companies have done with the health impact of smoking, the companies have set out to misled the public about the dangers of ETS, and to create a controversy about the health implications of ETS.

By the beginning of the eighties there was increasing epidemiological evidence that ETS posed a serious threat to the health of non-smokers, and increased the risk of lung cancer.

By the late eighties, Philip Morris and lawyers acting on its behalf set up a covert programme in Europe to recruit scientists to counter the negative publicity surrounding passive smoking.

In the early nineties, measures included setting up supposed independent foundations looking at Indoor Air Quality, and the publications of articles, books and research designed to confuse the issue of ETS and create a false controversy over the dangers of sick-building syndrome.

6.2 What is known - key facts about passive smoking

- Passive smoking is a cause of lung cancer and, in those with long term exposure, the increased risk is in the order of 20-30%. This means that several hundred lung cancer deaths per year in the UK can be attributed to passive smoking.[1]
- Non-smokers living in a household with a smoker have an overall 23% increased risk of heart disease.[2]

- Parental smoking is responsible for at least 17,000 admissions to hospital each year of children under the age of five.[3]
- Mothers who smoke double the risk of sudden infant death syndrome (cot death).[4]
- Passive smoking has been found to be a risk factor for asthma, middle ear infection, bronchitis and pneumonia in children. Among adults, in addition to lung cancer and heart disease, exposure to environmental tobacco smoke has been associated with nasal cancer, exacerbation of cystic fibrosis, decreased lung function and cervical cancer.[5]

6.3 What the tobacco industry said and what it knew

6.3.1 Early to mid 1970s:

Anti-smoking attack

A Brown and Williamson lawyer senses the threat posed by passive smoking:

"The anti-smoking lobby is using the issue of the alleged health effect of smoking on the non-smoker to generate media publicity. This trend has been growing since 1970 ...There is no medical evidence concerning the health effect of passive smoking. The real purpose is symbolic to make smoking socially unacceptable and by limiting the public areas where it is permitted."[6] (B&W,1973)

6.3.2 Mid-late 1970s:

Respond with a smokers' rights campaign

"RJ Reynolds is planning to strike back at the increasing number of anti-smoking crusades in the nation by launching its own smokers' rights campaign."

The Chairman of the Board of RJR says:

"The publication will deal with the so-called public smoking issue, the latest tactic by anti-smoking groups in their effort to do irreparable damage to the tobacco industry."[7] (Tobacco Reporter 1976)

Research points to health problems in smoke

Scientists at BAT replicate an experiment carried out by Carl Becker from Cornell University showing that glycoproteins [which can induce allergic reactions] were present in tobacco smoke. A scientist

"explained that ... Beaker's findings in relation to the presence of glycoproteins in mainstream and side-stream smoke had been confirmed."[8] (J Esdterle 1977)

Further BAT research highlights that: "... there is concern over the level of nitrosamines in foodstuffs. This explains in part the sensitivity to the presence of nitrosamines in tobacco

smoke and, particularly, the levels in side-stream smoke. The latter is a potential threat to the currently held view by many authorities that passive smoking does not constitute a direct hazard."[9] (S Green 1978)

But publicly we maintain its just an annoyance

BAT: " In our view this [ETS] appears to be an area of exaggerated concern ..the question is not really one of a health hazard but perhaps more of an annoyance." [10] (BAT 1977)

Front organisations established...

B&W and the other leading US tobacco companies defeat Proposition 5, the California Clean Indoor Air Act of 1978, by forming a front organisation called

"Californians for Common Sense."[11] (E Pepples 1978,1979)

it could threaten our viability – need medical evidence to refute claims

The Roper Organisation conducts a study for the US Tobacco Institute:

"what the smoker does to himself may be his business, but what the smoker does to the non-smoker is quite a different matter ... This we see as the most dangerous development yet to the viability of the tobacco industry that has yet occurred ... The strategic and long run antidote to the passive smoking issue is, as we see it, developing and widely publicising clear-cut, credible, medical evidence that passive smoking is not harmful to the non-smoker's health."[12] (1978)

6.3.3 Early-Mid 1980s:

Independent evidence says ETS a serious risk

An article is published in *Science*, concludes that;

"ETS presents a serious risk to the health of non-smokers. Since this risk is involuntary, it deserves as much attention as outdoor air pollution."[13] (J Repace, A Lowrey 1980)

The *BMJ* publishes a major epidemiological study by Takeshi Hirayama that concludes non-smoking women married to smokers were more likely to develop lung cancer than non-smoking women married to non-smokers.[14]

Privately B&W accepts the evidence

B&W's corporate counsel, writes about the Hirayama study, saying that both German and British scientists paid by the tobacco industry had reviewed the work and

"they believe Hirayama is a good scientist and that his non-smoking wives publication is correct."[15] (J Wells 1981)

But we need to counter

"All allegations that passive smoking is injurious to the health of non-smokers, in respect the social cost of

allegations strongly

smoking as well as unreasonable demands for no smoking areas in public places, should be countered strongly." [16] (BAT, 1982)

Need to reduce side-stream and undertake research

"BAT's strategy is to develop cigarettes with reduced side-stream emissions and/or reduced smell and irritation. Conduct research to anticipate and refute claims about the health effects of passive smoking." [17] (W Irvin 1983)

6.3.4 Mid – late 1980s:

Independent evidence accumulates:

The US Surgeon General, Dr. Everett Koop, publishes a report stating that

"it is certain that a substantial proportion of the lung cancers in non-smokers are due to ETS exposure" [18] (1986)

In the UK, a Government advisory committee maintains that passive smoking increases the non-smokers' risk of developing lung cancer by 10-30 per cent.[19] (1988)

BAT mounts defensive scientific challenge

"Another important issue affecting acceptability [of smoking] is passive smoking. Our current initiatives are to challenge the whole area of 'low risk epidemiology'. There are reputable external experts who believe that this is a highly imprecise science and we are finding means for them to express their concerns."[20] (BAT, 1986)

and suggests going on the pro-smoking offensive

BAT discusses: "a more direct public relations/political campaign might need to be mounted, primarily based on protecting the rights of smokers."[21] (BAT 1989)

The covert Whitecoat Programme

US lawyers working for Philip Morris and the US Tobacco Institute, begin setting up a "European Consultancy Programme" to counter proposed restriction on ETS. The underlying theme is to covertly recruit scientists or "Whitecoats" to work on Philip Morris' behalf, who will defend smoking and try and convince people that ETS is harmless. Code-named "Whitecoat" its "end goals" are:

Resist and roll back smoking restrictions

Restore smoker confidence.

The 'pre-requisites' are

Reverse scientific and popular misconception that ETS is harmful

Restore social acceptability of smoking."[22] (J Rupp 1988)

Sick- building

BAT strategy review says: "work being funded by the Tobacco

smoke-screen

industry in the USA on Environmental Tobacco Smoke (ETS) was being funded jointly by Philip Morris and RJ Reynolds rather than by the Tobacco Institute. B&W had put money into privately funded projects at the University of Kentucky and was active in promoting work on 'sick-buildings' to research the degree to which radon and air conditioning systems were important contributors to environmental health hazards."[23] (BAT 1988)

And the denials continue

"No conclusive proof exists to support the claim that exposure to environmental tobacco smoke in public places is a health risk to non-smokers."[24] (The Tobacco Institute 1989)

6.3.5 1990s:

Major covert consultancy operation

An internal industry memo summarises the status of the "European Consultancy Programme":

"Our consultants have created the world's only learned scientific society [Indoor Air International] addressing questions of indoor air quality ...Our EC consultants have formed a consulting group called ARIA (Associates for Research in Indoor Air) ... One of our consultants is an editor of this very influential British medical journal, and is continuing to publish numerous reviews, editorials and comments on ETS and other issues ...One consultant is, for example, the advisor to a particularly relevant committee of the House of Commons."[25] (Covington and Burling 1990)

Independent evidence accumulates

The US EPA concludes that ETS is a Class A carcinogen, estimating that ETS is responsible for 3000 lung cancers annually among non-smokers, whilst contributing up to 300,000 cases annually of respiratory illness in infants and children younger than 18 months.[26] (Tobacco Control 1993)

The Report of the Scientific Committee on Tobacco and Health (SCOTH) is published:

"Passive smoking is a cause of lung cancer and childhood respiratory disease. There is also evidence that passive smoking is a cause of ischaemic heart disease and cot death, middle ear disease and asthmatic attacks in children."[27] (1998)

But its all about freedom of choice

An editorial in *Tobacco International* states:

"Communism is about the absence of choice, which is why it failed; smoking is about the freedom of choice, which is why it survives."[28] (Tobacco International, 1998)

And biscuits and fudge

Philip Morris runs a series of adverts in Europe stating that the dangers from second-hand smoke are less than those from eating cookies or drinking milk. The Advertising Standards Authority rules that the Philip Morris campaign

"gave the misleading impression that passive smoking had been proved to pose less danger to the health of UK consumers than the five activities cited by the advert."[29] (R Oram 1998)

And foul-play

The tobacco industry is accused of "foul play" for misrepresenting the findings of an unpublished WHO report. Chris Proctor, Head of Research at BAT, claims that the report:

"confirms what we and other scientists have long believed that while smoking in public may be annoying to some non-smokers, the science does not show that being around a smoker is a lung-cancer risk." [30] (*the Guardian*, 1998)

WHO issues a press release to deny that it is suppressing research and that

"passive smoking causes lung cancer." [31] (WHO 1998)

But the denials continue

John Carlisle, of the Tobacco Manufacturers Association:

"There is no statistical evidence linking passive smoking to lung cancer." [32] (*The Independent*, 1998)

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7 "Emerging markets"

"They have to find a way to feed the monsters they've built. Just about the only way will be to increase sales to the developing world."[1]

Ex tobacco company employee, R Morelli, explaining the importance of the developing countries to the industry.

7.1 Summary

With smoking rates declining or peaking in the mature markets of the west, the transnational cigarette companies have looked to expand their international operations, especially in Eastern Europe and Asia, but also Latin America and Africa.

They have exploited the recent opening up of countries that were once closed for trade because of political reasons, such as Central and Eastern Europe, and the former Soviet Union.

The American companies, with the help of their Government, have used economic muscle – and the threat of sanctions - to open up countries in Asia, such as Taiwan and Japan.

They have set out to exploit low smoking rates by women in many areas.

The companies have been trying to gain entry into China: with some 300 million smokers, China remains, for the tobacco companies, the prize. Industry executives talk about thinking about China as the limits of space or of defying the imagination. There is evidence of companies being involved in smuggling cigarettes into China.

The industry has been accused of employing double standards in advertising - especially in targeting youth, sex, the glamour of western lifestyles – in the difference of tar/ nicotine levels between developed and developing countries.

7.2 What is known - key facts about the move into developing countries

If there are no dramatic changes in cessation rates, no new interventions, and if children start smoking at expected rates, then the current 1.1 billion smokers in the world are predicted to rise to 1.64 billion by 2025. The death toll on current trends, shown below, reflects the lag between increasing smoking levels and onset of disease - effectively developing countries started later.

	Present	By 2030
Developed countries	2 million	3 million
Developing countries	1 million	7 million
Total	3 million	10 million

In developing countries, women will be a particular focus as smoking rates are currently much lower among women, than among men. Prevalence of smoking among women in developing countries could rise from the current 8% to 20% by 2025.

7.3 What the tobacco industry said and what it knew

Feeding the monster

An ex-tobacco employee interviewed by *Marketing Week*, says:

"They have to find a way to feed the monsters they've built. Just about the only way will be to increase sales to the developing world."[2] (R Morelli 1998)

A bright future in the developing world

Tobacco Reporter says:

"Tobacco use in the developed nations will trend down slightly through the end of the century, while in the developing countries use could rise by about three percent annually .. A bright picture indeed! Not a smoke-free society, but continued growth for the tobacco industry."[3] (*Tobacco Reporter*, 1998)

So we should not get too depressed .. because this industry is consistently profitable

"We should not be depressed simply because the total free world markets appears to be declining. Within the total market, there are areas of strong growth, particularly in Asia and Africa; there are new markets opening up for our exports, such as Indo-China and the Comecom countries; and there are great opportunities to increase our market share in areas like Europe ... This industry is consistently profitable. And there are opportunities to increase that profitability still further."[4] (BAT, 1990)

Even if we do have to look elsewhere

Steven Goldstone, RJR Nabisco Chairman:

"The international tobacco business has become an increasingly important source of earnings for RJR Nabisco and can be the most significant driver of our future tobacco earnings growth."[5] (*Tobacco Reporter*, 1998)

Like Asia

You know what we want", says a tobacco executive

"we want Asia."[6] (Quoted in *Unhealthy Alliance*, 1998)

Using what ever means necessary

"The US government conducted three investigations on unfair tobacco trading practices of Japan, Taiwan and Korea ...between 1985-1988, the United States' Trade Representative (USTR) threatened these nations with sanctions on goods they exported to the US unless US

cigarette companies were given free access to their markets. No other US agricultural product received the same attention and all three nations capitulated to the US's demands."[7] (G Connolly, 1998)

Taiwan and Japan are opened up..

Both Taiwan and Japan yield to American pressure and open up their domestic markets to international brands, mainly American. A survey finds that in 1984 - two years before the markets was opened up - in Taiwan's capital city, Taipei, 26 % of boys and 15% of girls had tried smoking. By 1990, the figures were 48 % for boys and 20% for girls. Smoking amongst Tokyo women increases from 10 per cent in 1986 to 23 per cent in 1991[8]. (1993)

...teen smoking rates increased, too

So what if smoking increases - We can't answer morals – we just please shareholders

Rothmans Public Affairs Manager, Rothmans Exports:

"It would be stupid to ignore a growing market. I can't answer the moral dilemma. We are in the business of pleasing our shareholders. We have a very strong feeling that if no one had heard of cigarettes in Timbuktu, then a Rothmans billboard would not mean anything. All we are doing is responding to a demand."[9] (J Sweeney 1988)

And health really isn't an issue

Rothmans representative in Burkina Faso, Chris Burrell:

"The average life expectancy here is about forty years, infant mortality is high: the health problems which some say are caused by cigarettes just won't figure as a problem here."[10] (J Sweeney 1998)

And why shouldn't they smoke our brands

Matthew Winokur, Director of Philip Morris-Asia, talking about overseas markets,

"if people are going to smoke, why shouldn't they be able to choose American cigarettes."[11](Cited by L Heise 1988)

They want to smoke them

Michael Parsons from Philip Morris

"The demand for Marlboro is phenomenal. Its like saying: 'What is the potential market for Levi jeans? Probably every second adult in Russia'."[12] (*The Observer*, 1992)

Its lucky that communism collapsed

"Until recently, perhaps forty per cent of the world's smokers were locked behind ideological walls. We've been itching to get at them ... That's where our growth will come from."[13] (*The Observer*, 1992)

And the wall came down

May: Andreas Gembler, President of Philip Morris Europe:

"When the wall came down in 1989, there were tens of millions of consumers opening up to Philip Morris. If we hadn't reacted the way we did, by now the train would have gone. We would have seen its end lights."[14] (*Institutional Investor*, 1996)

Its trench warfare out there

November: " Thomas Marsh, RJ Reynold's Regional President, says of Eastern Europe:

"Its trench warfare. Hand to hand combat. We talk with each other on certain issues of mutual interest, such as smoking and health issues, advertising restrictions, things like that. We have industry associations where we sit down and act like perfect gentlemen - and then we leave the meeting and go out and battle in the streets again."[15] (*The Observer*, 1992)

Lets not lose sight of the goal

Sir Patrick Sheehy says that BAT is

"striving for greater global reach ... These are the most exciting times that I have seen in the tobacco industry in the last forty years."[16] (*Tobacco Reporter*, 1991)

And with over 300 million smokers, there is one prize left

Rene Scull, Vice President, Philip Morris Asia:

"No discussion of the tobacco industry in the year 2000 would be complete without addressing what may be the most important feature on the landscape, the China market. In every respect, China confounds the imagination."

The limits of space

Robert Fletcher, Rothmans Regional Public Affairs Manager:

"Thinking about Chinese smoking statistics is like trying to think about the limits of space."[17] (*Window* magazine, 1992)

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Truth and the Consequences of Cigarette Advertising

An Advocate's Guide to Arguments in Support of Banning Cigarette Advertising and Promotions

Developed by the Advocacy Institute
for the American Cancer Society
and the UICC

"Cigarettes are simultaneously the source of more death and disability than any product ever invented, and also the object of the largest marketing effort ever devoted to any product."
—Kenneth Warner, Ph.D., Draft Report, Tobacco Policy Research Project, August 1991

"To argue that advertising for tobacco should be allowed to continue forever is like arguing that some industry should be allowed to sell a cholera-infected water supply. When people realize the sheer absurdity of allowing an epidemic to be promoted, their belief systems will change. At that point tobacco advertising bans will be found to be completely acceptable."
—Garfield Mahood, *ANR Update*, Winter 1988

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Introduction

One of the greatest threats to human health today is tobacco use. The World Health Organization estimates that 3 million people die each year from using tobacco; by 2025, the annual figure could grow to 10 million.[1] Dr. Richard Peto, a WHO epidemiologist, noted at the Seventh Conference on Smoking and Health in Perth, Australia that "of all of the children in China today, 50 million will eventually be killed by tobacco."[2] These frightening figures emphasize the need for all nations, especially developing nations, to take strong action to discourage tobacco use among their citizens.

Restrictions or even bans on tobacco advertising are an important part of a comprehensive national policy to discourage tobacco use. Advertising restrictions not only encourage current smokers to smoke less but also help to prevent children from using tobacco, a habit that, once started, is extremely difficult to stop. Advertising restrictions work especially well as part of a comprehensive smoking control package that includes increasing the price of tobacco products through taxes and educating citizens about the dangers of smoking.

Many governments have wisely adopted controls on tobacco advertising. As of late 1990, 21 countries had enacted total bans on advertising and promotion. Approximately 38 to 40 other countries had put in place partial ad bans by restricting particular types of advertising, such as broadcast ads.[3] With the health dangers of tobacco so widely known, why do so many countries accept cigarette advertising and promotion? An important reason is the great economic power of the transnational cigarette companies as well as of those who benefit from the billions of dollars they spend on advertising and promotion each year. In addition to private interests, many governments desire the extra tax revenues and other economic benefits that result from tobacco advertising. To protect these economic interests, the tobacco industry and its allies devote great effort to creating plausible arguments, data and analysis, and a facade of scientific respectability to defend cigarette advertising and promotion. Many of the claims of these protobacco advocates are false or misleading.

As a prohealth, antitobacco activist, *you* must act to dispel this smokescreen of falsehoods in order to clear the way for a sensible restriction of tobacco advertising and promotion.

How To Use This Guide

This American Cancer Society guide was written to help you argue forcefully for the banning of cigarette advertising and promotion. Prepared by the Advocacy Institute, it is designed to provide the basic answers to industry arguments against such a ban. It also provides references to important scientific authorities to provide support for presentations in legislative or regulatory hearings and other forums.

Part 1 explains briefly the reasons that banning tobacco advertising is important. "Winning the Debate" is a discussion of the different arguments raised by protobacco advocates against advertising bans. Each argument is examined separately, and several different responses to the protobacco position are listed. Citations supporting many of the responses are included. The guide is designed and organized for easy use when opposing a protobacco advocate or speaking to a reporter. Finally, a list of additional resources provides more information on specific topics.

Truth and the Consequences of Cigarette Advertising should provide you with the basic tools you need to fight the protobacco forces and end or prevent the dangerous and misleading influence of tobacco advertising in your society.

Why Attack the Ads?

Why should tobacco control advocates seek to limit advertising? At the most basic level, the issue is ethical. Civilized societies should not permit the promotion of a highly addictive product that *cannot* be used safely and kills about one-fourth of those who use it. Furthermore, tobacco firms now focus their marketing efforts in developing countries, where good information about tobacco's dangers is unavailable to many citizens. Such societies should be welcomed into the international economy with healthful and useful products. To use advertising to build a market among disadvantaged peoples for the

most wasteful and hazardous product that the world produces is highly unethical and uncivilized.

In addition to this ethical argument, there are many practical reasons that tobacco advertising should be controlled. The following arguments are supported by facts and sound scientific evidence. We have included a selection of the best "authorities" for each; these citations can be used to reinforce the arguments in a discussion, debate, or other forum:

Cigarette advertising and promotion contribute to a social environment that supports smoking and convinces many to start. By associating tobacco with success, glamour, and independence and making smoking seem more common than it actually is, cigarette advertising adds to the social pressures that influence young people to start smoking and discourages many smokers from quitting.

There are two important arguments included in this point. This first is that cigarette advertising promotes *smoking*, not just brand switching. Independent scientific studies strongly suggest that the more cigarette companies advertise, the more people, especially young people, start or continue smoking.

> A comprehensive research survey concludes that "the evidence linking advertising and promotion with increased smoking, and the resulting disease and death, is sufficiently compelling to warrant that it not be permitted by our society."

—J. Tye, K. Warner, and S. Glantz. "Tobacco advertising and consumption: Evidence of a causal relationship," *Journal of Public Health Policy*, Winter 1987

> In the 6 months before New Zealand prohibited tobacco advertising, cigarette advertisers increased expenditures by 14 percent (in anticipation of the ban). During that period, tobacco consumption increased by 4.3 percent, and the number of smokers increased by 2.6 percent—the first increase in prevalence in 6 years. The New Zealand Department of Health said that the increased advertising "undoubtedly caused much of the increase in smoking:
>
> Without increased advertising, smoking should have reduced due to price increases.

—figures cited by Action on Smoking and Health of Great Britain, January 1992

> Researchers at Penn State University studied the effect of advertising on market levels (overall cigarette sales) and concluded that cigarette advertising raises the demand for cigarettes generally, not just the brand advertised.

—Mark J. Roberts and Larry Samuelson, "An empirical analysis of dynamic, nonprice competition in an oligopolistic industry." *RAND Journal of Economics*, Vol. 19, No. 2, Summer 1988, pp. 200-220

> A number of econometricians have found that advertising increases aggregate demand for cigarettes. One study "concluded not only that cigarette advertising increased demand in the period of the advertising, but that it had a residual effect, creating a higher level of demand in future periods."

—L. Telser, "Advertising and cigarettes." *Journal of Political Economy*, Vol. 70, 1962, p. 498

> A 1968 study found that "the abolition of cigarette advertising would decrease per capita consumption by five percent in the first year, and cumulatively more in a negative geometric fashion in following years."

—J. Simon, "The health consequences of cigarette consumption." *Journal of Human Resources*, Vol. 3, 1968, p. 112

> Former United States Surgeon General C. Everett Koop: Tobacco advertising and promotion "increases the total universe of users and increases consumption by those who already use it. It does this and does it very effectively."

The second argument is that cigarette advertising reinforces environmental stimuli to smoke. Advertising messages create the false impression that smoking is a broadly accepted social norm.

> Pervasive advertising's contributing to an environment in which smoking is perceived to be more common, more socially acceptable, and less dangerous than it is in fact . . . would

be expected to increase consumption relative to a less supportive environment.
—Kenneth E. Warner, Ph.D., Professor, Public Health Policy and Administration, University of Michigan

How a person views smoking will have a significant effect on his consumption of cigarettes. This is where advertising can have its biggest impact: an influence which has both direct and indirect, obvious and hidden components.
—William E. Hoffman, Canadian Council on Smoking and Health

A former chief executive of RJ Reynolds testified that cigarette advertisements make smoking appear to be pleasurable, fun, and "associated with happy occasions," and "to a degree, with love and the outdoors."

Ad messages reduce the effectiveness of health warnings. Images that portray smokers as healthy (even athletic), glamorous, and attractive draw attention away from health information about the dangers of tobacco. By portraying smoking as a common, harmless practice, advertising masks tobacco's addictive nature as well as the lethal effects of its use.

Cigarette advertising undermines concerns about health hazards, reassuring smokers and those who are considering tobacco use about the safety of the habit.

Recent surveys have shown that 17 percent of U.S. smokers—10 million people—don't believe there are any health hazards associated with the habit. Forty-one percent, or 20 million smokers, are unaware of the reduced life expectancy it carries. Half, or 25 million smokers, do not know that tobacco is responsible for almost all lung cancers. (See Ken Warner, *Selling Smoke: Cigarette Advertising and Public Health*, pp. 36-39, for detailed figures.) Common sense tells us that many people do not take the risks of smoking seriously at least partly because advertising portrays smoking as innocent and benign.

Most tobacco advertising focuses attention *away* from the long-term health consequences of smoking. Images of athletic young people smoking after strenuous physical activity conflict with the realities of fatigue, debilitating illness, and premature death that come with smoking.

The tobacco industry's approach to the evidence of the health threat of its products was summed up well by U.S. Federal Judge H. Lee Sarokin. He found in a 1988 case that there was substantial evidence that cigarette companies had engaged in "a sophisticated conspiracy . . . organized to refute, undermine, and neutralize information coming from the scientific and medical community and, at the same time, to confuse and mislead the consuming public in an effort to encourage existing smokers to continue and new persons to commence smoking."

In May 1981, the U.S. Federal Trade Commission (FTC) reported to Congress that "many cigarette advertising techniques appear to denigrate or undercut the health warning. Information obtained from subpoenaed documents indicate that, at least in the case of several advertising campaigns, these techniques have been carefully planned."

FTC cited the recommendation of a marketing consultant, "DON'T communicate health or health-related points." It also found evidence that such advice had been followed in the advertising for Brown & Williamson's Viceroy brand.

Another cigarette firm declined to advertise a new gas filtration system for Fact cigarettes "in order to avoid educating the public about the presence and hazardous nature of gases in cigarette smoke."
—Matthew Myers et al.,"Staff Report on the Cigarette Advertising Investigation," Federal Trade Commission, May 1981, p. 73

In addition to suppressing health information, tobacco advertising falsely suggests that the use of low-tar, low-nicotine products may make smoking safe. This too is false and misleading.

New England Journal of Medicine, June 15, 1989: "The tobacco industry has responded [to health education efforts] with advertising campaigns that imply that some cigarettes—'low yield' brands—are safe, or safer than others . . . information about low-yield cigarettes may be used to convince people that smoking is not as hazardous as it once was. As a result, smokers may switch to low-yield cigarettes rather than quit."

Dr. Claude Lenfant of the U.S. National Heart, Lung, and Blood Institute stated in testimony to Congress that "despite the seductive advertisements, there is no less hazardous, safer cigarette."

Many of the images and themes used in cigarette advertising and promotion are known to appeal to children and young people. Often, ads exploit the insecurities of children, influencing some who might be considering tobacco use to begin smoking and leading them into a life of cigarette addiction and disease. As most young people have difficulty understanding the concept of addiction or the long-term health threat posed by tobacco, allowing ads to contribute to their decision about smoking is especially dangerous.

Much cigarette advertising is designed to reach audiences of young people. Broadcast ads reach the very youngest members of society; in many countries cigarette ads dominate the radio stations most popular with teenagers. The sponsorship of rock concerts, rodeos, and other youth-oriented events undermines efforts to combat illegal smoking by youth and associates smoking with youth role models. Sampling—the distribution of free cigarettes at the events themselves—puts cigarettes directly into the hands of young smokers and potential smokers. In poor areas, billboards often dominate the environment of the young and the uneducated.

McCarthy and Gritz of University of California at Los Angeles (1987) describe the complex, indirect effects of advertising messages on teenagers: "The pervasiveness of cigarette advertising and the sophisticated appeal to teenagers' developmentally salient needs probably facilitate the transition from smoking a few cigarettes out of curiosity and in response to peer pressure into lifetime smoking, where smoking becomes embedded in the everyday social fabric and psychological well-being of the teenager."

—William J. McCarthy and Ellen R. Gritz, "Madison Avenue as the Pied Piper: Cigarette advertising and teenage smoking," presented to the American Psychological Association, New York City, August 1987, p. 20

Powerful images, assimilated even before a child learns to read, establish norms of desirable behavior to which there is no equally compelling cultural challenge. Images of the happy, sexy, healthy, young smoker signalling independence, adventure, and adulthood need no literacy or information-seeking to absorb. They are visible in newspaper and magazine ads, posters, billboards, and [at] sports and other youth-oriented events. These messages both initiate and legitimize or reinforce the attractiveness of smoking. By contrast, information about the deadly consequences of smoking is relatively rare. It requires both literacy and active information-seeking to find the information, let alone assimilate it. As long as that imbalance exists, we are marketing death on a cultural assembly line, especially targeted at the most vulnerable groups of people in our country and the world.

—*Youth and Drugs: Society's Mixed Messages*, U.S. Office for Substance Abuse Prevention (OSAP), 1990, p. 113

Cigarette advertising exploits the fears and frustrations of disadvantaged people. Ads targeted at women associate smoking with romance, social acceptability, sexual attractiveness, and independence; ads targeted at the poor and oppressed associate smoking with prosperity, success, social liberation, and independence.

Tobacco advertising lures women into smoking with subtle promises of success in a man's world, liberation, independence, and feminism. At the same time, many ads appeal to the concerns of more traditional, "unliberated" women, associating smoking with romance, social acceptability, and sexual attractiveness. Many ads connect smoking with thinness,

exploiting women's insecurities and subordinating health hazards to body image.

> Advertisements portraying women who smoke as sexually attractive, sophisticated and glamorous seem to be the most important influencing factor for the smoking group. This is in agreement with findings from industrialized countries.

—Dr. Mohamed Abdelmahmoud Al Arabi, "Women—Smoking habits in Sudan," paper presented at the Seventh World Conference on Smoking and Health, 1990

As more of the world's most wealthy and educated people shun smoking, the tobacco industry has redirected its advertising toward young people, the poor, and cultural minorities. This is true both in the developed world, where billboards are common only in the poorest neighborhoods, and in developing nations, where the TTCs use lack of health education and the deceptive promise of a better life to push tobacco. This is *colonialism*, not *liberation*.

> The tobacco industry is subjugating people of color through disease. You cannot keep your job if you are ill. You do not function, you do not challenge, you do not confront the status quo if you are ill.

—Dr. Reed Tuckson, Commissioner of Public Health for Washington, D.C.

> Clearly, the existence of large numbers of Hispanic children has a major impact on the makeup of the future adult population. What smoking patterns they will develop by that time is being determined now—and too often the major influence is the industry, not parents, educators, and health professionals.

—Jane Delgado, National Executive Director of COSSMHO (a Latino-American organization)

> Recent developments in the Third World are a major source of concern. This pertains to the expansion and shift of advertising targets to this region—where multi-media tobacco and tobacco-related propaganda incessantly assaults our local population with their ready cash and financial support for sporting events and broadcast revenue . . . . This unhealthy trend should not be allowed to succeed in Malaysia.

—Dr. David Q.L. Quek, "Myocardial infarction and cigarette smoking among Malaysian women," paper presented at the Seventh World Conference on Smoking and Health, 1990

The dependence of the mass media on cigarette advertising money prevents adequate media attention to smoking control needs and initiatives. Directly and indirectly, the tobacco industry pressures media to ignore or soften negative health reports on smoking, stories of smoking control policy initiatives, investigative stories about cigarette industry lobbying and marketing abuses, and editorial positions on smoking control policies.

> A study published in the *New England Journal of Medicine* showed that magazines that carry cigarette advertising are 38 percent less likely to publish articles on the risks of smoking than are magazines without cigarette ads.
>
> Americans substantially underestimate the dangers of smoking as compared to other risks to health. If the media bombard the public with frightening stories about health risks, ranging from toxic dumps to the use of Alar on apples, and fail to accord smoking its proper position in the constellation of risks, the public will confuse the important with the trivial. People who might not smoke if full and balanced coverage of the risks of smoking were available would continue to smoke. Avoidable suffering and premature death are the inevitable consequences.

—Warner, Goldenhar, and McLaughlin, "Cigarette advertising and magazine coverage of the hazards of smoking," *The New England Journal of Medicine*, Vol. 326, No. 5 (January 30, 1992), pp. 305-308

> A 1986 survey by the American Council on Science and Health examined a group of 20 magazines. Of the magazines surveyed, 4 out of 5 rated best in terms of overall coverage of hazards of smoking and health did not accept cigarette advertisements. Among those who scored the worst in terms of covering the smoking and health issues were *Cosmopolitan*,

Redbook, *Ladies' Home Journal*, and *Ms.*, all of which depended heavily on tobacco advertising.

An investigative reporter for the U.S. television show "20/20" reported that a number of years ago, *Family Circle* asked him to write an article, but told him, "Don't write about cigarettes, it might offend advertisers."

Harper's Bazaar rejected a science writer's article titled "Protect Your Man From Cancer," even though it had been specifically commissioned and already paid for. The editor explained that "the article focused too much on tobacco" and that "the magazine is running three full page, color [cigarette] ads this month."

Cosmopolitan publisher Helen Gurley Brown explained the need as an editor to avoid offending the tobacco industry: "Having come from the advertising world myself I think, 'Who needs somebody you're paying millions of dollars a year to come back and bite you on the ankle?' "

—Ken Warner, *Selling Smoke*. Washington, D.C., APHA, 1986, p. 74

Sponsorship of sporting and cultural events gives the tobacco industry a legitimacy it does not deserve. Sports promotions deceptively link smoking with health and athletic ability. Sponsorship of cultural and artistic programs are designed to portray the industry as a responsible member of society. Such false impressions work to hide the fact that the tobacco industry produces, and markets aggressively, the largest cause of preventable death in the world.

The money spent by the tobacco industry in sponsoring a wide variety of artistic, social, and political movements and events lends legitimacy, or "innocence by association," to cigarette manufacturers. In doing this, it gains considerable control of the groups it pays and subdues or squelches their support of the antitobacco movement.

African-American groups in the United States, for example, routinely accept money from tobacco companies. In 1987, the United Negro College Fund received $267,000 from RJ Reynolds, $120,000 from Philip Morris, and $32,000 from Brown & Williamson. Paul Ruffins, editor of the Congressional Black Caucus' quarterly magazine and a former advertising worker, raised concern that such groups are being "co-opted" by tobacco firms: "As a propagandist, I can see what's happening . . . Black and poor people are being used in propaganda wars that have nothing to do with them."

—Myron Levin, "Buying innocence by association—Tobacco's strange bedfellows," in the *APF Reporter*, Spring 1988, pp. 25-29. See also R.G. Robinson, M. Pertschuk, and Charyn Sutton, "Tobacco prevention and control: Targeting the African American community," *Kaiser Family Foundation*, 1991, pp. 35-49, for additional information

Tobacco firms also fund tennis, golf, college basketball, soccer, and other sports tournaments, including auto racing. The sponsorship of such events, and the use of athletes as role models and spokespeople, hides the fact that tobacco use destroys health and athletic performance. This sponsorship also results in the self-censorship of sports figures who might otherwise speak out against smoking.

Olympic diver Greg Louganis, testifying before the U.S. Congress in 1986, was told that, if he chose to become chairperson of the American Cancer Society's Great American Smoke-Out, he would be forced to give up his Philip Morris-sponsored training facilities, and possibly his hopes for Olympic competition. Louganis, an avowed antitobacco advocate, explained: "With the Olympics but a few months away, I had little choice but to turn down chairmanship of the Great American Smoke-Out and instead concentrate on my training."

—Congressional testimony of Greg Louganis, July 18, 1986

For years the professional women's tennis tour has been sponsored by Virginia Slims. Although the health effects of smoking on women have been the subject of much study and concern during this period, no female tennis star has been willing to speak out.

Winning the Debate

This section lists the different arguments raised by protobacco advocates, along with tobacco control responses worded for their strongest impact. Each issue is considered on its own page, as follows:

- A quick statement of the tobacco industry argument, along with other ways it might be phrased.
- A brief comment discussing the argument and the appropriate response.
- Several responses to the arguments, including the best approaches to countering an industry spokesperson in a newspaper column, on a talk-show, or in a debate. Many of these responses will be followed by useful supporting material in smaller print. Where necessary, additional strategy notes are included.

ARGUMENT: There's no proof that cigarette advertising increases tobacco use.

"Experts say that many factors contribute to smoking." "Smoking is a complex behavior." "Our studies find no relationship between advertising and smoking." "Children smoke because their parents do." "Marijuana isn't advertised, but a lot of people still smoke it."

There is solid logic and evidence to support the effectiveness of cigarette advertising bans, but absolute scientific proof will never be possible to obtain. Protobacco advocates undermine the evidence of this effectiveness by placing the burden of "absolute proof" on smoking control advocates before adoption of any smoking control policy is justified. To respond, emphasize the existing evidence that supports advertising bans, point out the dishonest nature of the protobacco claims, and place the burden on the cigarette industry to prove that advertising does not promote smoking.

Responses

Common sense tells us that the billions of dollars spent to make smoking romantic, mature, and successful and the thing that "beautiful" and healthy people do will attract some people, especially young people, to take up smoking who might not otherwise have done so and will influence some smokers who might have quit to keep on smoking. Shouldn't the industry that promotes this lethal product be responsible for proving that cigarette advertising *does not* induce anyone to smoke or keep anyone from quitting?

> Maintaining a position that requires the attribution of specific effects to specific factors might be a sign of a lack of understanding of the . . . variables that determine behavior, were it not such an obvious cynical industry tactic to keep on asking unanswerable questions . . . . As it is, tobacco industry insistence that it is up to smoking control advocates to 'prove' that advertising influences market size represents a cynical exercise in promoting tail-chasing.

—Simon Chapman, *The Lung Goodbye*. The Hague, IOCU, 1985, pp. 47-48

Many studies performed by scientists not hired by the tobacco industry do demonstrate that cigarette advertising can increase smoking. See Part I for citations of scientific papers that establish the effect of tobacco advertising on consumption.

> Tobacco advertising and promotion "increases the total universe of users and increases consumption by those who already use it. It does this and does it very effectively."
>
> —Former U.S. Surgeon General C. Everett Koop

> The current advertising and promotion practices engaged in by the tobacco industry are aimed at expanding the market for their products, specifically through the targeting of those populations among which there is the greatest potential for growth: youth, women, and minorities. By depicting a product as an integral part of a highly desirable lifestyle and personal image . . . an advertiser can attract individuals who do not currently use that product but who want to emulate that lifestyle and project a depicted image. Thus, ads which effectively associate smoking with the latest trends or ideas or with independence, sophistication, sexual, social, or athletic success and happiness will attract smokers and nonsmokers alike who appear in the ads.

—Charles Sharp, a management consultant to many of the top advertising firms in the United States

Almost all studies and experts cited by the tobacco industry are funded by the industry. These "experts" use the same dishonest and distorted arguments against the effects of advertising as they use to deny the dangers of smoking.

> Tobacco Institute officials told U.S. House Energy and Commerce Subcommittee on Health and the Environment that while tobacco advertising expenditures increased, smoking by high school seniors declined . . . . And they stressed, in something of a non sequitur, that although tobacco advertising may make smokers switch or stick to their brands, 'it does not cause smoking any more than soap advertising causes people to bathe or detergent advertising causes people to wash their clothes.' Another researcher . . . summarized studies showing that attitudes developed while growing up with parents, peers, and older siblings are the most important determiners of the decision to smoke. Of course, none of these arguments addresses the media's role in contributing to (rather than single-handedly causing) and cultivating relatively stable patterns of thinking and action.
>
> The leading industry arguments of brand name cultivation and the theory of mature markets actually confirm (rather than deny) the powerful consequences of steady exposure. Constant innovation and plugging of brand names is of course a way of saturating a market by targeting a large variety of ages, tastes, and styles and developing a niche for every group. The mature market theory takes saturation as a starting point and advances the argument that no change in that market means advertising has no effect, at least in terms of total numbers of consumers.

—*Youth and Drugs: Society's Mixed Messages*, OSAP, 1990, p. 110

Because nearly all smokers begin before they become adults, we must adopt the same standards of evidence in judging whether to take action to prevent smoking as we do for any addictive drug or disease affecting our children. (See Argument 10 on children, advertising, and smoking initiation.)

The misery, disease, and death caused by smoking are so vast that we must take every reasonable action to halt its spread. In an epidemic, you don't wait for proof that quarantining the cause will halt the disease; you take all rational measures against spreading the disease.

The only countries that have succeeded in reducing smoking are those that have adopted comprehensive smoking control measures. Although the effects of advertising restrictions may be difficult to separate out, controls on advertising are an important part of all effective smoking control programs.

> The findings from this study show unequivocally that tobacco consumption can be effectively decreased by government policies which ban tobacco promotion and raise tobacco prices . . . . For policy purposes, in the opinion of the Board, there is sufficient evidence from the 33 countries as a whole, and from the Board's report, to recommend the abolition of tobacco promotion as an essential part of a comprehensive policy to lower tobacco consumption.

—from "Government tobacco promotion policies and consumption trends in 33 countries from 1970 to 1986," in *World Smoking and Health*, Vol. 15, No. 1, Spring 1990, p. 19. (For a full examination of the data involved in this study, see the New Zealand Toxic Substances Board, *Health or Tobacco: An End to Tobacco Advertising and Promotion.* Wellington: New Zealand Department of Health, May 1989.)

Many people may smoke marijuana, but many, many more would smoke it if it were advertised. Even those who claim that such drugs should be *legalized* don't argue that they should be *advertised*!

We know that cigarette smoking is such a complex behavior that only a comprehensive set of tobacco control measures, working together, can reduce smoking effectively. No one claims that cigarette advertising is the only factor that influences young people to smoke or smokers to keep smoking. The smoking of friends and family are certainly influences, so it is not surprising that it is scientifically very difficult to separate out the influence of advertising. The tobacco companies know this.

The tobacco industry claims that the "correlational evidence" linking advertising and smoking is invalid. But the industry invests billions of dollars in advertising based solely on such evidence. There is absolutely no direct proof—other than statistical correlation—that advertising makes anyone buy Marlboros. But Philip Morris plainly is convinced that advertising works.

ARGUMENT: There is no evidence that advertising bans or restrictions reduce smoking.

> "Ad bans don't work." "In Eastern Bloc countries, there were ad bans for years—but smoking continued to increase." "Previously enacted bans have failed to reduce consumption; indeed, in some cases, they have led to increased tobacco consumption."

Many protobacco spokespeople, using flawed or dishonest "scientific" analysis, claim that advertising bans and other restrictions have no effect on tobacco consumption. They argue that even with advertising, smoking rates are going down in some areas, while countries that have never had tobacco advertising have increasing smoking rates. These arguments are specious and unscientific. In fact, examination of many countries before and after an advertising ban shows that tobacco consumption is much lower than it would have been without the ban.

Despite the claims of the industry, considerable credible scientific evidence suggests that ad bans can work. Don't let the protobacco side claim that science is on their side. Also, ask them why, if advertising bans won't affect their sales, they fight so hard against them!

Responses

No civilized society waits for certainty before acting to halt the spread of an addictive killer.

You are misrepresenting the evidence. In countries that have adopted advertising bans as an integral part of a comprehensive smoking control program, cigarette smoking has declined.

It is technically difficult to assess the impact of specific variables on consumption because the many other factors that influence the decision to smoke are constantly changing. These factors include social, religious, parental, sibling, and peer smoking behavior and attitudes; price and disposable income; and age limits, education, and social class. In general, it is hard to compare experiences across diverse countries that have wide cultural differences. But there is clear evidence from the Scandinavian countries, and most recently from New Zealand, that comprehensive tobacco control programs that include a ban on advertising and promotion are effective at reducing tobacco consumption.

> Recent data from New Zealand shows that, in the first 6 months of that country's advertising ban, tobacco sales fell by over 7 percent, and one in 11 smokers stopped smoking. In Canada, the rate of decline in cigarette consumption per adult has doubled since their advertising ban went into effect in January 1989.

—Figures cited by Action on Smoking and Health (of Great Britain), January 1992

> A study by the Toxic Substances Board of New Zealand examined the relationship between government tobacco promotion policies and tobacco consumption trends in 33 countries between 1970 and 1986. They found that "Government [as opposed to self-imposed industry] tobacco advertising bans and controls are accompanied by enhanced rates of fall in tobacco consumption; in the absence of any such control, consumption increases.". . . "Total tobacco promotion bans for health reasons are, on average, accompanied by falls in tobacco consumption which occur four times faster than in partial ban countries."

Data from 18 countries show that legislation banning tobacco promotion has had the effect of reducing the numbers of young people who begin smoking. See also Murray Laugeson and Chris Meads, "Do tobacco advertising bans lower consumption? Tobacco advertising restrictions, price, income, and tobacco consumption in OECD Countries, 1960-86," in *The Global War: Proceedings of the Seventh World Conference on Tobacco and Health*, Health Department of Western Australia, 1990, p. 126; and Kjell Bjartveit, "Fifteen years of

comprehensive legislation: Results and conclusions," Ibid., p. 71, for more evidence linking advertising bans and reductions in smoking initiation.

Tobacco companies try to reduce this complex scientific problem to a simple lie. The truth is, ad bans are effective—that's why the industry fears them.

> The issue is not whether advertising (and other promotional techniques) play the major role in enticing people (almost always children) to initiate tobacco use. Rather, the issue is whether advertising plays any role in encouraging consumption, and if so, what is its nature and its quantitative importance.

—Kenneth E. Warner, Ph.D., Professor, Public Health Policy and Administration, University of Michigan

If the smoking control measures proposed will be so ineffective, why does the tobacco industry as a whole resist their adoption so fiercely?

High smoking rates in countries that have never had advertising are not relevant to the question of the effectiveness of an ad ban. Tobacco use would likely be even more prevalent with cigarette advertising in these areas.

> In the realm of 'causal empiricism,' the tobacco industry often points to the fact that many countries, particularly East Bloc Communist countries, have never permitted cigarette advertising, yet they have high and growing rates of smoking. To suggest that this tells us anything at all about the role of advertising on smoking is simply wrong. No one argues that advertising is the only cause of smoking, and it is well documented that smoking has increased in all societies as they have gone through the stages of development. The relevant question is whether smoking rates would have been higher than they are, or whether the spread of the smoking habit would have been faster, if advertising would have been permitted.
>
> —Kenneth E. Warner

Although it is difficult to show a direct cause-and-effect relationship between an advertising ban and a drop in consumption, there is no proof that advertising bans did not help reduce smoking. Besides, the few cases in which the tobacco industry claims ad bans were followed by increases in consumption are not borne out by the data.

> The evidence presented by industry's experts to prove that bans don't work are based upon flawed or dishonest analysis. The industry often refers, for example, to the experience of Norway, where the total consumption of cigarettes increased by 42 percent between 1975, when a total advertising ban was imposed, and 1986. This figure does not mean very much in Norway, where most people roll their own tobacco and do not smoke cigarettes. In the years cited by the industry, total tobacco consumption per adult actually decreased by more than 8.5 percent. See advertisement, *Toronto Globe and Mail*, July 14, 1987, p. A11, and New Zealand Toxic Substances Board, in *Health or Tobacco: An End to Tobacco Advertising and Promotion.* Wellington: New Zealand Department of Health, May 1989.

> The work of Jean Boddewyn has sparked particularly pointed criticism. Three well-known scholars involved in the debate over advertising bans made these comments: "[Boddewyn's] approach to understanding the influence of advertising is bereft of credibility." As regards Boddewyn's publications, "One can only hope that the slick presentation of these booklets and the attempts to dignify their contents with academic respectability will be as transparent to their recipients as the industry's other major blind spot: the claim that smoking is not harmful to health."

—from Simon Chapman, Nigel Gray, and Judith MacKay, "Boddewyn on tobacco advertising: A critique of some recent tobacco and advertising industry propaganda," unpublished draft, February 1988, pp. 6-7

Because tobacco is so dangerous, the tobacco and advertising industries should have to prove that advertising does not increase cigarette consumption, rather than the other way around.

ARGUMENT: Advertising does not increase consumption; it merely encourages smokers to switch brands.

> "We're just fighting for market share." "Cigarettes are a 'mature' market." "Why would we direct our ads at people who don't smoke?" "Do automobile ads make people want to drive?" "You don't understand our business."

Tobacco industry experts claim that cigarette advertising is not designed to make smoking seem acceptable or inviting to nonsmokers but merely to lure current smokers to their own brand. They will condescendingly argue that those who think otherwise have made a simple-minded error. Respond with the findings of advertising experts that, in markets dominated by a few large companies, advertising always contains an element of market expansion as well as brand promotion.

Responses

How could you design an ad that makes Marlboros or Virginia Slims attractive, romantic, and appealing to a 19-year-old smoker but totally unappealing to an impressionable 14-year-old who hasn't yet decided to smoke?

Of course they're looking for new smokers—their customers are dying. Support this point with the devastating worldwide statistics on tobacco-related death and disease, along with your national or local figures, if you have them.

> More than 3 million people will die each year from tobacco-related disease in the 1990s.

—Richard Peto, "Worldwide mortality from current smoking patterns," in *The Global War*, p. 66

> Advertising experts (outside the tobacco industry) say that the basic purpose and result of advertising [are] to increase consumption of the brand by expanding the overall market as well as promoting brand switching.
>
> Researchers at Marquette University surveyed advertising professionals in Milwaukee, Wisconsin, and Minneapolis, Minnesota. They found that "respondents disagreed strongly with the [advertising] industry stand that tobacco advertising does not influence youngsters to start smoking. Respondents also believed advertising does increase primary demand and that a ban would reduce the number of new smokers, all contrary to industry leaders' statements.
>
> Overall, one point stands out clearly. When advertising spokespersons testify that advertising doesn't encourage smoking or that a ban on tobacco advertising will not decrease consumption they do so against the beliefs of those they claim to represent.

—John H. Crowley and James Pokrywczynski, "Advertising practitioners look at a ban on tobacco advertising," in *Journalism Quarterly*, Vol. 68, No. 3 (Autumn 1991), pp. 329-337

> One marketing employee [of Brown & Williamson] expressed candidly to the *Louisville Courier-Journal* the industry's market expansion strategy: "Nobody is stupid enough to put it in writing, or even in words, but there is always the presumption that your marketing approach should contain some element of market expansion, and market expansion in this industry means two things—kids and women. I think that covers the thinking of all the companies."
>
> Emerson Foote, former chairman of the board of McCann-Erickson, once responsible for $20 million in cigarette accounts: "The cigarette industry has been artfully maintaining that cigarette advertising has nothing to do with total sales . . . . This is complete and utter nonsense . . . . I am always amused by the suggestion that advertising, a function that has been shown to increase consumption of almost every other product, somehow miraculously fails to work for tobacco products."
>
> David Abbott, a leading British advertiser, has remarked: "I think it's incontrovertible, though people will argue against it, that advertising things encourages people to use them. The advertising industry believes that in every other product. I don't see why the rules are different for cigarettes."

—Simon Chapman, *Great Expectorations*. London: Comedia Publishing Group, 1986, pp. 26-27

It is common sense that any advertising or promotion that makes the smoking of a particular brand attractive also makes smoking attractive. (See Argument 1 for a variety of citations on this point.) The thrust of much cigarette advertising promotes a smoking lifestyle, not the specific merits of a particular brand. The most recent research reveals that additional advertising increases the demand for all cigarettes—not primarily the advertised brands.

> Research from 33 countries reviewed and analyzed by the Toxic Substances Board of New Zealand reveals that general demand for tobacco rises with increased advertising. Independent scientific studies strongly suggest that the more cigarette companies advertise, the more people, especially the young, start and continue to smoke.

—*World Smoking and Health*, American Cancer Society, Vol. 15, No. 1: Spring 1990, pp. 15-20

> Roberts and Samuelson, Penn State University: "The empirical results reveal that cigarette advertising affects primarily the level of market demand rather than the distribution of market shares."

If cigarette advertising affected only brand choice, it would be a waste of money for the industry. Fewer than 10 percent of all smokers switch brands each year, and many of those switch to another brand owned by the same company. If the goal of cigarette advertising is to get smokers to switch brands, then the industry is spending more for each converted customer than it earns.

> Fewer than ten percent of all smokers switch brands each year. Since there are only six major manufacturers of cigarettes in the United States and two of the manufacturers have about 75 percent of the total cigarette market, many, if not most, of those who switch brands change to another brand of the same company. At these rates, the tobacco industry is spending more each year for each person who switches than it makes.

—Matthew Myers, "Tobacco marketing and promotion," in *Final Report of the Tobacco Use in America Conference*. Washington: American Medical Association, 1989, p. 30

If advertising does not increase consumption as well as promote brand switching, why does it take place in countries with tobacco monopolies? In their markets, there is no competition, and brand switching is irrelevant, yet cigarette advertising often remains prevalent. At one time or another, many countries with state tobacco monopolies have engaged in widespread cigarette advertising.

> The March 30, 1985, issue of *The Lancet* listed 11 countries that, at that time, had tobacco monopolies that advertised: Austria, Cameroon, Denmark, Ivory Coast, Japan, Kenya, Mauritius, Syria, Thailand, Tunisia, and Turkey.
>
> In the late 1970s in Kenya, the BAT monopoly was the fourth largest advertiser for any product.

—Simon Chapman, *Great Expectorations*. London: Comedia Publishing Group, 1986

When advertising agencies promote their services for every other product than cigarettes, they boast and promise that advertising builds both brand loyalty and a bigger overall market. What makes tobacco different?

To compare buying cigarettes to buying a car is ridiculous. People spend weeks comparing different kinds of cars before they choose one. Cigarettes are more like candy; you can try a pack for the price of a newspaper or a small toy. Thus, an ad portraying smoking as attractive, healthy, and fun might lead to a quick-impulse buy. Unlike candy, of course, tobacco is very addictive; once the cigarette companies sell you a few packs, they've often made a lifelong customer.

> REMEMBER: An important part of the protobacco argument here is to portray you, the smoking control advocate, as a naive do-gooder who doesn't understand "business." Do not let this happen. Both the facts and common sense

are on your side, and the industry claim that their advertising is not intended to make more people buy more cigarettes can be easily exposed as either stupid or dishonest.

ARGUMENT: Advertising bans interfere with consumers' freedom of choice.

"If companies' ability to advertise their products is limited, consumers will not receive full information which they need to make informed purchasing decisions." "Consumers have a right to know—and to choose!" "Next, they'll want to outlaw smoking!"

The industry employs the free-market symbol of "freedom of choice" to discredit proposed regulations of cigarette sales and promotion. Ironically, their argument implies that a consumer has the right to accurate product information; the right to choose a product free of misleading or inaccurate information in its advertising. This alone provides a basis for restricting tobacco advertising, which is often misleading. Respond by highlighting the lack of real product information in cigarette advertisements.

If provoked, be sure to point out that no one proposes to limit the freedom of adult smokers to smoke either in the privacy of their own homes or in places where their smoking does not harm others.

Responses

Advertising bans don't interfere with the choice of the adult smoker to continue smoking—only with the license of the cigarette advertisers to stimulate smoking and reinforce it as a desirable social norm.

No one proposes to interfere with the freedom of consenting adults to commit smoking in the privacy of their own homes.

—U.S. Senator Robert Packwood

Every child and adolescent has the right to be protected from all tobacco promotion and to receive all necessary educational and other help to resist the temptation to start using tobacco in any form.

—from "The charter against tobacco," World Health Organization, Regional Office for Europe, 1988

Freedom should be seen not as the freedom of the manufacturer to promote a known health hazard but rather as the freedom and ability of society to implement public health measures.

Cigarette advertising interferes with consumers' freedom of choice by giving them false and misleadingly incomplete information, especially about the health dangers of smoking.

Tobacco advertisements are almost always misleading, promoting images that associate smoking and health, even as they avoid discussion of the proven health dangers of the product:

In my opinion much of today's advertising for tobacco products is deceptive . . . . One of the more outrageous cigarette ads had used, for at least a decade, the slogan 'Alive with Pleasure.' This is clearly a message designed to undermine the Surgeon General's warning. If you consider smokers who suffer from lung cancer, emphysema, or stroke caused by smoking, truth in advertising would demand use of the slogan, 'Dying in Agony' instead of 'Alive with Pleasure.'

—U.S. Surgeon General Dr. C. Everett Koop, testifying before the House Subcommittee on Transportation and Hazardous Substances, September 13, 1989

Even beneficial products such as polio vaccine and measles vaccines are required to have package inserts that detail the expected rare adverse reactions. Why are cigarette companies not required to provide similar information[?] . . . . Why are they allowed to perpetuate false advertising?

—William Foege, M.D., M.P.H., former president of the American Public Health Association

Most smokers begin smoking when they are too young to understand the risks, and by the time they are old enough to make an informed choice, their addiction undermines their freedom of choice.

About 90 percent of current adult smokers began as teenagers (*U.S. Surgeon General's 25th Report*, pp. 298-299). Virtually no one takes up smoking as an adult. Restrictions on the marketing and promotion of cigarettes are primarily designed to limit efforts to

make smoking attractive to young people. Most societies do limit the free choice of 12-, 13-, and 14-year-olds to take up lethal, addictive habits—and any commercial efforts to persuade them to do so.

Most cigarette advertising contains very little product-specific information; it generally promotes only a false image of smoking as healthy and glamorous.

It is ironic that the industry claims to be interested in protecting the consumer's right to receive information when it so carefully avoids giving out any information about the hazards or contents of its products.

"Tombstone" advertising—which would permit only the printing of text, such as information on tar, nicotine, and other ingredients, in cigarette ads—would fulfill tobacco advertisers' stated aims, but it is vigorously opposed by them as limiting their ability to communicate important information to their customers.

> A former chief executive of RJ Reynolds explains that cigarette advertisements are designed to make smoking appear to be pleasurable, fun, and "associated with happy occasions," and "to a degree, with love and the outdoors."
>
> Tobacco advertising is . . . defended on the grounds that the consumer has the right to receive product information and thereby make an informed choice. Presumably this means that people who prefer kayaking to racquetball will choose Camels over Kents.

—Peter Hanauer and Michael Pertschuk, "Tobacco advertising and the First Amendment," *Social Science Record*, Vol. 25, Issue 2, Fall 1988, pp. 17-18

What relevant product information is communicated by cigarette advertisements showing scenes of Marlboro country and smokers participating in sports?

Most smokers want to quit but find that they can't. This is why the industry targets much of its marketing at young people, who are not in a position to appreciate the addictive powers of tobacco or its deadly effects.

> "Cigarette companies practice false advertising at its worst; deceptive in offering freedom while actually inducing bondage [through addiction]."

—William Foege, M.D., M.P.H., former President of the American Public Health Association, testifying before the U.S. Congress, July 18, 1986

> Certainly, we should all sleep better at night with the realization that our teenagers will be so much better equipped to make an 'informed choice' by knowing that Salems are 'alive with pleasure'—at least until the lung cancer comes.
>
> —Hanauer and Pertschuk, p. 18

As educated, mature men and women shun smoking, the cigarette companies step up their advertising to young people and the poor and disadvantaged. What those ads offer is the message that smoking offers an escape from poverty, prejudice, and powerlessness. That's not free choice, but illusion.

ARGUMENT: Cigarette advertising includes warnings about the suspected risks of smoking and are a primary source of information about lower tar and nicotine cigarettes.

> "Without our ads, smokers would not know to switch to a lower tar and nicotine cigarette." "If you ban the ads, you ban the warnings."

This argument includes three premises that are largely false: (1) that health warnings on cigarette ads are effective as they are currently presented, (2) that lower tar and nicotine cigarettes are less dangerous than regular cigarettes, and (3) that the risks of smoking are only "suspected," "alleged," or "possible." Refute these claims, and point out that no health information would be banned if tobacco advertising is restricted.

Responses

In most countries, cigarette firms must list tar and nicotine yields on the label so that smokers can find and compare yields. Countries that bar cigarette advertising have approximately the same relative sales of low tar and nicotine cigarettes as countries with unrestrained advertising.

Data on [the] effect of an advertising ban on the switch to low tar cigarettes was considered by the New Zealand Toxic Substances Board. Comparing Norway and Finland, which have had total bans since 1975 and 1978 respectively, with Sweden and New Zealand, which continued to permit advertising, the board found that "whatever the reasons, a ban on cigarette advertising in Norway and Finland has not slowed the shift to lower tar cigarettes."

—*Health or Tobacco*, p. 73

In any case, scientists now believe that the switch to a low-tar-and-nicotine-yielding cigarette provides little or no health benefits, especially when compared with not smoking.

The notion that advertising bans do more harm than good by limiting the swing to low tar cigarettes can be soundly rejected . . . research shows that advertising promotions of low tar cigarettes increase overall cigarette sales! Low tar promotions, probably on balance, do more harm than good, by promoting a more dangerous alternative, given that most smokers want to quit.

—Ibid

Despite the seductive advertisements, there is no less hazardous, safer cigarette.

—Dr. Claude Lenfant of the U.S. National Heart, Lung, and Blood Institute

In many cases, health warnings in cigarette ads claim that the risks of tobacco use are unproven. This is wrong; the risks are proven by tens of thousands of studies from around the world. Many cigarette warnings misleadingly claim otherwise.

Health warnings need not accompany cigarette advertisements; in fact, they are undermined by the seductive imagery of the ads and, on billboards, are almost impossible to read. They can be placed much more effectively on their own and could be paid for with a tobacco excise tax.

ARGUMENT: If tobacco is legal to sell, then advertisers should be free to market it.

"If the product is harmful, ban the sale." "Where will the censorship stop? Alcohol is dangerous; autos kill; junk food is a hazard to kids."

The tobacco industry's argument, "if it is legal to sell, it must be legal to advertise," is not logical. The marketing of many legal products is regulated. In fact, if tobacco were a new product, to which a substantial portion of the adult public were not already addicted, there is no doubt that all civilized governments would bar its sale. Respond by pointing out the unique dangers of tobacco and the common use of marketing regulations. If the discussion turns to freedom of speech, see the next argument.

Responses

Cigarettes aren't just any other product. Cigarettes are a drug; and, in many countries, their sale is illegal to more people (young people) than those who smoke.

Tobacco is a unique product because, when used as intended, it causes harm to the consumer. There is no safe level of exposure to tobacco.

The legal status of tobacco is a historical accident; if tobacco were invented today, with all the information of its hazards we now have, no government would permit it to be sold.

Because tobacco became, through time, a social drug, prohibiting its sale would be difficult and perhaps undesirable. The tobacco industry makes this argument in the knowledge that society is not yet ready to ban tobacco. Stopping its promotion, however, is an entirely separate issue from prohibiting its sale. In the United States, the home of the First Amendment, the Supreme Court has made it clear that if Congress has the power to ban the sale of a product, it surely has the power to adopt the more moderate remedy of restricting promotion of the product.

In the Central Hudson case (1980), the Court ruled that commercial speech on behalf of a legal activity loses First Amendment protection if it is shown to be misleading. Even if not misleading, commercial speech can be restricted or regulated if it affects a substantial government interest.

In 1986, the Court upheld a ban against casino ads in Puerto Rico, asserting that, even when the government does not use its power to prohibit something, it is "permissible for the government to take the less intrusive step of allowing the conduct, but reducing the demand through restrictions on advertising."

Ironically, in most countries the reverse of the above argument exists: many countries outlaw the sale of tobacco to children, while all children are exposed to tobacco ads in the same ways as are adults.

REMEMBER: There is nothing new about regulating the marketing of hazardous products. Regulation preserves socially useful products for common use by reducing the risks. In Hong Kong, doctors, lawyers, marriage brokers, undertakers, and makers of many pharmaceutical products are not allowed to advertise their products and services. In Australia, prescription medications can be advertised only in medical magazines, not to the general public, and many over-the-counter medications, such as sleeping pills and antihistamines, cannot be advertised at all. Cigarettes are unique only in the sense that there is no way to prevent addiction and to reduce the risk from smoking. It would be criminal for society to fail to take every practical step to protect nonsmokers and to prevent the recruiting of a new generation of smokers. Medications save lives; tobacco takes lives. Yet medications cannot be advertised, and tobacco can.

ARGUMENT: Advertising bans interfere with tobacco companies' freedom of speech.

"There were no tobacco ads in Communist countries, either." "Next, you'll want to ban 'harmful' political dissent, too."

Tobacco industry public relations experts, lawyers, and lobbyists seek to portray themselves, not as profit seekers, but as defenders of fundamental freedoms. So they invoke "freedom of speech" in defense of tobacco advertising. In fact, the "free speech" that many countries protect almost always refers to political and artistic speech, whereas nearly all governments retain the power to "regulate commerce." Most countries that protect such "free" political speech simultaneously regulate commercial speech (e.g., making it illegal to advertise untruthfully or misleadingly).

Make sure that the protobacco spokesperson doesn't associate himself or herself exclusively with freedom. Note that freedom from exploitation, addiction, and disease is just as important and that tobacco companies regularly silence free speech about health in magazines where they advertise.

Responses

No society equates the rights of individuals with those of corporations or commercial advertising with the forms of speech associated with democracy—freedom of the press to report the news, freedom of political dissent, freedom of the arts.

Corporations "acquire a disproportionate power because of their financial resources, which can be and have been used to dominate portions of public life. These special aspects of the nature of corporations make them subject to broad regulation and control."

—U.S. civil libertarian Melvin L. Wulf, legal director of the American Civil Liberties Union from 1952 to 1977

I just can't help but think that those who talk about their constitutional right to free speech are really more concerned about their own profits. No one has a constitutional right to sell pro-drug propaganda to minors.

—U.S. President Ronald Reagan, criticizing entertainment productions that encourage drug abuse

Such legally produced products as pesticides, prescription drugs, and firearms often have extensive restrictions imposed upon their advertising and promotion. In fact, in many countries cigarettes cannot be legally advertised or sold to minors.

In most states cigarettes are illegal for minors. Yet while cigarette ads are unrestricted in publications seen by children, such as newspapers, ads for other products not legally sold to minors, such as the wares of 'adult' bookstores, are restricted, often severely and occasionally completely.

—Journalist Morton Mintz, discussing policy in the United States

> Leading Canadian newspaper publishers supported the government's ban on cigarette advertising and sponsorship. The *Globe and Mail* said: "It is the sale of cigarettes that is the anomaly, not the ban on their advertisement; we see no constitutional right for a manufacturer to promote a product which, when used precisely as the manufacturer intends, is demonstrably unsafe."

The tobacco industry is no lover of free speech. Time and again, it has sought to suppress free speech to further its own ends.

> The tobacco companies say that they are like any other legitimate business, but they are not. What other business has to defend itself by arguing that its products are 'legal'? Like the Soviet government, the cigarette companies suffer from a lack of legitimacy. And like the Soviets [of old], they do everything within their power to stifle criticism. The cigarette companies have a siege mentality and will go to great lengths to defend their deadly products. Everyone within their growing economic empire must follow the pro-cigarette line or suffer the consequences. Fancy talk about the glory of the First Amendment is strictly for outside consumption.

—Larry White, *Merchants of Death*. New York: Beech Tree Books, 1988, p. 214

> Philip Morris attempted to destroy all copies of a 1976 documentary called "Death in the West." The film documents the fatal lung diseases of six cowboys who had been addicted smokers. After it was first shown on British television, the firm sued the station that broadcast it and had its distribution barred by court order. The filmmakers were then prohibited by the court from speaking publicly about the film. When producers of the American news program "60 Minutes" attempted to buy a copy for their show, they too were prevented. Philip Morris attempted to destroy all copies of the film; only because a copy was smuggled to the United States does it exist at all today.

—Adam Hochschild, "Shoot-out in Marlboro country," *Mother Jones*, January 1979, p. 3; Jack Anderson, "Grim film," *San Francisco Chronicle*, May 6, 1982

All democratic societies regulate various activities in the public interest. Laws prohibiting transport of explosives over bridges, for example, sacrifice an "individual freedom" to guard against public risk.

How can a civilized society create a freedom to recruit a new generation of smokers from the population segments already suffering from disadvantage—young people, women, cultural minorities?

British philosopher John Stuart Mill, a great defender of individual freedom, once noted that "nobody should be free to harm others." If unfair and untruthful advertising is not regulated, our freedom from harm and addiction, and our children's freedom from deception and psychological manipulation, would be placed in jeopardy.

The "free" press is less "free" because of its dependence on tobacco advertising. U.S. magazines that take cigarette ads routinely avoid publishing news on the health hazards of tobacco use.

> REMEMBER: "Freedom is an emotive word carefully chosen so that the advocates of a ban can be dismissed as the enemies of freedom. But of what does this freedom really consist? Freedom for the tobacco advertiser is the freedom to persuade people to use nicotine, an addictive and dangerous drug. It is quite different from the lack of freedom experienced by most smokers, who want to stop smoking but find after many attempts that they still cannot. It is the freedom to use glossy images to distract from the fact that smoking kills and pollutes. It is the freedom to corrupt the language by calling a carcinogenic product 'mild,' and using terms like 'luxury' and 'fresh' to describe it. It is the freedom (and wealth) to attract young people while the health concerns have minimal budgets to counter such words. It is the freedom to make mega-profits while the smoker suffers."

—Dr. Judith MacKay, Director of the Asian Consultancy on Tobacco Control

ARGUMENT: Bans on promotion deprive sports, arts, and communities of essential support.

> "You want to cut the lifeline for our artists/athletes/communities." "We're a good corporate citizen." "To oppose us is to oppose women, cultural minorities, art, and diversity."

As the public increasingly questions the legitimacy of an enterprise that promotes and profits from "pushing" a lethal, addicting drug, the industry seeks to buy respectability through heavily publicized community sponsorship and philanthropy. Respond by reminding your audience that cigarette companies are not charitable institutions; their support is part of their calculated effort to promote their products and to weaken community support for smoking control efforts. Tobacco money can be used for honorable purposes, but it is always dirty money.

Cigarette manufacturers are not philanthropists. They give money as another subtle method of promoting their product. Sponsorship and other forms of indirect advertising are designed to circumvent advertising restrictions already in place.

> In the television coverage of the 1987 NASCAR stock car circuit, the Winston logo appeared on television for a total of 6 hours, 22 minutes, and 25 seconds. If purchased from television networks, this exposure time would have cost $7,867,830.

—John W. Richards, Jr., M.D., and Paul M. Fischer, M.D., "Smokescreen: How tobacco companies market to children," in the American Cancer Society's *World Smoking and Health*, Vol. 15, No. 1, Spring 1990, pp. 12-14

> A tobacco advertising journal reported that each three-second exposure to a ballpark billboard, racetrack banner, or corporate-sponsored race car has a marketing impact similar to a ten-second TV commercial.

—B. Felgner, *U.S. Tobacco and Candy Journal*, December 28, 1987, p. 16, cited in Richards and Fischer, p. 13

> The true motivations of tobacco company sponsors are evidenced by the comment of the chairman, president and chief executive of RJ Reynolds Tobacco Co. about his company's sponsorship of horse racing in 1980: "We made it clear from the day we announced our sponsorship of the Grand National Division that we were in the business of selling cigarettes, not the racing business."

—Chapman, 1987

The tobacco industry supports many events or institutions to buy legitimacy and to silence or mute the condemnation of smoking by community leaders.

> African-American groups in the United States, for example, routinely accept money from tobacco companies. In 1987, the United Negro College Fund received $267,000 from RJ Reynolds, $120,000 from Philip Morris, and $32,000 from Brown & Williamson. RJ Reynolds has been the largest contributor to the UNCF since 1983, and has committed $1 million dollars to the Fund. Paul Ruffins, editor of the Congressional Black Caucus' quarterly magazine and a former advertising worker, raised concern that such groups are being "co-opted" by tobacco firms: "As a propagandist, I can see what's happening . . . . Black and poor people are being used in propaganda wars that have nothing to do with them."

—Myron Levin, "Buying innocence by association—Tobacco's strange bedfellows," in *APF Reporter*, Spring 1988, pp. 25-29. See also R.G. Robinson, M. Pertschuk, and Charyn Sutton, "Tobacco prevention and control: Targeting the African American community," *Kaiser Family Foundation*, 1991, pp. 35-49, for additional information.

> Donald Hense, vice president for development of the Urban League, a group that accepts hundreds of thousands of dollars from cigarette companies, notes that, in doing so, the groups need not "endorse what the [tobacco firms] do" but adds, "The Urban League was founded on a partnership with business and black America. I frankly don't believe you can spend your time kicking or nibbling the ankles of people you expect to be in partnership with."

—from "A New Tobacco Alliance," *Newsweek*, February 13, 1989, p. 20

> With all appreciation for their corporate charity . . . there's no way we can compartmentalize our lives conveniently to say 'thanks so much for your promotion' and ignore the statistics [on tobacco-related disease among African-Americans].

—Rep. John Conyers (D-MI), an African-American member of Congress in Viveca Novak, "Courting black power: How special interests pursue the minority vote." *Common Cause Magazine*, March/April 1989, p. 22

A ban on direct and indirect advertising will not prevent tobacco companies from continuing to give financial and other support to such events. Like any other sponsor, they can give money anonymously—if they are actually motivated by philanthropy rather than profit. The charity of tobacco companies quickly disappears when its recipients try to speak out about the dangers of smoking.

We manage to finance art exhibits without looking to the Mafia for help. Culture can survive without providing a cloak of legitimacy for an industry that kills on a far greater scale.

"Good citizenship" of companies is best measured by the kind of products they promote and the marketing strategies they use. Tobacco industry efforts to identify its product—a major cause of disease—with sports, where physical conditioning is tested, is in itself a deception.

If sports, arts, and community institutions should be supported from the profits of cigarette sales, then provisions should be made, as in Australia, for a health promotion fund to replace direct tobacco company sponsorship of such events with government funding from tobacco taxes.

In addition to reducing the exposure of young people to sports-related tobacco addiction, the fund has also helped to move Australian politicians away from tobacco influence and toward support for prohealth groups and causes.

> The health promotion foundation is proving popular and successful and is providing unforeseen benefits. The public health establishment has become more influential in Victoria through the act because of its access to politicians through sport. Top politicians used to attend sports as the guests of tobacco sponsors but they are now guests of the health organizations funded by the Victorian Health Promotion Foundation.

—Martin Raw, Patti White, and Ann McNeill, *Clearing the Air: A Guide for Action on Tobacco*. London: British Medical Association, 1990, p. 67

In the United States, the tobacco industry was honored for supporting the President's campaign against child abuse. Isn't cigarette advertising that is designed to make smoking attractive to young people a form of child abuse?

ARGUMENT: The tobacco industry can (and does) regulate its own advertising through voluntary codes and acceptance of limited bans.

> "Meddling by government is wasteful and unnecessary." "We don't market to children or nonsmokers—we put it in writing." "We already banned our ads from television/radio."

Protobacco advocates will claim that no mandated ad ban is necessary because tobacco advertising is already self-regulated through voluntary agreements or limited bans (on broadcast ads, for example). Such voluntary actions are designed to prevent stronger action by governments. Make it clear that leaving the protection of public health to tobacco industry "volunteerism" is inadequate and irresponsible policy. You can reinforce this position by citing the repeated failures of the tobacco industry to enforce its own codes or even to live up to the spirit of those limited laws that have been passed.

Responses

Advertising by its very nature is designed to make the use of the product advertised attractive and appealing. The industry's codes leave the advertiser as many ways to make smoking appealing to young people as they restrict.

> One example of such a technique is product-placement in movies. Films produced in the United States often feature smoking scenes. Cigarette companies have paid movie producers

to show cigarette brand names in youth-oriented movies such as "Superman II." About half of individuals who attend movie theatres in the United States are under the age of 21. ("Cigarette advertising at a glance," Public Information Branch, U.S. Office on Smoking and Health, March, 1991, p. 6.) Similarly, Philip Morris paid $350,000 to have its Lark brand appear in a James Bond adventure movie, especially popular with youth.

—Kevin Cote, "Philip Morris plans Bond-ing effort," *Advertising Age*, April 17, 1989

The *Christian Science Monitor* (July 28, 1989, p. 19) reported that cigarette companies have allegedly paid to get general smoking scenes in television programs.

Voluntary agreements and partial bans have given rise worldwide to quite absurd contradictions. In New South Wales, Australia, for example, a tobacco billboard 200 metres from a school is considered unacceptably influential and banned under a voluntary code, yet the very same advertisement 201 metres from a school is acceptable, apparently having lost its influence on children in the magic extra metre.

—Simon Chapman, Ph.D., Senior Lecturer in Community Medicine, University of Sydney, 1991

The tobacco industry has already proven that it can't be trusted to restrict its advertising without external force. The current practices of tobacco advertisers under their voluntary codes show this.

Many code provisions are themselves inadequate. They ban the use of very young models. But young people often seek their role models in adults, not youngsters their own age. The tobacco industry uses this fact to evade the codes.

John Benson, a former account executive for Leo Burnett (the agency that handles Marlboro) once inadvertently bragged: "I think the Marlboro cowboy dispels another myth. In order to attract young people, you've got to show young people. That's not true, not true at all."

—*Merchants of Death*, p. 124

These "voluntary codes" are a fraud because the tobacco industry does not volunteer to enforce them. Tobacco companies promise to adopt the codes to head off stronger government action, then consistently ignore and violate their restrictions. The industry consistently violates its own guidelines in a variety of areas; it uses models who appear to be under the age of 25, gives free samples to minors, and depicts people smoking during or immediately after strenuous physical activity.

In 1969 and again in 1981, the U.S. Federal Trade Commission evaluated the Code's effectiveness. On both occasions FTC found that the data amply demonstrated the "futility" of relying on voluntary regulation to achieve any significant changes in the content and meaning of cigarette advertising.

The Advertising Standards Council of Australia conducted a study in which they asked 300 school children between 10 and 15 the age of a model in a cigarette ad. Most of the children said that the model was under 25 years of age. The study concluded that "the tobacco industry's self-regulating advertising code does not appear to protect children from cigarette advertising."

Tobacco advertisers evade current television ad bans with huge billboards along race tracks and other stadia in which televised sporting events are conducted.

Through sponsorship, tobacco companies attach their cigarette brand names to sporting and other events, gaining exposure in both the broadcast and print media. "Benson & Hedges" Cricket in Australia and the "Marlboro Grand Prix" in the United Kingdom and United States are but two examples of this practice.

During the 1981/82 Australian cricket season, Benson and Hedges, the sponsor, received a "stupefying 40,000 exposures" on one television channel alone, "ranging from quick flashes to long languid camera pans of their distinctive, strategically-placed 300 metres of ground level boarding."

"The Marlboro logo was visible for 46 minutes out of a total broadcast program length of 93 minutes during the Marlboro Grand Prix auto race in the United States. The cost of the 18 minutes of clear, in-focus transmission of the logo in advertising terms was calculated at $1 million."
—Dr. Alan Blum, Doctors Ought to Care, testifying before the U.S. Congress, 1991

Health policies such as advertising controls are far too important to leave to the producers of this lethal product.

REMEMBER: Don't get caught in the trap of agreeing with a protobacco spokesperson that an industry code would be acceptable if it were improved or enforced. This suggests that tobacco companies are trying to adhere to such codes but are having difficulties. This is not true; the codes are nothing more than a ploy to avoid government action.

ARGUMENT: Smoking is for adults, not children. So are the ads; they are designed to help adults make an informed brand choice.

"Smoking is an adult custom." "The tobacco industry doesn't want kids to smoke." "We can't reduce the press to children's level."

If the issue of the effect of tobacco advertising on children is raised, protobacco advocates will argue that cigarette advertising is not for children and that the way to prevent smoking among young people is to prevent the sales, not the ads. Respond with solid statistics that show that almost all new smokers are children and with evidence of tobacco advertising and promotional practices that are clearly aimed at young people. It should be easy to find many examples.

Responses

This claim is questionable because the vast majority of smokers begin smoking as children and because so many children are deeply affected by advertising. Furthermore, it is irrelevant. No matter what the intentions of cigarette marketers, the effect of tobacco advertising reaches children—and encourages them to begin smoking. For this reason, it is a dangerous threat to children's health.

A study of American children aged 3 to 6 years showed that 30 percent of 3-year olds and more than 90 percent of 6-year olds recognized and correctly associated RJR's "Old Joe" cartoon character with cigarettes. This recognition rate was independent of the use of cigarettes in the children's homes.

While cigarette companies claim that they do not intend to market to children, their intentions are irrelevant if advertising affects what children know. RJ Reynolds Tobacco Company is as effective as The Disney Channel in reaching six-year old children. Given this fact and the known health consequences of smoking, cigarette advertising may be an important health risk for children.
—Paul M. Fischer, M.D., et al., "Brand logo recognition by children aged 3 to 6 years: Mickey Mouse and Old Joe the Camel," in *Journal of the American Medical Association (JAMA)*, vol. 266, No. 22 (December 11, 1991), pp. 3145-3148

A University of Massachusetts study found that children in grades 9 through 12 were far more likely than adults to have been exposed to Camel's "Old Joe" campaign and were more able to identify the product advertised and its brand name. The Camel advertisements were also significantly more appealing to adults than to children.

Our study provides further evidence that tobacco advertising promotes and maintains nicotine addiction among children and adolescents. A total ban of tobacco advertising and promotions, as part of an effort to protect children from the dangers of tobacco, can be based on sound scientific reasoning.
—Joseph R. DiFranza, M.D., John W. Richards, Jr., M.D., et al., "RJR Nabisco's cartoon camel promotes camel cigarettes to children," in *JAMA*, Vol. 266, No. 22 (December 11, 1991), pp. 3149-3153

A study from the University of California at San Diego examined the perceptions of advertising and market share among adult and young (less than 18 years old) smokers. It showed that young smokers' perceptions of cigarette advertising were higher than those of adults and that

changes in market share due to advertising occur mostly in younger smokers.

Our results suggest that tobacco advertising is causally related to young people becoming addicted to cigarettes . . . . Given the potential harm to the health of future generations, public policy should, as a matter of urgency, extend the ban on tobacco advertising to cover not only electronic media but also all other forms of cigarette advertising and promotion.

—John P. Pierce, Ph.D., et al., "Does tobacco advertising target young people to start smoking? Evidence from California," in *JAMA*, Vol. 266, No. 22 (December 11, 1991), pp. 3154-3158

Sixty percent of smokers start by age 13; more than 90 percent begin smoking before the age of 20.

—J. Tye, K. Warner, and S. Glantz. "Tobacco advertising and consumption: Evidence of a causal relationship," *Journal of Public Health Policy*, Winter 1987

Studies cited by the U.S. Surgeon General (Report 1989) show that children are exposed to cigarette ads and recognize ad slogans with high accuracy.

Two recent studies show that 22 percent of the 6-10 year olds and 91 percent of the 12-16 year olds were able to identify cigarette advertisements that contained no smoking clues.

—Aitken et al., "'Brand-stretching' advertisements for cigarettes: The impact on children," *Health Education Journal*, Vol. 44, 1985, pp. 201-202; P.P. Aitken, and D.R. Eadie, "Reinforcing effects of cigarette advertising on underage smoking," *BJA*, Vol. 85, 1990, pp. 399-412

Cigarette ads are seen by young people just as much as by adults. Ads on billboards, public transportation, radio, television, and in the print media permeate our surroundings.

A study of French children reveals that only 18 percent of adolescents reported never having noticed certain advertising messages, whereas 45 percent of adults said they had never seen them.

—K. Rombouts and G. Fouconnier, "What is learnt is learnt well? A study of the influence of tobacco advertising on adolescents." *European Journal of Communication*, Vol. 3, 1988, pp. 303-322

Powerful images, assimilated even before a child learns to read, establish norms of desirable behavior to which there is no equally compelling cultural challenge. Images of the happy, sexy, healthy, young smoker signalling independence, adventure, and adulthood need no literacy or information-seeking to absorb. They are visible in newspaper and magazine ads, posters, billboards, and [at] sports and other youth-oriented events. These messages both initiate and legitimize or reinforce the attractiveness of smoking. By contrast, information about the deadly consequences of smoking is relatively rare. It requires both literacy and active information-seeking to find the information, let alone assimilate it. As long as that imbalance exists, we are marketing death on a cultural assembly line, especially targeted at the most vulnerable groups of people in our country and the world.

—*Youth and Drugs: Society's Mixed Messages*, p. 113

In advertising their deadly product, cigarette firms regularly use themes that entice young people to smoke, such as the Camel cartoon characters and the tough, independent Marlboro man.

One notorious example of a youth-targeted ad campaign is RJ Reynolds' "Old Joe" cartoon character, used to promote Camel cigarettes. The character is not only found in such youth-oriented magazines as Rolling Stone, but is also available on large posters and on T-shirts (available in child- and infant-sized versions.) Rick Sanders, a VP for advertising and brand management at RJR Tobacco, explained that "young adults somehow choose Marlboro because of peer pressure. [!] It is our ardent hope that our campaign efforts will get them to make a more considered decision." Sanders later told Adweek magazine that the campaign was very successful.

—John W. Richards, Jr., M.D., and Paul M. Fischer, M.D., "Smokescreen: How tobacco companies

market to children," in the American Cancer Society's *World Smoking and Health*, Vol. 15, No. 1, Spring 1990, pp. 12-13

> Do tobacco companies market to children? The answer was summed up nicely by one of our sons who, at age 2-1/2, picked up a drinking straw, pretending to smoke it, and said, 'Daddy, when I grow up I want to be a man, smoke cigarettes, and drive fast cars.'
>
> —Richards and Fischer, p. 14

Contrary to its claims that it does not market to children, the tobacco industry uses promotions directly aimed at young people. Many cigarette promotions are designed to reach audiences of young people—the vast majority of new smokers. The sponsorship of rock concerts, rodeos, and other youth-oriented events undermines efforts to combat illegal smoking by youth and associates smoking with youth role models. Sampling—the distribution of free cigarettes at the events themselves—puts cigarettes directly into the hands of young smokers and potential smokers.

> RJ Reynolds used children in an advertisement for Salem in Malaysia, promoting a Salem competition for breakdancing, a strictly youth-oriented activity.
>
> In Taiwan, R.J. Reynolds promoted a rock concert featuring a teenage pop star, with coupons to be returned for free tickets when accompanied by a number of empty Salem cigarette packages.
>
> How is it that, according to the industry, a smoking father watching a grand prix race might be influenced by a sponsorship message but his non-smoking 12-year-old son sitting next to him, besotted with the culture and glamour of motor racing, is allegedly impervious to the same persuasive intent?
>
> —Simon Chapman, Ph.D., Senior Lecturer in Community Medicine, University of Sydney, 1991

Tobacco companies have often ignored voluntary agreements not to depict young models in tobacco advertisements, not to place ads in youth-oriented publications, and not to erect billboard ads near schools.

Many countries manage to restrict advertising for weapons and pornography without "juvenilizing" the press; why not do the same for tobacco ads, which may be even more dangerous?

ARGUMENT: Tobacco ads can help our country economically.

> "Permitting the ads, and the sales, helps put food on our tables." "The health risks of tobacco advertising now are small compared to the economic gains."

As a crop that commands one of the highest prices per acre in the world, tobacco is a very attractive choice for many countries, especially in the developing world. Industry spokespeople may argue that advertising restrictions and other measures to discourage tobacco use will have harmful effects on the economy, both by hurting the tobacco industry and by damaging the media that accept the advertising. Respond to this by pointing out the enormous social and economic costs that go with tobacco and its advertising: death, health care costs, and the censorship of important health information that will add to the death toll.

Responses

Economic benefits? What about vastly increasing health care costs attributed to smoking-caused disease (estimated at $22 billion in the United States alone)? The loss of work-years and productivity (estimated at $43 billion in the United States)? The loss of head-of-household wage-earners killed by smoking-related disease? Higher welfare costs? The loss of farmland otherwise available for alternative (nutritional) crops? The loss of scarce timber crops to inefficient flue curing as well as cigarette paper, packaging, and advertising itself? The expropriation of tobacco profits by multinational companies, contributing to balance of payment problems of developing nations? The world glut of tobacco production?

We can't afford to mortgage our future to tobacco addiction for short-term gain. While the cigarette manufacturers proclaim their concern for the

economic fate of developing nations, they readily subvert their interests in pursuit of profits. Tobacco company morality and progressiveness are limited to the bottom line.

> Recent developments in the Third World are a major source of concern. This pertains to the expansion and shift of advertising targets to this region—where multi-media tobacco and tobacco-related propaganda incessantly assaults our local population with their ready cash and financial support for sporting events and broadcast revenue . . . . This unhealthy trend should not be allowed to succeed in Malaysia.

—Dr. David Q.L. Quek, "Myocardial infarction and cigarette smoking among Malaysian women," paper presented at the Seventh World Conference on Smoking and Health, 1990

> Despite the gravity of the current economic crisis facing the country, the choice to subsidize the electronic media through the pushing of [tobacco] is an ill-advised and destructive one . . . . Mortgaging the health and welfare of Venezuela can only ultimately worsen the economic problems she faces, through lost labor, additional disability and health costs. To allow American firms to use Venezuelan television and radio to subject its citizens to an addiction more powerful than that of heroin or cocaine is more than medically irresponsible; it is an invitation to an economic colonialism which could leach millions of dollars in tobacco profits yearly out of the already distressed economy. The advertising bans are an important bulwark against such exploitation; without them, the independence of the people and economy of Venezuela are further imperiled.

—Allan Erickson, American Cancer Society, in a letter to the minister of communications of Venezuela, 1990

> REMEMBER: Health advocates must be aware of the critical economic problems that their countries face; many will want to support programs to help the fledgling free media in their countries and to encourage the orderly transition of tobacco farmers to other, wholesome, crops.

Additional Resources

1. Advocacy Institute. *Media Strategies for Smoking Control: Guidelines.* National Cancer Institute, 1988.

This 43-page booklet is an indepth analysis of the principles and components of tobacco control media advocacy. It discusses strategies for gaining access to the media, and the methods of framing and seizing the symbols of the tobacco control debate and examines the role of media advocacy in tobacco control. It is highly recommended for those who want to move beyond the basic lessons included in this guide and master the techniques of media advocacy.

2. Advocacy Institute. *Smoke Signals: The Smoking Control Media Handbook.* American Cancer Society, 1987.

This manual was prepared by the American Cancer Society for the use of advocates in the United States. Most of the guide focuses on strategies for gaining media attention and capturing the symbols of the tobacco vs. health debate. Although it is focused on American issues, many of its lessons are widely applicable to other countries, and it is useful for advocates who want to hone their antitobacco framing and debating skills.

3. American Cancer Society. "A look at tobacco advertising." *World Smoking and Health*, Vol. 15, No. 1, Spring 1990.

World Smoking and Health is published by the American Cancer Society; this particular issue includes several useful articles on tobacco marketing techniques and a summary article of the data assembled in *Health or Tobacco* (see citation 7).

4. Chapman, Simon. *Great Expectorations: Advertising and the Tobacco Industry.* London: Comedia Publishing Group, 1986.

Much of this book is devoted to a detailed analysis of mechanisms by which various kinds of cigarette advertising work to promote both smoking and brand recognition. The beginning of the book outlines the evidence linking smoking and consumption and the arguments for advertising restrictions. Advocates seeking to wrestle with the manipulative imagery of tobacco ads will find this book most helpful.

5. Chapman, Simon. *The Lung Goodbye: A Manual of Tactics for Counteracting the Tobacco Industry in the 1980s.* The Hague: International Organization of Consumers Unions, 1985.

This book is an excellent guide to fighting the tobacco industry both rhetorically and through media advocacy. Somewhat lengthy, the book is full of good examples of tactics and includes a strong discussion of tobacco control debating methods. The book is a useful compendium of strategies on advertising control and other tobacco-related issues.

6. *Europe Against Cancer, Report on Tobacco Advertising: Give Children a Chance.* 1991.

The report, one of a series of publications prepared by Europe Against Cancer, looks at the issues of advertising, ad restrictions, and children from a European perspective.

7. New Zealand Toxic Substances Board. *Health or Tobacco: An End to Tobacco Advertising and Promotion.* Wellington: New Zealand Department of Health, 1989.

Prepared by the New Zealand Department of Health as a policy paper supporting an advertising ban in New Zealand, this book incorporates a great deal of international scientific research. It makes a cogent argument on the links between tobacco, tobacco advertising, and disease and examines the experiences of 33 countries, looking closely at the effectiveness of advertising restrictions in the different countries. Those with a need for broad data on advertising bans will want to use this book.

8. Raw, Martin; Patti White; and Ann McNeill. *Clearing the Air: A Guide for Action on Tobacco.* London: British Medical Association, 1990.

Clearing the Air is a guide to tobacco control prepared jointly by the British Medical Association, the World Health Organization, and the Commission of the European Communities. It centers on 10 case studies of different tobacco control initiatives, including a variety of advertising control efforts. Lists of contacts and useful publications are also included.

9. Warner, K. *Selling Smoke: Cigarette Advertising and Public Health.* American Public Health Association, October 1986.

Professor Warner's book assembles coherently a wide variety of scientific evidence on the mechanisms and effects of tobacco advertising. It is extremely useful as a source of carefully reasoned scientific support for advertising restrictions.

Endnotes

1. Richard Peto. "Worldwide mortality from current smoking patterns." *The Global War: Proceedings From the Seventh World Conference on Tobacco and Health.* Perth: Health Department of Western Australia, 1990, p. 66.

2. Judith MacKay. Personal communication, August 1991.

3. Ruth Roemer. "Political will and the tobacco epidemic." Presented to the Fifth National Conference on Chronic Disease Prevention and Control, Detroit, October 19, 1990, p. 5.

British Journal of Addiction (1990) 85, 399–412

RESEARCH REPORT

Reinforcing effects of cigarette advertising on under-age smoking

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Abstract

Interviews were conducted with 848 Glasgow children aged between 11 and 14 years. There were consistent differences between smokers and non-smokers. Smokers tended to be more adept at recalling, recognizing and identifying cigarette advertisements. This suggests they tend to pay more attention to cigarette advertising. Smokers also tended to be generally more appreciative of cigarette advertising. Moreover, this greater awareness and appreciation of cigarette advertising was independent of other important predictors of under-age smoking, such as smoking by peers, siblings and parents. These findings, taken in conjunction with previous research, indicate that cigarette advertising is reinforcing under-age smoking. The smokers showed an enhanced or heightened preference for Kensitas Club, the brand favoured by adults. This is consistent with previous research indicating that promotional devices which help determine and reinforce adult cigarette brand preferences have an even greater effect on under-age smokers.

Introduction

There is a growing body of evidence indicating that children are receptive to cigarette advertising (Aitken, 1988). For example, many children can identify edited or cryptic cigarette advertisements which do not show brand names (Chapman & Fitzgerald, 1982; Aitken *et al.*, 1987a; Goldstein *et al.*, 1987) and many can identify cigarette brand imagery in 'brand-stretching' advertisements for services and other products which do not show health warnings or mention 'cigarettes' (Aitken, Leathar & O'Hagan, 1985).

Reinforcing effects of cigarette advertising

Under-age smokers tend to be more adept than non-smokers at recognizing and identifying cigarette brand imagery (Chapman & Fitzgerald, 1982; Aitken *et al.*, 1987a; Goldstein *et al.*, 1987). In a study conducted in Australia, under-age smokers were nearly twice as good as non-smokers at identifying edited cigarette advertisements and brand slogans (Chapman & Fitzgerald, 1982). This suggests they tend to be more aware of cigarette advertising.

Under-age smokers also tend to have more positive attitudes towards cigarette advertising (O'Connell *et al.*, 1981; Alexander *et al.*, 1983; Aitken, Leathar & Squair, 1986a) and tend to be more appreciative of specific examples of cigarette advertising (Charlton, 1986; Potts, Gillies & Herbert, 1986).

We have suggested that these findings indicate that under-age smokers are getting some kind of pleasure, reward or reassurance out of cigarette advertising (Aitken, Leathar & Squair, 1986b; Aitken, 1988). In other words, cigarette advertising is reinforcing under-age smoking.

The present survey

The research described here attempts to assess the extent to which associations between awareness/appreciation of cigarette advertising and under-age smoking are independent of other important predictors of under-age smoking. Research in Australia (O'Connell *et al.*, 1981; Alexander *et al.*, 1983) has shown that under-age smokers' more positive attitudes towards cigarette advertising appear to be independent of a number of important influences on under-age smoking (for example, smoking by parents, siblings and peers). However, no previous surveys have shown that under-age smokers' greater ability to recognize or identify cigarette advertising is independent of other important influences on under-age smoking. Moreover, previous surveys covered only a limited range of measures of perceptions of cigarette advertising. The survey described below covered a much more extensive range of variables measuring awareness and appreciation of cigarette advertising than measured previously.

Method

Individual interviews were conducted during June–July 1988 with a four-stage quasi-random probability sample of 11- to 14-year-olds in the Glasgow District Area. For the first stage, we selected 12 out of 66 district wards, stratified according to distribution of council/private housing. At the second and third stage, three polling districts in each ward and then a total of 250 houses were selected. At each of these three stages random selection procedures were used with probability proportional to population. During the fourth stage, interviewers began at each of the selected addresses and used a random route procedure (Sudman, 1966; Market Advisory Services, 1973) to select four children, one boy and one girl at each of two age levels—11–12 and 13–14 years. There were 868 successful contacts out a possible 1000.

The interviews were conducted by interviewers experienced in market and social research. They were fully briefed beforehand and instructed to avoid giving the impression of being either pro- or anti-cigarette advertising or pro- or anti-smoking. They were also warned that post-interview checks would be made of a random 10% of the interviews. (These checks were conducted satisfactorily after the questionnaires had been returned.)

Parental permission was obtained before each interview. While obtaining this (in the absence of the child) parents were asked about their own smoking habits and cigarette brand preferences. Each child was then interviewed alone.

The survey questions covered the two major areas of perceptions summarized above: awareness and appreciation of cigarette advertising. Other questions covered their own smoking experiences and known important predictors of under-age smoking (for example, smoking by siblings and peers).

Results

Data analysis

Twenty questionnaires were dropped from the analyses because key questions about smoking were not answered. Thus, the analyses described here were conducted on 848 children. The bases in Table 1 show there were approximately equal numbers of boys and girls and approximately equal numbers in each age group. Twenty-two per cent were children of ABC1 parents and 78% were children of C2DE parents. The Registrar General's Office (1984) estimated the proportions of ABC1 and C2DE adults living in the Glasgow District Area as 28% and 72% respectively.

The children's responses were first broken down by age, sex, social class and smoking experience. Responses that could be put in the form of continuous variables were subjected to four-way analyses of variance. Some of the cell frequencies in these analyses were very small; therefore three-way and higher-order interactions were suppressed. In order to avoid repetition and lengthy description only significant features of the initial breakdowns by these four factors will be specified.

The major variables were then entered as predictor variables in a series of multiple discriminant analyses. These assessed the extent to which the children's perceptions of advertisements for cigarettes were independently associated with under-age smoking when other important variables (for example, smoking by parents, siblings and peers) were held constant. These analyses will be described in more detail after the initial breakdowns have been described.

Smoking experience and brand preferences

Sixty-seven per cent of the children said they had never tried a cigarette (non-smokers), 26% said they had at least tried a cigarette but did not smoke now (triers) and 7% said they smoked now (smokers). Table 1 shows there were proportionally more non-

Table 1. *Admitted smoking experience: proportions (%) in each category*

	Age (years)		Sex		Socio-economic group		All children ($n=848$)
	11–12 ($n=428$)	13–14 ($n=420$)	Males ($n=421$)	Females ($n=427$)	ABC1 ($n=186$)	C2DE ($n=661$)	
Non-smoker (has never tried a cigarette)	75	59	70	65	77	64	67
Trier (has at least tried a cigarette, but does not smoke now)	21	31	24	28	20	27	26
Smoker (smokes now)	4	10	7	8	3	8	7

smokers among the younger children (χ^2 test, $p<0.001$) and among children of ABC1 parents ($p<0.01$).

Table 2 shows the cigarette brand preferences of children and parents who smoked. More parents and children said they usually smoked Kensitas Club. However, the preferences of the children were much more extreme: 95% of the children compared with 53% of the parents said they usually smoked Kensitas Club (χ^2 test, $p<0.001$).

Table 2. *Brand preferences (%) of parents and children who smoke cigarettes*

	Parents ($n=833$)	Children ($n=60$)
Kensitas Club	53	95
Embassy Regal	10	0
Benson & Hedges	6	2
Other brands	18	2
Roll-ups	11	0
Don't know/no preference	2	2

Note: Brand names have been specified only when mentioned by at least 5% of the respondents.

Recall of cigarette advertisements

At the beginning of the interview the children were told that we were interested in what young people think about cigarette advertisements. They were then asked what brands or makes of cigarettes they had seen advertised. Analysis of variance showed that older children, boys and smokers tended to name more brands. The mean numbers of brand names mentioned are shown in the first row of Table 3.

Liked and disliked advertisements for cigarettes

They were then asked if they could think of any cigarette advertisements that they liked and any that they disliked. Only 9% said they could think of a cigarette advertisement that they liked. The first row of Table 4 shows that proportionally more of these were children of ABC1 parents, boys and smokers. Eighteen per cent said they could think of a cigarette advertisement that they disliked. The second row of Table 4 shows that proportionally more of these were children of ABC1 parents.

Ratings of cigarette advertisements

They then rated a set of statements 'that people have said about cigarette advertisements': 'They are interesting / dull / old-fashioned / colourful / glamorous / ugly / exciting / stylish / stupid / amusing / boring / eye-catching'. The statements were based on adjectives in rating scales used by other researchers (Potts, Gillies & Herbert, 1986) and words used by children when describing advertisements (Aitken, Leathar & Scott, 1988). The children answered by choosing alternatives from a five-point scale ('agree strongly' to 'disagree strongly') on a show card.

Although the ratings were intercorrelated several of the underlying distributions were markedly bimodal. This precluded effective factor analysis and computation of factor scores. For this reason we constructed a simple *Critical view of cigarette advertisements* scale by summing the number of times each child agreed ('strongly' or 'a little') with a negative statement or disagreed ('strongly' or 'a little') with a positive statement about cigarette

Table 3. *Mean scores describing the children's awareness and appreciation of cigarette advertisements*

	Age (years)		Sex		Socio-economic group		Smoking experience			All children	*N*
	11–12	13–14	Males	Females	ABC1	C2DE	Non-smokers	Triers	Smokers		
Number of brand names mentioned as having been seen advertised	2.06	2.50**	2.41	2.15*	2.32	2.27	2.06	2.68	2.92***	2.28	847
Critical view of cigarette advertisements (scaled score)	7.50	6.70***	6.90	7.30*	7.10	7.10	7.36	6.80	5.75***	7.10	847
Number of cigarette advertisements correctly identified	2.63	3.43***	3.21	2.85***	2.88	3.07	2.67	3.56	4.48***	3.03	847
Number of cigarette advertisements recognized	4.98	5.40*	5.14	5.24	5.26	5.17	4.96	5.54	6.07***	5.19	847
General appreciation of cigarette advertisements (factor score)	−0.05	0.05	0.07	−0.07*	0.01	−0.00	−0.10	0.09	0.61***	0.00	846

Note: The asterisks denote probabilities obtained from four-way analyses of variance: * $p<0.05$; ** $p<0.01$; *** $p<0.001$.

Table 4. *Proportions of children (%) who (a) said they liked some cigarette advertisements, (b) said they disliked some cigarette advertisements, and (c) said they were in favour of a ban on cigarette advertisements*

	Age (years)		Sex		Socio-economic group		Smoking experience			All children
	11–12	13–14	Males	Females	ABC1	C2DE	Non-smokers	Triers	Smokers	
Liked some advertisements for cigarettes	8	11	13	6**	13	8*	8	12	18**	9
Disliked some advertisements for cigarettes	19	18	20	17	30	15***	19	18	17	18
In favour of a ban on cigarette advertisements	75	65**	67	72	69	70	73	67	45***	70

Note: Because of missing data the bases for these comparisons vary between 845 and 848.
χ^2 tests: * $p<0.05$; ** $p<0.01$; *** $p<0.001$.

advertisements. The summed scores provided a good approximation to a normal distribution and analysis of variance showed that older children, boys and smokers tended to express a less negative—or more appreciative—view of cigarette advertisements (Table 3).

Identification and recognition of cigarette advertisements

The children were presented simultaneously with a set of nine coloured photographs of cigarette advertisements selected to provide a range of advertisements varying in familiarity. Six (Embassy Regal, Benson & Hedges, Kensitas Club, Silk Cut, Rothmans, Dunhill) had been shown in magazines during the previous month and three (John Player Special, More, Marlboro) were taken from magazines published 3-years previously. Two (Benson & Hedges, Silk Cut) did not show brand names and one (Marlboro) showed only part of the name ('arlbo'). The brand names on the remaining six had been covered with marker ink.

The interviewer pointed to each in turn, asking what brand or make it advertised. Older children, boys and smokers tended to be more adept at identifying the advertisements (Table 3).

The interviewer then presented a second set of photographs of the same advertisements; but this time showing the brand names on advertisements that had previously been edited. The interviewer pointed to each in turn, asking the children if they had seen it before. Older children and smokers tended to recognize more advertisements (Table 3).

Evaluations of the cigarette advertisements

The interviewer again pointed to each advertisement in turn, asking how much the children liked or disliked it. The children rated each one by choosing answers from a show card. This described a five-point scale ranging from 'like a lot' to 'dislike a lot'.

Only a minority said they liked the advertisements, although about a third of them said they liked the advertisements for Embassy Regal, Kensitas Club and John Player Special. However, there were marked and consistent differences between smokers and non-smokers. For example, 73% of the smokers and 34% of the non-smokers said they liked ('a lot' or 'a little') the advertisement for Kensitas Club. As noted above, the young smokers showed a heightened preference for this brand.

The correlations between the ratings were all positive and highly significant ($p<0.001$). The results of a principal component analysis are shown in Table 5. (Principal components/factor analysis attempts to describe a large number of variables in terms of a smaller number of components or factors.) Only one component had an eigenvalue greater than one. The structure of this component shows that it provided a measure of *General appreciation of cigarette advertisements*. Analysis of variance of the factor scores computed from the factor-score coefficient matrix showed that boys and smokers tended to be more appreciative of the advertisements (Table 3).

Table 5. *Principal components analysis of the like–dislike evaluations of the cigarette advertisements: loadings on the first principal component (decimal points omitted)*

Advertisements	Loadings
Embassy Regal	67
Benson & Hedges	50
Kensitas Club	67
John Player Special	59
More	62
Silk Cut	58
Rothmans	69
Dunhill	71
Marlboro	68
Percentage variance accounted for	41
N	847

Should cigarette advertisements be banned?

The last question concerned with cigarette advertising asked whether or not cigarette advertisements should be banned. Seventy per cent said they should be banned, 13% said they should be allowed and 18% were undecided. The third row of Table 4 shows that higher proportions of younger children and non-smokers were in favour of a ban. Again, the differences between smokers and others were substantial.

Additional variables measured for the multiple discriminant analyses

Attitudes towards smokers and smoking. It seemed possible that under-age smokers' greater awareness and appreciation of cigarette advertising is merely part of a generally more tolerant attitude towards smokers and smoking. In other words, it seemed possible that if general attitudes towards smokers

Table 6. *Proportions of children (%) who agreed with anti-smoking statements and disagreed with pro-smoking statements*

		Smoking experience			All children	*N*
		Non-smokers	Triers	Smokers		
Anti-smoking statements						
Young people smoke to show off	agree (a little or strongly)	88	95	70***	88	847
	agree strongly	65	77	43***	66	847
Smoking makes you smelly	agree (a little or strongly)	89	90	86	89	845
	agree strongly	72	75	48***	71	845
Smoking is a waste of money	agree (a little or strongly)	96	96	90	96	848
	agree strongly	91	90	68***	89	848
Smoking is a dirty habit	agree (a little or strongly	97	95	83***	95	848
	agree strongly	88	90	55***	86	848
Pro-smoking statements						
Smoking is fun	disagree (a little or strongly)	95	92	65***	92	848
	disagree strongly	87	81	35***	82	848
Smoking calms your nerves	disagree (a little or strongly)	50	44	30**	47	847
	disagree strongly	35	30	8***	32	847
Smoking makes you look tough	disagree (a little or strongly)	68	67	64	67	847
	disagree strongly	50	51	34*	49	847
Smoking makes you feel grown-up	disagree (a little or strongly)	63	60	48	61	848
	disagree strongly	49	46	25**	47	848
Smoking keeps your weight down	disagree (a little or strongly)	52	43	35**	48	847
	disagree strongly	37	33	28	35	847
Smoking gives you confidence	disagree (a little or strongly)	66	66	43**	65	848
	disagree strongly	45	43	25**	43	848

Note: χ^2 tests: * $p<0.05$; ** $p<0.01$; *** $p<0.001$.

and smoking were controlled or held constant then variables describing awareness and appreciation of cigarette advertising might no longer be significant predictors of under-age smoking. In order to examine the extent to which this is so we included a battery of attitude or belief statements based on items used in previous research in the United Kingdom (Charlton, 1984, 1986). The statements were rated on a five-point scale ranging from 'agree strongly' to 'disagree strongly'. Table 6 shows the children tended to express a generally rather negative attitude towards smoking, although quite high proportions did not unequivocally reject the notion that 'smoking calms your nerves' and 'keeps your weight down'. As expected, smokers tended to express less negative attitudes. However, in several instances the significant differences were due mainly to smokers tending to choose a less extreme answer to express a negative view. For example, although there was no significant difference attributable to smoking experience in the proportions of children who agreed ('a little' or 'strongly') that 'smoking makes you smelly', a significantly lower proportion of smokers agreed 'strongly' with this statement. The highly skewed distributions underlying several of the scales precluded systematic factor analysis and construction of factor scores. For this reason we constructed a simple *Negative attitude towards smoking and smokers* scale by summing the number of times each child expressed strong agreement with an anti-smoking statement or strong disagreement with a pro-smoking statement. This categorization procedure differentiated between smokers and others more effectively than the other procedure shown in Table 6. The summed scores also provided a better approximation to a normal distribution.

Appreciation of advertising in general. It also seemed possible that awareness and appreciation of cigarette advertising might merely be part of a more generally positive attitude towards advertising. For this reason we included an item in which the children rated 'advertising in general' by choosing alternatives from a five-point rating scale ranging from 'most advertisements are very good' to 'most advertisements are very bad'.

Smoking by parents. As mentioned earlier, parents were asked if they smoked.

Parental attitudes towards under-age smoking. Perceptions of parental attitudes were measured by asking the children what their parents think of young people who smoke. The five alternative answers on the show card ranged from 'very strongly against it' to 'very strongly in favour of it'.

Smoking by siblings. The children were asked whether they had any brothers or sisters who smoked.

Smoking by peers. The children described how many of their friends smoke cigarettes by choosing one of five alternatives ranging from 'all of them' to 'none of them'.

Table 7 shows that all of these additional predictor variables were significantly associated with smoking experience. Several of the differences between smokers and non-smokers were quite marked. Interestingly, smokers did tend to be slightly more appreciative of advertising in general.

Multiple discriminant analyses

The primary purpose of the multiple discriminant analyses was to assess the extent to which higher levels of awareness and appreciation of cigarette advertising were associated with under-age smoking when other important predictors of under-age smoking were controlled or held constant.

The use of large numbers of independent variables presents problems in this kind of analysis (Norusis, 1985). For this reason preliminary analyses were directed towards reducing the number of measures of children's awareness and appreciation of cigarette advertising to a smaller number of relatively independent measures. The eight measures shown in Tables 3 and 4 were entered into stepwise and direct multiple discriminant analyses (Norusis, 1985) with the three levels of smoking experience as the dependent variable. Two variables, *General appreciation of cigarette advertisements* and *Number of cigarette advertisements correctly identified*, were significant. An additional variable, *In favour of a ban on cigarette advertisements*, was marginally signifcant ($p<0.1$). The two significant variables were retained for the final set of analyses which included the additional predictor variables described above.

Unfortunately, there was no information about parental smoking behaviour for 5% of the children because some parents refused to answer questions about their own and/or their spouse's smoking habits. For this reason the main multiple discriminant analyses were conducted twice: first with all of the predictor variables described above—except parental smoking habits—on a sample with few

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Table 7. *Mean scores according to smoking experience of the additional variables measured for the multiple discriminant analyses*

	Smoking experience			All children	*N*
	Non-smokers	Triers	Smokers		
Negative attitude towards smoking and smokers (scaled score)	6.20	6.14	3.68**	6.00	846
Appreciation of advertising in general (most advertisements are very bad=1, quite bad=2, neither good nor bad=3, quite good=4, very good=5)	3.59	3.76	3.85*	3.65	846
One or both parents smoke (=1, neither smokes=0)	0.70	0.80	0.95**	0.75	805
Parents attitudes towards under-age smoking (very strongly against=0, other answers=1)	0.38	0.50	0.70**	0.43	846
Brother or sister smokes (=1, other answers=0)	0.17	0.37	0.58**	0.25	846
Half or more friends smoke (=1, other answers=0)	0.09	0.24	0.83**	0.18	846

Note: F-tests: * $p<0.05$; ** $p<0.001$.

missing data; and then with parental smoking habits included on a slightly reduced sample.

Two types of multiple discriminant analysis were conducted. First, analyses in which all of the independent or predictor variables were entered directly. These were designed to show which if any of the variables describing perceptions of cigarette advertisements were significant independent predictors of under-age smoking when all of the other predictor variables were held constant. The second set of analyses used stepwise procedures (Norusis, 1985). These were designed to show which variables provided the most economical set of predictors: variables that accounted for higher proportions of the variance were entered first; and only variables that accounted for at least marginally significant ($p<0.1$) amounts of variance were allowed into and retained in the discriminant functions. Listwise missing data deletion procedures were used in each analysis.

Table 8 summarizes the major findings. Stepwise and direct procedures provided similar findings and there were no important differences between analyses which included parental smoking habits and analyses which did not.

The first discriminant functions in the unrotated solutions accounted for over 90% of the variance between the three groups. The mean discriminant scores for the three groups show that these functions simply contrast smokers against triers and non-smokers. Of particular importance here, smokers tended to have higher scores on the measures of awareness and appreciation of cigarette advertising.

In discriminant analysis, as in factor analysis, interpretations can sometimes be improved by rotation. The rotated solutions in Table 8 are of interest because they suggest that some variables may be more effective in contrasting smokers against triers and non-smokers whereas other variables may be more effective in contrasting smokers against non-smokers, with triers occupying an intermediate position.

The first rotated discriminant functions contrast smokers against triers and non-smokers. Smokers tended to have more friends who smoke, tended to have less negative attitudes towards smoking and smokers and were more likely to have parents who smoke.

The second rotated discriminant functions contrast smokers against non-smokers with triers occupying an intermediate position, although nearer to smokers than to non-smokers. These show that smokers also tended to be more adept at identifying cigarette advertisements, were more likely to have brothers or sisters who smoke, tended to be more appreciative of cigarette advertisements and were less likely to perceive their parents as being strongly against under-age smoking.

The important point to note here is that these analyses show that the measures of awareness and appreciation of cigarette advertising were indeed significant predictors of under-age smoking even when the influence of the other important predictors was controlled or held constant.

Interestingly, the sex variable was also significant. Thus, although there were no significant differences between boys and girls in the simple bivariate analysis in Table 1, the multiple discriminant models described here, which control for other important predictors, suggest that girls are more likely to smoke and experiment with cigarettes.

Finally, the multiple discriminant analyses were more efficient at classifying smokers and non-smokers than triers. For example, the model with eight predictor variables shown in Table 8 classified 66% of the cases correctly—72% of the non-smokers, 44% of the triers and 84% of the smokers.

Discussion

Social class, age and sex differences

There were no important differences between the children of working- and middle-class parents. It is true that there were proportionally more non-smokers among the children of middle-class parents. However, the multiple discriminant analyses showed that social class was not a significant predictor of smoking experience when other variables were controlled or held constant. This suggests that social influences from peers, siblings and parents as well as wider influences from advertising are more important in encouraging smoking than are material differences in socio-economic background.

The older children tended to be more adept at recognizing and identifying cigarette brand imagery and tended to express less negative attitudes towards cigarette advertising. This is consistent with previous research (Aitken, Leathar & O'Hagan, 1985; Aitken, Leathar & Squair, 1986a; Aitken *et al.*, 1987a). Interestingly, there were no marked and consistent differences between the two age groups in their 'like-dislike' evaluations of specific advertisements shown to them. This suggests that younger children's more negative view of cigarette advertising has more to do with the 'idea' of cigarette advertising rather than with characteristics in the

Table 8. *Stepwise and direct multiple discriminant analyses of smoking experience: standardized discriminant function coefficients and mean discriminant function scores for the three groups (decimal points omitted)*

	Stepwise					Direct				
	Unrotated		Varimax rotation			Unrotated		Varimax rotation		
	I	II	I	II		I	II	I	II	
Half or more friends smoke	71	−35	79	01	***	71	−38	81	04	***
Negative attitude towards smoking and smokers	−31	66	−60	44	***	−33	64	−62	37	***
Number of cigarette advertisements correctly identified	34	54	06	63	***	33	46	04	57	***
Brother or sister smokes	31	43	08	53	***	31	42	05	52	***
Sex (female)	13	22	02	25	**	13	19	01	24	**
General appreciation of cigarette advertisements	14	19	04	24	**	14	15	04	20	*
One or both parents smoke	13	−01	12	05	*	14	−05	14	03	*
Parents perceived as not strongly against under-age smoking	10	25	−03	27	*	10	22	−03	24	
Age	—	—	—	—		01	21	−10	19	
Socio-economic group (C2DE)	—	—	—	—		−04	16	−12	12	
Appreciation of advertising in general	—	—	—	—		03	14	−05	13	
Percentage of between-groups variance	93	7	75	25		92	8	69	31	
Mean discriminant scores for each group										
Non-smokers	−41	−10	−32	−27		−14	−10	−29	−30	
Triers	38	34	18	48		38	36	14	50	
Smokers	248	−34	236	83		248	−35	230	99	

Note: *F*-tests: * $p<0.1$; ** $p<0.05$; *** $p<0.001$; $N=805$.

advertisements themselves. This is consistent with previous research indicating that attitudes towards smoking and cigarette advertising tend to be more 'moralistic' at 10 than at 14 (Aitken, 1978; Aitken, Leathar & O'Hagan, 1985).

Boys tended to recall more brand names when listing cigarette advertisements that they had seen. Although there were no significant differences in the number of cigarette advertisements recognized by boys and girls, boys tended to be more adept at identifying the brand imagery in the cigarette advertisements shown to them.

Boys also tended to have a less negative view of cigarette advertising. For example, more boys than girls said they could think of a cigarette advertisement that they liked and boys tended to have higher scores on the scale measuring appreciation of cigarette advertisements.

These findings are similar in some respects to recent findings from research in Glasgow on children's perceptions of alcohol commercials. For example, boys tended to be more adept at recognizing and identifying photographs of alcohol commercials and proportionally more boys than girls said they had a favourite alcohol commercial (Aitken *et al.*, 1988).

Although there were more non-smokers among the boys, the simple bivariate comparison was not significant. Despite this, the multiple discriminant models, which controlled for a number of important variables, predict that girls are more likely to smoke and experiment with cigarettes. This is consistent with recent findings from surveys in Britain and elsewhere (Marsh, 1989; McNeill *et al.*, 1989; Swan, 1988).

Reinforcing effects of cigarette advertising

There were consistent differences between smokers and non-smokers. Smokers tended to be better at recalling, recognizing and identifying cigarette advertisements. These findings are consistent with previous research summarized in the introduction and suggest that under-age smokers tend to pay more attention to cigarette advertising.

Proportionally more smokers said they could think of a cigarette advertisement that they liked and proportionally more of them were against a ban on cigarette advertising. The smokers also tended to have a generally less negative view of cigarette advertisements. Again, this is consistent with previous research summarized above in suggesting that under-age smokers tend to be generally more appreciative of cigarette advertising.

The young smokers were particularly appreciative of the advertisement for Kensitas Club, the brand most of them smoked. Seventy-three per cent of the smokers compared with 34% of the non-smokers said they liked the advertisement. This of course does not mean that their appreciation was brand-specific: the young smokers tended to be *generally* more appreciative of the cigarette advertisements shown to them.

These findings are of considerable interest because advertising practitioners have emphasized the importance of the rewarding or reinforcing function of advertising (Day, 1978; Lannon & Cooper, 1983; Bowring, 1985). Barry Day (1978), Vice-Chairman of McCann-Erickson Worldwide, one of the best-known names in international advertising, put in these words:

> 'I BELIEVE that all advertising must in some way *reassure* . . . I BELIEVE an ad should be a *reward*.'

It is important to note that there were major differences between under-age smokers and non-smokers even when other important variables were held constant. The differences between under-age smokers and non-smokers with respect to *Number of cigarette advertisements correctly identified* and *General appreciation of cigarette advertisements* were independent of sex, age, socio-economic group, appreciation of advertising in general, attitudes towards smoking and smokers, perceived parental attitudes towards under-age smoking and smoking by parents, siblings and peers.

This does not necessarily mean that advertising plays an important part in inducing children to *start* smoking. Cause-and-effect relationships are always difficult to disentangle. For example, children may become more aware and appreciative of cigarette advertising after they start smoking. However, research in Australia suggests that attitudes towards cigarette advertising may be important predictors of future changes in children's smoking behaviour. Children who approved of cigarette advertising were twice as likely to become smokers during a follow-up year than children who disapproved (Alexander *et al.*, 1983). As the authors of this important study suggest, their findings indicate that cigarette advertising may have predisposing as well as reinforcing effects on children's smoking behaviour. There is a need for additional prospective studies using the kind of measures of cigarette advertising awareness

and appreciation that we have described here. Such studies are important because predictors of current smoking behaviour may not necessarily be important predictors of the onset of under-age smoking (McNeill *et al.*, 1989).

It is also important to note that we are not saying that advertising is more important than other influences. Indeed, the weights in Table 8 suggest that peer group influences may be more important in encouraging smoking. Certain beliefs about smoking which are current in our culture also appear to be important. For example, few smokers unequivocally rejected the notion that 'smoking calms your nerves'. The belief that smoking is an aid to 'affect control' is probably important among young as well as adult smokers (Marsh, 1984, 1988).

Nevertheless, the findings described here, taken together with findings from previous studies summarized above, do show that children who smoke are more aware and more appreciative of cigarette advertising. Under-age smokers are getting (or are attempting to get) some kind of pleasure, reward or reassurance out of cigarette advertisements. In other words, cigarette advertising is reinforcing under-age smoking.

Children's cigarette brand preferences

Although spokesmen for the advertising and tobacco industries claim that cigarette advertising does not promote or reinforce smoking *per se*, they do not deny that advertising influences brand preferences among adults (Waterson, 1984). Logically, there seems to be no *a priori* reason why advertising should not be an important factor in determining cigarette brand preferences among children. As described above, there is now considerable evidence that cigarette advertising is getting through to children and to under-age smokers in particular.

In fact, there is good reason to suggest that the various promotional devices which help determine and reinforce adult cigarette brand preferences have an even greater influence on the brand preferences of under-age smokers (Aitken *et al.*, 1987b). Kensitas Club has been heavily advertised in the Glasgow tabloid newspapers (Aitken *et al.*, 1987b). In the present study, 95% of the under-age smokers compared with 53% of the adult smokers said they usually smoked Kensitas Club. These findings are consistent with research showing that under-age smokers tend to show enhanced or heightened preferences for heavily advertised cigarette brands most preferred by adults (Chapman & Fitzgerald, 1982; McNeill, Jarvis & West, 1985; Aitken *et al.*, 1987b; Goldstein *et al.*, 1987).

This heightened preference for heavily advertised brands suggests that children are highly sensitive to cigarette brand advertising and provides further support for the findings summarized above indicating that cigarette advertising promotes and reinforces smoking among the young.

Acknowledgements

This research was supported by the Cancer Research Campaign. We are grateful for the help of the children and their parents who allowed us to conduct the interviews.

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British Journal of Addiction (1991) 86, 383–390

RESEARCH REPORT

Predisposing effects of cigarette advertising on children's intentions to smoke when older

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Abstract

Six hundred and forty Glasgow children, initially aged between 11 and 14 years, were interviewed twice, with approximately one year between interviews. Children whose intentions to smoke when older became more positive between the two interviews tended to be more aware of cigarette advertising at the time of the first interview (compared with children whose intentions to smoke were negative at both interviews). Children whose intentions to smoke became more negative between the interviews tended to be less appreciative of cigarette advertisements at the time of the first interview (compared with children whose intentions to smoke were positive at both interviews). Since both groups differed from their respective contrast groups before *their declared intentions changed, these findings support the view that cigarette advertising has predisposing as well as reinforcing effects on children's attitudes and behaviour with respect to smoking.*

Introduction

There is good evidence from research in Australia, the United Kingdom and the United States, that children are very much aware of cigarette advertising (Aitken, 1988). For example, research in all three countries has shown that many children are able to identify edited or cryptic cigarette advertisements which do not show brand names (Chapman & Figzgerald, 1982; Aitken *et al.*, 1987a; Goldstein *et al.*, 1987).

Cigarette advertising reinforces under-age smoking

Research has also shown consistent differences between under-age smokers and non-smokers of the same age. Under-age smokers tend to be more adept at recalling, recognizing and identifying cigarette advertisements (Chapman & Fitzgerald, 1982; Aitken *et al.*, 1987a; Goldstein *et al.*, 1987; Aitken & Eadie, 1990). This suggests they tend to pay more attention to cigarette advertising.

Under-age smokers also tend to have more positive attitudes towards cigarette advertising (O'Connell *et al.*, 1981; Alexander *et al.*, 1983; Aitken, Leathar & Squair, 1986a; Aitken & Eadie, 1990) and tend to be more appreciative of specific examples of cigarette advertisements (Charlton, 1986; Potts, Gillies & Herbert, 1986; Aitken & Eadie, 1990).

We have suggested that these findings indicate that under-age smokers are getting (or are attempting to get) some kind of pleasure, reward or reassurance out of cigarette advertising (Aitken, Leathar & Squair, 1986b; Aitken, 1988). In other words, cigarette advertising is reinforcing under-age smoking.

Cigarette advertising promotes and reinforces cigarette brand preferences among under-age smokers
There is also evidence from research in Australia, the United Kingdom and the United States, that under-age smokers tend to show enhanced or heightened preferences for heavily advertised brands most preferred by adult smokers (Chapman & Fitzgerald, 1982; McNeill, Jarvis & West, 1985; Aitken *et al.*, 1987b; Goldstein *et al.*, 1987; Aitken & Eadie, 1990).

For example, recent research in Glasgow, Scotland (Aitken & Eadie, 1990) found that 95% of under-age smokers, compared with 53% of adult smokers, usually smoked Kensitas Club, a brand heavily advertised in the west of Scotland (Aitken *et al.*, 1987b).

This indicates that promotional devices which help determine and reinforce adult cigarette brand preferences have an even greater effect on under-age smokers and provides further support for the research summarized above indicating that cigarette advertising reinforces smoking among the young.

Predisposing effects of cigarette advertising
The findings described above do not necessarily mean that advertising plays an important part in inducing children to *start* smoking. Cause and effect relationships are always difficult to disentangle. For example, children may become more aware and appreciative of cigarette advertising *after* they start smoking. Indeed, research in Australia has shown that changes in attitudes do tend to occur after children start smoking (Alexander *et al.*, 1983).

However, there are good reasons for suggesting that cigarette advertising has predisposing as well as reinforcing effects. In a Scottish study, primary school children who said they would smoke when they were older tended to have more positive attitudes towards cigarette advertising than children who said they did not (Aitken *et al.*, 1986a). A subsequent survey showed that 11–14 year olds who said they had tried cigarettes (but did not at that time consider themselves to be smokers) tended to be more aware and appreciative of cigarette advertising than children who said they had not tried cigarettes (Aitken & Eadie, 1990). These findings suggest that perceptions of cigarette advertising may play a part as precursors in the transition from smoker to non-smoker.

In a survey of children in England, non-smokers who named a favourite cigarette advertisement tended to show greater support for supposed values of smoking (e.g. "looking tough," "looking grown-up") than did non-smokers who did not name a favourite cigarette advertisement (Charlton, 1986). As Charlton suggested, the non-smokers who named a favourite cigarette advertisement could be the next recruits to smoking in that they seem to be providing themselves with 'evidence' for the supposed values of smoking.

Finally, a prospective study conducted in Australia indicates that attitudes towards cigarette advertising are important predictors of *future* changes in children's smoking behaviour (Alexander *et al.*, 1983). Children who approved of cigarette advertising were twice as likely to become smokers during a follow-up year than children who disapproved. Smokers who approved were less likely to give up than smokers who disapproved of cigarette advertising. As the authors of this important study suggest, their findings indicate that cigarette advertising may have predisposing as well as reinforcing effects on children's smoking behaviour.

The present survey
There is a clear need for additional prospective studies to examine possible predisposing effects of cigarette advertising on under-age smoking. Although the investigation by Alexander *et al.* (1983) showed that attitudes towards cigarette advertising are important predictors of future changes in children's smoking behaviour, no previous survey have shown whether or not measures of children's awareness of cigarette advertising are predictive of future changes in children's smoking behaviour.

For this reason, Strathclyde University's Advertising Research Unit began, in 1988, an extensive prospective study of children's perceptions of cigarette advertising. Findings from the first set of interviews have already been published (Aitken & Eadie, 1990). As predicted on the basis of previous research, there were consistent differences between smokers and non-smokers: smokers tended to be more aware and more appreciative of cigarette advertising.

The majority of the children were re-interviewed in 1989. Very few had begun smoking during the interim period. However, higher proportions had apparently changed their minds about whether or not they would smoke when they were older.

Intentions to smoke when older or uncertain about remaining a non-smoker are important predictors of taking up smoking (e.g. McNeill *et al.*, 1989). For this reason, the present paper examines

the extent to which measures of awareness and appreciation of cigarette advertising obtained during the first wave of interviews were predictive of subsequent changes in intentions to smoke when older.

Method

The first set of interviews was conducted with a four-stage quasi-random probability sample of 11–14 year olds in the Glasgow district area. The sampling procedures have been described elsewhere (Aitken & Eadie, 1990). Briefly, during the first three stages, 250 addresses were randomly selected; then a random route procedure was used to recruit two boys and two girls, beginning at each address. There were 848 successful contacts out of a possible 1000.

Approximately one year later (July–August 1989) 640 of the children (75%) were successfully contacted and re-interviewed. As before, parental permission was obtained before each interview and the children were interviewed alone in their homes by interviewers experienced in market and social research. The interviewers were fully briefed beforehand and warned that post-interview checks would be made of a random 10% of the interviews. These checks were conducted satisfactorily after the questionnaires had been returned. There were no significant differences in terms of age, sex or socio-economic group between respondents and those we failed to re-interview.

The questions in both sets of interviews have also been described elsewhere (Aitken & Eadie, 1990). Briefly, the interview schedules covered two major areas of perceptions of cigarette advertising: awareness and appreciation. Awareness of cigarette advertising was measured by asking the children what brands of cigarettes they had seen advertised and by asking them if they had seen and whether they could identify the brands advertised in photographs of cryptic and edited cigarette advertisements. Appreciation of cigarette advertising was measured by asking them if they could think of any cigarette advertisements that they liked, by asking whether or not they agreed with a set of statements describing cigarette advertisements (e.g. "they are glamorous," "they are boring"), by their 'like–dislike' evaluations of a set of cigarette advertisements and by asking them whether or not cigarette advertisements should be banned. Other questions covered their own smoking experiences (and intentions) and known important predictors of under-age smoking (e.g. smoking by siblings and peers).

Results

Changes in intentions to smoke when older between the first and second interviews

Table 1 shows the number of children who answered "yes," "don't know" or "no" when asked "Do you think you will smoke cigarettes when you are older?" The majority of children (77%) answered "no" on both occasions.

Some of the cell frequencies shown in Table 1 were too small for effective analysis. However, as preliminary breakdowns showed that children who answered "yes" or "don't know" tended to differ in expected directions from children who answered "no," the "yes" and "don't know" categories were combined for further analysis. Thus there were two major groups whose intentions changed between the two interviews.

(1) *Children whose intentions to smoke when older became more positive between the two interviews.* These were the 54 children who said "no" at the first interview and "don't know" or "yes" at the second interview. In

Table 1. *Frequencies of responses at both interviews to the question "Do you think you will smoke cigarettes when you are older?" (n=631)*

		Second interview responses		
		Will smoke when older	Don't know	Will not smoke when older
First interview responses	Will smoke when older	13	5	11
	Don't know	7	19	35
	Will not smoke when older	13	41	487

the analysis described below this group was contrasted against the 487 children who said "no" at both interviews.

(2) *Children whose intentions to smoke when older became more negative between the two interviews.* These were the 46 children who said "don't know" or "yes" at the first interview and "no" at the second interview. In the analysis described below this group was contrasted against the 44 children who said "don't know" or "yes" at both interviews.

Children whose intentions to smoke when older became more positive between the two interviews

If perceptions of cigarette advertising have predisposing effects on intentions to smoke then we would expect many of the children whose intentions to smoke became more positive between the two interviews to have been more aware and/or more appreciative of cigarette advertising at the time of the first interview, that is, before their declared intentions changed. Preliminary analysis showed that this was so in terms of the three measures of cigarette advertising awareness: children whose intentions to smoke became more positive tended to be more adept at recalling, recognizing and identifying cigarette advertisements during the first interview.

It is of course important to show that associations between measures of cigarette advertising awareness and measures of smoking behaviour or intentions cannot be explained in terms of the association of both sets of variables with other perhaps more important variables (e.g. age, attitudes towards smoking and smokers, peer group smoking). In order to do this the major predictor variables were entered into a series of multiple regression analyses with the dichotomous contrast between children whose intentions to smoke when older became more positive (scored 1) and children whose intentions remained negative (scored 0) as the dependent variable.

The use of large numbers of independent variables presents problems in this kind of analysis (Norusis, 1985). For this reason preliminary multiple regression analyses were directed towards reducing the number of measures of children's awareness and appreciation of cigarette advertising to a smaller number of relatively independent measures. Only one variable was significant—*Number of cigarette advertisements correctly identified*. This was included in the next set of multiple regressive analyses along with the other major predictors. Two types of analysis were conducted. First, an analysis in which all of the predictor variables were entered directly. This was designed to show whether or not the advertising variable was a significant predictor of changes in intentions to smoke when all of the other predictors were held constant. The second analysis used stepwise procedures (Norusis, 1985). This was designed to show which variables provided the most economical set of predictors: variables that accounted for higher proportions of the variance were entered first; and only variables that accounted for marginally significant ($p<0.1$) amounts of variance were allowed into or retained in the regression equations. Listwise missing data deletion procedures were used in each analysis. The major findings are summarized in Table 2. For readers who are not familiar with multiple regression analysis, the standardized regression coefficients in the table (and in subsequent tables) can be thought of as partial correlation coefficients. For example, Table 2 shows that the correlation between *Number of cigarette advertisements correctly identified* and a positive change in intentions was statistically significant even when all of the other, possibly confounding, variables were held constant. In other words, children whose intentions to smoke became more positive between the two interviews did indeed tend to be more adept at identifying cigarette advertisements at the time of the first interviews, that is, before their declared intentions changed. They also tended to be younger, to have had more friends who smoke, were more likely to be the children of C2DE (i.e. working class) parents and were less likely to have been non-smokers at the time of the first interview.

Children whose intentions to smoke when old became more negative between the two interviews

A similar analysis was conducted using the dichotomous contrast between children whose intentions to smoke when older remained positive (scored 1) and children whose intentions became less positive (scored 0) as the dependent variable. Table 3 shows that children whose intentions to smoke decrease between the two interviews tended to be less appreciative of the cigarette advertisements presented during the first interviews, that is, before their declared intentions changed. They were all less likely to have been smokers, tended to be older

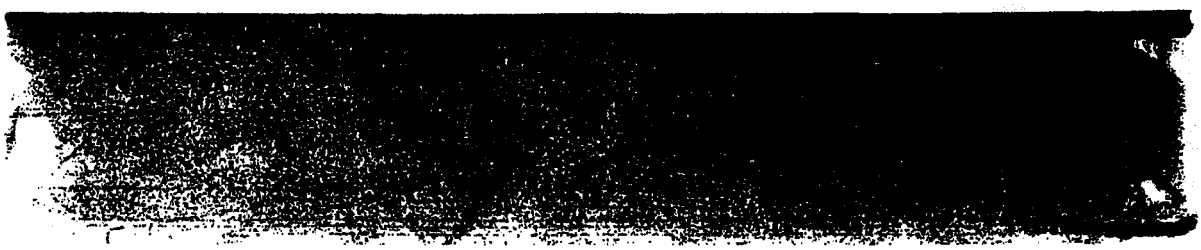

Table 2. *First interview responses: direct and stepwise multiple regression analyses with the dichotomous contrast between children whose intentions to smoke when older became more positive and children whose intentions remained negative as the dependent variable: standardized regression coefficients (decimal points omitted)*

Predictor variables measured during the first interview	Direct	Stepwise
Had tried a cigarette	11**	09**
Smoker	08*	–
(The excluded category for the above categories was 'non-smoker')		
Number of cigarette advertisements correctly identified	10**	11**
Socio-economic group (C2DE)	09**	08*
Age	−09**	−09**
Half or more friends smoke	08*	10**
Negative attitude towards smoking and smokers	01	–
One or both parents smoke	−01	–
Parents perceived as not strongly against under-age smoking	02	–
Brother or sister smokes	−04	–
Sex (female)	−02	–
Appreciation of advertising in general	−02	–
Adjusted R^2	04***	04****

F-tests: *$p<0.1$; **$p<0.05$; ***$p<0.01$; ****$p<0.001$; $N=516$.

Table 3. *First interview responses: direct and stepwise multiple regression analyses with the dichotomous contrast between children whose intentions to smoke when older remained positive and children whose intentions became less positive as the dependent variable: standardized regression coefficients (decimal points omitted)*

Predictor variables measured during the first interview	Direct	Stepwise
Had tried a cigarette	06	–
Smoker	51***	40****
(The excluded category for the above categories was 'non-smoker')		
General appreciation of cigarette advertisements	31***	26**
Age	−14	−19*
Appreciation of advertising in general	−18*	−18*
Half or more friends smoke	−18	–
Negative attitude towards smoking and smokers	−05	–
One or both parents smoke	02	–
Parents perceived as not strongly against under-age smoking	−04	–
Brother or sister smokes	−00	–
Sex (female)	16	–
Socio-economic group (C2DE)	−02	–
Adjusted R^2	15**	19****

F-tests: *$p<0.1$; **$p<0.05$; ***$p<0.01$; ****$p<0.001$; $N=87$.

Table 4. *Second interview responses: direct and stepwise multiple regression analyses with the dichotomous contrast between children whose intentions to smoke when older became more positive and children whose intentions remained negative as the dependent variable: standardised regression coefficients (decimal points omitted)*

Predictor variables measured during the second interview	Direct	Stepwise
Had tried a cigarette	05	–
Smoker	29****	29****
(The excluded category for the above categories was 'non-smoker')		
General appreciation of cigarette advertisements	12***	13***
Negative attitude towards smoking and smokers	−11**	−11**
Socio-economic group (C2DE)	07*	08*
Age	−09**	–
Number of cigarette advertisements correctly identified	08*	–
More than half friends smoke	01	–
One or both parents smoke	−01	–
Parents perceived as not strongly against under-age smoking	−00	–
Brother or sister smokes	01	–
Sex (female)	02	–
Appreciation of advertising in general	05	–
Adjusted R^2	13****	13****

F-tests: *$p<0.1$; **$p<0.05$; ***$p<0.01$; ****$p<0.001$; $N=509$.

and tended to be more appreciative of advertising in general.

Measures of awareness/appreciation of cigarette advertising obtained in the second interview

So far we have shown that children whose intentions to smoke become more positive tended to be more aware of cigarette advertising and children whose intentions to smoke became more negative tended to be less appreciative of cigarette advertising *before* their intentions changed. This raised an interesting question: Were there any significant differences between these two groups and their respective contrast groups in the measures of awareness and appreciation of cigarette advertising obtained in the second interview? Tables 4 and 5 show the major findings obtained from multiple regression analyses of the second interview data conducted in a similar manner to those described above.

Table 4 shows that children whose intentions to smoke become more positive between the interviews tended to be more adept at identifying cigarette advertisements *and* more appreciative of cigarette advertisements at the time of the second interview. (At the time of the first interview they tended only to be more adept at identifying cigarette advertisements.) They were also more likely to be smokers, tended to be younger, tended to have working class parents and tended to have less negative attitude towards smoking and smokers.

Finally, Table 5 shows that children whose intentions to smoke became more negative between the interviews tended to be less appreciative of cigarette advertisements *and* less adept at recalling cigarette advertisements at the time of the second interview. (At the time of the first interview they tended only to be less appreciative of the cigarette advertisements presented.) They were also less likely to be smokers.

Discussion

Two findings were quite clear-cut. First, children whose intentions to smoke when older became more positive between the two interviews tended to be more aware of cigarette advertising at the time of the first interview. This suggests that they were already paying more attention to cigarette advertising.

Secondly, children whose intentions to smoke became more negative between the interviews tended to be less appreciative of cigarette advertising at the time of the first interview. This suggests that they were already getting less pleasure or less reassurance from cigarette advertising.

Table 5. *Second interview responses: direct and stepwise multiple regression analyses with the dichotomous contrast between children whose intentions to smoke when older remained positive and children whose intentions became less positive as the dependent variable: standardized regression coefficients (decimal points omitted)*

Predictor variables measured during the second interview	Direct	Stepwise
Had tried a cigarette	08	–
Smoker	36*	29**
(The excluded category for the above categories was 'non-smoker')		
Number of brand names mentioned as having been seen advertised	30**	28**
General appreciation of cigarette advertisements	32**	23*
Negative attitude towards smoking and smokers	−06	–
More than half friends smoke	−13	–
One or both parents smoke	−03	–
Parents perceived as not strongly against under-age smoking	−01	–
Brother or sister smokes	07	–
Sex (female)	10	–
Age	−08	–
Socio-economic group (C2DE)	13	–
Appreciation of advertising in general	17	–
Adjusted R^2	21***	24***

F-tests: $*p<0.05$; $**p<0.01$; $***p<0.001$; $N=86$.

Since both of these groups differed from their respective contrast groups *before* their declared intentions changed, these findings suggest that perceptions of cigarette advertising play a part as precursors to subsequent changes in intentions with respect to smoking. This is consistent with the research described above which indicates that perceptions of cigarette advertising have predisposing as well as reinforcing effects on children's attitudes and behaviour with respect to smoking.

Finally, it is important to note that these findings were independent of sex, age, socio-economic group, appreciation of advertising in general, attitudes towards smoking and smokers, perceived parental attitudes towards under-age smoking, admitted smoking experience and smoking by parents, siblings and peers. Therefore it is extemely unlikely that the associations between perceptions of advertising and subsequent changes in intentions to smoke can be explained in terms of uncontrolled associations with other perhaps more important variables.

Temporal changes in awareness and appreciation of cigarette advertising

The two groups in question also differed from their respective contrast groups in responses to questions in the second interview. At the time of the second interview both of the groups who changed their minds about smoking when older differed from their contrast groups in terms of measures of awareness and measures of appreciation of cigarette advertising.

Children whose intentions to smoke became more positive between the interviews tended to be more adept at identifying cigarette advertisements *and* more appreciative of cigarette advertisements at the time of the second interview. At the time of the first interview they tended only to be more adept at identifying cigarette advertisements presented.

Similarly, children whose intentions to smoke became more negative between the interviews tended to be less appreciative of cigarette advertisements *and* less adept at recalling cigarette advertisements at the time of the second interview. At the time of the first interview they tended only to be less appreciative of the cigarette advertisements presented.

These findings suggest that changes in awareness of (or attention to) cigarette advertising and changes in appreciation of cigarette advertising may take place at different times. More specifically, increases in awareness of (or attention to) cigarette advertising may occur before increases in appreciation of cigarette advertising when children change

their minds in a pro-smoking direction—when they decide that they will or perhaps may smoke when they are older.

Conversely, when children change their minds in an anti-smoking direction, deciding that they will not smoke when they are older, changes in appreciation of cigarette advertising may precede changes in awareness of (or attention to) cigarette advertising.

These subsidiary interpretations require further testing and replication. However, the major findings were quite clear-cut. Perceptions of cigarette advertising do appear to have predisposing as well as reinforcing effects on children's changes in intentions with respect to smoking.

Acknowledgements

This research was supported by the Cancer Research Campaign. We are grateful for the help of the children and their parents who allowed us to conduct the interviews.

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Printed in Great Britain

Pergamon Press Ltd

AG.237

CHILDREN'S PERCEPTIONS OF ADVERTISEMENTS FOR CIGARETTES

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Abstract—Groups of children aged between 6 and 16 years discussed a series of advertisements, including those for cigarettes. Clear patterns emerged in their recognition of cigarette brand imagery. For example, in response to an advertisement for holidays which also presents the brand imagery of John Player Special cigarettes, 22% of primary school children and 91% of secondary school children said it advertises cigarettes.

There were consistent trends in responses to the symbolism portrayed. Younger children were very much tied to what was specifically shown in the advertisements; older ones tended to perceive more complex imagery. For example, whereas 10-year-olds said people who like the advertisement for Kim cigarettes (which has symbols for drinking) would smoke and drink, some 12-year-olds and most 14- and 16-year-olds saw Kim as feminine, sociable, trendy and sporty.

It seems that some 12-year-olds and most 14- and 16-year-olds perceive cigarette advertisements much in the way that young adults do; therefore advertising campaigns targeted at older teenagers and young adults are likely to present qualities which younger teenagers find attractive.

INTRODUCTION

The latest report of the Royal College of Physicians of London on smoking and health [1] again calls for a ban on all sales promotion of tobacco. In the U.K., cigarettes may not be advertised on television or radio. In addition, cigarette advertising in other media is subject to a voluntary code of practice administered by the Advertising Standards Authority [2]. This code was devised to proscribe many associations or claims which advertisers might wish to make for their products. For example, it expressly forbids the use of cigarette advertisements showing people benefiting from smoking in terms of sexual, financial or social success. It also forbids cigarette advertisements that may have a special appeal to the young.

Critics from within the advertising industry as well as outside it have claimed that this voluntary code of practice has often been cynically disregarded [3, 4]. More than this, Fynn, a director of the prestigious advertising agency Saatchi & Saatchi, suggests: "A way will always be found to manoeuvre around the restrictions of the Code so that appeals to luxury, glamour, prestige and even youth can be made" [3].

Nevertheless, there is little *empirical* evidence that promotional activities and advertisements for cigarettes often employ (inadvertently or otherwise) images which are attractive to the young. Most accounts which claim to show how cigarette advertisements link smoking with success, glamour, manliness, etc. [5-7] apparently assume that there is a single interpretation or decoding of an advertisement. Although several of these interpretations are very convincing—for example, few would deny that the Marlboro cowboys advertisements are promoting masculinity [7]—the interpretations would be even more convincing if they had been subjected to some kind of empirical testing, perhaps with small panels of independent judges or discussion groups. Furthermore, even if one accepts the validity of the interpretations given, it is not known at what age young people would perceive the advertisements in similar terms.

The investigation described here therefore examined young people's perceptions of the imagery in cigarette advertisements currently in use in the U.K.

METHOD

The advertisements

Fifteen full-page coloured advertisements, taken from magazines, were fixed to black cardboard mounts. They were presented in the following order:

1. Honda car
2. Addis mop
3. JPS Grand Prix holidays
4. Canadian Club whisky
5. Benson & Hedges cigarettes
6. Pronuptia wedding dresses
7. Eden Continental conservatories
8. Kim cigarettes
9. Kuwahara bikes
10. Bukta leisure/sports clothes
11. Freez' Bees! computer games
12. Embassy Regal cigarettes
13. Creda Concept electric cookers
14. More cigarettes
15. Marlboro cigarettes.

Five are advertisements for cigarettes and one (JPS Grand Prix holidays) advertises holidays but also presents the imagery of John Player Special cigarettes. Benson & Hedges, John Player Special and Embassy are leading brands. In agreement with this, a recent study, conducted in Manchester, showed that 88, 72 and 52% of a sample of secondary school children were able to name these three brands [8].

Kim and More, although not brand leaders, are claimed by some to be aimed at females [9]. These

were included in order to discover if—and at what age—children could detect the appeal to females rather than males. A 'Marlboro Cowboy' advertisement was included because it is claimed to be aimed at men [7, 10] and because it provides a good example of the cigarette advertisements, rich in imagery, which appear in in-flight magazines in the U.K. The example used was taken from a recent British Airways High Life magazine.

The six cigarette-related advertisements researched in the study were as follows:

JPS Grand Prix Holidays. The main feature of this colourful advertisement was a picture of the racing car sponsored by John Player Special cigarettes. The car showed the brand name, the logo and colours of the John Player Special cigarette pack. This picture occupied about half of the space covered by the advertisement. There were three smaller pictures: two of groups of attractive young men and women in bathing costumes (the majority young people in their twenties), and one of a plush hotel. The wording gave details of holidays in places associated with the international racing circuit (e.g. Monaco, Monza). There was no mention of 'cigarettes' and the advertisement did not bear a Government Health Warning.

The advertisement has been quoted as a good example of the tobacco industry's use of 'brand stretching'—a device designed to promote cigarettes without linking them to smoking [8]. This particular example of JPS advertising was included because it provided an excellent opportunity to pinpoint the age at which children are able to recognise (1) any imagery associated with JPS cigarettes and (2) the purpose of 'brand stretching' devices, if any.

Marlboro cigarettes. This advertisement showed a cowboy on horseback. He was leading two additional horses along a ridge overlooking a scenic river valley. There were two packs of Marlboro cigarettes shown—an open hard pack and an unopened soft pack; a prominent slogan, 'Come to Marlboro Country'; and a less prominent one, 'Marlboro, the number one selling cigarette in the world'. The advertisement did not show a Government Health Warning in contrast to the remaining four advertisements for Benson & Hedges, Kim, Embassy Regal and More cigarettes.

Benson & Hedges cigarettes. This advertisement was a good example of Benson & Hedges surrealistic brand imagery. It showed a snake-like imprint on a background of sand. Near the 'head' of this imprint was something that looks like (to those who know it is an advertisement for Benson & Hedges) a torn and shredded gold-coloured Benson & Hedges cigarette pack. The advertisement contained no brand name other than a barely discernible letter 'B' on the pack-like 'thing'.

This particular advertisement provided an excellent opportunity to pinpoint the age at which children are able to recognise the distinctive brand imagery of Benson & Hedges, in the absence of the brand name.

Kim cigarettes. This advertisement contained an open packet of Kim cigarettes; representations, in silhouette form, of cocktails in the bright and gay Kim colours; and a slogan: 'Kim! Much more to your taste'.

Embassy Regal cigarettes. This advertisement showed a closed pack of Embassy Regal cigarettes, with the pronounced blue diagonal; a coffee cup and saucer; a brandy glass containing a blue candle just being lit; and the slogan: 'A touch of Blue does it'. The fingers holding the match lighting the candle were male and carefully manicured.

More cigarettes. This advertisement contained two packs of More cigarettes, one coloured red and one green; two bottles of wine and a corkscrew; a long brown-coloured cigarette; and the slogan: 'More. The long, slim cigarette'.

Methodology

We were concerned that the children's responses should not be constrained by the use of formal highly structured questioning procedures. In our experience, young people are often more relaxed and forthcoming in discussion groups than when questioned alone. Certainly their behaviour is likely to be more playful; and this is useful in a study of advertisements in which uncensured and perhaps fleeting first impressions are of interest. For these reasons we used loosely structured group discussions as the research methodology.

Group discussions have many advantages. Areas are discussed and explored, rather than (perhaps standard) answers being given to specific questions. Respondents can select their own priorities in exploring topics, thereby ensuring that the areas covered do not simply reflect the biases of the researchers. Topics can be explored by a variety of questioning techniques, and can be repeated, if necessary, to assess consistency of opinion. Complex attitudes, such as imagery, can be examined since complicated questioning procedures are feasible. The method is eminently suitable for using indirect, projective interviewing techniques, rather than more direct questioning methods that may be superficial or inappropriate for complex attitude research.

An additional advantage over more formal research procedures such as self-completion questionnaires is that focused discussions can be used with minor modifications over a wide age range: we covered the years 6–16 in this exploratory study, although only relatively brief discussions were practicable with the children below 10 years.

Sample

Twenty-four groups of children were interviewed in total. The groups were split equally between an inner-city working-class area of Glasgow and a suburban middle-class area of Glasgow. Four groups (two of females and two of males) were selected for each of the years 6, 8, 10, 12, 14 and 16. There were approx. 10 children in each group (247 in total). Apart from the constraints of area, age and sex, the children were randomly sampled from the primary and secondary schools serving the two areas.

The two areas are vastly different. The inner-city area is a mixture of warehouses, workplaces and high-rise apartments; it is criss-crossed by busy roads and motorways. The general statistics for the City District for the 1981 Census were: owner-occupied housing 25%; rented accommodation 63%; men out of employment 22%; no car ownership 71% [11]. The suburban area is essentially a leafy residential area

with most of the residents living in owner-occupied housing. The general statistics for this area in the 1981 Census were: owner-occupied housing 81%; rented accommodation 14%; men out of employment 5%; no car ownership 21% [11].

Thus these two areas provided *contrast* samples. The rationale behind this choice was that if socio-economic-status and material circumstances play an important part in the perception of imagery in cigarette advertisements then we might expect to find differences in perceptions between children from the two areas.

An anti-smoking campaign had been launched within the city district but it was evident (through publicity and newspaper reports) that its impact had spread beyond the city to the suburban area. The authors were not aware of any differences between school authorities in their promotion of anti-smoking material within the educational curriculum.

Procedure

The discussions were held in schools. The children were not told about the purpose of the study, merely that if they wished, they could take part in group discussions about advertisements; and that the discussions would be tape-recorded. There were no objections and many of the children welcomed the opportunity of a break from school lessons.

The discussions with the 10–16-year-olds lasted about 75–90 minutes. During the first 15–20 minutes they were encouraged to talk about advertisements they had seen recently; the various media in which advertisements appear; advertisements they like and dislike and the reasons why; and the purposes of advertising. During the rest of the session they were shown the 15 advertisements listed above.

Some children – and adults – may be reluctant to admit that they find the imagery in advertisements attractive because they may suspect that this would be taken to mean that they are influenced by advertising, which people usually deny. For this reason, as well as asking what they thought of each advertisement, we also used more oblique questions, such as: "What kind of person would like this advertisement?" After giving time for spontaneous replies they were asked to specify the person's sex, age, occupation, leisure activities, clothing and music preferences. In order to obtain a measure of agreement disagreement, votes were taken on each characteristic by a show of hands. This procedure was followed, at least to some extent, for each advertisement. However, the supplementary questions and probing were more intensive during discussions of cigarette advertisements. The other advertisements served as buffer items, to keep the children entertained and to take their attention away from cigarette-related imagery when necessary. In particular, we did not wish to draw the children's attention to cigarette advertisements before they had discussed the purpose of the ambiguous JPS Grand Prix Holidays and Benson & Hedges advertisements. The first two non-cigarette-related advertisements also served as 'warm-up' or practice items.

As the Marlboro advertisement is not typical of cigarette advertisements in U.K. media it was used mainly to round-off the discussion. However, the children were asked if it would be preferred by males, females or by both sexes equally.

Additional questions (accompanied by votes by show of hands) were asked, where necessary, about two advertisements. The JPS Grand Prix Holidays advertisement was the first of the embedded advertisements shown. With this advertisement additional prompts were used where necessary to elicit discussion about the purpose of the advertisement. It is important to remember here that the children were unaware—at this stage of the discussion—that we were primarily interested in advertisements for cigarettes.

The advertisement for Benson & Hedges did not carry the brand name. This was the second of the embedded advertisements presented. Prompts were used where necessary in order to elicit discussion about whether any product was being advertised and the name of the manufacturer.

The sessions with the 6- and 8-year-olds lasted about 30 minutes. They too discussed advertisements they had seen recently, advertisements they liked and disliked, etc.; however, proportionally more time was taken to assess whether or not they were aware of the purposes of advertising. The additional questions about the JPS Holidays and Benson & Hedges advertisements were also put to these children; however, questions about the characteristics of people who would like the advertisements were omitted; not surprisingly, it was difficult to maintain their attention for periods longer than about half an hour. They were merely asked what the advertisements were advertising; and whether the More and Marlboro advertisements would be preferred by males, females or by both sexes equally.

Data analysis

The initial discussions about advertisements they had seen recently and advertisements they liked, etc. and the spontaneous comments about the advertisements presented, were analysed by examining transcripts for consistency of response across the sample as a whole and within subgroups.

The votes by show of hands in response to questions discussed by all age groups were subjected to simple quantitative analysis. There were no marked or consistent differences between area or sex subgroups with respect to these voting patterns.

The 10–16-year-olds' votes to the oblique questions examining the imagery in the advertisements were subjected to multivariate analysis. As votes were obtained about the sex, age, job, leisure activities, clothing and music preferences of people who would like each of the cigarette advertisements (excepting that for Marlboro cigarettes) the votes could be placed in the cells of repertory grids [12–14] in which the rows of the grid or matrix were defined by the words (*constructs*, in repertory grid terminology) used to describe the person who would like the advertisement (e.g. the person's sex, age, leisure activities). The columns (or *elements*) were the five advertisements. Thus these grids provided numerical descriptions of the groups' perceptions of the kind of people who would like the advertisements.

There were no marked and consistent differences between area or sex subgroups at each age in the kind

of imagery used or in their voting patterns. Therefore, the area and sex variables were collapsed and consensus grids were constructed for each of the ages 10, 12, 14 and 16. Each grid was subjected to a full principal components analysis using Slater's [14] INGRID analysis.

RESULTS

The initial discussions

All of the primary school groups, except for the 6-year-olds in the inner-city working-class area, were able to describe the selling function of advertising ("It tells people the price of things". "Something you can see and it tells you to buy it".) However, when asked where they had seen advertisements, the 6-year-olds from the working-class area mentioned most of the media listed by their suburban peers. The children from the working-class area mentioned T.V., cinemas, newspapers and shop windows; their middle-class peers added radio, posters and magazines to this list. Moreover, when talking about the advertisements presented after the initial discussion, the 6-year-olds from the working-class area were able to identify the products just as well as their peers from the middle-class area. Thus, it seems likely that even these children had a rudimentary understanding of advertising, but one which they found difficult in putting into words.

Few of the 6-year-olds mentioned brand names when talking about products in advertisements they had seen; and several of the children in this age group mentioned publicity about such things as the dangers involved in talking to strangers and the Green Cross Code.

All of the groups, except for the 6-year-olds, agreed that the advertisements which they most liked were 'the funny ones'. Here the most frequently mentioned were T.V. advertisements for products such as crisps and chocolates, followed, among the secondary school children, by T.V. advertisements for beers and lagers. Commercials with catchy tunes or jingles were also frequently mentioned.

None of the primary school children spontaneously claimed that advertisers sometimes used biased appeals or that advertisements could sometimes be misleading. By contrast, the secondary school children made much of this feature of advertising. ("Tell a lot of lies". "Say something is brilliant and it always works . . . and it disnae".)

Perhaps not surprisingly, since most of the advertisements mentioned had been seen on television, only three primary and three secondary school groups mentioned cigarette advertising during the preliminary discussions. However, on the few occasions when cigarette advertisements were referred to, the children's comments were critical. The primary school children mentioned health issues ("Cigarettes give you cancer and there are posters about them; they should be banned") and the secondary children mentioned health issues and persuasive techniques. ("They lead people on . . . make it seem as if they are healthy and clean, whereas they don't do you any good and they're dirty".)

Awareness of the 'brand stretching' function of the JPS Grand Prix Holidays advertisement

We have already mentioned that the JPS Holidays advertisement appears to offer an excellent example of 'brand stretching'. Table 1 shows that 59% of the 6-year-olds and 46% of the 8-year-olds said it advertises racing or racing cars. These children appear to have paid more attention to the visual content of the advertisement. Furthermore, 44% of the 8-year-olds and 57% of the 10-year-olds said it advertises holidays only. These children appear to have paid more attention to the bold wording on the advertisement.

Nevertheless, 22% of the primary school children and 91% of the secondary school children said that cigarettes were being advertised in some way. Table 1 shows that among the children who made this claim, a majority of the older children said that cigarettes *and* holidays were being advertised, whereas the younger children tended to say the advertisement was for cigarettes only.

Examination of the qualitative data revealed that none of the primary school children said the advertisement is misleading. However, most of the secondary school groups made this point, including three of the four groups of 12-year-olds:

"What's John Player holidays got to do with cigarettes?" (Inner-city boy, 12 years)

"Garbage . . . it's a con" (Inner-city girl, 12 years)

"It's a con way of advertising cigarettes" (Suburban boy, 12 years)

"John Player Special sponsor this because they want publicity". "Kinda sneaky" (Inner-city boy, 14 years)

"It advertises cigarettes on the motor" (Inner-city girl, 14 years)

"Using holiday pictures to say that cigarettes are relaxing" (Suburban boy, 14 years)

Table 1. Age differences in the descriptions of the advertisement for JPS Grand Prix Holidays

	Age						
	6	8	10	12	14	16	All Subjects
Base	44	48	42	42	36	35	247
	(%)	(%)	(%)	(%)	(%)	(%)	(%)
Descriptions referring to cigarettes							
It advertises cigarettes *and* holidays	0	0	12	43	67	71	29
It advertises cigarettes	20	10	26	50	25	17	25
(Total)	(20)	(10)	(38)	(93)	(92)	(89)	(54)
Other descriptions							
It advertises holidays	11	44	57	7	8	11	24
It advertises racing/racing cars	59	46	0	0	0	0	19
Don't know/idiosyncratic descriptions	9	0	5	0	0	0	2

Table 2. Age differences in the descriptions of the advertisement for Benson & Hedges cigarettes

	Age						
Base	6 44 (%)	8 48 (%)	10 42 (%)	12 42 (%)	14 36 (%)	16 35 (%)	All Subjects 247 (%)
Descriptions of the advertisement							
It advertises cigarettes	30	54	62	88	94	94	68
(The make or brand is Benson & Hedges)	(2)	(4)	(38)	(83)	(86)	(80)	(46)
Anti-smoking publicity	25	23	31	2	6	3	16
It advertises something else	43	10	0	0	0	0	10
Don't know	2	13	7	10	0	3	6

"Holidays sponsored by cigarettes". (Suburban girl, 14 years)

"Killing two birds with one stone. Advertising two things in the one advert" (Suburban boy, 16 years).

Recognition of the brand imagery in the Benson & Hedges advertisement

As mentioned above, there was no brand name on the Benson & Hedges advertisement. Table 2 shows that a majority of the children at each age, except at 6 years, said that it advertises cigarettes. When discussing this, several children mentioned that the Government Health Warning appears on cigarette advertisements. It is interesting to note in this context that about a quarter of the 6–10-year-olds said that the advertisement represented anti-smoking publicity.

The majority of the secondary school children and just over a third of the 10-year-olds identified the brand as Benson & Hedges (Table 2). Examination of the qualitative data revealed that the most frequently voiced reasons for this referred to the gold colour and surrealistic quality of the brand imagery:

"Benson & Hedges have a gold colour" (Suburban boy, 10 years)

"Benson & Hedges always have silly ones. Some of them have the name on them. So when you see one like that you know it is Benson & Hedges". (Suburban girl, 10 years)

"They go for advertisements like that". "They've always got gold in their adverts" (Inner-city boys, 12 years)

"It's always gold". "Benson & Hedges do stupid things... like bees coming out of it" (Suburban boys, 12 years)

"Benson & Hedges has a gold colour" (Suburban girl, 12 years).

Table 3. The 6- and 8-year-olds' descriptions of the advertisement for More cigarettes

	Age		
Base	6 44 (%)	8 48 (%)	Both Ages 92 (%)
Descriptions of the advertisement			
It advertises cigarettes	14	50	33
It advertises cigars	52	27	39
It advertises wine	16	4	10
It advertises cigarettes and wine	0	17	9
It advertises cigars and wine	18	0	9
Anti-smoking publicity	0	2	1

Perception of the purpose of the other cigarette advertisements

Almost all of the 6- and 8-year-olds said the Kim, Embassy and Marlboro advertisements were advertisements for cigarettes. However, Table 3 shows the majority of the 6-year-olds and about half of the 8-year-olds were confused by the More advertisement. The brown cigarette was often mistaken for a cigar; and some children thought the wine indicated that it was an advertisement for an alcoholic drink. Few of the older children spontaneously mentioned that it advertised cigars; therefore votes on this particular issue were not taken from the 10–16-year-olds.

Perception of the imagery in the JPS, Benson & Hedges, Kim, Embassy Regal and More advertisements

Table 4 shows the results of the INGRID analyses of the voting patterns describing the 10-16-year-olds' perceptions of the characteristics of people who would like the five advertisements.

The perceptions of the younger children were less differentiated: the proportions of variance accounted for by the first principal components decrease and the proportions accounted for by the second and third components increase as a function of increasing age, although the differences between the 14- and 16-year-olds are negligible.

The 10-year-olds

The loadings on the first principal component contrast JPS Grand Prix Holidays against all of the other advertisements. More than the other groups, the 10-year-olds used the activities specifically shown in the JPS advertisement in their descriptions of the kind of person who would like this advertisement: equally likely to be male or female, he or she would have a dangerous, exciting job, such as a racing driver; would engage in active outdoor sports, such as swimming; would enjoy holiday type activities, such as sightseeing; and would wear leather protective clothing like that worn by racing drivers. They also tended to say that people who like the JPS advertisement would prefer 'heavy metal' or loud pop music.

Against this, the other four advertisements elicited little in the way of imagery and had few distinguishing features. The people who like them could be male or female; of any age, including teenagers; would either be unemployed or have no particular kind of job; and would have no distinguishing features in their clothing or music preferences. In fact,

Table 4. Loadings on the first three principal components for the cigarette advertisements and descriptions of the people who would like these advertisements as construed by the 10–16-year-olds

	10-Year-olds			12-Year-olds			14-Year-olds			16-Year-olds		
	I	II	III	I	II	III	I	II	III	I	II	III
Advertisements												
JPS Grand Prix Holidays	−57.9	−4.4	1.1	36.7	−16.6	2.7	1.9	−24.4	34.8	7.5	−27.2	33.5
Benson & Hedges	11.6	0.6	−21.2	−26.5	−13.4	1.2	−49.8	3.6	−14.9	−54.7	−9.8	−18.6
Kim	22.8	−19.6	6.2	3.9	9.5	−18.5	37.9	−27.6	−25.5	41.2	−22.0	−24.3
Embassy Regal	15.4	−0.4	7.9	−22.1	−1.7	3.7	−28.3	8.7	0.8	−23.0	21.9	10.5
More	8.1	23.8	5.9	8.0	22.2	10.9	38.2	39.7	4.8	28.9	37.2	−1.0
Descriptions												
Sex												
Male	−4.2	2.2	1.0	1.4	0.8	3.7	3.4	5.2	7.1	1.7	−8.2	14.8
Female	2.3	3.5	1.9	2.4	12.4	3.9	21.9	−7.5	−16.2	25.6	3.1	−17.6
Male or female	0.4	−6.6	−2.6	−3.3	−12.8	−7.6	−25.3	2.3	9.1	−27.3	5.1	2.8
Age												
Teens and above/all ages	10.1	−1.4	−5.9	−10.8	2.1	−5.5	−16.7	−4.7	−15.7	−16.0	−14.3	−13.8
Twenties and above	−11.8	−6.7	4.6	7.7	−4.7	0.9	2.0	−7.1	22.5	11.8	−7.2	4.5
Thirties and above	2.8	7.0	4.3	1.5	2.9	2.6	15.4	11.5	−6.8	5.2	21.3	9.4
Occupation												
Any job/nothing special	9.1	−10.2	9.0	−7.0	0.6	−3.0	−28.3	1.2	−5.5	−25.6	−5.1	−4.5
Office job/secretary	—	—	—	4.8	4.5	1.2	10.1	−12.8	−9.5	11.9	−3.3	−3.0
A good job/well off	—	—	—	0.8	−3.7	1.9	12.0	20.6	8.5	10.0	17.6	−1.9
Dangerous exciting job/racing driver	−32.8	−5.4	2.8	—	—	—	—	—	—	—	—	—
Unemployed	10.6	−1.8	−2.3	—	—	—	—	—	—	—	—	—
Leisure preferences												
Anything/nothing special	4.8	15.2	8.2	−24.2	11.6	3.4	−28.6	4.9	−11.4	−26.4	−2.4	−11.6
Relaxed, peaceful activities	9.9	−11.1	−6.0	−15.4	−10.0	2.6	−14.1	4.5	−2.1	−12.4	22.8	2.0
Sports	−27.8	−5.2	3.0	17.0	0.7	−4.4	5.9	−21.6	17.7	10.8	−22.3	17.9
Social activities	7.1	−2.4	−2.1	1.2	4.8	−11.3	27.1	0.7	−7.2	26.3	2.9	−17.7
Holiday activities/sightseeing	−15.9	−2.5	0.8	19.7	−12.5	4.3	—	—	—	—	—	—
Drinking	9.3	−3.2	9.7	—	—	—	—	—	—	—	—	—
Smoking	12.3	−6.8	−6.4	—	—	—	—	—	—	—	—	—
Clothing preferences												
Anything/nothing special	19.3	−6.1	2.5	−16.0	−0.2	−0.8	−14.3	1.4	−6.0	−27.4	−2.2	−11.8
Casual/holiday clothing	−4.6	8.0	−3.0	18.8	5.2	3.6	−9.4	−6.4	11.0	−0.2	−6.4	15.2
Trendy/fashionable/up-to-date	4.2	−3.6	−0.2	0.6	2.3	−6.7	11.3	−15.1	−6.7	21.2	−16.6	−5.9
Expensive/sophisticated	—	—	—	—	—	—	16.5	17.0	3.7	8.5	19.7	0.6
Old fashioned/not modern	—	—	—	—	—	—	—	—	—	−3.5	4.6	2.7
Leather/protective/crash helmets	−18.8	−3.1	−0.4	—	—	—	—	—	—	—	—	—
Music preferences												
Anything/mixed/nothing special	16.2	−7.4	9.8	−11.7	−12.4	2.4	−25.1	−2.7	0.4	−17.5	−6.4	2.1
Pop/modern/disco	−6.4	1.2	−6.2	9.6	5.1	−8.3	15.4	−21.1	−2.3	10.4	−9.3	−7.0
Classical/posh stuff	3.2	4.5	−1.7	3.7	5.3	5.3	11.9	24.7	0.6	3.6	7.0	−0.3
Relaxing/quiet/soft	—	—	—	—	—	—	—	—	—	3.8	9.0	8.2
Heavy metal	−5.6	−5.0	−1.0	—	—	—	—	—	—	—	—	—
Loud music/loud pop	−15.0	−2.4	0.8	—	—	—	—	—	—	—	—	—
Percentage of variance accounted for	71.6	16.2	9.8	60.6	24.1	11.2	51.9	25.3	17.7	51.1	26.7	18.2

there were only two distinguishing features of interest in these advertisements. These are shown in the patterns of loadings on the second and third principal components. First, although smoking was often mentioned as a leisure activity engaged in by people who like the Benson & Hedges, Kim and Embassy Regal advertisements, this was mentioned less often with reference to the advertisement for More. Secondly, although drinking was often mentioned as a leisure activity when talking about Kim, Embassy Regal and More, it was not mentioned at all when discussing the Benson & Hedges advertisement. It is important to remember here that the Benson & Hedges advertisement—unlike the advertisements for Kim, Embassy Regal and More—has no symbolism referring to drinking.

The 10-year-olds' spontaneous comments when first shown the advertisements also tended to refer to what was specifically shown in the advertisements. For example, in response to open-ended questions (such as, "What kind of person would like this advertisement?") advertisements showing cigarette packs and symbols referring to drinking often elicited answers referring to smoking (e.g. "Smokers!") and sometimes to drinking (e.g. "Alcoholics!").

Finally, whereas many of the older children (especially the 14- and 16-year-olds) made slighting or tongue-in-cheek remarks about the sometimes duplicitous nature of advertising, the 10-year-olds tended to be more moralistic in their comments:

"They're trying to get you to buy cigarettes. Cigarettes are bad for you" (Inner-city girl, 10 years)

"Background is quite good but . . . not cigarettes. They damage your health" (Suburban boy, 10 years)

"A good advert but I don't like cigarettes", "Not very good. It can start teenagers off smoking" (Suburban girls, 10 years).

The 12-year-olds

The loadings on the first principal component contrast Embassy Regal and Benson & Hedges against JPS. People who like the Embassy Regal and Benson & Hedges advertisements were seen as having few distinguishing features: for example, they are equally likely to be male or female; to be of any age, including teenagers; and to engage in any leisure activity, as long as it does not involve physical effort. Against this, JPS is a person in his or her twenties who enjoys sports and holiday activities (going abroad, touring) and has a taste for casual clothes.

The second principal component specifies characteristics which More and Kim have in common. Both were seen as more likely than were the other advertisements to be liked by females. The third principal component specifies characteristics which differentiate Kim and More: Kim was seen as more likely to appeal equally to both sexes, and as preferred more by teenagers and people who liked sports, social activities (such as discos and parties), trendy clothes and modern pop or disco music.

However, many of the 12-year-olds said that people who like the Kim and More advertisements would have no particular characteristics. Therefore the distinguishing features of the More and Kim advertisements shown in the second and third component loadings are the result of consistent minority opinions within this group. In this respect the 12-year-olds differed from the 14- and 16-year-olds, since the latter's similar though much richer imagery, described below, largely came from the majority of the group.

The spontaneous comments about the people who would like the advertisements were also less imaginative than those given by the older children. In most cases the answer to the preliminary question asked when the advertisements were presented ("What kind of person would like this advertisement?") was: "a smoker!" or "smokers!". In a few cases this was expanded to: "a lady", "a woman", or "a woman who smokes", in response to the More and Kim adverts; however, as in the analysis described above, this was a minority opinion.

The 14- and 16-year-olds

Table 4 shows the loadings of the 14- and 16-year-olds are very similar. The first principal components contrast Benson & Hedges and Embassy Regal against Kim and More. People who like the Benson & Hedges and Embassy Regal advertisements were seen as having few distinguishing features: they could be male or female; they could be of any age, including teenagers; they could have any kind of job; they have no particular clothing or music preferences; and they have no particular leisure preferences, with the important proviso that they do not engage in active sport.

The initial spontaneous comments about people who would like the Benson & Hedges and Embassy Regal advertisements also indicated that they would have few distinguishing features, except that they would smoke. However, some children made comments about the surrealistic quality of the Benson & Hedges advertisement; and some mentioned darts or snooker when talking about the Embassy advertisement:

Benson & Hedges

"A Smoker" (Suburban boy, 14 years)

"Anyone who smokes" (Suburban girl, 14 years)

"Art student, people who would think about it. They would go to art museums and that. Pile of bricks and a' that" (Inner-city boy, 14 years)

"Eighty a day people" (Inner-city girl, 14 years)

"A smoker . . . the most striking thing on that is the writing underneath" (Suburban boy, 16 years)

"People that smoke", "An intellectual" (Suburban girls, 16 years)

"Weirdos" (Inner-city boy, 16 years)

"Smokers" (Inner-city girl, 16 years)

Embassy Regal

"Smokers!" (Inner-city boys and girls, 14 and 16 years)

"Boring people" (Inner-city boy, 16 years)

"A smoker, lazy, a big fat guy, anybody who's big and fat." (Suburban girl, 14 years. When saying this the girl mimed

the action of a ponderous fat man throwing a dart—much to the amusement of the other girls).

On the other hand, Table 4 shows that the Kim and More advertisements were seen as being liked by females with rather distinctive tastes. The distinguishing features are defined by the loadings on the second components. Kim was seen as an office worker, in her twenties; she wears fashionable, trendy clothes and likes modern pop or disco music. She was also seen to enjoy sports; although some youngsters specified that her sporting activities are often of a casual nature: "A wee bit of sport—tennis or just something she looks trendy at". One group mentioned Kim sportswear worn by tennis players on television programmes.

More was seen as an older woman, in her thirties or forties. She is well-off, wears expensive, sophisticated clothes and tends to prefer classical music. Both Kim and More were seen as enjoying an active social life. However, the descriptions of their social life showed clear differences in the kind of social life they enjoy. Kim enjoys a lively night life, dancing and discos: "Not staying in knitting and a' that". More was seen as enjoying a more sophisticated social life: "... going out for meals at night"; "cocktails, bridge and all that".

The initial spontaneous comments about the two advertisements were often nicely illustrative of these differences. In addition, some comments were critical and cynical; and some referred to the association of smoking and drinking in both advertisements:

Kim

"More for females because it's called Kim and because of the colours and that" (Suburban boy, 14 years)

"A young lady" (Suburban girl, 14 years)
"Fags again! Women's fags this time" (Inner-city boy, 14 years)

"Smokers... someone who likes fancy things" (Inner-city girl, 14 years)

"Colourful like all cigarette ads—trying to associate their products with glamour... cocktail glasses" (Suburban boy, 16 years)

"Young female, lively" (Suburban girl, 16 years)

"Glamourising cigarettes .. cocktails and all that fanciness" (Inner-city girl, 16 years)

More

"Somebody who thinks he's flashy, but he's not got enough money to be flashy". "Wine bar freaks and a' that" (Inner-city boys, 14 years)

"Stottin' about the house... doesn't like to get her hands dirty" (Inner-city girl, 14 years)

"Women". "A long slim lady" (Inner-city boys, 16 years)

"Sophisticated people". "Associating drink again!" (Inner-city girls, 16 years)

"Wording itself is for females—long, slim". "A Sloane Ranger" (Suburban boys, 16 years).

The characteristics of people perceived to like the JPS Grand Prix Holidays advertisement are defined by the loadings on the second and third principal components. The second components specify characteristics which this advertisement was seen to have in common with the advertisement for Kim. JPS, like Kim, was seen as liking trendy clothes and pop music; and both were seen as engaging in sports, although unlike Kim, there were no suggestions that JPS is a *poseur* in this respect.

The third principal components contrast JPS against Kim and More. Whereas Kim and More were seen as feminine, JPS was seen as more likely to be a sport-loving male who likes casual clothing.

As with the Kim and More advertisements, some of the initial spontaneous comments about the kind of person who would like the JPS advertisement were playful and cynical:

"Somebody who smokes". "Somebody who likes danger" (Suburban girls, 14 years)

"A smoker, everybody. Something for everyone here—swimming, motor racing" (Inner-city boy, 14 years)

"Someone who likes racing" (Inner-city girl, 14 years)

"Anyone who can see himself as a racing driver—the dreamers of the world". To which someone replied: "The smokers of the world" (Suburban boys, 16 years)

"An attempt to attract a sort of macho man" (Inner-city boy, 16 years).

The perceptions of the 14- and 16-year-olds were very similar. There were only two notable differences. Whereas the majority of the 16-year-olds perceived JPS as male, most of the 14-year-olds said that this advertisement would be liked equally by males and females. Secondly, although the majority of the 16-year-olds saw More as female, only about a third of the 14-year-olds held this view. One of the probable reasons for the latter disparity is that the brown cigarette in the More advertisement was mistaken for a cigar by some of the 14-year-olds.

The Marlboro advertisement

Most of the questions asked about the Marlboro advertisement were more open-ended, such as: "What do you think of this?" The 6- and 8-year-olds said little in response to this other than to offer descriptions of the product and appreciative descriptions of the scenery: "Cigarettes!", "Ah, cowboys", "Horses!" The 10-year-olds, although appreciative of the scenery, tended to be more critical of the product. Only one 10-year-old suggested that the advertisement attempted to link smoking with cowboy imagery:

"Cowboys to get more people to buy them—do what the cowboys do" (Inner-city boy, 10 years)

"It's trying to get you to buy cigarettes" (Inner-city girl, 10 years)

"Good background, scenery; good feel, got character to it. Shouldn't advertise cigarettes" (Suburban boy, 10 years)

"I like the horses and the scenery, but I don't like the advertising for cigarettes" (Suburban girl, 10 years).

The older children were much more scathing in their comments, with the 14- and 16-year-olds claim-

Table 5. Age differences in the judgements of the sex of people who would most like the advertisement for Marlboro cigarettes

	Age						
Base	6 44 (%)	8 48 (%)	10 42 (%)	12 42 (%)	14 36 (%)	16 35 (%)	All subjects 247 (%)
Sex of person who would most like the advertisement							
Male	7	19	31	74	100	89	50
Female	7	10	5	0	0	3	4
Both sexes equally	86	71	64	26	0	9	46

ing that the advertisement attempted to associate male smoking with toughness, fresh air and freedom:

"Rubbish" (Suburban girl, 12 years)

"I don't see what horses have to do with cigarettes" (Inner-city boy, 12 years)

"Tough and big because you smoke like a cowboy". "Try to create an image . . . enjoy yourself in the fresh air like enjoying a cigarette" (Suburban boys, 14 years)

"It must be cool to smoke . . . like a cowboy . . . relaxed. Absolutely groovy. Relaxed . . . nothing gets you going, nothing bothers you". (Suburban girl, 14 years)

"It's tellin' ye that if you smoke them you're gonnae be a macho he-man" (Inner-city boy, 14 years)

"A big strong guy on a horse appeal to boys" (Suburban boy, 16 years)

"A certain sort of man smokes a certain sort of cigarette. If that looks good then smoke them" (Suburban girl, 16 years)

"You'll have a relaxed time if you smoke this cigarette". "Macho man!" "Hard men smoke this cigarette". "Not hard, but tough . . . like John Wayne" (Inner-city boys, 16 years).

They were also asked if the advertisement would be most liked by males, females or by both sexes equally. The results, shown in Table 5, are much as expected from the comments listed above: the majority of the secondary school children said that the advertisement would appeal mostly to males; the majority of the primary school children said it would appeal equally to both sexes.

A similar question was asked about the preceding advertisement for More cigarettes in order to give the 6- and 8-year-olds some practice at answering this kind of question before showing them the Marlboro advertisement. The results, shown in Table 6, are worth mentioning briefly because they indicate that even young children can make systematic judgements about sex preferences with respect to advertisements; and hence that their responses to the Marlboro advertisement cannot be explained in terms of an inability to make inferences about sex preferences for advertisements. The majority of the children in the youngest age group said the More advertisement would most appeal to men. As noted above, a majority of these children said that this picture advertises cigars or cigars and wine.

DISCUSSION

There were quite marked differences between the groups from the two areas in their attitudes towards the discussions. The suburban primary school children tended to be more articulate and less aggressive than those in the inner-city area. The suburban secondary school children generally engaged in relaxed debate, taking turns and time to make points. Their inner-city peers tended to be more aggressive, scathing and forceful, particularly when talking about what they thought were pretentious features in some of the advertisements. However, despite these differences, it was interesting to find basic similarity in response to the cigarette advertisements. There were also no discernible differences between boys' and girls' responses. With hindsight these findings are perhaps not surprising because there are few clear-cut differences in Scotland between children from different socio-economic groups or between boys and girls in their attitudes and behaviour with respect to smoking [15–17].

Awareness of cigarette advertising, brand imagery and 'brand stretching' procedures

It seems that children are aware of the presence of advertisements from quite an early age. The 6-year-old groups were able to list most of the

Table 6. Age differences in the judgements of the sex of people who would most like the advertisement for More cigarettes

	Age						
Base	6 44 (%)	8 48 (%)	10 42 (%)	12 42 (%)	14 36 (%)	16 35 (%)	All subjects 247 (%)
Sex of person who would most like the advertisement							
Male	82	23	12	12	33	3	28
Female	2	4	19	40	36	66	26
Both sexes equally	16	73	64	48	31	31	45
Don't know	0	0	5	0	0	0	1

advertising media cited by the older children, including television, radio, cinemas, newspapers, magazines, posters and shop windows. Moreover, although the 6-year-olds in the working class inner-city area were unable to define 'advertisements' or 'advertising' to incorporate a selling component, their middle-class suburban peers were able to do so, some with surprising fluency. This is perhaps unexpected since a number of studies indicate that children younger than 7 or 8 have a relatively poor awareness of the selling intent of television commercials [18].

The 6-years-old tended to pay more attention to the pictorial features rather than the wording of the advertisements. This sometimes led to errors in interpretation. Most of the 6-year-olds in both areas said the Kim, Embassy Regal and Marlboro advertisements were for cigarettes. These show clearly recognisable packs of cigarettes, unlike those for More and Benson & Hedges. The More advertisement—which shows a 'cigar-like' cigarette and two bottles of wine—was interpreted by the majority of the 6-year-olds as an advertisement for cigars, or wine, or both, despite the presence of the Government Health Warning which specifically mentions 'cigarettes'.

It is important to note that the majority of the 6-year-olds in the middle-class area also made this mistake. As most of these children were judged to be good readers by their teachers it seems that this error in interpretation was due more to their focusing on the prominent pictorial features of the advertisement rather than to their inability to read the Government Health Warning. It is also interesting that the Benson & Hedges advertisement was more likely to be interpreted by the 6-year-olds than was the More one as being concerned with cigarettes. In fact, a majority of the 6-year-olds interpreted the Benson & Hedges advertisement as being in some way concerned with cigarettes. The picture in the advertisement gives no indication of the product *and* has little meaning (unless the reader knows it is an example of Benson & Hedges brand imagery; and only the older children were generally aware of this), so the reader is almost forced to attend to the Government Health Warning as an aid to interpretation. Thus it is perhaps not surprising that about a quarter of the 6-year-olds (and 8- and 10-year-olds) interpreted this particular advertisement as anti-smoking publicity.

After about the age of 6 or 7 it seems that children pay more attention to the wording of advertisements and for this reason are less likely to make gross errors in interpretation. Fewer 8-year-olds than 6-year-olds misinterpreted the advertisement for More cigarettes. Furthermore, a majority of the 8-year-olds said that the Benson & Hedges picture advertises cigarettes. However, although 30% of the 6-year-olds and 54% of the 8-year-olds said it advertises cigarettes, only 2 and 4% respectively were able to give the brand name.

Sixty-two per cent of the 10-year-olds said that the Benson & Hedges picture advertises cigarettes and 38% were able to give the brand name. Thereafter, at 12 years and above, a majority of the children correctly identified the brand.

It is interesting to note that among those who did identify the brand name, even among the 10-year-olds, several children were able to specify some of the characteristics of the Benson & Hedges brand imagery which commentators [5, 19–22] have suggested as reasons for its supposed appeal. Several children pointed to the omnipresent 'gold' quality in the imagery:

"They've always got gold in their adverts".

Several also alluded to the surrealistic quality of the imagery. The explanation given by a 10-year-old girl is worth repeating because it gives a terse description of the supposed appeal:

"Benson & Hedges always have silly ones. Some of them have the name on them. So when you see one like that you know it is Benson & Hedges".

This seems tantamount to saying that there is a 'concept' of Benson & Hedges brand imagery; and so successful is the advertising campaign in keeping the brand name in memory that many children of 10 years and above are aware of it.

The age-related trend in the children's interpretations of the More and Benson & Hedges advertisements is also apparent in their interpretations of the JPS Grand Prix Holiday advertisement. The majority of the 6-year-olds and a large proportion of the 8-year-olds interpreted this as an advertisement for racing or racing cars. These children apparently paid more attention to the largest colourful picture in the advertisement. However, a large proportion of the 8-year-olds and the majority of the 10-year-olds said it was an advertisement for holidays. These children presumably paid more attention to the wording of the advertisement.

A substantial proportion of the children did not agree with either of these interpretations. Despite the fact that this 'brand stretching' advertisement does not mention 'cigarettes' and does not show a Government Health Warning, 22% of the 6–10-year-olds said it advertised cigarettes or cigarettes and holidays. This proportion increased to 91% among the secondary school children and their spontaneous comments indicate that many children of 12 and above are aware of the duplicitous nature of this kind of advertising:

"It's a con way of advertising cigarettes".

No doubt the people who commissioned the advertisement would say that it does not advertise cigarettes. The results of the present study indicate that many school children would disagree with this.

Chapman and Fitzgerald [23] found that large proportions of Australian children of secondary school age were able to correctly identify cigarette advertisements and brand slogans. They concluded that adolescents are well aware of cigarette advertisements. The results of the present study provide supporting evidence for this view and, in addition, suggest that many preadolescents and children below secondary school age are also well aware of cigarette advertising.

Brand imagery

There were consistent age-related trends in the children's responses to the symbols in the advertisements. The component structure of the INGRID analyses shows that the younger children's perceptions were much less differentiated than were those of

the older children. The 10-year-olds' responses seem to have been tied to what was specifically shown in the advertisements. For them, the kind of people who would like the Kim advertisement, for example, would have few distinguishing features except that they would smoke and drink. This advertisement has explicit symbolism referring to these two activities.

Some of the 12-year-olds and most of the 14- and 16-year-olds went far beyond what was explicitly shown in the advertisements. Many of their comments were similar to what one might expect from adults and appear to refer to messages aimed at distinguishing one brand from another. For example, Kim was seen as an office worker, in her twenties; she wears fashionable, trendy clothes and likes modern pop or disco music. More, although older, was also seen to have some attractive qualities: "A long cool lady", "A Sloane Ranger". These findings suggest that most 14- and 16-year-olds and some 12-year-olds are able to (a) see attractive qualities in some of the cigarette advertisements currently in use in the U.K., and (b) distinguish between the images portrayed much in the way that adults do.

There is evidence that a substantial part of market research involves assessing older teenagers' and young adults' attitudes which are then considered in developing marketing and advertising strategy [24, 25]. Given this it is not surprising that some cigarette advertisements present qualities which younger teenagers find attractive.

It is true that some of their spontaneous comments about these advertisements were derogatory. For example, one girl saw More as:

"Stottin' about the house . . . doesn't like to get her hands dirty".

However, it is interesting that negative comments were largely ignored in their eventual descriptions of the kind of people who would like the Kim and More advertisements. It is possible that some of these comments served the function of telling their companions (and the investigators) that they themselves would not be influenced by the advertisements. Few people seem to believe that they themselves are influenced by advertising, a claim that is patently untrue.

However, it is important to note that many young adults make derogatory comments about the imagery portrayed in cigarette advertisements [25]. Thus, the finding that several 14- and 16-year-olds made scathing remarks about the characteristics of people who would like the advertisements is consistent with our suggestion that young people of this age tend to perceive cigarette advertisements much in the way that young adults do.

The Kim brand imagery appears to be particularly attractive to young people. In the present study some of the 12-year-olds and most of the 14- and 16-year-olds saw Kim as fun-loving, sociable and trendy. These are characteristics which 10 14-year-olds perceive as being prized by other youngsters [15]. It is also interesting that Beike and Heiland [26, 27] found, in a small-scale study with West German adolescents and adults, that the adolescents' perceptions of the qualities shown in an advertisement for Kim cigarettes were quite highly correlated with their conceptions of an ideal style of advertising.

This is not to say that the Kim imagery is specifically aimed at young teenage girls. In fact, it seems that the target market was young working women in their twenties and thirties [28]. The campaign stressed "the distinctive colouring and style of the pack—which some women now regard as an accessory—that it was designed for women and that it was an elegant long smoke" [28]. Nevertheless, our finding that some 12-year-olds and most 14- and 16-year-olds perceived attractive characteristics in the Kim imagery suggests that campaigns aimed at young adults are likely to present qualities that younger teenagers find attractive.

There were similar age-related trends in the responses to the Marlboro advertisement. The 10-year-olds' comments largely referred to what was actually shown in the picture. The 14- and 16-year-olds' perceptions were much more like those of adult commentators [7, 10] who have tried to specify the attractive qualities of the genre:

"It's tellin' ye that if you smoke them you're gonnae be a macho he-man"

"It must be cool to smoke . . . like a cowboy . . . relaxed".

The majority of the 6–10-year-olds said the advertisement would be liked equally by males and females. However, the majority of the 12–16-year-olds said that it would be more preferred by males. As Chapman and Egger suggest, the imagery tells us that Marlboro "is a tough smoke for tough men" [7]. Cigarette advertisements portraying this kind of rich imagery (and *not* showing a Government Health Warning) are currently appearing in in-flight magazines in the U.K.

There were few age-related differences in the descriptions of the kind of people who would like the Benson & Hedges and Embassy Regal advertisements. These elicited little in the way of specific imagery from any age group. Some of the children referred to the surrealistic quality of the Benson & Hedges picture, but their comments had little effect on the voting patterns describing the kind of person who would like the advertisement. Adult commentators appear to have had similar difficulties in specifying the supposed appeal of this kind of imagery: there seems to be little agreement in their descriptions of the genre, except that it has a certain 'arty' appeal [10, 21, 22].

Brand-stretching and sponsorship

The responses to the 'brand stretching' JPS Grand Prix Holidays advertisement followed a similar developmental course to that described above: the 10-year-olds' responses were more tied to the activities shown in the pictures than were the older children's responses. However, here the age-related differences in their descriptions of the kind of people who would like the advertisement were much less pronounced. Because of the strong and vivid imagery in this advertisement (the symbolism is clearly less oblique than that shown in the other advertisements, except possibly Marlboro) even the 10-year-olds were able to list qualities reflecting the appeal to ex-

citement, sports and holiday activities. Cigarette advertisements using this kind of rich imagery have not been allowed in specific UK media for the past eight years.

In a study of this type it is of course not possible to specify to what extent responses were determined by the particular advertisements shown or by the subjects' recollections of other advertisements or publicity. For example, some of the older children mentioned darts and snooker when talking about the Embassy Regal advertisement. Other Embassy advertisements in this series portray symbols referring to these activities. Moreover, both activities have been sponsored by Embassy and have attracted considerable television coverage [8]. Nevertheless, the fact remains that the Embassy Regal advertisement had little appeal for the youngsters in the present study.

It also seems possible that the association between Kim and sport was determined to some extent by recollections of previous publicity. There seems to be nothing referring to sport in the symbolism of the Kim advertisement. However, many of the 14- and 16-year-olds and some of the 12-year-olds said that girls who would like this advertisement would engage in sporting activities, although some added the proviso that the sporting activities would be of a casual nature:

"A wee bit of sport—tennis or just something she looks trendy at".

It is possible that this particular association of Kim and sport was due to recollections—unconscious or otherwise—of the 'brand stretching' activities of British American Tobacco. In 1982 tennis stars appeared at Wimbledon wearing the Kim logo and colours. The Kim colours were worn by Martina Navratilova for two seasons at Wimbledon. This was seen on television by a world-wide audience of millions. British American Tobacco said she was promoting a range of sportswear and not cigarettes [24].

Comparisons with findings from Scottish studies of age changes in attitudes towards smoking

The 6-year-olds tended to be less 'moralistic' in their comments about cigarette advertisements than were the 10-year-olds. This appears to mirror changes in primary school children's attitudes: children's judgements of smokers (and drinkers) tend to increase in severity over the years 6–10 [29].

The changes in attitudes over the years 10–16 were more complex. Some of the 12-year-olds and most of the 14- and 16-year-olds saw attractive qualities in some of the cigarette advertisements. It is true that many of the children were critical of cigarette advertising. However, whereas the 10-year-olds' comments tended to be 'moralistic' the older children's tended to be more playful and 'tongue-in-cheek'. This developmental trend accompanies major changes in behaviour and attitudes with respect to smoking: smoking prevalence rates increase [15–17] and judgements of the morality of smoking (and drinking) decrease in severity [15] over the years 10–14.

The older children also tended to have a more differentiated (i.e. less simplistic) view of cigarette advertisements. This is consistent with findings that young people's perceptions of smokers and non-smokers, drinkers and non-drinkers, tend to become more differentiated over the years 10–14 [15]. Young people are much less likely to see things in terms of black and white simplicity at 14 than they are at 10 [30].

Concluding comments

Cigarette advertisers may find the information described above useful for their own purposes. Despite this we believe that descriptions of childrens's perceptions of cigarette advertisements should be freely available to those concerned with health education. A sound knowledge of children's perceptions of advertisements for cigarettes is an important prerequisite for the design of effective health education programmes to make children more aware of the social pressures acting upon them, and which help mould their attitudes towards smoking. Effective communication demands an understanding of the child's point of view.

The findings also appear to have important implications for health policy issues. Much of the current controversy on whether cigarette advertising should be restricted revolves around the issue of whether it influences volume sales, i.e. market size, or whether, as the industry claims [e.g. 31], it reflects brand switching strategies. In our view, this conceals an even more fundamental issue: whether in this brand-switching strategy ostensibly aimed at adults, it is acceptable for children to be exposed to and perceive attractive images in the advertising materials used. It is worth noting that when cigarette advertising was banned in Norway in 1975, the decline in smoking was most noticeable amongst young people [32].

Acknowledgements—This research was supported by the Cancer Research Campaign. We are grateful for the help of the children, teachers and head teachers who allowed us to intrude upon their time; and to the anonymous referees who made useful comments on an earlier draft of the paper.

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CHILDREN AND SMOKING

'Brand-stretching' advertisements for cigarettes: the impact on children

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CIGARETTE brand imagery is often presented in advertisements for other products or services. Recent research sponsored by the Cancer Research Campaign suggests that many primary school children may identify such advertisements as advertising cigarettes, and perceive exciting and attractive imagery in this kind of advertising material.

TOBACCO companies can avoid many of the restrictions on cigarette advertising by 'brand-stretching' – that is, by attaching cigarette brand names and their visual cues to non-tobacco goods and services. For example, the distinctive Kim logo and colours were worn by Martina Navratilova for two seasons at Wimbledon and were seen on television by a worldwide audience of millions[1]. Similarly, a BBC *Panorama* programme of 1984[2] noted that John Collier clothes advertising the John Player Special brand (without health warnings) were designed with the young in mind and at a price they could afford.

Not surprisingly, perhaps, the industry insists that it does not aim advertising at the young[3]. In the case of Kim, for example, British American Tobacco (BAT) said that Kim sportswear was being promoted, not Kim cigarettes[1]. This denial was not very convincing, given that a 1979 BAT memorandum stated:

> 'Opportunities should be explored by all companies so as to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifiers. This is likely to be a long-term and costly operation, but the principle is nevertheless to ensure that cigarette lines can be effectively publicised when all direct forms of communication are denied . . .'[1]

In 1984, when we were planning a study of young people's perceptions of cigarette advertising imagery, a colourful advertisement for JPS Grand Prix Holidays appeared in magazines and colour supplements. The main feature of the advertisement was a picture of the racing car sponsored by John Player Special cigarettes. This provided us with an excellent opportunity to pinpoint the age at which children are able to (1) recognise the 'essential visual identifiers' associated with John Player Special cigarettes, and (2) understand the purpose of 'brand-stretching' advertisements.

The methodology of this study has been fully described elsewhere[4]. Briefly, groups of children and young people discussed a range of magazine advertisements, including those for cigarettes. Quite early in the discussion they were presented with the advertisement for JPS Grand Prix Holidays (the first cigarette-related one shown). At this stage in the research they were not aware that we were primarily interested in their views on cigarette advertising. Prompts were used where necessary to elicit discussion about the purpose of the advertisement, in order to obtain a measure of agreement/disagreement, votes by show of hands were taken.

In detailed terms, about half the advertisement showed the John Player Special car featuring the brand name, logo and colours of the cigarette pack. There were also some smaller pictures: two of attractive young men and women in bathing costumes, and one of a plush hotel. The wording gave details of holidays in places associated with motor racing (eg Monaco, Monza). The advertisement did not mention 'cigarettes' and did not show a Government Health Warning.

The major interpretation of the advertisement's intentions are shown in the table, analysed by age.

Table 1

Age differences in the descriptions of the advertisement for JPS Grand Prix Holidays*

	Age (years)						
	6	8	10	12	14	16	All subjects
Descriptions referring to cigarettes (%)							
It advertises cigarettes *and* holidays	0	0	12	43	67	71	29
It advertises cigarettes (Total)	20 (20)	10 (10)	26 (38)	50 (93)	25 (92)	17 (89)	25 (54)
Other Descriptions (%)							
It advertises holidays	11	44	57	7	8	11	24
It advertises racing/racing cars	59	46	0	0	0	0	19
Don't know/ idiosyncratic descriptions	9	0	5	0	0	0	2
Base	44	48	42	42	36	35	247

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Despite the fact that the advertisement did not mention 'cigarettes' or give a health warning, 22 per cent of the six- to 10-year-olds and 91 per cent of the 12- to 16-year-olds said it advertised cigarettes, or holidays *and* cigarettes. Among those who made this claim, a majority of the older children said that cigarettes *and* holidays were being advertised, whereas the younger children tended to say that it advertised cigarettes.

None of the primary school children spontaneously mentioned the duplicity involved in this kind of advertising. However, the secondary school children made much of this point:

"Garbage . . . it's a con"
"It's a con way of advertising cigarettes"
"John Player Special sponsor this because they want publicity"
"Kinda sneaky"
"Using holiday pictures to say that cigarettes are relaxing"
"Killing two birds with one stone. Advertising two things in the one advert."

We then explored the imagery projected by the advertisement. In general terms, primary and secondary school children normally differ with respect to their perceptions of cigarette advertising imagery[4]. Ten-year-olds and under appear to be very much tied to what is specifically shown in advertisements, whereas older children tend to perceive more complex imagery. For example, when we showed them an advertisement for Kim cigarettes (which had symbols for drinking and little else except attractive colours), the 10-year-olds said that people who liked this would have few distinguishing characteristics except that they would smoke and drink. However, some of the 12-year-olds and most of the 14- and 16-year-olds went far beyond what was explicitly shown. They tended to perceive Kim as feminine, sociable, trendy and sporty.

These age-related differences were much less evident in their perceptions of the JPS Grand Prix Holidays advertisement. Because of the strong and vivid imagery in this advertisement, even the younger children were able to specify qualities reflecting the appeal to excitement, sports and holiday activities. When asked to describe a person who would like this advertisement, the 10-year-olds generally specified that he or she would have a dangerous or exciting job such as a racing driver; would engage in active sports, such as swimming; would enjoy holiday type activities, such as sightseeing; would wear leather protective clothing like that worn by racing drivers; and would like 'heavy metal' or loud pop music. In short, we have good reason to believe that many primary school children are able to perceive – and associate with cigarettes – exciting and attractive imagery in this kind of advertising material.

In 1981, A E Fynn of the advertising agency Saatchi and Saatchi, then responsible for the Health Education Council's anti-smoking publicity, stated: "A way will always be found to manoeuvre around . . . restrictions . . . so that appeals to luxury, glamour, prestige and *even youth* [authors' italics] can be made"[5]. Sadly, his predictions have now come true. At present, brand-stretching advertisements can promote with impunity, even to 10-year-olds and under, the kind of explicit, rich imagery that has not been allowed in UK media for the past nine years.

Acknowledgements

We are grateful to the Cancer Research Campaign for supporting the research on which this article is based; and to Pergamon Press Ltd for giving us permission to reproduce material published elsewhere[4].

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Theory and Practice

Pages 203–211

Children's awareness of cigarette brand sponsorship of sports and games in the UK

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P.P.Aitken, D.S.Leathar and S.I.Squair

Abstract

This study explores children's awareness of cigarette brand sponsorship of sporting events in the UK. Individual interviews were conducted with 726 children aged between 6 and 17 in Glasgow, UK. The findings indicate that the majority of children have some understanding of the meaning of 'sponsorship' by the late primary/early secondary years. About a third of the 10- and 11-year-olds and more than half of the secondary school children were able to name cigarette brands and sponsored sports. The brands and sports most frequently mentioned were John Player Special and motor racing, Embassy and snooker, Benson and Hedges and snooker, Marlboro and motor racing. Only 9% of the primary school children named Marlboro or John Player Special as sponsoring motor racing. Nevertheless, 47% of them pointed to advertisements for these brands (which did not refer to motor racing) as being liked by 'someone who likes excitement and fast racing cars'. This suggests that associations between brand names (or their visual cues) and exciting sports can be elicited by simple advertisements. That such associations can be elicited even in children of primary school age is a cause for concern. There were no significant differences between smokers and non-smokers in their awareness of brand sponsorship. This probably reflects the all-pervasive nature of cigarette sponsorship of sports and games.

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Introduction

Investigations conducted in Australia and the UK indicate that children are much more aware of cigarette advertising than adults realize (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1985a, 1986a). For example, recent studies conducted in Scotland indicate that the majority of children aged between 6 and 11 years can recognize cigarette advertisements from highly prominent, long-running campaigns; and many can correctly identify cigarette brands in cryptic advertisements which do not show brand names (Aitken *et al.*, 1985a, 1986a).

Under-age smokers (i.e. smokers below the age of 16) are adept at identifying cigarette brand imagery (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1986a). In a study conducted in Australia, under-age smokers were nearly twice as likely to identify edited cigarette advertisements and brand slogans than were non-smokers (Chapman and Fitzgerald, 1982).

Under-age smokers also tend to have more positive attitudes towards cigarette advertising than do non-smokers of the same age (O'Connell *et al.*, 1981; Alexander *et al.*, 1983; Aitken *et al.*, 1986b). There is also some evidence that under-age smokers tend to rate cigarette advertisements more highly on rating scales describing attractive qualities (e.g. exciting, eye-catching) than do non-smokers of the same age (Potts *et al.*, 1986).

This indicates that under-age smokers are deriving some benefit from cigarette advertisements. It seems likely that some of this benefit is in the form of perceived support from society, in the sense that advertisements for cigarettes are a token of society's support for smoking.

However, it is possible that under-age smokers are

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also being more directly reinforced. It is possible that young smokers use attractive features in cigarette advertisements in order to reduce some of the conflict between the positive and negative aspects of smoking. In otherwords, we suggest that young smokers attempt to reduce the dissonance between knowledge that smoking is harmful and the symbolic appeal of smoking by paying attention to attractive features in cigarette advertisements. That such a process or activity is occurring is suggested by the research mentioned above which indicates that under-age smokers take more notice of cigarette advertisements than do non-smokers of the same age (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1986a).

The majority of adolescents are aware of the dangers of smoking (Davies and Stacey, 1972). Yet associations between under-age smoking and precocious, rebellious behaviour (Bynner, 1969; Aitken, 1978, 1980) and perceptions of the young smoker as being tougher (Bynner, 1969) or more rowdily extrovert (Aitken, 1978) indicate that smoking has a symbolic appeal for many young people. Thus it does seem reasonable to suggest that young smokers enhance the symbolic appeal of smoking by paying attention to the symbolism involved in the promotion of cigarettes.

This of course does not necessarily mean that cigarette advertising plays a part in inducing children to start smoking. Attitudes towards cigarette advertising may become more positive after children start smoking. However, there are good reasons for suggesting that this latter explanation does not provide the whole answer. In a recent study conducted in the U.K. primary school children who said they intended to smoke when older tended to be more favourably disposed to cigarette advertising (Aitken *et al.*, 1986b). This suggests that attitudes towards cigarette advertising may play a part in the transition from non-smoker to smoker.

Furthermore, research in Australia indicates that attitudes towards cigarette advertising are predictive of future changes in children's smoking behaviour. Children who approved of cigarette advertising were twice as likely to have become smokers during a follow-up year as those who disapproved: smokers who approved were less likely to have given up than were smokers who disapproved (Alexander *et al.*, 1983). As Alexander *et al.* (1983) suggest, these findings indicate that cigarette advertising may have predisposing as well as reinforcing effects on children's smoking behaviour.

Most of the research into children's awareness and perceptions of cigarette advertising has been concerned with conventional cigarette advertisements, although some studies have touched upon other promotional devices (Fisher and Magnus, 1981; Aitken *et al.*, 1985 a,b). However, in recent years there has been a rapid growth of television sports sponsorship by cigarette manufacturers.

In the UK there are two kinds of sponsorship — charity and commercial sponsorship. Charity sponsorship is a device for raising money for 'good causes': members of the public donate money according to the performance of sponsored individuals. For example, people often sponsor a child in a 'sponsored walk' and contribute a small sum to a specified charity or 'good cause' for each mile the child walks. In commerical sponsorship a company provides economic support in return for publicity. Cigarette companies of course engage in commerical sponsorship.

Little is known about children's awareness and perceptions of this kind of promotional device. A recent review of the links between cigarette advertising and smoking (Chapman, 1985) indicates that there has been only one systematic study of children's awareness of cigarette brand sponsorship of sports and games. Ledwith (1984) found that many Manchester secondary school children were able to name cigarette brands and sponsored sports. The children were most aware of brands and sports most frequently associated with televised sporting events: John Player Special and motor-car racing, Benson and Hedges and snooker, Embassy and snooker, Marlboro and motor-car racing.

The present paper describes findings from a survey which contained questions designed to examine relationships between children's awareness of cigarette brand sponsorship of sports and (1) age, (2) sex, (3) socio-economic status, (4) admitted smoking habits, (5) future intentions about smoking and (6)

parental smoking habits. Other issues examined in the survey have been described elsewhere (Aitken *et al.*, 1986 a,b).

Method

Individual interviews were conducted in June–July 1985 with a quota sample of 726 primary and secondary school children in Glasgow, Scotland. In Scotland, children between 5 and 11 years attend primary schools and children of 12 and above attend secondary schools. Table I gives the composition of the sample. There were approximately equal numbers of boys and girls at each of six age levels between 6 and 17 years; 25% of each age by sex group were children of ABC1 parents and 75% were children of C2DE parents.

The interviews were conducted by interviewers experienced in market and social research. They were fully briefed beforehand and warned that post-interview checks would be made of a random 10% of their interviews. (These checks were satisfactorily conducted after the questionnaires had been returned.)

Parental permission was obtained before each interview. While obtaining this (in the absence of the child) parents were asked about their own smoking habits. Each child was then interviewed alone. The questionnaire — which took about 10 min to administer — covered a range of issues related to smoking and cigarette advertising. (A copy of the questionnaire and interview instructions is available from the authors). This paper is primarily concerned with the children's answers to questions about sponsorship.

Results

Children's understanding of 'sponsorship'

Each child was asked if he/she understood the meaning of 'sponsorship', using the question:

> 'Now for something slightly different. Do you know what sponsorship means — I mean like when big sports events or games are sponsored?'

Those who said they did were asked to explain the meaning. The interviewers attempted to probe, but not prompt ('Can it mean anything else?') when children described charity as opposed to commercial sponsorship.

Table I. *Sample structure*

Age	Socio-economic status				Row totals
	ABC1		C2DE		
	Boys	Girls	Boys	Girls	
6–7	14	14	45	47	120
8–9	12	13	45	48	118
10–11	17	14	46	49	126
12–13	18	14	44	44	120
14–15	19	14	44	45	122
16–17	13	17	47	43	120
Column totals	93	86	271	276	726

Table II shows a marked increase with increasing age in the proportion of children who said they understood the meaning of sponsorship (χ^2 = 231.99; df = 5; $P < 0.001$). However, although more than half of the children of 10 and above said they understood the meaning, only a minority mentioned both the 'publicity/advertising' and 'economic' components of commercial sponsorship: 'You get money from big companies and they show their name.' (7-year-old); 'Advertising at sports . . . company puts money in.' (10-year-old); 'When a company supplies money they get advertising of their product.' (12-year-old); 'A cigarette company pays the players to smoke their cigarettes or wear like T-shirts with the slogan on them.' (13-year-old); 'They give them money and advertise things . . . like Celtic and C.R. Smith.' (14-year-old); 'They provide the money to stage the sports event . . . if it is shown on TV they get publicity.' (15-year-old); 'Company gives money and gets advertising at sports events.' (16-year-old).

Although the number of correct definitions increased with age (χ^2 = 111.92; df = 5; $P < 0.001$), only 43% of the children in the oldest age group specified both of the advertising and economic components of commercial sponsorship. However, about half of the 10- and 11-year-olds and a majority of the children of 12 and above described at least one component.

Despite prompts from the interviewers to probe the children's understanding of commercial sponsor-

Table II. *Children's awareness of the meaning of 'sponsorship', by age and socio-economic status*

	Age						Socio-economic status		All respondents
	6–7	8–9	10–11	12–13	14–15	16–17	ABC1	C2DE	
Base	120	118	126	120	122	120	179	547	726
	%	%	%	%	%	%	%	%	%
Claims to understand the meaning of 'sponsorship'	14	22	56	74	80	88	67	52	56
Explanations of 'sponsorship'									
Mentions both the advertising and economic components	1	0	13	26	27	43	25	16	18
Mentions only the economic component	9	14	32	28	33	27	25	24	24
Mentions only the advertising component	0	0	4	12	11	10	7	6	6
Incorrect explanations	4	5	7	10	7	8	9	6	7
Don't know	0	3	1	0	1	0	1	1	1

ship, many children gave examples of non-commercial sponsorship. Among children who specified only the economic component, the majority of primary school children described charity sponsorship. More secondary school children described commercial sponsorship:

'Sponsored walk or run . . . you walk to raise money for Ethiopia.' (7-year-old); 'The firms give a lot of money so that players can have cash to live on.' (8-year-old); 'You go to run . . . you win . . . go round the doors and get money.' (10-year-old); 'You sponsor people . . . go round doors and get money for what you are doing.' (11-year-old); 'When football teams are sponsored by companies to make money.' (12-year-old); 'Somebody gives money to see what you can do.' (13-year-old); 'When a certain big company gives money to do things like contests.' (14-year-old); 'It's when cigarette firms give a lot of money to football or other games to help people involved with sports.' (15-years-old).

Among children who mentioned only one of the components of sponsorship, few specified the publicity advertising component: 'The company put their name on the game or the prizes.' (10-year-old); 'People advertise . . . sponsor to make their name look good.' (12-year-old); 'Putting adverts on sides of cars . . . like Marlboro.' (13-year-old); 'To advertise their products for people to see . . . they wear T-shirts and things with the name on.' (15-year-old).

There were no significant differences in answers to the questions about the meaning of 'sponsorship' between children categorized according to sex, smoking habits, future intentions about smoking or parental smoking habits. However, Table II shows that proportionally more children of ABC1 parents said they understood the meaning of the word (χ^2 = 12.20; df = 1; $P < 0.001$).

Children's awareness of cigarette brand sponsorship of sports or games

Each child was then asked if he/she could think of any brands of cigarettes that sponsored sports or games: 'Can you think of any makes or brands of cigarettes that sponsor sports or games — any makes or brands that are connected with sports or games?' Table III shows that the majority of the primary school children said 'don't know' to this question. However, the proportion of 'don't knows' decreased and the proportion who attempted to specify a brand and a sponsored sport increased with age (χ^2 = 204.88; df = 5; $P < 0.001$). About a third of the 10- and 11-year-olds and more than half of the secondary school children were able to specify a brand and sponsored sport or game.

Table III also shows that proportionally more boys (χ^2 = 27.02; df = 1; $P < 0.001$) and children of ABC1 parents (χ^2 = 12.85; df = 1; $P < 0.001$) were able to specify cigarette brands and sponsored

Table III. *Cigarette brands and sports/games most frequently mentioned; by age, sex and socio-economic status*

	Age						Sex		Socio-economic status		All respondents
	6–7	8–9	10–11	12–13	14–15	16–17	Male	Female	ABC1	C2DE	
Base	120	118	126	120	122	120	364	362	179	547	726
	%	%	%	%	%	%	%	%	%	%	%
John Player Special and motor-car racing	1	4	15	21	25	29	22	10	22	14	16
Embassy and snooker	1	3	6	18	26	28	17	10	17	13	14
Benson and Hedges and snooker	0	1	7	10	13	19	11	6	7	9	8
Marlboro and motor-car racing	0	2	6	9	11	18	12	4	12	6	8
Other correctly specified brands and sponsored sports/games	0	2	10	16	23	21	17	7	18	10	12
Incorrect or incomplete answers	3	7	8	19	18	14	11	12	13	11	11
Don't know	97	86	63	40	31	30	48	67	46	62	58

Note: Up to three answers were recorded from each respondent.

sports. There were no consistent differences in this respect between children categorized according to smoking habits, future intentions about smoking or parental smoking habits.

The most frequently mentioned brands and sports were John Player Special and motor-car racing, Embassy and snooker, Benson and Hedges and snooker, and Marlboro and motor-car racing.

The most frequently mentioned brands correctly associated with other sports or games were Benson and Hedges (5% mentioned this brand), Rothmans (3%) and Embassy (2%). Most of the incorrect answers gave a brand name but incorrectly specified or failed to specify a sport or game: Benson and Hedges (3%), Embassy (2%), John Player Special (2%), Kensitas (2%). Overall the most frequently mentioned brands were John Player Special (19%), Embassy (18%), Benson and Hedges (16%) and Marlboro (9%).

Sponsorship and 'brand personality'

None of the questions described above actually specified brand names or particular sports and games. However, later in the interview each child was asked questions about a set of nine small coloured photographs of cigarette advertisements mounted on a display card. This part of the research has been described elsewhere (Aitken *et al.*, 1986a). However, the responses to one particular question are worth describing in more detail because they illustrate the power of associations between brand names (or their associated visual cues) and sponsored sports.

In one battery of questions the interviewer read out 'thumbnail sketches' describing different kinds of people and asked the child which of the nine advertisements each person described would most like. One of the descriptions was: 'Someone who likes excitement and fast racing cars.' Table IV shows the proportions of children who chose either the John Player Special or Marlboro advertisement as matching this description were considerably higher than expected by chance. Although both of these brands sponsor racing cars, there was no reference to this in the advertisements shown on the display card. The John Player Special advertisement showed the cigarette pack against a black background, with two prominent 'cat-like' eyes above the pack. The Marlboro advertisement showed part of the brand name against the distinctive inverted-V-shaped design of the red and white cigarette pack.

Table IV also shows that proportionally more boys ($\chi^2 = 20.00$; df = 1; $P < 0.001$) and children of ABC1 parents ($\chi^2 = 4.07$; df = 1; $P < 0.05$) chose Marlboro or John Player Special. There were no consistent differences in this respect between children

Table IV. *Cigarette advertisements chosen by children as being most liked by 'someone who likes excitement and fast racing cars'*

	Age						Sex		Socio-economic status		All respondents
	6–7	8–9	10–11	12–13	14–15	16–17	Male	Female	ABC	C2DE	
Base	120	118	126	120	122	120	364	362	179	547	726
	%	%	%	%	%	%	%	%	%	%	%
Benson and Hedges	5	7	2	8	3	4	4	6	1	6	5
Rothmans	8	8	10	9	5	8	8	9	8	8	8
Marlboro	17*	24***	35***	22***	33***	34***	30***	24***	30***	27***	27***
Kim	8	8	6	6	0	1	4	6	3	5	5
Peter Stuyvesant	16	8	4	17*	10	11	8	14*	11	11	11
Silk Cut	4	3	3	2	2	3	3	2	1	3	3
More	11	10	4	3	6	2	4	8	4	6	6
Embassy Regal	11	9	7	4	5	1	5	7	8	6	6
John Player Special	16	20**	29***	31***	36***	37***	33***	23***	32***	27***	28***

Note: The asterisks denote probabilities (two-tailed, obtains from binomial tests, with $P = 0.11$, $Q = 0.89$ and N as specified) of the observed proportions occurring by chance. * < 0.05, ** < 0.01, *** < 0.001.

categorized according to smoking habits, future intentions about smoking or parental smoking habits.

Comparisons between Tables III and IV show that higher proportions of children at each age chose the advertisements for Marlboro or John Player Special than were able to name these brands as sponsoring racing cars. The differences in this respect are especially marked in the primary school groups: whereas only 9% of the primary school children named these brands as sponsoring or being associated with racing cars, 47% of them pointed to John Player Special or Marlboro as being liked by 'someone who likes excitement and fast racing cars'.

Finally, in another question which mentioned sponsored games, the children were asked which of the nine advertisements would be most liked by: 'Someone who likes pubs and playing darts and snooker.' A higher proportion of children in each age group chose Embassy Regal in response to this; in each age group the proportion choosing this advertisement was much higher than expected on a purely chance basis (Aitken *et al.*, 1986a). However, this advertisement showed the edges of two red snooker balls; therefore this choice could be explained in terms of the specific reference to snooker in the particular advertisement presented.

Discussion

The development of children's understanding of 'sponsorship'

Most of the children below the age of 10 said they did not know what 'sponsorship' meant. Furthermore, among primary school children who did try to define the meaning, the majority described charity as opposed to commercial sponsorship.

Nevertheless, the number of children who said they understood the meaning of 'sponsorship' increased with age. About half of the 10- and 11-year-olds and the majority of the secondary school children were able to describe at least one of the two components of sponsorship, although more children described the 'economic support' than the 'advertising/publicity' component.

It is true that only a minority described both components. However, this particular part of the questioning procedure demanded a fair amount of verbal ability on the part of the respondents and therefore almost certainly provided underestimates of the proportions of children who understand the purposes of commercial sponsorship. A recent small-scale qualitative study which used group discussion pro-

'cedures (Hastings and Leathar, 1984) suggests that children of – 10 or 11 and above are aware of commercial sponsorship.

Moreover, research in Australia in which children were merely asked to give 'true', 'false' or 'don't know' responses to simple statements about the purposes of cigarette advertising and sponsorship suggests that the majority of 10- and 11-year-olds have some understanding of the purposes of commercial sponsorship (Fisher and Magnus, 1981). For example, 68% of them disagreed with the proposition that 'tobacco companies give money to sport because they are generous'. Seventy-four percent agreed that 'sponsorship of sport is really just another way of advertising'.

Thus it seems that although they may find it difficult to put into words, the majority of children appear to have at least some understanding of the purposes of commercial sponsorship by the late primary early secondary school years.

Knowledge of cigarette brand sponsorship of sports

Although few of the younger primary school children were able to specify a brand name and a sponsored sport or game, about a third of the 10- and 11-year-olds and more than half of the secondary school children were able to do so. The brands and sports most frequently mentioned were those most frequently mentioned by the secondary school children in Ledwith's (1984) Manchester study: John Player Special and motor-car racing, Embassy and snooker, Benson and Hedges and snooker, Marlboro and motor-car racing.

Clearly, many secondary school children and older primary school children are aware of connections between cigarette brand names and sports. Moreover, as the brands and sports most frequently mentioned have often been shown on television, this suggests that many children learn about these connections by watching televized sporting events (Ledwith, 1984). It seems likely that this is one of the major reasons why survey respondents — children and adults — often claim to have seen cigarette advertisements on television (Department of Health and Social Services, 1983; Marsh and Matheson, 1983). If this is the case, then, as Ledwith suggests, television sports sponsorship by tobacco manufacturers acts as cigarette advertising and therefore circumvents the law banning cigarette advertising on television.

Cigarette manufacturers and their advertising agencies are of course well aware of the power of television advertising. A director of the advertising agency Saatchi and Saatchi has given a neat example of the business acumen of the tobacco companies in this respect: 'A BBC technicians' strike caused the blacking of the Rugby League John Player Cup Final. It was duly postponed. No television coverage, no match, said John Player' (Fynn, 1981, p.138).

Sponsorship and 'brand personality'

Only 9% of the primary school children named Marlboro or John Player Special as sponsoring or being associated with racing cars. Despite this, 47% of the primary school children pointed to advertisements for these brands as being liked by: 'Someone who likes excitement and fast racing cars'. Although both brands sponsor racing cars there was no specific reference to this in the advertisements shown. This suggests that linkages or associations between cigarette brand names (or their visual cues) and exciting sponsored sports can be elicited by simple advertisements. That such associations can be elicited even in children of primary school age is a cause for concern.

Two additional issues are worth emphasizing because they suggest that cigarette brand sponsorship of sports has an insidious quality. First, as mentioned above, few of the primary school children *named* Marlboro or John Player Special as being associated with motor-car racing. This suggests that linkages or associations between brand names (or their visual cues) and exciting sports are often unconscious or, at least, not readily retrieved to consciousness. Second, as few younger primary school children understand the purpose of brand sponsorship, it seems that associations between brand names or visual cues and exciting sports can be elicited in children who do not have a critical awareness of the purpose of commercial sponsorship. The fact that

children are perceiving the effects of cigarette sponsorship in this way must surely be an issue of major concern.

Sex differences

Proportionally more boys than girls were able to specify cigarette brand names and sponsored sports or games; and proportionally more boys chose the Marlboro or John Player Special advertisements as being liked by 'someone who likes excitement and fast racing cars'.

The most frequently mentioned sports (motor-car racing, snooker) are predominantly male sports. Therefore these findings probably indicate that boys are more likely to take notice of television programmes and other devices (e.g. newspaper and magazine illustrations and articles) which promote male-orientated cigarette brand-sponsored sports.

Social class differences

Proportionally more children of ABC1 parents than children of C2DE parents attempted to define the meaning of sponsorship; and proportionally more children of ABC1 parents were able to name cigarette brands and sponsored sports or games. These differences might appear to reflect social class differences in verbal ability. However, proportionally more children of ABC1 parents chose Marlboro or John Player Special as being liked by 'someone who likes excitement and fast racing cars'. Since this task did not require verbal fluency, this suggests that children of middle-class parents may tend to be more aware of cigarette brand sponsorship of sports and games.

Smoking experience

There were no significant differences in answers to any of the questions concerned with sponsorship between children categorized according to present smoking habits, future intentions about smoking or parental smoking habits.

Other findings from this survey (Aitken *et al.*, 1986a) suggest that the majority of children — even children of primary school age — can recognize cigarette advertisements which have received considerable and sustained media exposure. Proportionally more under-age smokers said they recognized the advertisements presented; but the differences were significant only with respect to advertisements from unusual, less prominent or discontinued campaigns. There were no significant differences in recognition rates between smokers and non-smokers of the same age with respect to advertisements from highly prominent, long-running campaigns in which advertisements did not change markedly from month to month.

Thus the finding that there were no significant differences between smokers and non-smokers of the same age in response to direct and indirect questions about brand sponsorship probably reflects the all-pervasive, long-running and highly visible nature of the most frequently mentioned brands and sponsored sports and games.

Implications

Three important issues should be considered by those concerned with health policy and the rules and regulations surrounding cigarette advertising. We suggest that these issues point to a serious need for socio-political action.

First, more than half the secondary school children and about a third of the 10- and 11-year-olds were able to name cigarette brands and sponsored sports. This shows the power of sports sponsorship in putting cigarette brand names and associated sports imagery into children's memories. Thus sponsorship of sports by tobacco companies works in direct opposition to the spirit of the British Code of Advertising Practice (1983) which forbids cigarette advertisements that have a special appeal to the young.

Secondly, it is likely that children learn about connections between cigarette brands and sports by watching television. Thus it seems that television sports sponsorship by cigarette manufacturers acts as advertising and therefore circumvents the law banning cigarette advertising on television.

Thirdly, and perhaps even more important, the research described here indicates that associations between cigarette brand names (or their visual cues) and exciting sponsored sports can be elicited or triggered by simple advertisements. That such associa-

·tions can be elicited even in young primary school children indicates the insidious nature of cigarette brand sponsorship of sports. That they can be triggered in an unconscious way before children have any critical awareness of the purpose of commercial sponsorship must surely be an issue of even more concern, and unacceptable in any responsible society.

Acknowledgements

This research was supported by the Cancer Research Campaign. We are grateful for their support, and also for the help of the children and their parents who allowed us to conduct the interviews. We would also like to thank Kenneth Beck for handling the editorial process, and the anonymous referees for their helpful comments.

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Received 4 June 1986, accepted on 12 August 1986

International Journal of Epidemiology
© Oxford University Press 1983

SM-M18

Alexander et al (1983)

Vol. 12, No. 1
Printed in Great Britain

Cigarette Smoking and Drug Use in Schoolchildren: IV—Factors Associated with Changes in Smoking Behaviour

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Factors associated with changes in the smoking behaviour of approximately 6000 schoolchildren (two cohorts aged between 10 and 12 years in 1979) over 12 months are described. They were measured twice as part of a randomized controlled trial of a smoking prevention programme. Four groups were defined: (a) those who became smokers (adopters); (b) those who remained non-smokers; (c) those who became non-smokers (quitters), and, (d) those who remained smokers.

Personal and social variables were ordered using a logistic regression model according to the strength of their association with adopting and quitting smoking. Factors distinguishing adopters from children who remained non-smokers were, being a member of the older cohort, having friends who smoke, having siblings who smoke, approving of cigarette advertising and having a relatively large amount of money to spend each week. Factors distinguishing quitters from children who continued to smoke were, having siblings who do not smoke, being a member of the younger cohort, disapproving of cigarette advertising and having a relatively small amount of money to spend each week. Initial attitude scores were indicative of future smoking behaviour and where smoking behaviour changed, attitudes also changed so that the two remained congruent. The younger cohort improved their knowledge of smoking hazards over the year irrespective of their smoking behaviour. The older cohort showed significant differences in knowledge which were dependent upon smoking category, with 1980 smokers having lower knowledge scores than non-smokers and showing an apparent decrement in their previous knowledge.

The relative ineffectiveness of most smoking prevention programmes to date[1–3] has emphasized the need to examine more fully the context in which some young people adopt smoking, others experiment but quit early, while some never even try smoking. It is vitally important to understand how various social and personal factors relate to these behaviours at different stages of development.

In an endeavour to further our understanding of these relationships we initially ranked various personal and social factors associated with current smoking in 10–12 year old schoolchildren.[4] In this paper we describe changes which occurred in smoking behaviour over the one year period of a randomized controlled trial.[5] We relate these changes to changes in the children's attitudes and knowledge and we report on the relative importance of personal and social factors associated with changes in smoking behaviour.

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METHODS

Full details of the study design, sample selection and methods have been published elsewhere.[5,6] In brief, confidential self-administered questionnaires were used to survey the children, their parents and their teachers. Smoking prevalence data for the children were obtained before and after half of them had received the educational programme. In both 1979 and 1980 the children were asked identical questions about their smoking behaviour, alcohol and analgesic use, smoking by friends, siblings and parents and the amount of money they had to spend weekly. Their knowledge of the harmful effects of tobacco on health was scored as the number of items answered correctly on a 28-item questionnaire. Their attitudes to smoking and cigarette advertising were measured by semantic differential scales and the responses were summarized as a composite attitude score between 0 and 1.

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TABLE 1 *Smoking category in 1979 and 1980 and adoption and quitting rates according to cohort and sex*

Category of smoking behaviour*		Boys		Girls	
		Years 5–6	Years 6–7	Years 5–6	Years 6–7
NN%		81.1	66.6	87.8	72.4
NS%		9.0	17.6	7.1	19.2
SN%		5.8	5.9	2.6	2.8
SS%		4.1	9.9	2.5	5.6
Total (100%)	n =	1473	1394	1409	1340
Adoption rate %		10.0	19.2	7.5	20.9
Quitting rate %		58.9	37.3	51.4	33.6

* NN Children who did not smoke in either 1979 or 1980
NS Children who did not smoke in 1979 but who reported smoking in 1980
SN Children who reported smoking in 1979 but who did not in 1980
SS Children who reported smoking in 1979 and 1980.

rates (Tables 2 and 3). Previously,[4] we found that many of the variables we measured were highly correlated with one another.

Children whose siblings smoked were twice as likely to adopt the habit as children whose siblings did not smoke or who had no siblings (Table 2). Children whose friends smoked in 1979 were two or three times more likely to take it up than those whose friends did not smoke. Children who approved of cigarette advertising were twice as likely to become smokers as children who disapproved, with the smoking behaviour of those who were ambivalent about advertising falling between that of the other two groups. There was a strong trend toward the adoption of cigarette smoking with increasing amounts of money to spend per week. Parental smoking was also significantly related to adoption rates. There was some association between adoption of smoking and the smoking prevention education programme, but this was mainly due to the adoption rate being highest amongst a group of children whose teachers had scored lowest on the implementation scale.[5]

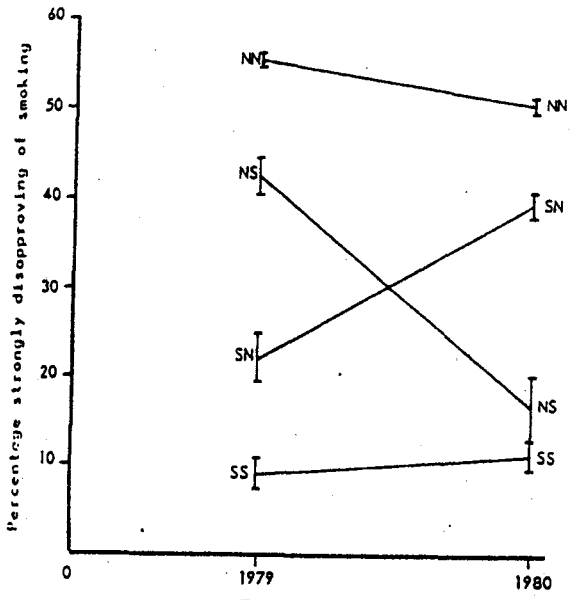

FIGURE 1 *Smoking category in 1979 and 1980 according to attitude scores (± one standard error)*

Factors which were not associated with the adoption of cigarette smoking included the teachers' smoking habits, teachers' sex, urban or non-urban location of the school or whether the children attended a State or Catholic school.

Factors which appeared to promote the adoption of smoking also acted against giving up the habit (Table 3). Thus children who claimed to smoke in 1979 and whose siblings were non-smokers, were nearly twice as likely to have quit by 1980 as those whose siblings smoked or who had no siblings. Of children who initially claimed to smoke although their friends were non-smokers, 71% subsequently quit, compared with a 41% quitting rate for children whose friends smoked. Children who disapproved of cigarette advertising were more likely to quit than those who approved of it. There was a trend in quitting rates associated with the amount of money to spend each week. Those children with most money were least likely to give up smoking. Children with one or more non-smoking parents were more likely to quit than those whose parents smoked.

There was some evidence that children who had female teachers were more likely to give up smoking than those with male teachers. However, quitting rates

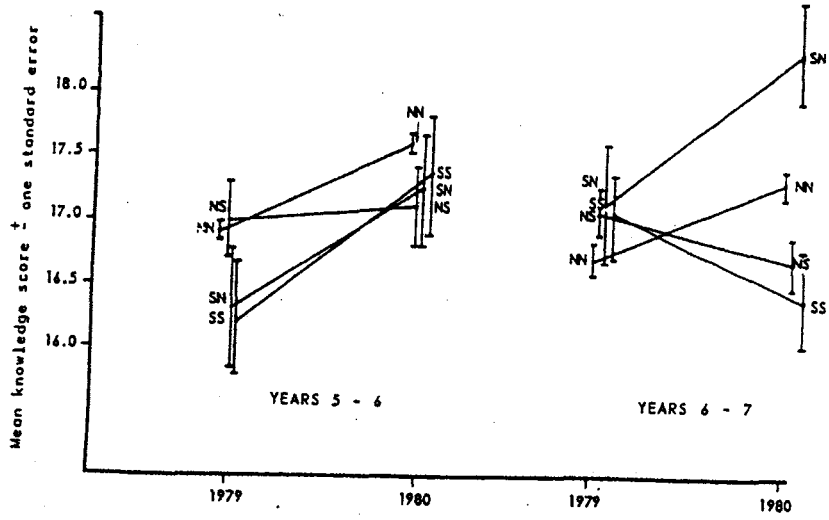

FIGURE 2
Mean knowledge scores in 1979 and 1980 according to smoking category and cohort (± one standard error)

were unrelated to other aspects of the school environment such as the teachers' smoking habits, the smoking prevention education programme, attendance at a State or Catholic school, and urban or non-urban location of the school.

The order of importance of these factors in relation the adoption and quitting rates was determined us logistic regression, with the variable included at e.

TABLE 2 *Adoption rates for cigarette smoking associated with levels of each factor*

Factor	Levels	n	Adoption rate per 100	χ^2	Significance level
Siblings' smoking	Yes	1232	23.3	$\chi^2_2 = 100.2$	$p < 0.001$
	No	3599	11.8		
	No siblings	166	10.8		
Friends' smoking	Yes	2125	22.3	$\chi^2_2 = 184.8$	$p < 0.001$
	No	1063	6.9		
	Don't know	1823	9.9		
Approval of advertising	Yes	370	27.0	$\chi^2_2 = 81.8$	$p < 0.001$
	No	3712	12.1		
	Don't know	946	19.3		
Weekly spending money	< $1.00	2223	11.4	$\chi^2_3 = 52.6$	$p < 0.001$
	$1.00–$1.99	1580	14.8		
	$2.00–$4.99	903	19.0	$\chi^2_1 = 52.2$*	$p < 0.001$
	⩾ $5.00	293	23.9		
Number of smoking parents	Two	774	16.3	$\chi^2_3 = 11.3$	$p = 0.01$
	One	1437	15.1		
	None	2021	12.6	$\chi^2_1 = 7.8$*	$p = 0.009$
	Unknown	833	16.6		
Teacher's sex	Male	2959	15.2	$\chi^2_1 = 1.8$	$p = 0.2$
	Female	1995	13.8		
Smoking prevention education implementation scale	Control	2607	14.5	$\chi^2_5 = 11.5$	$p = 0.05$
	1 = low score	127	23.6		
	2	440	12.3		
	3	725	14.5		
	4	569	14.2		
	5 = high score	126	11.1		

* χ^2_1 for trend has 1 degree of freedom and was calculated omitting the level 'unknown'

TABLE 3 *Quitting rates for cigarette smoking associated with levels of each factor*

Factor	Levels	n	Quitting rate per 100	χ^2	Significance level
Siblings' smoking	Yes	351	35.9	$\chi^2_2 = 30.8$	$p < 0.001$
	No	177	61.0		
	No siblings	15	33.3		
Friends' smoking	Yes	465	40.9	$\chi^2_2 = 12.8$	$p = 0.002$
	No	14	71.4		
	Don't know	67	59.7		
Approval of advertising	Yes	181	33.7	$\chi^2_2 = 13.1$	$p = 0.002$
	No	219	51.6		
	Don't know	149	45.6		
Weekly spending money	< $1.00	150	51.3	$\chi^2_3 = 11.9$	$p = 0.008$
	$1.00–$1.99	169	47.3		
	$2.00–$4.99	138	41.3	$\chi^2_1 = 11.1^*$	$p < 0.001$
	⩾ $5.00	88	29.5		
Number of smoking parents	Two	125	36.8	$\chi^2_3 = 7.3$	$p = 0.06$
	One	155	43.9	$\chi^2_1 = 6.9^*$	$p = 0.009$
	None	138	52.9		
	Unknown	133	42.1		
Teacher's sex	Male	344	40.1	$\chi^2_1 = 6.1$	$p = 0.01$
	Female	198	51.0		
Smoking prevention education implementation scale	Control	264	42.8	$\chi^2_5 = 1.5$	$p = 0.09$
	1 = low score	13	46.2		
	2	46	45.7		
	3	96	41.7		
	4	61	41.0		
	5 = high score	18	55.6		

* χ^2_1 for trend has 1 degree of freedom and was calculated omitting the level 'unknown'

step being the one which gave the greatest improvement in fit (deviance). For adoption (Table 4), the most important predictive factor was membership of the older cohort, followed by having friends who smoked, siblings who smoked, approving of cigarette advertising and having a relatively large amount of money to spend each week. Other factors were not significantly related to the adoption of smoking after those five had been included in the model. First order interactions were also considered and only the smoking prevention education programme by amount of money to spend per week was statistically significant, although it is unlikely to be of practical importance.

For quitting (Table 5), having non-smoking siblings was the most important factor followed by membership of the younger cohort, disapproving of cigarette advertising and having little money to spend per week.

Usage of Other Drugs

Alcohol and analgesic usage in 1979 and 1980 was significantly related to changes in smoking behaviour (Table 6). Children who took up cigarette smoking increased their use of alcohol and analgesics whilst those who gave up the habit also reduced their use of these substances.

DISCUSSION

Previously we reported the results of a cross-sectional study in which we identified social and personal factors associated with current smoking among schoolchildren.[4] Now, we have extended this analysis by comparing the earlier smoking behaviour of these children with their behaviour 12 months later. We have determined key factors in the adoption and quitting of cigarette smoking. Many earlier studies have relied on static measures of association between single factors and

TABLE 4 *Order of importance of factors related to the adoption of smoking*

Factor	Reduction in deviance (χ^2)	d.f.	Probability
Belonging to the older cohort	157	1	$p < 0.001$
Friends who smoke	158	2	$p < 0.001$
Siblings who smoke	59	2	$p < 0.001$
Approval of advertising	33	2	$p < 0.001$
More money to spend weekly	15	3	$p = 0.002$

TABLE 5 *Order of importance of factors related to quitting smoking*

Factor	Reduction in deviance (χ^2)	d.f.	Probability
Non-smoking siblings	30.8	2	$p < 0.001$
Belonging to the younger cohort	26.1	1	$p < 0.001$
Disapproval of advertising	10.9	2	$p = 0.005$
Less money to spend weekly	8.2	3	$p = 0.04$

TABLE 6 *Prevalence of alcohol and analgesic usage according to smoking category in 1979 and 1980*

Smoking category	Alcohol prevalence (n = 5401) 1979	1980	Analgesic prevalence (n = 5248) 1979	1980
NN%	32.1	...1	34.3	38.2
NS%	50.1	64.7	44.6	56.7
SN%	68.4	59.2	49.1	42.0
SS%	67.1	73.2	53.3	54.0

smoking behaviour.[8–13] Our approach has allowed us to present a more dynamic picture of childhood smoking and the use of logistic regression has enabled us to determine the relative importance of factors influencing this behaviour.

Most of the key factors which we had earlier found to be associated with current smoking[4] were also related to adoption and quitting. These were age, siblings' smoking, approval of advertising, the amount of money to spend per week and friends' smoking (although this last factor was less important in relation to quitting). Other factors, highly associated with current smoking in 1979, were not as important in relation to adoption and quitting. For example, parental smoking was an important determinant of current smoking in 1979 but it was not an independent predictor for either adoption or quitting by children in 1980. Smoking prevalence was strongly related to sex in 1979 but the adoption and quitting rates over the study period were similar for boys and girls. The result of this effect was that more girls than boys became smokers so that by 1980 smoking in the older cohort was almost as prevalent amongst girls as amongst boys.

Age, as reflected by membership of the younger or older cohort, was the most important factor not only in the prevalence of smoking but also in its adoption. The importance of the relationship found between membership of the older cohort and adoption probably reflects the crucial step between primary and secondary school with its attendant developmental and social pressures. The higher quitting rates amongst the younger cohort suggest that a number of the older children may have already become regular smokers, whilst in the younger children smoking was more likely to have been casual and experimental. The differences in knowledge between the cohorts also indicate developmental differences. For the younger children there was no association between knowledge and behaviour but for the older children those who did not smoke in 1980 showed an increased knowledge whilst those who claimed to smoke in 1980 appeared to be less aware of the health hazards than they had been in 1979. It may be that this awareness was modified in these older children by their smoking behaviour. This suggests that an important change may occur in the relationship between knowledge and behaviour as children move from pre-adolescence adolescence.

In order to make the step from this empirical analyse to recommendations for future educational endeavour a useful conceptual framework is provided by Green model for health education.[14] Green classifies factors relating to behaviour as predisposing, reinforcing and enabling.

Predisposing factors are those which are anteceded to smoking behaviour and which provide the initial motivation for it. In our study these included smoking by parents, siblings and friends. We also found that approval of advertising was an important predisposing factor. Furthermore, children who held favourable attitudes to smoking and cigarette advertising were greater risk of adopting or maintaining smoking behaviour than those whose attitudes were more disapproving.

Reinforcing factors are related to the maintenance of the behaviour. Most of the predisposing factors we identified also have a role in reinforcement. We found that attitudes to cigarette advertising and smoking changed over the study period so that they remained congruent with smoking behaviour. This suggests to us that these attitudes form part of the reinforcement process.

Enabling factors are those which facilitate the establishment and maintenance of the behaviour. Ready access to cigarettes falls within this category. The relationship between the amount of money children had available to spend and whether or not they maintained adopted or quit smoking during the study period emphasizes this issue.

The nature of our self-report questionnaires only permitted us to examine a small number of variables. Undoubtedly there are others, particularly in the psychosocial area, which could be categorized as predisposing, reinforcing or enabling in relation to smoking behaviour, but which we did not address.

Based on the classification of our results in terms of Green's model, we offer three major recommendations.

Firstly, legislation banning the advertising of cigarettes is required to counter the predisposing and reinforcing effects of this advertising on children. This step is necessary as it is highly unlikely that public health authorities will ever have sufficient resources to outweigh the media campaigns presently waged by tobacco companies.

Secondly, cigarettes should be made less readily available to children. Despite the fact that it is illegal to sell cigarettes to children under 16 years of age in New South Wales, we found that 45% of children who claimed to be regular smokers said that they obtained their cigarettes from shops.[4] The rigorous enforcement and perhaps strengthening of existing legislation would be a positive step towards prevention.

Thirdly, health education programmes need to be carefully tailored for the intended audience. There was evidence that the programme we evaluated was more effective for older girls than for boys, and that when it was poorly implemented it may have led to increased smoking.[5] The children we surveyed differed in gender, developmental stage, prior involvement with cigarette smoking and the social pressures to which they are being subjected. It is unlikely that a common programme would be effective for all groups. The importance of peer group and family in relation to smoking emphasizes the need for programmes to aim at the wider social milieu of the child. Recent approaches have attempted to address the recognized importance of peer pressure.[15–18] Educational programmes must also be directed toward the parent population given the continuing importance of the family in the adoption and maintenance of cigarette smoking in children.

In summary, well-enforced legislation is needed to ban the sale of cigarettes to children as well as banning all advertising of cigarettes. These strategies should be supplemented by carefully tailored health education programmes. These three measures should lead to a reduction in childhood smoking because they would provide a broad attack on the predisposing, reinforcing and enabling aspects of this unhealthy behaviour.

ACKNOWLEDGEMENTS

The cooperation of the New South Wales Department of Education (Hunter Region), the Diocese of Maitland Catholic Education Office, the principals, teachers and pupils in the schools and the parents of the children is gratefully acknowledged.

We wish to thank members of the Steering Committee, in particular Kevin Donnelly who conducted the inservice training course for teachers, Kath Kirkby and Joy Peate who assisted with data management, Caroline Cranfield and Brenda Whyte who were responsible for the typing, Anne Young and all those who helped in the preparation of survey materials. Finally, our appreciation goes to Professor Charles du V Florey for the valuable contribution he made to the study.

The study was funded by the National Health and Medical Research Council of Australia, the New South Wales State Cancer Council and the University of Newcastle.

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Tobacco Promotion and Susceptibility to Tobacco Use among Adolescents Aged 12 through 17 Years in a Nationally Representative Sample

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ABSTRACT

Objectives. The purpose of this study was to examine whether youth participation in tobacco promotion campaigns is associated with susceptibility to tobacco use.

Methods. Data were collected from telephone interviews of a national random sample of 1047 adolescents 12 to 17 years of age.

Results. A proportional odds model was used to estimate the effects of age, gender, presence of a tobacco user in the household, awareness of tobacco promotions, knowledge of a young adult or adolescent friend owning a promotional item, participation in tobacco promotions, and receipt of free tobacco samples or direct mail from tobacco companies on susceptibility to tobacco use. All of the covariates, except for receiving direct mailings and knowing a young adult friend who owned a promotional item, were significantly associated with susceptibility.

Conclusions. There is a strong association between an awareness of and involvement with tobacco promotions and being susceptible to tobacco use or a user of tobacco products. (*Am J Public Health.* 1996; 86:1590–1593)

Introduction

In the United States, tobacco products are more heavily marketed than any consumer product other than automobiles.[1] In 1993, tobacco companies spent more than $6 billion on advertising and promotion.[2] Of this total, $756 million was spent on specialty item distribution (e.g., free samples of tobacco, tee shirts, lighters, hats, product catalogs) and $2.6 billion was spent on coupons and retail value added promotions at the point of purchase. Representatives of the tobacco industry have repeatedly stated that these items are not intended for anyone under 21 years of age. Concern about tobacco promotions has grown, prompted by the effective RJR Joe Camel Cash and Philip Morris Marlboro Adventure Team campaigns, both of which included widespread catalog distribution and specialty item promotions. For example, it was estimated that over approximately 1 year, 4 million people received 14 million promotional items (e.g., caps, lighters) in the Philip Morris Marlboro Adventure Team campaign.[3,4]

In 1993, approximately 19% of high school seniors reported daily smoking, an increase from 17.2% in the previous year.[5–7] The persistence of adolescent tobacco use,[1,8] combined with large tobacco industry marketing expenditures, highlights the importance of examining the relationship between youth susceptibility to tobacco use and participation in promotional campaigns.[9–12]

Methods

Sample and Design

Data were collected from telephone interviews of a random sample of US adolescents (12 to 17 years of age) and young adults (18 to 24 years of age). Since this paper is concerned with the effect of promotions on minors, only the results for the adolescent sample are reported here.

The list of telephone numbers was generated from a modified Mitofksy–Waksberg random-digit dial sampling method; the "Random B" sample was purchased from Survey Sampling Inc (Fairfield, Conn) for use in this study. All area codes in the United States were eligible for the sampling frame, and known business numbers were removed. Persons answering the telephone confirmed household eligibility criteria and the number of eligible persons. One eligible participant per household was selected randomly by computer to be interviewed. Except for age, the sole exclusion criterion was inability to speak English or Spanish. The consent of both the respondent and his or her parents was sought whenever a respondent less than 18 years of age was selected. Respondents were told that they had been selected randomly, their responses were confidential and anonymous, they would not be called again, and they would not receive any remuneration for participating. As a

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This paper was accepted April 4, 1996.

means of limiting response bias, parents were asked to allow the young person to respond to the questions in private. Parents who refused to provide such privacy were counted as refusals in response rate calculations. As a means of facilitating minors' privacy, all respondents were given a toll-free number to call if they preferred being interviewed at another time or place. The interview took approximately 12 minutes to administer.

Participant Accrual

Participant accrual procedures and telephone interviews were conducted by Freeman, Sullivan & Co in San Francisco, Calif. All interviewers (n = 23) were trained to administer the study questionnaire in English; 2 were trained to administer it in Spanish. Participant accrual began on July 9, 1993, and was completed on August 6, 1993. Interviews were conducted Monday through Friday from 8 AM to 9 PM, Saturday from 10 AM to 9 PM, and Sunday from 3 PM to 9 PM. All numbers were attempted at least five times at different periods over 3 days.

Response Rates

Survey Sampling Inc produced 51 000 random-digit phone numbers. Business, unassigned, and nonworking numbers were removed, leaving a net total of 45 274 numbers. From this list, 30 147 telephone calls were made to meet the predetermined quota. Of these calls, 2155 (7.1%) reached households with respondents determined to be eligible. Interviews were completed with 1337 of these eligible respondents (1047 adolescents and 290 young adults). This represented a refusal rate of 38.0% of households known to have an eligible respondent. Of the 818 refusals among eligible households, 331 (40.5%) were from parents refusing to allow interviewers to speak with their children. The remaining 487 (59.9%) came from eligible respondents themselves. An additional 3938 calls resulted in a refusal to participate before household eligibility could be determined.

Measures

Explanatory variables. The hypothesized explanatory variables were age in years, gender, presence of a tobacco user in the household, awareness of tobacco promotions (i.e., awareness of the Camel Cash, Marlboro Adventure Team, Winston Cup Point Challenge, Virginia Slims Wear, Winston Weekends, and Parliament Getaways promotions), knowledge of a young adult or adolescent friend owning a promotional item, participation in tobacco promotions (i.e., the respondent had ever owned a promotional item; saved proof of purchase coupons, UPC codes, or "Camel Cash" or "Marlboro Mile" coupons; or had a copy of a promotional catalog), receipt of mail from a tobacco company, and receipt of a free tobacco sample.

Dependent variable. Susceptibility to tobacco use was the dependent variable. This three-category ordered variable involved coding of respondents as nontobacco users, as susceptible to tobacco use, or as current users of tobacco products. Tobacco use included both cigarettes and chewing tobacco. Previous research has shown this susceptibility measure to be a valid predictor of subsequent tobacco use.[10–13] Respondents were coded as susceptible if they met one or more of the following criteria: (1) never puffed on a cigarette and responded "yes" to the question "Do you think you will try a cigarette soon?" (2) responded "yes" when asked, "Do you think you will try a cigarette soon?" (3) had never puffed on a cigarette and did not respond "definitely not" when asked, "If one of your best friends were to offer you a cigarette, would you smoke it?" (4) had puffed on a cigarette and did not respond "definitely not" when asked, "At any time during the next year, do you think that you will smoke a cigarette?" and (5) smoked in the previous month (coded as current user). History of chewing tobacco use was probed with the same items as cigarette smoking, except that the phrase "snuff or chewing tobacco" was used. Susceptibility to use of chewing tobacco was determined in the same manner as smoking.

TABLE 1—Descriptive Data on the Tobacco Susceptibility Index among Youth 12 to 17 Years of Age (n = 1047)

	Not Susceptible (n = 718)	Susceptible, Not Current User (n = 156)	Susceptible, Current User (n = 173)
Mean age, y	14.1	14.9	15.5
Male, %	46.9	55.8	57.8
Tobacco user in household, %	38.9	55.1	65.3
Ever heard of any promotional campaign, %	78.8	91.0	96.0
Ever participated in promotional campaign, %	24.5	46.2	68.2
Adolescent friend owns promotional item, %	40.5	53.8	66.7
Young adult friend owns promotional item, %	42.7	28.9	26.5
Ever received mail from a tobacco company, %	3.8	3.3	11.0
Ever received free tobacco sample, %	2.7	3.9	11.0

Data Analysis

The data were analyzed with a proportional odds model.[14,15] This model is used when there is an ordered categorical dependent variable. The model can be simply stated. Let Y be an ordered response variable with k ordered categories (the susceptibility index has three categories), and let x be a vector of covariates. The proportional odds model can be written as follows:

$$\ln\left[\frac{p_j}{1-p_j}\right] = \alpha_j + \beta'\mathbf{x}, j = 1, \ldots, k-1,$$

where p_j is the probability of falling into one of the $k - j$ categories above category j (i.e., $p_j = P(Y > j \mid X = x)$, β is a vector of logistic coefficients, and x is a vector of independent variables. The intercept terms, α_j, vary across categories, and $\alpha_1 \geq \ldots \geq \alpha_{k-1}$. Note that the intercept terms must be ordered because the number of cases in the numerator is decreasing as j increases, so the log odds must also be decreasing. For the simple case in which there is one binary covariate (coded 0 or 1), α_j is the log odds of falling above the jth cut point for the zero coded category of the covariate. Note that although the intercept terms (i.e., the α_j's) vary across the $k - 1$ equations, the assumption is made that the "slope" parameters are constant across equations. The validity of this assumption was tested by means of a score statistic.[16,17] The model's goodness of fit was also examined.[18]

Results

Table 1 provides descriptive data illustrating the relationship between the susceptibility index and the covariates.

TABLE 2—Proportional Odds Model of Susceptibility among Youth 12 to 17 Years of Age

Covariate	$\hat{\beta}$	SE	*P*	Exponential $\hat{\beta}$	95% Confidence Interval
Awareness	0.69	0.276	.012	2.00	1.17, 3.44
Adolescent friend owns item	0.52	0.152	.001	1.69	1.25, 2.27
Participation	1.02	0.155	.000	2.77	2.04, 3.75
Received free tobacco	0.85	0.352	.016	2.34	1.17, 4.66
Tobacco user in home	0.85	0.152	.000	2.34	1.74, 3.15
Female	−0.35	0.149	.018	0.70	0.52, 0.94
Age, y	0.40	0.048	.000	1.49	1.36, 1.64
Intercept 1	−8.18	0.759	...	...	...
Intercept 2	−9.20	0.773	...	...	...

These data illustrate the positive association between susceptibility and tobacco promotions.

A proportional odds model was used to estimate the effects of the covariates (i.e., age, gender, presence of a tobacco user in the household other than the respondent, awareness of tobacco promotions, knowledge of a young adult or an adolescent friend owning a promotional item, participation in tobacco promotions, receipt of a direct mailing from tobacco companies, and receipt of free tobacco samples) on the susceptibility index. An initial analysis using all of the covariates just listed resulted in all coefficients being statistically significant, except for those associated with receiving direct mailings from tobacco companies and knowing a young adult friend who owned a promotional item. Because 56 respondents had missing data on the two items for which the coefficients were not significant, the model was refit without these two covariates to increase the sample size and thereby somewhat reduce the standard errors. The nonsignificant results of the score test supported the assumption of equality of slopes ($\chi^2 = 6.16$, $df = 7$, $P = .52$). Similarly, the goodness of fit test indicated that the model fit the data ($\chi^2 = 8.28$, $df = 4$, $P = .08$). Table 2 presents the estimated coefficients for the refit model ($\hat{\beta}$), as well as the asymptotic standard errors, the *P* value associated with each coefficient, the exponential value of the coefficient, and the 95% confidence interval.

The results shown in Table 2 indicate that girls were less likely to be either susceptible to tobacco use or current tobacco users. Susceptibility to tobacco use and actual tobacco use increased with age. The coefficients for the promotional items indicate that these items increased the probability of being susceptible to tobacco use or being a current tobacco user. For example, as shown in Table 2, when a child was aware of tobacco promotions, the odds of being a user or being susceptible were about 2 times greater than when a child was unaware of tobacco promotions (assuming fixed values for age, gender, and presence of a tobacco user in the household). When a child was both aware of tobacco promotions and had an adolescent friend who owned a promotional item, the predicted odds of being a user or being susceptible were 3.4 times greater than the odds for a child who was unaware of tobacco promotions and had no friends who owned promotional items. The odds of being susceptible or of being a tobacco user for a child who was aware, had a friend who owned an item, and had personally participated in tobacco promotions were predicted to be 9.3 times greater than the odds for a child who did not have these characteristics. Finally, the odds of being a user or being susceptible were 21.8 times greater when all promotional covariates were present (i.e., awareness of tobacco promotions, knowledge of an adolescent friend owning a promotional item, participation in tobacco promotions, and receiving free tobacco samples) than when all of the promotional covariates were absent. Thus, there was a strong association between an awareness of and involvement with tobacco promotions and being susceptible to tobacco use or being a user of tobacco products.

Discussion

This study is the first national representative survey of youth that has examined the relationship between experience with tobacco promotions and susceptibility to use tobacco. Our data provide evidence that experience with tobacco promotions, as measured by awareness, knowledge of others owning items, and firsthand experience with promotions, is strongly associated with susceptibility to tobacco use. This finding is important because there is evidence of a dose–response relationship between the susceptibility index and subsequent tobacco use[10–13] and other evidence that youth are highly involved in tobacco promotion campaigns.[9] These findings should be interpreted in light of the modestly large nonparticipation rate and the potential for the true nonparticipation rate to be higher as a result of calls for which the eligibility of households could not be determined.

Although tobacco companies have stated their opposition to minors participating in tobacco promotion campaigns, our data indicate that company efforts to prevent this from happening have failed. Stronger regulation of tobacco company practices is the only realistic means of ensuring that children and adolescents are protected. Regulations might include prohibiting free samples and specialty item distribution, requiring that warning labels appear on all promotional items, increasing the enforcement of laws regarding the distribution of tobacco and tobacco promotions to minors, and more tightly regulating the methods of distributing promotional items, including the use of the mail for tobacco product marketing.[19] Most of these suggestions are included in the Food and Drug Administration's proposal to regulate cigarettes and smokeless tobacco products.[20]

Our data justify the concern expressed by public health professionals that tobacco promotions are reaching minors.[21] Perhaps most important, these data illustrate that exposure to tobacco promotions is associated with use of tobacco, although longitudinal studies are needed to examine this relationship prospectively. □

Acknowledgment

This study was supported by grant 18107 from The Robert Wood Johnson Foundation.

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Children, Adolescents, and Advertising

Committee on Communications

Advertising is a powerful force in American culture. It exists to sell products and services. In 1750 BC the Code of Hammurabi made it a crime, punishable by death, to sell anything to a child without first obtaining a power of attorney. In the 1990s, selling products to American children has become a standard business practice.

American children have viewed an estimated 360 000 advertisements on television before graduating from high school.[1] Additional exposures include advertisements on the radio, in print media, on public transportation, and billboards. Commercials have even entered the classroom through programs like Channel One—video equipment packaged with current events programming that contains commercials.

The principal goal of commercial children's television is to sell products to children, with food and toys being the two most frequently advertised product categories.[2] Advertisers generally use two approaches to sell their products. The traditional method places commercials in programs that are attractive to children. These commercials promote products unrelated to the program being shown. The second approach, begun in 1982, features toy action figures as the main characters of a program. Because these programs are often developed by the marketing division of toy companies to market specific toys, they are frequently referred to as "program-length commercials."

The Children's Television Act of 1990 mandates that all broadcasters carry children's educational or instructional programming as a condition for license renewal. One of the problems of the current law is that stations can cite public service announcements (PSAs) or short vignettes as evidence of compliance. These actions may fulfill the letter of the law; however, they do not fulfill its intent. In fact, good evidence exists that the Children's Television Act of 1990 is being undercut already, even in the law's first year of enactment.[3] Because programming practices can be challenged only at the time of licensure renewal, local monitoring is essential. Local monitoring is the only way to ensure that stations are complying not only with the letter of the law, but also with the INTENT of the law, which is to create a better television programming environment for children. Networks appear to be violating the law's intent by airing cartoons and claiming them as educational programming.[3]

In addition to improving the quality of programming, the Children's Television Act of 1990 also limits commercial time during children's programming to 10½ minutes per hour on weekends and 12 minutes per hour on weekdays. Part of this act directs the Federal Communications Commission (FCC) to consider whether children's programs based on toys constitute program-length commercials. The FCC concluded that only those shows that include paid advertising for the toy(s) featured in the program can be classified as program-length commercials. Even though the FCC has enforced this guideline, it appears that it is too narrow and should address *all* program-length commercials. In addition, the Children's Television Act established the Children's Television Endowment Fund to encourage the development of new educational programming for children.

EFFECTS OF ADVERTISING ON CHILDREN

There have been numerous studies documenting that young children under 8 years of age developmentally are unable to understand the intent of advertisements and, in fact, accept advertising claims as true.[4,5] Indeed, the youngest viewers, up to age 8, cannot distinguish advertising from regular television programming.[4,5] In addition, advertisers have become adept at circumventing rules and minimizing warnings. For example, the disclaimers "some assembly required" or "when eaten as part of a complete nutritional breakfast" are spoken rapidly by the announcer or shown in small print, and are not understood by most children.[5]

Commercials broadcast during children's programs also promote foods that may have an adverse influence on children's health. Television viewing has been associated with obesity, the most prevalent nutritional disease among children in the United States.[6,7] Food commercials that are broadcast during children's programming often promote high-calorie foods which, when eaten too often, may contribute to the energy imbalance that promotes obesity.

The barrage of advertising for food and toys, especially on Saturday morning television, may also result in increased conflict between parents and their children.[4,5] The American Academy of Pediatrics believes advertising directed toward children is inherently deceptive and exploits children under age 8 years of age.

The recommendations in this statement do not indicate an exclusive course of treatment or procedure to be followed. Variations, taking into account individual circumstances, may be appropriate.

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EFFECTS OF ADVERTISING ON ADOLESCENTS

Adolescents are capable of understanding the nature of advertisements. However, many of the products advertised to adolescents are harmful to their health. Nearly 90% of high school seniors have tried alcohol[8] and most tobacco abuse begins by age 16.[9] Beer, wine, and liquor companies spend over $2 billion per year on advertising and promotion. Cigarette manufacturers spend $3.25 billion per year solely on advertising.[10,11] Although the advertisers insist that their intent is to promote brand selection, an unacknowledged consequence is increased product consumption. Good data support this assertion.[4,5] In the United States, the increased per capita consumption of alcohol parallels expenditures on beer and wine advertising.[12] In the mid-1970s the per capita consumption of alcohol in Sweden decreased by 20% after all beer and wine advertising was banned. In Japan, consumption of cigarettes has increased substantially since a massive cigarette advertising campaign was begun.[13]

CIGARETTES

In the United States, tobacco consumption causes over 400 000 deaths per year and contributes to more than one of every six deaths.[14,15] In 1988 alone, teenagers spent $1.26 billion on cigarettes and smokeless tobacco.[14] Approximately 2 million teenagers begin smoking cigarettes each year.[14] Despite the ban on television advertising of cigarettes, the prominent display of logos, billboards, and banners in televised sports events makes cigarette advertising on American television more prominent than ever before.[16]

In two recent studies, one-third of 3-year-old children and nearly all children older than age 6 were able to recognize the Old Joe Camel logo.[17,18] By age 6 the Camel logo is as familiar to children as Mickey Mouse.[17]

Advertising for Camel cigarettes was more effective among children and adolescents than among adults.[18] Camel's share of the illegal children's cigarette market represents sales of $476 million per year—one-third of all cigarette sales to minors.[18]

BEER AND WINE

Alcoholic beverages represent a major health risk to American youth. In 1991, 14 727 young people who were 16 to 20 years of age died in alcohol-related motor vehicle crashes.[19] In addition, alcohol is involved in more than one-fourth of teenage suicides and homicides, which are the second and third leading cause of deaths for that age group.[20] Nonetheless, American children view nearly 2000 beer and wine commercials per year on television.[12] Alcohol advertising specifically targets young people by showing the supposed advantages of drinking—more friends, greater prestige, more fun, and greater sex appeal[21]—and suggesting that without alcoholic beverages teens cannot have fun or be popular.

There is compelling public health interest in protecting children and adolescents against both cigarette and alcohol advertising. Counter-advertising aimed at alcoholic beverages or cigarettes is effective but rarely seen, especially when compared with ads against marijuana and cocaine.[2]

RESPONSIBLE SEXUAL BEHAVIOR

Billions of dollars are being spent to encourage children and adolescents to buy products that are not healthy for them, with American advertising messages often including inappropriate sexual innuendos in an attempt to sell their products. Conversely, PSAs for abstinence and birth control products—which could prevent unwanted teenage pregnancies and sexually transmitted diseases including acquired immunodeficiency syndrome (AIDS), remain largely forbidden by national network television.[22] The 1985 Guttmacher report found that the United States has the highest teenage pregnancy rate in the Western world due, in part, to inadequate access to birth control products, inappropriate depictions of sexuality in American media, and inadequate sex education.[23] Guidelines for appropriate sexual content in advertising messages exist and should be followed.[24]

RECOMMENDATIONS OF THE COMMITTEE ON COMMUNICATIONS

One conclusion might be to ban advertising directed at children under age 8 and recommend that all advertising directed toward adolescents should promote health. However, the viewing audience cannot be accurately sequestered by age, and a ban would also infringe on the rights of free speech directed at older children. Therefore, the American Academy of Pediatrics recommends the following:

1. *All* toy-based programs (as defined by the FCC), since they truly represent commercials for products, should be regulated by the FCC.
2. There should be stricter enforcement of existing regulations that define the nature and content of educational programs. Strict and heavy fines should be imposed when such violations are proved.
3. There should be stricter limitations on the amount of advertising permitted on children's television (eg, no more than 5 to 6 commercial minutes per hour on weekday or weekend programming). This would decrease the current limits by approximately 50%.
4. There should be increased funding of the Children's Television Endowment Fund. Funds should be used to underwrite the production of high-quality, educational programming for children. This programming could be broadcast on either current public broadcasting systems or a new commercial-free public station for children. This fund should be augmented by a new 10% surcharge on advertisers who target children and adolescents.
5. There should be a ban on all tobacco and alcohol advertising in all media. This ban should include all "passive" advertising in sponsored sports events (ie, banners, logos, etc).
6. PSAs dealing with AIDS should emphasize the use of condoms as well as benefits of abstinence for adolescents. Broadcast of advertising for con-

doms and other birth control products should also be increased through commercial channels targeted to adolescents and young adults, including cable.

7. "Anti-drug" PSAs should receive more prominent airing during prime time hours. Drug-related counter-advertising should target cigarettes and alcohol, in addition to marijuana and cocaine.
8. Funding should be increased to continue the study of the effects of television and other media on behaviors of children and adolescents.
9. Parents must educate children to be responsible and informed consumers. A variety of resources should be developed to help parents teach children that commercials are designed to sell products. These resources should be made available to parents through schools, libraries, and pediatricians' offices. School-based curricula that teach children and adolescents media literacy should be developed and disseminated.
10. Parents, interested groups, committees of the Academy (nationally and locally), and pediatricians should monitor local television broadcasts to ensure adherence to existing limits on commercial time. There must be stronger support for strict FCC monitoring of local television stations' adherence to the Children's Television Act of 1990.

COMMITTEE ON COMMUNICATIONS, 1993 TO 1994
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APA (1995)

AMERICAN
PSYCHOLOGICAL
ASSOCIATION

December 28, 1995

David A. Kessler, M.D., Commissioner
Food and Drug Administration
Docket Management Branch (HFA-305)
12420 Parklawn Drive, Room 1-23
Rockville, Maryland 20857

RE: Docket No. 95N-0253

Dear Dr. Kessler:

The American Psychological Association (APA) represents 132,000 members and affiliates and is the largest organization of psychologists in the world. We are pleased to have this opportunity to comment on the proposed rule of the Food and Drug Administration (FDA) to restrict the sale and distribution of cigarettes and smokeless tobacco products to protect our nation's children and youth. Our specific research-based recommendations, covering nearly all of the questions raised for comment, reflect significant input from the following seven APA divisions: Personality and Social Psychology (Div. 8), Society for the Psychological Study of Social Issues (Div. 9), Consumer Psychology (Div. 23), Society for Community Research and Action: The Division of Community Psychology (Div. 27), Psychopharmacology and Substance Abuse (Div. 28), Health Psychology (Div. 38), and Addictions (Div. 50) and other individual members. The scope and level of effort devoted to this response attest to the critical importance placed by our membership on initiatives to support the FDA regulatory action.

APA maintains that there are strong and compelling reasons for our nation to implement regulations and laws to prevent tobacco use by minors. Cigarette smoking is the leading preventable cause of death in the United States, resulting in an estimated 419,000 deaths each year (Centers for Disease Control, 1993). Of those casualties, over 314,000 began smoking before they reached the age of 18 years (Centers for Disease Control, 1991). It has been estimated that 3,000 adolescents begin smoking each day (Pierce et al., 1989), about one-third of them will eventually die as a result of a tobacco-related illness. If we can prevent the growing number of youth from using tobacco products through a comprehensive national strategy designed to reduce youth demand for and access to tobacco products, such as that proposed by the FDA, we will greatly enhance the overall health status of current and future generations and save billions of dollars in annual tobacco-related health care costs in the process.

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Our formal comment to the proposed rule that was published in the Federal Register on August 11, 1995, Volume 60, No. 155, 21 CFR Parts 801, 803, 804, and 897 is divided into two parts. The first section addresses the argument raised in the accompanying FDA notices (pp.41454-41787) regarding the agency's jurisdiction over nicotine-containing cigarettes and smokeless tobacco products. APA's supportive position is based on substantial contributions from psychological research to the establishment of a research base on the addictive properties of nicotine. The second section responds to the specific questions raised for comment in the proposed rule with recommendations based on psychological research. In fact, our members have conducted the groundbreaking research related to almost all of the strategies set forth in the proposed rule to reduce minors' demand for and to restrict their access to tobacco products.

I. FDA Jurisdiction over Nicotine-Containing Tobacco Products

Based on overwhelming evidence from psychological research, APA strongly endorses the critical FDA finding that "the nicotine in these [nicotine-containing cigarettes and smokeless tobacco] products is a drug and that these products are nicotine-delivery devices within the meaning of the Federal Food, Drug, and Cosmetic Act" (p.41314). The FDA is thereby authorized to regulate cigarettes and smokeless tobacco products by employing its restricted device authority under this Act. The landmark 1988 report by the Surgeon General (U.S. Department of Health and Human Services, 1988) in part provided the basis for the FDA finding by concluding that cigarettes and other forms of tobacco are addicting, that nicotine is the drug that causes addiction, and that the pharmacological and behavioral processes that determine tobacco addiction are similar to those that determine addiction to drugs such as heroin and cocaine. Cigarettes and smokeless tobacco products serve as highly effective and efficient drug delivery systems, which by their very design enable people to readily develop and sustain nicotine addiction.

The term "addiction" generally refers to the ability of a drug to produce physical and/or psychological dependence, also called a drug's abuse liability. There is evidence that the great majority of smokers meet criteria for dependence (Hughes, 1993), including those 20 years of age and younger (Centers for Disease Control, 1994; McNeill, 1991). *A sample of findings from the vast research literature that offers additional support for the premise underlying FDA jurisdiction over nicotine-containing tobacco products is provided below:*

* Corrigall and Coen (1989) demonstrated that rats would readily self-administer nicotine under simple reinforcement schedules.

* The doses most readily self-administered by rats, dogs,

and monkeys (Goldberg et al., 1983) are virtually identical to those typically obtained by humans when smoking cigarettes (after correcting for body weight differences), on the order of 0.01 to 0.03 mg/kg (U.S. Department of Health and Human Services, 1988).

* There is evidence from several sources that humans will also self-administer nicotine. These findings complement the research on animal self-administration of nicotine. Specifically, humans have been shown to select intravenous nicotine injections more frequently than saline injections (Henningfield & Goldberg, 1983).

* Nicotine gum and patch produce very gradual increases in blood nicotine, peaking between 30 minutes (gum) and four hours (patch) after administration (Benowitz, 1993). Largely because of this slow pattern of nicotine delivery, these products may not be addictive (Henningfield & Keenan, 1993) and have therefore been approved by the FDA for relief of tobacco withdrawal. In sharp contrast, cigarette-smoking nicotine is inhaled from the tobacco smoke, delivering nicotine to the blood and brain in less that 20 seconds, faster than even intravenous delivery. Inhaling smoke leads to the absorption of nicotine into the arterial circulation, resulting in the delivery of nicotine to the brain in far higher concentrations than those achieved by other nicotine delivery vehicles, such as patch or gum (Henningfield & Keenan, 1993). It is the very rapid uptake of nicotine from inhalation that is primarily responsible for the high abuse liability of nicotine via tobacco smoking (Henningfield & Keenan, 1993).

* Following brief abstinence from smoking (e.g., overnight), most regular smokers experience characteristic tobacco withdrawal signs and symptoms, including restlessness, dysphoria, fatigue, difficulty concentrating, tension, and impaired psychomotor performance (Hughes et al., 1990). Termination of chronic nicotine treatment produces a similar withdrawal in animals (Malin et al., 1992). Nicotine intake via smoking, and to a lesser extent by nicotine replacement products, reverses this withdrawal (U.S. Dept. of Health and Human Services, 1988), thereby providing additional reinforcement for continued use.

* There is also evidence that pre-treatment with nicotine enhances the speed of acquisition of cocaine self-administration in rats (Horger et al., 1992). This finding is consistent with the premise that early nicotine exposure via tobacco products may serve as a "gateway" to the use of cocaine and possibly other "hard"

drugs as well (U.S. Department of Health and Human Services, 1994).

* Nicotine dependence develops relatively quickly in adolescents who begin to smoke. After smoking as few as 100 cigarettes, the majority of young smokers report that they continue to smoke because it is difficult to quit (Centers for Disease Control, 1994). Furthermore, many adolescents report symptoms of nicotine withdrawaal when they refrain from smoking (Centers for Disease Control, 1994; McNeill, 1991). Adolescents may begin to smoke on the assumption that they can easily quit, only to find later that nicotine dependence makes quitting difficult.

Given the addictive nature of nicotine-containing tobacco products, smoking cessation is often a difficult goal to accomplish, even with strong personal motivation. This implies that the public health would be best served by reducing the number of people who begin smoking. Data suggest that up to 85 to 90 percent of smokers begin smoking during adolescence (O'Donnell et al., 1976). In addition, adolescents who begin smoking earlier are more likely to consume more cigarettes as adults (Revell et al., 1985). It is imperative to address personal (e.g., self-image), social (e.g., peer influence), and environmental (e.g., ease of access to and cost of tobacco products) factors to effectively reduce the development and maintenance of nicotine addiction among our youth.

II. Specific Comments on Proposed Regulatory Provisions

APA strongly endorses the intended goal of the proposed FDA rule to shield our youth from the serious health risks associated with tobacco products. The following two-pronged approach espoused by the FDA offers viable means to help accomplish this goal. As stated on p.41315, it would involve: "(1) Restrictions on cigarette and smokeless tobacco sales that will make these products less accessible to young people; and (2) restrictions on labeling and advertising to help reduce the appeal of tobacco products to young people along with requirements for a manufacturer-funded national education campaign aimed at those under 18 years of age to help reduce the products' appeal to these young people." *Yet, we are concerned that these measures may be insufficient to accomplish the FDA's intended goal of reducing by roughly one half the use of tobacco products by youth within seven years of publication of the final rule. Accordingly, we offer research-based recommendations to strengthen the proposed provisions, along with some additional measures for your consideration.* Some of these suggestions would require no further authorization (e.g., enforcement of regulation and state law), while others (e.g., increased cigarette taxes) would. *Our specific responses to the issues raised for public comment are presented below:*

<u>Subpart B: Sale and Distribution to Persons Under 18 Years of Age</u>

Additional Responsibilities of Retailers
(Section 897.14, p.41323-41324)

The provisions under this section are designed to restrict the sale of tobacco products to minors by requiring face-to-face sale by retailers with age verification through direct visual inspection (or via photographic identification card with birth date, if necessary), thereby prohibiting the use of electronic or mechanical devices, such as vending machines. This section would also eliminate mail-order sales, free samples, self-service displays, and the sale of single cigarettes ("loosies").

The intent of these provisions is to reduce the illegal sales of tobacco to young people, an important priority. *Several studies have shown that reductions in youth access to cigarettes are associated with reductions in cigarette use by minors.* These reductions range from 22% (Hinds, 1992) to 38% (DiFranza, 1992) to 50% (Jason et al., 1991). Fundamental marketing principles (e.g., Kotler, 1991) also support the contention that proposals to reduce youth access to tobacco products, e.g. a prohibition against single item sales, are likely to be effective in lowering rates of tobacco use. The marketing strategy of single item sales, for example, is likely to appeal to youth disproportionately, since they have less disposable income than adults and are more price sensitive. The practice of "unbundling" (i.e., breaking a pack of 20 cigarettes and selling the items individually) overcomes youths' initial resistance by substantially reducing the cost of trial. Therefore, restrictions on single item sales are likely to lower sales to youth disproportionately.

Yet, the provisions do not address the fundamental problem of youth access, namely that compliance with existing state laws prohibiting the sale of tobacco products to minors is rarely enforced. In effect, minors are able to openly and directly purchase cigarettes 70% to 100% of the time and the vast majority of these purchases are face-to-face sales from a clerk (Altman et al., 1989; DiFranza, 1992; Feighery et al., 1991; Jason et al., 1991; Hinds, 1992; Jason et al., 1992; Mead, 1993; Radecki & Zdunich, 1993). It is not clear why retailers, after blatantly disregarding the law for years, would now be expected to assume a new "additional responsibility" requiring them to check for age. The problem is compounded by the fact that there is a preponderance of underage minors employed as cashiers in these stores. It is difficult for them not to sell tobacco products to their peers. Thus one key component of an effective intervention might include training for these underage sales people on how to address this conflict.

Considerable research now exists evaluating the effectiveness of various interventions to end sales of tobacco products to minors. Those that have been found to have only a temporary impact on illegal sales include the following: posting of warning signs (Centers for Disease Control, 1993; DiFranza & Brown, 1992; Mead,

1993; Skretny et al., 1990); minor education (Arkin et al., 1981; Botvin et al., 1980; Nutbeam et al., 1993), merchant education with voluntary compliance to the law (Altman et al., 1989; Feighery et al., 1991; Forster et al., 1992; Keay et al., 1993), and mobilization of positive reinforcement for clerks not selling tobacco to young people (Biglan et al., 1995).

It is only when these educational approaches are combined with the routine enforcement of tobacco legislation that sustained reductions in minors' access to tobacco are achieved (Altman et al., 1991; Jason et al., 1991). For example, in research conducted at DePaul University, it was consistently found that over 80% of merchants sold cigarettes to minors (Jason et al., 1992) and in Chicago, it was found that merchants only stop this practice when "stings" occur (i.e., minors are sent into stores to purchase cigarettes and merchants are fined for selling to them). Minors' access to tobacco at the retail level was reduced from 70% to less than 5% within three enforcements with the following critical provisions (i.e., merchant licensing, a graduated system of civil penalties culminating in license revocation, and enforcement) (Jason et al., 1991).

A viable approach to help ensure the enforcement of the proposed FDA regulations is offered by the Synar amendment. This federal legislation sponsored by then Congressman Mike Synar was signed into law by President George Bush in 1992. Its provisions require all states to: (1) adopt laws that prohibit the sale of tobacco to minors; (2) implement programs that ensure merchant compliance with the law; and (3) demonstrate state compliance with the law. In the first year, states would be required to demonstrate that no more than 50% of stores sampled sold cigarettes to minors. A further 10% reduction would need to be demonstrated each year until the fourth year, after which sales would need to remain at less than 20%. Failure to achieve this standard would have resulted in the state losing 10% of its federal substance abuse block grants each year to a maximum yearly loss of 40% ("Substance Abuse Prevention," 1993).

Regulations to implement this law have been proposed for public comment by the Department of Health and Human Services but not yet finalized. It is unfortunate that their possible role in reducing adolescent tobacco use has been ignored in the context of the current FDA regulatory effort. In the absence of such an enforcement mechanism, few states have conducted such inspections (Synar Regulations, 1993). Thirty percent of states have no enforcement procedures at all, and 26% enforce their tobacco legislation only erratically ("State Oversight of Tobacco", 1995). In designing an effective enforcement mechanism, the FDA would be well advised to consult with other jurisdictions that have been working on the same issue. For instance, the Ontario government recently enacted a new law addressing tobacco sales to minors, which includes enforcement provisions.

Conditions of Manufacture, Sale and Distribution
(Section 897.16 (b), p.41324)

This provision would make 20 cigarettes the minimum package size for cigarettes. Packs smaller in size, sometimes referred to as "kiddie packs", are more likely to appeal to youth, since they are less expensive and easier to conceal. *Accordingly, the regulatory provision requiring a minimum of 20 cigarettes per pack would be likely to contribute to reduced consumption of cigarettes by youth. APA also advocates that 20 be stipulated as the maximum number of cigarettes per pack; yet there is insufficient data on the impact of packaging to warrant a strong recommendation.* Although the FDA notes a lack of evidence that tobacco firms intend to market cigarette packages containing more than 20 cigarettes, such a practice could provide firms with a competitive advantage in the market place. Furthermore, a break from the typical 20 cigarette pack might also contribute to a significantly larger dose of nicotine (e.g., 25% more for a 25-cigarette pack) for the pack (or more) per day smoker, leading to more serious health risks and smoking cessation difficulties. This is of particular concern for youth. Based on an Australian study conducted by Hill et al. (1990), older children preferred cigarette packages that contained 25 cigarettes. Epidemiological considerations also provide a compelling rationale for a 20 cigarette per pack standard to facilitate retrospective studies.

Subpart C - Labels and Educational Programs

Educational Programs Concerning Cigarettes and Smokeless Tobacco Products (Section 897.29, pp.41326-41328)

This section calls for the creation of a $150 million public education program to be funded by tobacco companies proportionate to their individual share of the total advertising and promotional expenditures of the cigarette and smokeless tobacco industry. As stated in the regulation, "Each manufacturer shall establish and maintain an effective national public education program to discourage persons under 18 years of age from using cigarettes and smokeless tobacco products. The major portion of this program must appear on television."

This provision could be highly effective if the public education program is broadened in scope beyond the mass media delivery of anti-tobacco messages to youth and carried out in concert with other initiatives. The evidence that such a campaign, as currently conceived, would be successful in deterring adolescent tobacco use remains quite limited (e.g., Flynn et al., 1992; Flay, 1987). Yet, research has shown that anti-smoking advertising in the mass media (television, radio, billboards), when combined with school programs in grades 5-10, can reduce the appeal of smoking and rates of smoking among people under 18 years of age (Bauman et al., 1991; Flynn et al., 1992, 1994; Pechmann & Ratneshwar, 1994). In the

Flynn et al. 1992 study, 15% of 9th graders smoked if they just attended special anti-smoking classes at school; in contrast, 9% smoked if they saw anti-smoking ads plus attended the special anti-smoking classes. By 10th grade, the percentages were 20% and 13%, respectively.

Educational programs to reduce adolescent tobacco use may be more effective if they focus on resistance to peer influence and short-term negative consequences of tobacco use. Strategies that focus on the role of the peer group in generating a desire to begin smoking (Evans et al., 1984; Flay, 1985; Murray et al., 1984) are typically more successful than programs that focus on the long-term health consequences of smoking (see Botvin et al., 1980; Murray et al., 1984). However, even these programs may not have the ability to impact all adolescents who are at risk. For example, Mosbach and Leventhal (1988) suggest that the relationship between peer groups and smoking status may be at least in part due to the selection of similar friends after smoking behavior has been initiated. Some adolescents who value risk-taking and new experiences may seek out smoking as an alternative even in the absence of peer group pressure. For these adolescents, perhaps the only means of limiting their tobacco consumption is to limit their access to tobacco.

It is unclear whether the proposed public education program will be effective if televised educational programming is used rather than advertising. *Based on general marketing principles, it should be easier to reach youth by embedding ads in their favorite programs rather than by launching new educational programs (Pechmann, 1996).* The quality of the anti-tobacco ads is critical. Research has shown that poorly designed anti-tobacco ads can produce no effects or even effects opposite to those intended (McKenna & Williams, 1993; Pechmann & Knight, 1996). Anti-tobacco ads might inadvertently depict tobacco use as glamorous, the norm, or as a desirable adult activity that youth will want to emulate.

The following recommendations are offered for designing the anti-tobacco ad campaigns based on research conducted primarily by social psychologists. *To be effective, the individual anti-tobacco ads should:*

1) <u>Provide specific counterarguments to the points and inducements highlighted in tobacco ads</u>. Counterarguments have been shown to be highly effective in causing resistance to persuasive messages (McGuire, 1962; Petty & Cacioppo, 1977). Indeed, in one study, a treatment that employed a counterargument strategy in an educational anti-smoking curriculum significantly reduced cigarette consumption among junior high school students (McAlister et al., 1979). These results are consistent with the impact of TV counter-advertising campaigns mandated in 1967-68 by the Federal Communications Commission to balance the pro-smoking TV ads of tobacco companies. The counter ads led to a 10% reduction in

smoking over three years, which prompted the tobacco companies to remove their own ads from TV, which, in turn, led to the removal of anti-smoking ads and to an immediate 5% increase in cigarette consumption nationwide (McAlister et al., 1989).

2) Avoid scare tactics such as images of severe health problems or images of death. Teenagers see themselves as relatively invulnerable to such consequences and will not be motivated by them. Much more effective would be negative images of specific drawbacks that would be current and salient to young people. For example, Bauman et al (1988) first asked ninth graders to list various negative results of smoking. After one year, the researchers performed analyses to determine which of the nominated negative consequences best predicted whether nonsmokers continued to abstain. The best predictors all involved contemporaneous, salient issues for teenagers, e.g., bad breath, loss of friends, and trouble with adults, rather than fear of death. The target audience for whom long-term, severe consequences of tobacco use should be more effective are the gatekeepers for tobacco consumption -- parents, teachers, even store owners. These individuals are more likely than teenagers to have a longer range perspective and a more realistic view of the vulnerability of even young people to the serious health consequences. Accordingly, we recommend that special anti-tobacco ads be produced for adults as well.

3. Portray tobacco users as different from the target audience and non-tobacco users as similar to the target audience. Research has shown that nonsmoking teenagers are more likely to intend to become smokers if their self-images are similar to their images of the typical smoker; similarly, they are more likely to intend to abstain if their self-images are different from their images of the typical smoker (Chassin et al., 1981; 1985). Subsequent research has supported Chassin's findings with other health risk behaviors for youth, namely drinking, reckless driving, and ineffective contraception (Gibbons & Gerrard, 1995).

4. Contain arguments that assert that tobacco companies are trying to control teenagers' behavior. Adolescence is a time when individuals are forming an identity independent from their parents. Not surprisingly, imposing traditional parental or adult control tactics at this time can be counterproductive. Teenagers will often fight to resist such attempts to limit their independence or to control their behaviors (Brehm & Brehm, 1981). This tendency may in part account for the decision to begin using tobacco products despite, or because of, strong parental/adult attempts to restrict such behavior. If this is the case, it may be effective to structure anti-tobacco ads that depict tobacco company executives and marketers as adults employing various means to control teenagers' choices and lifestyles for their own monetary gain.

5. Refrain from describing teenage tobacco use as a widespread national problem. Handwringing declarations of the extent of the teenage tobacco problem (e.g., By the age of ___, 1 out of every ___ teenagers is a smoker), while well-meaning, could have the unintended effect of increasing tobacco use by normalizing the behavior for teens. That is, teenagers are likely to be more sensitive to what their peers do than to what adults prefer. Thus, in sending the message that tobacco use among adolescents is problematic, communicators should be wary of trying to dramatize its negative impact by depicting it as regrettably frequent. Much evidence exists that people are likely to engage in unlawful behavior if they perceive that many similar others do so (Cialdini et al., 1990; MacCoun, 1993). One study sought to identify why resistance training procedures (e.g., repeated "just say no" skits and exercises) led to a boomerang effect on the alcohol use of public junior high school students, causing them to be more likely to drink after participation in the program. Analyses traced the causal effect to the inflated perception, generated by the exercises, that drug and alcohol use requests were prevalent in public schools (Donaldson et al., 1995). Thus ads should not try to mobilize action against adolescent tobacco use by focusing on its prevalence. Inherent in the proscriptive message "Look at all the people like you who are behaving in this regrettable way," is the potentially undercutting prescriptive message, "Look at all the people like you who are behaving in this regrettable way."

As suggested above, efforts should also be undertaken to educate parents and other concerned adults, along with special constituencies (e.g., political and community leaders) about the critical need to prevent adolescent tobacco use. Public service announcements would be aired on television and radio that effectively advocate for public support to control the entire range of marketing practices of the tobacco industry, including easy access to tobacco products and advertising. Widespread public support could then be generated for such effective interventions as enforcement of state laws against the sale of tobacco to minors and an increased tobacco tax, for example.

In addition, state and local organizations of constituencies supporting effective control of tobacco marketing practices are needed, since the tobacco companies are well-organized to lobby and influence public opinion in every state. An infrastructure for such efforts already exists thanks to funding by the Robert Wood Johnson Foundation of the SmokeLess States projects, the National Cancer Institute's support for ASSIST, and the Centers for Disease Control and Prevention support for IMPACT in the majority of states. Funds for public education should be used to strengthen the efforts of these groups, as they remain quite limited compared to the money being spent by the tobacco companies.

Furthermore, any national educational program to reduce adolescent tobacco use should attempt to mobilize community level efforts to

prevent adolescent tobacco use. Components of such programs, including community-wide media, family communications about tobacco, youth anti-tobacco activities, and efforts to reduce illegal tobacco sales to minors, have been defined and evaluated (Biglan et al., submitted, a,b). When the members of individual communities understand the dimensions of the tobacco problem and are assisted in taking steps to control adolescent tobacco use, they produce grassroots support for tobacco control measures that are difficult for the tobacco companies to counteract. This explains why tobacco companies are lobbying for state laws that preempt local jurisdictions from taking action on tobacco use. Experience in California, for example, suggests that community level organizing plays a critical role in the development of practices that reduce tobacco use (Glantz, 1994).

Expenditures on anti-tobacco educational efforts must be adequate to offset tobacco advertising and marketing expenditures. As a general rule, each anti-tobacco ad should be seen by 80-90% of the target audience at least five to ten times (Flynn et al., 1992). Thus it is important to ensure absolute dollar expenditures are adequate to attain that level of exposure. It is also important to consider relative expenditures, i.e., the "share of voice" or ratio of anti-tobacco to pro-tobacco expenditures. Extrapolating from past research, if youths see one anti-tobacco ad for every four tobacco ads, their tobacco use rates should decline (Lewit et al., 1981). According to the Federal Trade Commission (FTC), in 1993 the tobacco industry spent $943 million on mass media and point of sale advertising, and $840 million on specialty item distribution and event sponsorships, for a total of $1.783 billion. If the tobacco industry had been required to spend $150 million on anti-tobacco educational programs, the ratio of anti-tobacco expenditures to those pro-tobacco expenditures noted above would have been 1:12, which is far below the 1:4 ratio. This discrepancy would be expected to be offset somewhat by the lack of tobacco advertising on television and radio and by the further restrictions set forth in the FDA regulations to reduce the impact of imagery through text-only advertising in certain circumstances.

Some concerns have also been raised about the appropriateness of the nature and level of tobacco industry involvement in the public education campaign. Although states, organizations, and other consultants will be involved in the development of anti-tobacco messages, it appears that the messages will actually be selected by the tobacco companies. Were this to be the case, it would be hard to imagine classes of potentially effective messages, such as that presented in #4 above that challenge the tobacco companies, would ever be selected. *Thus, it would be better if the FDA or some other federal (e.g., Center for Substance Abuse Prevention) or private agency (e.g, Robert Wood Johnson Foundation) were fully responsible for the administration of the public education program, with no content involvement on the part of the tobacco industry.* The various initiatives undertaken should be pre-tested and

evaluated to determine their effectiveness. A competitive process involving independent agents submitting proposals for peer review might also be implemented.

Subpart D - Labeling and Advertising
(Sections 897.30, 897.32, 897.34, 897.36, pp. 41334-41338)

Provisions under this section include requirements that all outdoor advertising (billboards, bus kiosks, etc.), point-of-purchase advertising (posters, displays, etc.) and advertising in publications with substantial youth readerships be limited to black text on white background. No outdoor advertising may be placed within 1,000 feet of any playground or any elementary or secondary school. Furthermore, tobacco companies cannot use premiums, contests, or event sponsorships (except in the corporate name) to advertise or promote their products. These rules are designed to reduce youths' exposure to image-oriented cigarette advertising and promotions, and thus detract from the symbolic or "badge" value of cigarettes for projecting a desired image. Based on a substantial body of research, it is likely that such efforts will be successful in helping to reduce youth demand for tobacco products. The "text-only" approach also derives support from the Canadian government's efforts regarding plain packaging. A summary of relevant research is provided below that provides support for the proposed regulation by establishing that tobacco companies effectively influence youth through their image-oriented advertising. *Subsequently, measures that reduce youths' overall exposure to tobacco advertisements (and to the positive imagery presented in the remaining ads) would be expected to contribute to reductions in underage smoking rates.*

Research indicates that children and adolescents in the United States are exposed to substantial tobacco advertising and promotion (Fischer et al., 1991; Mazis et al., 1992; Mizerski, 1995), despite the fact that it has been banned from television and radio. There is considerable evidence that young people are exposed to tobacco ads, that those who smoke are especially likely to be aware of cigarette advertising, and that liking of cigarette advertising among young people is predictive of smoking behavior (U.S. Dept. of Health and Human Services, 1994).

Particularly revealing are a number of recent studies of the impact of advertising for Marlboro and Camel cigarettes. Pierce et al. (1991) reported that youth in California were more likely than adults to name Marlboro and Camel as the most advertised brands (28.5% vs. 13.7%, respectively) and that Camel was especially likely to be named by the youngest adolescents. Fischer et al. (1991) found that 91% of six-year-olds recognized the cartoon character Old Joe Camel, a logo recognition matched only by the Disney Channel! In a related study, Mizerski (1995) reported that 72% of six-year-olds recognized Joe Camel, while 19% recognized the Marlboro Cowboy. Finally, the Teenage Attitudes and Practices Survey (MMWR, 1994) showed that Camel brand market share among

adolescents aged 12 to 18 increased from 8% to 13% between 1989 and 1993 following the introduction of the Joe Camel character, whereas Marlboro brand market share among these adolesents decreased from 69% to 60% over this time period.

A recently published historical analysis conducted by Pierce and Gilpin (1995) documents "sex-specific temporal associations between major cigarette marketing campaigns and increases in youth smoking initiation using national survey data for 1910-1977." During the most recent time period evaluated (i.e., 1968-1977), it was noted that coincident with the heavy marketing of women's cigarette brands (e.g., Virginia Slims) smoking uptake among young females aged 10 to 17 increased rapidly. The authors concluded that tobacco marketing campaigns to gain new smokers appear to be effective solely with adolescents. To decrease adolescent demand for tobacco products, they advocate a total ban on tobacco marketing practices (i.e., no text-only or adult publication exceptions).

Innumerable theories and studies of persuasion suggest that reducing people's exposure to advertising and promotions impedes persuasion (e.g., Lavidge & Steiner, 1961; McGuire, 1972). Yet, even brief exposure to cigarette advertising can cause youngsters to have more favorable thoughts about smokers (Pechmann & Ratneshwar, 1994). If youth receive extensive anti-smoking education and have negative attitudes toward smoking they may be considered to be "inoculated" against smoking. Based on recent research, these youth are not likely to be swayed by cigarette ads alone, or by peer smoking alone (Pechmann & Knight, 1996). However, when these youths see cigarette ads and then see peers smoking, despite their "inoculation", the combination can cause them to have more favorable beliefs about smokers (Pechmann & Knight, 1996). The cigarette ads promulgate highly attractive images, while the peer smoking personalizes the images, making them seem realistic and relevant to youths' lives.

Finally, both research and common sense indicate that replacing image-oriented ads and promotions with text-only ads should reduce the tobacco companies' ability to suggest tobacco users project a desirable image, e.g., that smokers look glamorous, sexy and mature (Cohen, 1995, Goldberg et al., 1996; Pollay & Lavack, 1993; Richins, 1991). It appears that many youth smoke because they hope to convey a positive image (Chassin et al., 1981; Barton et al., 1982; also see Belk, 1988; Belk et al., 1984; Levy, 1986; Solomon, 1983). Image or impression management (Schlenker, 1980) has great utility for adolescents as they struggle for social acceptance and autonomy (Havighurst, 1951; Spranger, 1955). Hence, measures that detract from smoking's image or badge value among youth should decrease the utility of the behavior and, thus, underage smoking rates.

With respect to developmental aspects of adolescence, there are two

related factors that make adolescents especially vulnerable to being influenced by tobacco advertising. First, adolescents are typically beginning to focus on peer group interactions more than on family interactions (e.g., Brown et al., 1986), which they may likewise value to a far greater extent. Second, tobacco use constitutes a "temporal trap" (Messick & McClelland, 1983) in the sense that the peer group benefits of tobacco use are immediate, while the negative consequences in terms of health outcomes are so far into the future that many adolescents, who often see themselves as invulnerable even in the present, would consider them to be irrelevant. Furthermore, the negative social consequences of tobacco use in adulthood (i.e., social stigmatization, Gibson, 1994; Gibson, 1995) are also unimportant to adolescents at the time they are making the decision to use tobacco products.

In light of the above considerations, APA strongly supports the provisions set forth in the proposed regulation to limit youth exposure to tobacco advertising, with one recommended change. We maintain that text-only advertising should also be banned in publications targeted primarily to youth. Since it is illegal to sell tobacco products to minors, advertising such products to minors should be banned outright as a matter of public policy.

APA also strongly supports the provisions in the regulation calling for the inclusion of informational messages in tobacco advertising. These would include the product's established name (e.g., "Cigarettes", "Loose Leaf Chewing Tobacco"), followed by the words "A Nicotine-Delivery Device" to inform the public of its intended use. *In keeping with the intent of this provision, APA also recommends that the FDA pursue actions to require a listing of component parts or ingredients of these restricted devices in advertisements of tobacco products.*

With respect to labeling practices, APA maintains that the FDA should require manufacturers to provide information describing the range of possible human exposures to nicotine via cigarette delivery, to be determined based on human data or careful extrapolations from laboratory to human experience. The labels should also convey that how much nicotine one receives varies with how one smokes. Cigarette labels should also carry information about several major toxins present in smoke, such as cyanide, benzene, formaldehyde, nitrosamines, and others. Besides naming the toxin, particular ingredients should be described as "known carcinogens," "known ciliatoxins," etc., as appropriate, i.e., they should be labeled as to their effect. This would help further the truth-in-advertising provision of the proposed rule. The FDA should also develop a process to regularly revisit the content of this rulemaking to ensure that recommendations on labeling and other product safety/toxicity issues reflect new knowledge that may emerge into the public domain.

The inclusion of a brief statement in all tobacco advertising, as

stipulated in the proposed rule, to alert youth about the dangers of tobacco products may also be effective in curtailing their tobacco consumption. (A distinction should be made here between the use of "scare tactics" in the context of tobacco advertising as opposed to the anti-smoking public education program discussed earlier, which was not recommended.) While warning messages can help to inform the public, many -- perhaps most-- are poorly designed (see review by Stewart & Martin, 1994). Policy officials cannot rely on the size or color of the lettering, expert opinion, or their own judgment, to enhance a warning message's noticeability or impact. Messages must be carefully pretested on members of the target audience to ensure the labels: 1) attract attention; 2) are personally relevant, and 3) do not elicit psychological reactance, i.e., behaviors directly counter to those desired due to irritation, rebellion, or misinterpretation. (We are aware that the FDA has utilized focus groups to pretest some potential statements.) Messages must also be varied periodically to ensure that they remain attention-getting and pertinent. Fischer et al. (1989) found that 44% of adolescents ignored the current Surgeon General's warning on tobacco advertisements.

However, in light of the discussion of adolescence presented here, we are skeptical about the likely success of the FDA-proposed statement: "About one out of three kids who become smokers will die from their smoking." Such a statement runs the risk of being discounted by youth who would not generally be dissuaded in their decision to smoke by fear of death in their 60s. Yet, recent random surveys of youth across the country reveal growing youth fears of early death by AIDS and violence, for example. It is possible that messages included in tobacco advertisements that draw upon this theme may encounter more success. In a related area of research, MacKinnon et al. (1994) found that alcohol warning labels with the words "poison," "cancer," or "health problems" were the most powerful of those studied in eliciting an avoidance response in their high-school sample (see review article by MacKinnon, 1995). *In designing a brief statement, it is also important to consider that pictorial messages may be as effective or more so than written ones.* For example, the inclusion of an actual image of a damaged lung has been shown to be very effective in a Canadian study (Goldberg et al., 1996). It may even be most striking to include both a written statement and a pictorial image in the warning message.

Subpart E - Miscellaneous Requirements

Additional Regulatory Measures (Section 897.43, p. 41341)

As a means to evaluate the proposed rule's effectiveness in reducing youth smoking by 50% within the established time period, APA endorses utilization of the Monitoring the Future Project data set. The survey methodology offered by this project, which has been administered for the past 19 years by the Institute for Social

Research of the University of Michigan, is very comprehensive and appropriate for this purpose.

In the event that the regulatory provisions set forth in the final rule prove to be inadequate to accomplish the stated goal, APA proposes that one or more of the following four additional measures be implemented. These would involve action on the part of the federal government to: a) Increase the federal tax on tobacco products; b) Apply further restrictions on tobacco marketing practices; c) Require plain (generic) cigarette packaging; and d) Mandate tobacco industry coverage of tobacco-related illnesses.

a) Increase the Federal Tax on Tobacco Products

Although the FDA cannot impose taxes, significant benefits would be derived from increasing the tax on tobacco products. *APA advocates a $2 per pack cigarette tax increase to be maintained in real terms and applied proportionately to other tobacco products.* We formally presented this position to Congress in 1993 in testimony before the Committee on Ways and Means of the U.S. House of Representatives. About one-half of all cigarette smokers attempt to quit each year, and increasing the tax may provide extra incentives to reduce cigarette smoking and eventually improve health status. In addition to reduced smoking prevalence, the other compelling reasons presented below include increased federal revenue, health care costs, and quality life years saved.

First of all, numerous econometric studies have shown that increases in the price of tobacco products are related to decreases in consumption (Department of Health and Human Services, 1994; World Health Organization, 1987). In this regard, an evaluation of the impact of the 1989 introduction of the California tax found evidence for an accelerated rate of decline in the prevalence of smoking among those 20 years of age and older (from .70 to 1.27 percent per year). Among adolescents, there was a slight increase in smoking behavior, which might be attributable to aggressive marketing by the tobacco industry to offset the impact of a tax-related price increase. A large price increase (e.g., $2 per pack), not as easily offset by the tobacco industry, may be required to place these deadly products out of range for non-addicted youth. Data from the California Tobacco Survey (Pierce et al., 1991) indicate that 40% of the citizens would approve of quadrupling the tax rate. Further support for the behavioral impact of taxation can be found through international comparisons. In 22 European countries there is a rough linear relationship between price and consumption. Specifically, those countries charging more per pack tend to have lower rates of cigarette smoking. In Norway, for example, with a $4.17 per pack charge that includes $2.71 in tax (greater than that being proposed here), has evolved the lowest per capita rate of tobacco consumption in Europe (World Health Organization, 1987).

Second, a tobacco tax could raise substantial revenue to help finance health care and related research while improving our nation's health. In the state of California, the $.25 per pack tax raised over $60 million in the first year alone. It is estimated that a $.75 per pack federal tax will raise $15 billion per year and that a $2.00 tax would generate $59 billion over three years.

Another critical analysis of the impact of a tobacco tax takes into account life years saved. When adjusted for quality of life, these units are known as quality adjusted life years (QALYs). This is particularly important given the recent estimate that 434,000 deaths in 1994 were attributed to smoking (McGinnis & Foege, 1993). This exceeds by over two-fold the combination of deaths (173,000 in all) attributable to AIDS, automobile and other accidents, homicide, and suicide. According to Kaplan et al. (1995), there is a 50% chance that we could save 5.5 million QALYs in the United States by increasing tobacco taxes by 20%. The model also shows that there is a 90% chance of saving about 2.5 million QALYs. To put these figures into perspective, the total annual health effect of arthritis is estimated to cost society 5 million QALYs, while the impact of homicide is about 1.5 million years. In other words, the public health benefits of an increased tobacco tax may well exceed the benefit of having a whole year without arthritis or homicide (Kaplan, 1993). We know of no other health services that can improve the public health to the extent estimated to be attributable to an increased tobacco tax.

In conclusion, by significantly increasing the tax on cigarettes and smokeless tobacco products, the federal government would save lives, generate substantial revenue, lower health care costs, and reduce the prevalence of tobacco product use, particularly among youth. As noted earlier, public education to inform parents and other concerned adults about the effectiveness of increased taxes in deterring adolescent tobacco use could contribute to generating widespread public support for such an initiative. By setting aside a small amount of the revenue, perhaps $.03 per pack, a fund could be created that would support important new research on cessation of tobacco product use, health promotion, and disease prevention. This fund ($700 million estimated value) could also help support community anti-tobacco public education campaigns.

b) Apply Further Restrictions on Tobacco Marketing Practices

Another possible measure would involve further restrictions on tobacco advertising, e.g., as currently practiced in Canada, and on other marketing practices. *To help insure lack of tobacco product exposure to minors, a total ban (i.e., not allowing for text-only forms) would be imposed on outdoor advertising, point-of-purchase advertising, and in publications targeted to youth audiences.* It might also be necessary to scale back the provisions included in the regulation regarding the definition of adult publications (e.g., to comprise 90-95% adult readership and less than 500,000 to

1 million youth readers) or even to prohibit tobacco advertising in all adult publications as well. (As noted above, a total ban on tobacco marketing practices was strongly advocated by Pierce and Gilpin (1995) based on their historical analyses.) In a related vein, APA was concerned to learn of the publication of numerous articles in *The Weekly Reader* and *Scholastic News* (with a combined readership of over eight million school children) presenting the Joe Camel cigarette mascot and what were described in *The Washington Post* article (Kurtz, 1995) as pro-smoking views of the tobacco industry. Such research findings call for the need to monitor and possibly increase restrictions on the presentation of tobacco messages in other media.

c) Require Plain (Generic) Cigarette Packaging

Leading marketing textbooks (e.g., Wells et al., 1989; Rothschild, 1967) attest to the critical role played by the package design in brand image and product identity. As explained by Pollay (1984), "the package is the ultimate communication tool of the firm. It is the last step in the promotional process." Especially were imagery to be restricted in most tobacco advertising encountered by youth (as proposed in the current FDA rule), the package design might assume even more influence and importance. Moreover, as a means to circumvent FDA regulatory action, the tobacco industry might specifically modify their package colors, graphic elements, proportioning, and typography to appeal directly to youth. Such an action would be consistent with prior package modifications to target consumers by sex and socioeconomic status (Pollay, 1984). Therefore, it is recommended that generic packaging be required with standard type-face with name and coloring. This position is also supported by a recent study sponsored by the Canadian federal government that found that the cigarette package's self-definitional and "badge" value to teenagers was significantly reduced by stripping the package of its unique characteristics (except for brand name in uniform font). Since generic packaging would not enhance youth's self-image, this approach would be likely to reduce the appeal of tobacco products for youth and consequently their use of such products (Goldberg et al., 1996).

d) Mandate Tobacco Industry Coverage of Tobacco-Related Illnesses

A number of states (e.g., Florida, Mississippi, Minnesota, and West Virginia) have filed suit against the tobacco industry to recover funds spent each year on Medicaid costs for tobacco-related illnesses. Maryland Governor Parris Glendening recently announced his intention to file suit next spring against about 10 large tobacco companies in the hopes of recovering $50 million in annual costs to provide health care for indigent patients suffering from lung cancer and other tobacco-related illnesses. Although tobacco companies have not lost a liability suit in the past 40 years, mounting evidence of their prior knowledge of the addictive nature of nicotine and related manufacturing practices that have been

called into question might leave them exposed to liability claims in the ongoing Mississippi suit and possibly in other future lawsuits as well.

Conclusion

APA offers its strong endorsement for the FDA proposed rule to restrict the sale and distribution of tobacco products to youth, along with its underlying regulatory justification based on the finding that nicotine-containing tobacco products are drug-delivery devices. While a number of suggestions are made to strengthen individual provisions, the most critical involves the need for an enforcement mechanism to ensure that the regulatory provisions are effectively implemented. Since the potential cost to today's youth of waiting seven years to evaluate the success of these measures is so great, we urge you to consider an interim three-year review period. This will enable the agency to determine whether the recommended provisions are effective and allow for more immediate modifications to accomplish the overall objective of achieving a 50% reduction in youth consumption of tobacco products. The FDA should seriously consider imposing fees upon each pack of cigarettes, as a means to help defray the cost of this comprehensive regulatory action.

In closing, we would like to commend you for spearheading this vital effort and offer our expertise to facilitate the process of revising the proposed rule.

Sincerely,

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Enclosure: References

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Cigarette advertising and marketing strategies

The primary objective of the tobacco industry, like any commercial enterprise, is to maximise sales and profits. This requires that its attention be focused not only on maintaining existing sales and markets but on ensuring that new customers are recruited to buying its product. The tobacco industry faces particularly difficult – indeed, unique – challenges in this respect. Not only does its main product, cigarettes, kill a quarter of its consumers[1,2] but over the past two decades there has been a considerable decline in tobacco consumption in countries such as the United States, the United Kingdom, Canada, and Australia, which were traditionally its strongest markets.[3] Faced with increasing public awareness in many countries of the serious health effects of smoking, and increasing government action directed at reducing smoking, the tobacco industry has responded by developing new strategies aimed at sustaining current markets and developing new markets around the world.

One of the most important of these strategies has been the development of increasingly sophisticated marketing methods to target specific groups. This has included, for example, introducing brands that appeal to specific groups such as the "women" only brands Kim, Vogue, Capri, and More[4–7] and developing brand images that have been tailored to appeal to certain groups such as young white women with low levels of education,[8,9] people from racial and ethnic minority groups,[9–11] and young people.[12–14] Another important way in which the tobacco industry has attempted to target certain groups is highlighted in a study reported in this issue of *Tobacco Control* – that is, selectively placing advertisements in the media that are read predominantly by the target group.[15] Warner and Goldenhar's study of 92 magazines in the United States found that between 1959 and 1986 the magazines with the largest female and blue collar (working class) readerships experienced substantial increases in their relative share of cigarette advertising, while the relative share of cigarette advertising in magazines with predominantly white collar (middle class) readerships declined. The increased targeting of women by the tobacco industry revealed in this study – there was nearly a tenfold relative increase in cigarette advertising in women's magazines published in the United States over the 28 year period – has also been observed in other industrialised countries. For example, in the United Kingdom cigarette advertising expenditure in women's weekly magazines increased in real terms by nearly two thirds between 1984 and 1988. This was in marked contrast to the decline in real terms in cigarette advertising revenue experienced by general weekly and monthly magazines over the same period.[16]

Other studies have shown that the preferential targeting of cigarette advertising to certain groups has not been confined to magazines. Cigarette advertisements on billboards and posters have been found disproportionately in the United States in cities where the population is predominantly black (DP Hackborth *et al*, 119th annual meeting of the American Public Health Association, Atlanta, Georgia, 1991) and in the United Kingdom in less affluent, working class areas.[17] In addition, tobacco companies have become increasingly involved in sponsoring sports that have large blue collar audiences and also reach many young people.[18,19]

The increased targeting of vulnerable groups in the United States and other countries, such as those from minority ethnic backgrounds, those with a manual occupation, and those with low levels of education, is of particular concern as these groups have relatively poor levels of health[20,21] and have shown the lowest rates of smoking cessation.[22–25] The use of magazines to target these groups may also carry additional benefits for the tobacco industry. Not only are magazines an effective way of reaching certain groups but the placing of cigarette advertisements in magazines such as high fashion women's magazines can lend a spurious social acceptability or stylish image to smoking.[26] Furthermore, the presence of tobacco advertisements in magazines may dilute the impact of articles on tobacco and health. Indeed, there is evidence, particularly from women's magazines, that magazine editors who accept tobacco advertisements are more likely to apply a form of self censorship and to play down or avoid covering the issue of smoking and health altogether.[26–30]

The tobacco industry has, however, not had total freedom of action in developing its marketing strategies. For as its marketing has become increasingly sophisticated so has the understanding of researchers and policy makers of the likely impact of such strategies, particularly on children and young people.[14,31,32] This increased awareness has led governments around the world to take action to reduce smoking by banning tobacco advertising and promotion. Around 20 countries have now banned tobacco advertising.[32] Most recently bans have been introduced, or are shortly to be introduced, in industrialised countries that have traditionally been major markets for cigarettes such as Canada, France, New Zealand, and Australia. The effect of these bans has been immediate and dramatic. New Zealand introduced its ban in mid-December 1990. In the following six months consumption of tobacco was 11·3% lower than during the same period in 1990. The prevalence of smoking fell from 27·5% in 1990 to 25·1% by mid-1991.[33] Similar effects have been observed in Canada. Since a ban on cigarette advertising was introduced in January 1989 the rate of decline in smoking has doubled from an average decline of 3·6% a year between 1983 and 1988 to 7·6% in 1989 and 6·7% in 1990.[33] While other factors may also have contributed to these declines in smoking, such as increased cigarette taxes in Canada,[34] the introduction of the advertising bans are considered to have played an important part, especially in New Zealand.[33] Given the dramatic immediate impact on smoking and the likely longer term effects which should arise from reduced uptake among young people, it is not surprising that these bans are being vigorously contested by the tobacco industry.[35] The tobacco industry has also mounted a major campaign in countries of the European Community in an attempt to block the adoption of a European Commission directive, which will be decided in May 1992 and would ban tobacco advertising and promotions in all countries in the European Community.[36,37]

Faced with increasing restrictions on the promotion of its product in its traditional markets the tobacco industry has, not surprisingly, been keen to develop markets in parts of the world where there are comparatively few restrictions and less awareness about the threat of smoking to public health. The presence of the transnational tobacco companies and their marketing activities have been spreading throughout the rest of the industrialised and non-industrialised world from Africa, the Indian subcontinent, and the Far East to South America.[38,39] The marketing strategies used in these countries show striking similarities with those developed in the West. For example, in Hong Kong there has been a major advertising campaign

for Virginia Slims, a clear attempt to recruit women to smoke as only 1% of women under the age of 40 currently smoke cigarettes.[40] In India a brand called MS has been launched which similarly is aimed at women.[41] Even countries with strong restrictions on the advertising and sale of foreign cigarettes have not been protected from the attentions of transnational tobacco companies. Lobbying by US senators with tobacco interests led to the US government pressuring Japan to open up its market to US tobacco companies. As a result Japan has been exposed to major advertising campaigns for US cigarette brands.[42] Thailand was only partially able to resist pressure from GATT (General Agreement on Tariffs and Trade) to open up its market to foreign tobacco companies. After an international campaign coordinated by the American Cancer Society[43,44] GATT ruled that Thailand must open its market to foreign cigarettes but allowed the country to maintain its ban on tobacco advertising.[45] It remains to be seen whether the Chinese government, which recently introduced a comprehensive tobacco law that includes a ban on tobacco advertising, will be able to resist any similar pressures.[46]

The recent collapse of communism in Eastern Europe has also created opportunities for market expansion which the transnational companies have been quick to seize.[47,48] It is disturbing to see in several countries where advertising used to be strictly forbidden that there are now few constraints. Indeed, Czechoslovakia has recently agreed to allow tobacco advertisements on television.[49]

Thus, although there have been enormous successes in recent years, with increasing numbers of countries introducing measures to reduce tobacco consumption, there is no place for complacency. Tobacco consumption may be continuing to decline in industrialised countries, but the tobacco industry has responded to this challenge by increasing its targeting of vulnerable groups, particularly young people, within these countries and developing markets in other parts of the world. It is to be hoped that the sharing of research and information in this and future issues of this journal about tobacco industry tactics, and the success of strategies to counter their efforts, will lead to a more rapid attainment of the goal of a smoke-free world for our children and future generations.

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ORIGINAL ARTICLES

Influence of education and advertising on the uptake of smoking by children

(for editorial comment, see page 113, see also page 124)

Bruce K. Armstrong, Nicholas H. de Klerk, Ruth E. Shean, Deborah A. Dunn and Paul J. Dolin

ABSTRACT **How effective are peer-led programmes in preventing the uptake of smoking by children? In 1981, we conducted a randomized controlled trial of a school-based educational programme for the prevention of smoking in children who were in their seventh year at school. In this article, the reported results of two years of follow-up confirm an earlier report that both teacher-led and peer-led programmes resulted in a reduction, to about the same degree, in the uptake of smoking by girls, while only the teacher-led programme appeared to be effective in boys. In girls, both the teacher-led and peer-led programmes maintained their effects over the two years of follow-up with adjusted differences in prevalence rates of the uptake of smoking relative to the control group of −6.6% (95% CL, −17.3%,4.0%) and −8.1% (95% CL, −18.9%,2.7%), respectively, after two years. In boys, the effect of the teacher-led programme was reduced substantially by the second year with a difference in the prevalence rate of −2.8% (95% CL, −11.2%,5.6%); for the peer-led programme the difference in the prevalence rate was +6.4% (95% CL, −3.6%,16.4%). Other variables which had a significant effect on the smoking behaviour were the perceived response to cigarette advertising, parental and sibling smoking status, the perceived parental sanctions on smoking behaviour, selected peer influences and the intention to smoke. The children's perceived responses to cigarette advertising showed the strongest and most consistent evidence of an effect on the uptake of smoking by children who initially were non-smokers. After adjustment for the effects of other variables there was an excess of 15.0% (95% CL, 2.1%,27.9%) in the prevalence rate of smoking after two years for girls who thought that they were influenced by advertising compared with those who did not. The corresponding difference for boys was 15.3% (95% CL, 4.0%,26.6%). As smoking-prevention programmes only may delay the onset of smoking in children, it is important that legislative measures be introduced to reduce the effects of cigarette advertising.**

(Med J Aust 1990; 152: 117-124)

Smoking among children has particular significance for the prevalence of future smoking-related disease. First, the earlier the onset of smoking, the earlier the risk of smoking-related disease begins to rise and the higher this risk is likely to become in the smoker's lifetime.[1] Secondly, the age of onset of smoking is an important predictor of success in quitting. The younger a person is when he or, now more commonly, she starts to smoke, the less likely it is that he or she will ever cease.[2] As quitting smoking leads to a reduction in the relative risk of smoking-related disease,[1] the early smoker with little chance of quitting is in double jeopardy. Thirdly, it is suspected that if the onset of smoking can be delayed, it may be possible to prevent it entirely. Thus, as smoking cessation can be difficult and expensive to achieve on a community-wide basis,[3] it is more sensible to concentrate on preventing smoking before it is taken up rather than to try to stop it later. Consequently, smoking-prevention programmes now must concentrate on children if a further substantial impact is to be made on the prevalence of smoking-related disease.

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A national survey that was conducted in Australia in 1984 showed that by 15 years of age, 29% of boys and 34% of girls were smokers of at least one cigarette a week.[4] A National Health and Medical Research Council (NHMRC) survey that was conducted 11 years earlier, in which a different definition of a regular smoker was used, estimated that 45% of boys and 31% of girls were smokers by 15 years of age.[5] The NHMRC survey included as regular smokers those who had smoked more than 10 cigarettes during their lives and who thought of themselves as smokers. This definition may, in part, explain the apparently higher prevalence of smoking in boys then than in boys now. However, in girls, regardless of the definitions, the prevalence of smoking has increased over the past 11 years.

Other survey data show that the average age at which smokers have begun to smoke has fallen. In Busselton, Western Australia, surveys in adults that were conducted at three-yearly intervals from 1966 to 1981 showed that the average age that men started to smoke fell from 21 years of age in those men who were born before 1920 to 16 years of age in those men who were born around 1956. In women, the fall was much greater—from nearly 40 years of age in those who were born before 1905 to 18 years of age in those who were born around 1956.[6] Similar patterns are evident in cross-sectional data from the National Heart Foundation of Australia's Risk Factor Prevalence Study.[7,8]

It is in this context that smoking-prevention programmes have been introduced into school curricula in many parts of the world. The use of peer leaders in these programmes to discourage smoking in their fellows almost has become institutionalized in the United States.[9] Indeed, Murray et al. suggested that the use of same-age peer leaders as teachers is a necessary condition for success in school-based smoking-prevention programmes.[10] In Australia too, peer-led programmes for smoking prevention have gained some popularity in recent years.[11]

How effective are peer-led programmes, or any other smoking-prevention programmes for that matter, in preventing the uptake of smoking behaviour by children? Flay acknowledges that "the social influence approach to smoking prevention can be effective some of the time", but cautions that "this conclusion seems to be somewhat fragile, given the considerable differences between studies in the patterns of reported results".[9] In his international review of smoking-prevention programmes, Flay drew attention to the dearth of rigorous evaluations of these programmes and commented that defensible long-term follow-up studies were rare.[9] However, this situation is being rectified.[12]

In 1981, we conducted a randomized controlled trial of a school-based educational programme for the prevention of smoking in children in their seventh year at school and we reported the results of follow-up after one year at the Fifth World Conference on Smoking and Health.[13] A teacher-led programme was shown to be effective in preventing smoking in both boys and girls, while a peer-led programme was slightly less effective in girls and was ineffective in boys. We describe here the results of this educational programme after two years of follow-up and a detailed analysis of factors, in addition to the educational programme, that influenced smoking behaviour.

Methods

Educational programme

The objectives of the programme were to increase children's knowledge of the effects of smoking, their awareness of non-smoking and to provide them with training in ways to resist pressures to smoke. The programme was based on the social consequences curriculum that was developed by the University of Minnesota[14] with minor modifications to make it more suitable to the WA environment.[13]

There were five sessions. In the first session, students estimated the number of children of their age who smoked, listed and categorized the negative consequences of smoking and identified reasons why children of their age begin to smoke. The immediate physiological effects of smoking on the heart rate and blood carbon-monoxide levels were introduced. In the second session, the children were given accurate information on the proportion of children of their age who smoked to counteract the belief that most of their peers smoked. Students listed situations in which they personally had experienced social pressure to smoke and refusal techniques for these situations were practised.

The third session involved the students in preparing and discussing arguments in support of non-smokers' rights and the development of arguments that countered the excuses which smokers often give for their behaviour. The fourth session examined the family and its role in influencing smoking behaviour. Advertising techniques that are used to promote cigarettes also were identified. In the last session, students wrote a short essay that gave their reasons for remaining non-smokers and made a public commitment to non-smoking, if they wished, by reading their essays to the class.

Two versions of the programme were developed. The first version was led by peers of the same age, who were selected by their class, with teachers acting as facilitators. The second version was led by the teachers. All leaders received appropriate previous training.

Experimental design

The study group consisted of 2366 students in Year 7 (modal age, 12 years), the last year of primary school, in 45 schools. Each school was assigned at random to one of three interventional groups: control group (no planned intervention); peer-led programme; and teacher-led programme. The schools were stratified by size of class and regional location before randomization to ensure, as far as possible, equal numbers of children and uniformity of socioeconomic status across the three interventional groups.

In June 1981, all students were surveyed by questionnaire to collect baseline information on smoking habits; smoking habits of parents, siblings and friends; and knowledge of and attitudes to smoking. Parental consent was not required for participation in the survey and students were not informed that they were to be followed-up. At the time of the survey, the children, their teachers and those who conducted the survey did not know the interventional group to which the class was assigned. The programme was conducted from July to December 1981.

Follow-up

A follow-up survey was conducted in December, 1982, using the same questionnaire as in 1981. By this time the children had graduated to high school and the surveys were conducted in the high schools that were fed by the primary schools in which the interventional programme had been conducted. All Year-8 children were surveyed, regardless of whether they had participated in the Year-7 programme. No reference was made to the previous survey or educational programme and those who conducted the survey were unaware of the interventional group to which each child had belonged. Schools were visited for the follow-up survey if there were at least 10 children from the original programmes in their Year-8 class. A further follow-up was conducted in December 1983, according to the same methods.

In collecting data on smoking habits, an approach, which was similar to that of Evans et al.[15] was used. Students were shown a film that demonstrated how smoking could be detected through analysis of a saliva sample for thiocyanate. Saliva samples then were collected from each student before obtaining self-reports of smoking behaviour. With this so-called bogus-pipeline method, saliva is not actually analysed, but the "threat" of analysis enhances reliability of the self-reports.[15] Some saliva samples were analysed in this study but this information is not used here.

The educational programme was designed specifically to prevent children from commencing smoking and targeted those children who were not smoking when the study was conducted. Therefore, this article is concerned primarily with the uptake of smoking among non-smokers and any effects of the programmes, or other variables, among smokers are not discussed here.

The following definitions of smoking status were used at every survey: non-smoker—had not smoked a cigarette, not even a few puffs, in the 12 months before the survey; smoker—had smoked a cigarette, even just a few puffs, in the 12 months before the survey.

Statistical analysis

As intervention was allocated by randomization of the classes and not the individuals (by nature of the intervention itself) then analysis should be performed in the same way.[16-18] Randomization of interventions is used to ensure independence of errors; when intervention is allocated in clusters it usually is assumed in the analysis that the errors in the measure of outcome within groups or clusters are not independent, that is, there is a non-zero correlation within groups, or, more generally, the correlation is greater among individuals within groups than among individuals in different groups. We decided against analysing the data in this way for the following reasons.

First, assessments of outcome were made 12 months and 24 months after the interventions finished at the end of primary school, when students had progressed to an assortment of high schools. Thus, at the time of assessment, the original classes had been "mixed up", reducing the between-to-within group differences. This is different to the more usual situation, when assessment is made at the end of intervention or while the intervention is continuing.[12,18] In addition, it was not readily apparent how the groups were to be defined, whether as the original schools, the high schools, classes within the high school, or combinations of these.

Secondly, given that demographic variables and other characteristics of individuals also were collected and analysed, our approach makes the interpretation of their effects much easier. Thirdly, and perhaps most importantly, the data that identified each child's school were erased inadvertently shortly after the initial survey and were not available to us for these analyses.

Given the large number of original classes and the subsequent mixing of students that is described above, it is likely that any biases which arose in estimates of the effects or their precision because of the analysis of individuals rather than classes would be small.

Comparisons among the proportions of students in the different interventional groups who took up smoking were tested using Pearson's χ^2 test with all tests being two-sided.[19]

The effects of other variables that were collected in the initial survey, both on the uptake of smoking and on the effects of the interventions, were examined by logistic regression using the computer program, EGRET.[20] Analyses were carried out separately for boys and girls and for each year of follow-up, with smoking, as defined above, as the outcome variable. The logistic models were based on only those children who participated in the original study, who were surveyed at both follow-up periods, and who were non-smokers (as defined above) in the first survey (499 boys and 529 girls) to allow comparison of the models over time. The interventional variables were forced into the models at the first step. Variables that made appreciable contributions ($P \leq 0.10$, using the score test[21]) to the model in either follow-up year were retained for both follow-up periods to show trends within the same models.

Once the final models were chosen their parameters were re-estimated in an additive risk model[20] which provides results that are interepreted more easily and also has a stronger theoretical basis in that the effects of most of the measured variables are much more likely to act additively than multiplicatively.

Thus, these final results are presented in terms of differences in prevalence rates and their confidence limits (CL)s.

Results

Eighty-two per cent and 64% of students were traced and resurveyed in the first and second follow-up studies, respectively (Table 1). Students were lost to follow-up for a variety of reasons including: not attending the high schools to which the primary schools fed; attending a school that was not visited by the survey team; or the student had died, moved away or was absent from school on the day of the survey.

TABLE 1: Number of students in the programmes at recruitment and at the two follow-up surveys

Programme	Time of survey		
	Recruitment	One-year follow-up	Two-year follow-up
Girls			
Control	366(100%)	297(81%)	241(66%)
Teacher-led	424(100%)	342(81%)	275(65%)
Peer-led	368(100%)	299(81%)	215(58%)
Boys			
Control	415(100%)	344(83%)	266(64%)
Teacher-led	404(100%)	330(82%)	256(63%)
Peer-led	389(100%)	323(83%)	252(65%)

Prevalence of smoking on follow-up by interventional group

Each child was classified for each survey as either a smoker or non-smoker as defined above. The prevalence of smoking in each follow-up period according to sex and interventional group is shown in Table 2. Twenty-eight per cent of girls and 36% of boys were smokers at the time of the educational programme. This proportion increased during the two years of follow-up in all interventional groups to 53% of girls and 49% of boys, with a greater rate of increase among girls.

The prevalence of smoking in each follow-up period according to smoking status at the time of the programme is shown in Table 3. Fewer girls in both interventional groups commenced smoking in the first year of follow-up as compared with girls in the control group ($\chi^2 = 4.8$; df = 2; $P = 0.09$; for both interventional groups combined, $\chi^2 = 4.2$; df = 1; $P = 0.04$). The proportion of girls who started to smoke increased in the second year of follow-up but remained lower in both interventional groups than in the control group ($\chi^2 = 6.7$; df = 2; $P = 0.03$).

Substantially fewer boys in the teacher-led group than in either the control group or the peer-led group started smoking during the first year of follow-up ($\chi^2 = 16.7$; df = 2; $P = 0.0002$). This pattern persisted, although not so strongly, in the second year of follow-up ($\chi^2 = 9.4$; df = 2; $P = 0.009$).

Influence of other variables on the effects of intervention and on smoking

All variables which produced significant effects on the prevalence of smoking in either year of follow-up ($P \leq 0.1$ from the score test) were included together in a single additive risk model, separately for each sex and year (Tables 4 and 5). The tables show, for each category of each variable, the adjusted difference in prevalence from the prevalence rates in the baseline or reference group. As an example, for girls in the second year of follow-up, the predicted prevalence rate among a group who were in the teacher-led programme, who thought that they were influenced by advertising, whose fathers, sisters and best friends did not smoke, who believed most adults smoked, whose parents would be angry if they smoked, who received no pressure from their friends to smoke and who had not intended to smoke, would be $-6.6\% + 15.0\% + 0 + 0 + 0 + 2.6\% - 10.2\% + 0 + 0 + 26.8\% = 27.6\%$. This also could be interpreted as the probability of being a smoker at that time for an individual with the same characteristics.

The examined variables which were not included in any model because the score test P value was greater than 0.1 were: country of birth, mother's smoking habits, whether their best friend smokes now, and opinions about the effects of smoking on health, appearance and popularity. Confounding appeared to account for most of the differences between the interventional effects in the first

TABLE 2: Prevalence of smoking by sex and interventional group for children who were surveyed in both follow-up periods

Programme	Time of survey: Recruitment	One-year follow-up	Two-year follow-up
Girls			
Control ($n = 241$)	29.9%	48.1%	59.3%
Teacher-led ($n = 275$)	28.7%	40.7%	49.5%
Peer-led ($n = 215$)	23.7%	35.8%	49.3%
Boys			
Control ($n = 266$)	36.1%	43.2%	49.2%
Teacher-led ($n = 256$)	36.7%	36.3%	45.7%
Peer-led ($n = 252$)	33.7%	47.2%	52.0%

TABLE 3: Prevalence of smoking by sex, interventional group and original smoking status for children who were surveyed in both follow-up periods

Original smoking status in 1981	Girls: Control	Girls: Teacher-led	Girls: Peer-led	Boys: Control	Boys: Teacher-led	Boys: Peer-led
Non-smoker						
Number	169	196	164	170	162	167
One-year follow-up	33.1%	25.0%	23.2%	29.4%	15.4%	34.7%
Two-year follow-up	49.7%	37.8%	37.8%	33.5%	25.9%	41.9%
Smoker						
Number	72	79	51	96	94	85
One-year follow-up	83.3%	79.7%	76.5%	67.7%	72.3%	71.8%
Two-year follow-up	81.9%	78.5%	86.3%	77.1%	79.8%	71.8%

TABLE 4: Adjusted differences in prevalence (and 95% confidence limits) for girls who commenced smoking in the first or second year of follow-up

Variable	Prevalence of each characteristic ($n = 529$)	One-year follow-up ($n = 529$)	Two-year follow-up ($n = 386$)
Baseline*	—	18.6%(9.0%,28.1%)	26.8%(15.8%,37.8%)
Interventional group			
Control	31.9%	0	0
Teacher-led	37.1%	−6.6%(−15.6%,2.4%)	−6.6%(−17.3%, 4.0%)
Peer-led	31.0%	−7.8%(−17.1%,1.5%)	−8.1%(−18.9%,2.7%)
Perceived response to cigarette advertisements			
None at all	77.7%	0	0
Some influence	22.3%	8.4%(−1.2%,18.1%)	15.0%(2.1%,27.9%)
Father smokes			
No/not known	62.4%	0	0
Yes	37.6%	1.2%(−6.3%,8.7%)	5.0%(−4.5%,14.5%)
Sister smokes			
No/not known	90.7%	0	0
Yes	9.3%	4.4%(−8.8%,17.5%)	16.3%(−2.7%,35.2%)
Best friend ever smoked			
No/not known	66.9%	0	0
Yes	33.1%	7.1%(−1.4%,15.7%)	8.5%(−1.6%,18.5%)
Believe most adults smoke			
No/not known	34.8%	0	0
Yes	65.2%	7.2%(−0.3%,14.7%)	2.6%(−5.9%,11.1%)
Response of parents if found smoking			
Not angry/ not known	50.0%	0	0
Angry	50.0%	0.1%(−7.1%,7.3%)	−10.2%(−18.6%,−1.8%)
Pressure from friends to smoke			
No	81.7%	0	0
Yes	18.3%	12.9%(2.2%,23.7%)	8.3%(−4.6%,21.2%)
Intention to smoke			
Never	94.3%	0	0
At some time	5.7%	20.7%(2.3%,39.1%)	−6.3%(−28.2%,15.7%)

*To be added to all differences in the prevalence rates (theoretical prevalence for those with zero or reference values for all covariates).

TABLE 5: Adjusted differences in prevalence (and 95% confidence limits) for boys who commenced smoking in the first or second year of follow-up

Variable	Prevalence of each characteristic ($n = 499$)	One-year follow-up ($n = 499$)	Two-year follow-up ($n = 366$)
Baseline*	—	27.2%(18.1%,36.4%)	17.7%(8.6%,26.7%)
Interventional group			
Control	34.1%	0	0
Teacher-led	32.5%	−12.8%(−21.1%,−4.6%)	−2.8%(−11.2%, 5.6%)
Peer-led	33.4%	4.9%(−4.7%,14.5%)	6.4%(−3.6%,16.4%)
Perceived response to cigarette advertisements			
None at all	75.6%	0	0
Some influence	24.4%	5.3%(−5.2%,15.8%)	15.3%(4.0%,26.6%)
Brother smokes			
No/not known	88.6%	0	0
Yes	11.4%	0.01%(−12.5%,12.5%)	15.4%(−0.8%,31.6%)
Good friends who smoke			
None/some/ not known	99.0%	0	0
Most/all	1.0%	34.8%(−10.7%,80.2%)	—†
Response of parents if found smoking			
Not angry/ not known	40.5%	0	0
Angry	59.5%	−8.1%(−15.6%,−0.5%)	−3.0%(−10.6%, 4.6%)
Susceptibility to peer pressure			
No	55.3%	0	0
Yes	44.7%	4.7%(−2.4%,11.7%)	−7.0%(−14.3%,0.4%)
Intention to smoke			
Never	91.0%	0	0
At some time	9.0%	21.9%(4.9%,39.0%)	20.1%(−4.4%,46.1%)
Intention to smoke when grown up			
No/not known	94.6%	0	0
Yes	5.4%	21.2%(−1.3%,43.6%)	27.2%(−3.6%,58.0%)

*To be added to all differences in the prevalence rates (i.e. theoretical prevalence for those with zero or reference values for all covariates).
†No continuing non-smokers gave this response

and second years of follow-up in girls, with both teacher-led and peer-led groups having an adjusted prevalence rate of approximately 7%,8% lower than that of the control group in both years of follow-up, although confidence limits included zero in all cases.

In boys, the adjusted effect of the teacher-led programme was large and highly significant (difference in the prevalence rate, −12.8%; CL, −21.1%,4.6%) in the first year of follow-up but was reduced substantially by the second year of follow-up (difference in the prevalence rate, −2.8%; CL, −11.2,5.6%). The peer-led programme appeared to increase the adjusted prevalence rate of boy smokers over both years, although confidence limits were wide and included zero.

The other variables that were found to be predictive of whether or not a child who was a non-smoker in 1981 became a smoker in 1982 and 1983 fell into five main groups: smoking in family members; tobacco advertising; influence of peers; attitude of parents; and future intentions with respect to smoking.

The likelihood that a non-smoking girl would become a smoker was increased in those with a father or sister who smoked. The evidence for these effects was strongest in the second year of follow-up with a difference in the prevalence rate of 5% when the father was a smoker and of 16.3% when a sister was a smoker. Interestingly, little or no effect on girls becoming smokers was apparent in those with a mother who smoked; the difference in the prevalence rate in the first year of follow-up was 2.2% (95% CL, −6.9%,11.4%) and in the second year was −4.3% (95% CL, −14.9%,6.3%). For boys, a high likelihood of becoming a smoker was associated with having a brother who smoked, but only in the second year of follow-up (difference in the prevalence rate; 15.4%).

A perceived influence of cigarette advertising (any positive response to the question, "how much do cigarette advertisements make you think you would like to smoke a cigarette?") was associated with a high likelihood of becoming a smoker in both follow-up years with the strongest effect in the second year of follow-up (difference in the prevalence rate was 15.0% in girls and 15.3% in boys).

A higher likelihood of girls becoming smokers was associated with having a best friend who had smoked. In boys, a similar effect was apparent in those in whom most or all of their good friends were smokers. Direct pressure from friends to smoke a cigarette was associated with a higher likelihood of girls becoming smokers, especially in the first year of follow-up. In boys, a perceived susceptibility to peer pressure (an affirmative response to the statement, "in general I do things that other kids want me to do, even though I don't want to") had a similar, although weaker, effect in the first year of follow-up, but a strong effect in the opposite direction in the second year (difference in the prevalence rate, −7%).

A mixed pattern also was seen for the association of taking up smoking with the parents' attitude to smoking. Girls who believed that their parents would be angry if they were found smoking were less likely to become smokers in the second year of follow-up than were those who did not have this belief, whereas this belief appeared to have little effect on taking up smoking in the first year of follow-up. The opposite was true in boys with the effect of parents' attitudes appearing strongest in the first year of follow-up.

Nearly 6% of those who initially were non-smokers thought that they would ever smoke. Both boys and girls in this group were more likely to become smokers in the first year of follow-up than were other non-smokers. However, this variable appeared to predict smoking behaviour in the second year of follow-up only in boys.

Discussion

The results of this analysis confirm our earlier report[13] that both the teacher-led and peer-led programmes reduced, to about the same degree, the uptake of smoking by girls while only the teacher-led programme appeared to be effective in boys. Indeed, the peer-led programme may even have encouraged smoking in boys, although the difference from the control group was not statistically significant. In girls, both the teacher-led and peer-led programmes maintained their effects over the two years of follow-up, while in boys the effect of the teacher-led programme was reduced substantially by the second year of follow-up and appeared to be confounded with other variables. Thus, in boys, the programme might have delayed the onset of smoking only. The same might have been true in girls, only with a longer delay, but the present data do not permit this conclusion.

What evidence is there from other studies that peer-led programmes work, or that the effect of a single programme lasts for more than a year or so? Some studies have claimed that peer-led programmes are effective in preventing the onset of smoking in adolescents,[10,14,18,22-24] and that these effects persist.[10,23,24] However, in an overview of these studies, Flay et al. identified only two studies as being rigorous methodologically.[25] The first, the Waterloo study (a six-lesson, social influences programme that was led by college students), was not able at two years of follow-up to demonstrate significant effects on the persistence of non-smokers, but did show a fall in the prevalence of regular smoking in high-risk students—students with two or more smoking role models in their immediate environment.[25] Further follow-up over two and a half years suggested partial maintenance of this effect.[24] Our earlier report[13] was the second study to be considered rigorous by Flay et al. Flay et al.'s main criticism of both the Waterloo study and our study was the possibility of the Hawthorne effect — that is, special attention of any kind that is given to a subject may alter reports of the behaviour or the behaviour itself.[26]

Among other variables, the children's perceived responses to cigarette advertising showed the strongest and most consistent evidence of an effect on the uptake of smoking by children who initially were non-smokers. Moreover, in contrast to the effect of the educational programme, this association became stronger over time.

The exposure of children to cigarette advertising and its effect on them has been very difficult to measure. It could be argued that our measure of response to advertising (answers to the question, "how much do cigarette advertisements make you think you would like to smoke a cigarette?") was indirect and measured a response in the children other than an effect of advertising. However, other similarly indirect studies all have pointed in the same direction. A controlled trial similar to ours, which was conducted in Newcastle, New South Wales, showed that children who approved of cigarette advertising were more likely to start smoking than were those who did not.[26]

Other Australian studies have shown that children usually smoke the most-heavily advertised brands of cigarettes,[27,28] and there has been a recent shift in brand preference away from the market leader, "Winfield", to the heavily advertised brand, "Peter Jackson."[29] Many informed observers have considered that the advertising campaign of "Peter Jackson" was particularly appealing to adolescents. Moreover, recent evidence from the WA component of the 1987 National Secondary Schools Smoking Survey (unpublished data) suggests that the trend towards "Peter Jackson" has been greatest in younger children; that is, it may have affected mainly those who were beginning to smoke rather than those who already were smoking.

Ledwith found that sponsorship by tobacco manufacturers of televised sports acted as cigarette advertising to children who were better able to identify cigarette brands after watching tobacco-sponsored sporting events than they were before.[30] Aitken et al. found that some 12-year-old and most 14-year-old British children perceived cigarette advertisements in much the same way as did young adults,[31] which suggests that advertising campaigns that supposedly are aimed at young adults also would have an impact on young teenagers. Tye et al., on review of the available evidence, concluded that "a preponderance of quantitative studies of cigarette advertising suggests a causal relationship with consumption".[32]

All this evidence points to an effect of cigarette advertising on

the uptake of smoking by children, as do the substantial falls in smoking prevalence among adolescents in Norway that have followed the ban on tobacco advertising which was implemented, with other smoking control measures, in that country in 1975.[33] Recent and as yet unpublished results that were obtained by one of us (R.E.S.) provide an insight into the way in which cigarette advertising affects children. In a small group of children who were experimenting with cigarettes and who were uncommitted with respect to their future smoking behaviour, those who became committed smokers were more likely than were the others to perceive a large discrepancy between the rather mundane and boring reality of their parents' adult lives and their own ideal concept of adulthood that was characterized by freedom and fun. This discrepant, and false (for the vast majority) concept of adult life is that which is portrayed in cigarette advertising, and for these children it appeared that the use of cigarettes symbolized their escape from the reality of their parents to the ideal of the advertisements.

Our data showed effects on the uptake of smoking of most of the other variables that usually are considered to have such effects. Girls were more likely to take up smoking if their father or sister smoked, and boys were more likely to take up smoking if their brother smoked. In each case this effect was evident mainly in the second year of follow-up. This time-modified effect may be caused by age rather than the programme, although perhaps the programme initially negated the influence of the behaviour of other family members. The sibling effects should be interpreted cautiously because it may be that a child begins to smoke for the same reasons as his or her siblings rather than because the sibling is a smoker.

There was evidence that both boys and girls were deterred from taking up smoking when they considered that their parents would be angry if they were to do so. This effect was most evident in the first year of follow-up in boys and in the second year of follow-up in girls. Past research on parental tolerance or the sanction of smoking behaviour in adolescents has agreed that children who smoke are more likely than are other children to have parents who have approved of smoking or to perceive their parents as approving of smoking.[34]

Peer pressure as an influence on adolescent smoking behaviour has been covered extensively in previous research. Many studies report a strong relationship between the smoking behaviour of children and the attitudes towards smoking and smoking status of their peers.[35-37] It probably is for this reason that "peer pressure" often is cited as the major influence on smoking behaviour. However, cross-sectional associations between the smoking habits of children and those of their peers do not necessarily mean that peer pressure as such is a determinant of the uptake of smoking. Moreover, not all workers agree on the overriding importance of peer influences in the uptake of smoking by children. For example, Moschis, in a study of a wide range of consumer behaviours among 806 adolescents in 13 US schools, found that peer pressure was secondary to the effect of the mass media.[38] He concluded that the mass media taught adolescents to be consumers; peer influences exerted a secondary mediating effect, and served to predict attitudes to advertising, rather than to influence behaviour directly. Further, Eiser and van der Pligt found that peer pressure was less important than were attitudes towards smoking and parental smoking behaviour,[39] and Bewley et al. found peer pressure to be less important than parental and sibling smoking habits.[35]

We were able to examine some specific aspects of peer influence. We found that having a best friend who smoked was associated with a higher likelihood of girls becoming smokers. The same was true in boys for whom most or all of their good friends were smokers. Girls who experienced pressure from friends to smoke were more likely to do so, and in boys, general susceptibility to the influence of peers, rather than to specific pressure to smoke, was associated with smoking. These findings support the concept that peer group

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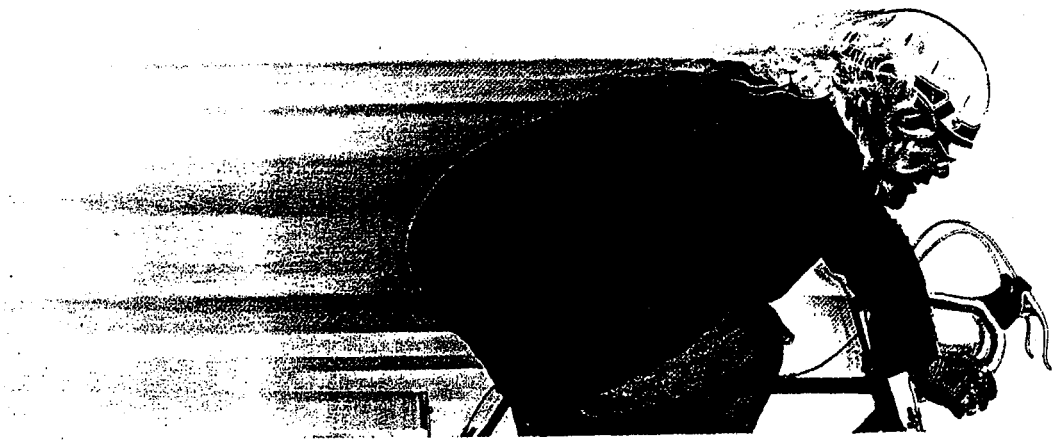

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influences are determinants of smoking behaviour. They leave open the question, as does most similar research, of what are the determinants of the peer group influences.[40]

Our study showed that several other variables were predictors of smoking behaviour. As suggested by Ajzen and Fishbein,[41,42] future intentions to smoke were good predictors of smoking behaviour at 12 months follow-up, but for girls the predictive value of this variable decreased by 24 months follow-up. This suggests that self-referent labels for smoking behaviour may be useful, in the short term at least, for establishing "at-risk" children who might be targeted for special and possibly repeated interventional programmes during their adolescent years.

Many of the other variables we measured had as strong or stronger effects on the subsequent smoking behaviour as did our educational programme, although the persistent effect of the programme in girls alone justifies its continuation. In addition, while educational programmes may not prevent children from starting to smoke, they do teach persons about smoking: not just children, but their teachers and parents as well. Parents may appreciate the moral support of the school, and may be prepared to take a firmer stand on their child's smoking than they would in the absence of educational programmes—it has been established that children who believe that their parents do not approve of the children smoking are less likely to smoke.[5] In addition, it is possible that students who have received education about smoking at school are more susceptible to anti-smoking messages later in life. Because of this possibility, we now are in the process of following-up the children in our study again, at 18 years of age. Finally, educational programmes help to legitimize other smoking-control activities. These programmes highlight the importance of smoking in children, and may lead parents and teachers to call for more effective action.

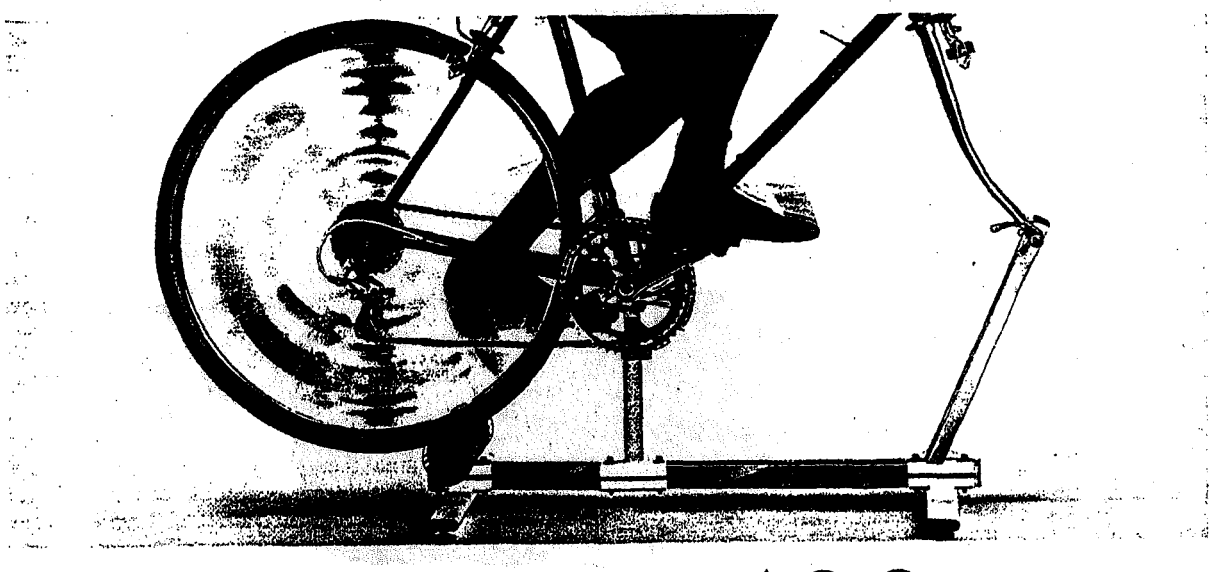
While school-based educational programmes about smoking should continue, our results in boys would suggest the need to rethink the use of peer leaders. Teacher-led programmes generally would be, in any case, easier and more convenient to implement and therefore preferred even if peer-led programmes were equally effective. Consideration also should be given to programmes that continue into the first years of high school, because they might lead to a greater persistence of effect than was obtained with this programme which was implemented only in the last year of primary school.

Taken together with the results of other research, we believe that there now is no room for doubt, if there ever really was, that cigarette advertising has an important effect on the uptake of smoking by children. It also may be that the educational programmes are less effective than they might be because of the overwhelming power of advertising. Our results suggest that the most effective action against smoking in children lies not with the teacher but with the politician. However, the action of the former still will be necessary for some time to come.

The last six months have seen dramatic progress in smoking control legislation. A bill to ban tobacco advertising from the print media nationally was introduced in the Senate by Australian Democrats Senator Janet Powell; supported by the Government, it has now been passed by both houses. In Western Australia, a bill to phase out tobacco advertising, to raise tobaco tax, and to establish a health promotion foundation has passed through the Legislative Assembly, and is expected to become legislation as soon as Parliament resumes. Legislation similar to that pioneered in Victoria will then exist in Victoria, South Australia and Western Australia. The Tasmanian Government is reported to be planning a similar measure, and it is also one of the commitments of the new administration in Queensland. Across the Tasman, the NZ Government has announced that it will follow the Victorian lead in early 1990.

Until all Australian governments follow the lead of the Victorian and SA governments in banning those forms of tobacco advertising

Low risk



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which are state responsibilities, and thus make a complete ban possible, it will have the dimensions of a token response to the cause of the largest epidemic of serious disease in modern Australia.

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(Received January 16; accepted November 13, 1989).

Tobacco and alcohol use among Australian secondary schoolchildren in 1987

(for editorial comment, see page 113; see also page 117)

David J. Hill, Victoria M. White, Michelle D. Pain and Godfrey J. Gardner

ABSTRACT A survey of 19 166 secondary schoolchildren aged 12–17 years in five Australian states, the Australian Capital Territory and the Northern Territory was undertaken in 1987 to determine the prevalence of tobacco and alcohol use. Current smoking (that is, smoking at least one cigarette in the last week) rose with age to 27% in boys who were aged 16 years and to 30% in girls who were aged 16 years. The prevalence of current drinking (that is, consuming one alcoholic drink in the last week) rose with age to 55% in boys who were aged 16 years and to 50% in girls who were aged 17 years. Compared with an identical survey in 1984, the prevalence of smoking among 12- to 17-year-old schoolchildren had fallen significantly. The prevalence of drinking alcohol among 12- to 15-year-old schoolchildren also had fallen significantly, but not to the same extent as that of smoking; no significant reduction was found in the drinking of alcohol among 16- to 17-year-old schoolchildren. These trends are encouraging, but a need remains for all states to enact tobacco-control legislation, including the prohibition of tobacco advertising. (Med J Aust 1990; 152: 124-130)

Tobacco smoking and alcohol abuse now are recognized widely as the leading "drug problems" in Australia; in 1985 it was estimated that tobacco smoking caused 17 800 deaths and that alcohol abuse caused 3500 deaths, in a total of 118 808 deaths of all causes.[1] Tobacco smoking and alcohol abuse accounted, between them, for 97% of drug-related deaths.[1] Experimentation with and the beginnings of regular use of both these substances begin during childhood and adolescence. In the case of tobacco smoking at least, it is to be expected that patterns of use that are observed in adolescent populations may predict life-time adult use, as well as ultimate morbidity and mortality rates of tobacco-related diseases.[2] Therefore, public-health strategies to control the consequence of smoking and drinking have included programmes which are intended specifically for young persons — either delivered through the school system or sometimes by the mass media. Both for the targeting of interventions and as a guide to the over-all effectiveness of endeavours to moderate tobacco and alcohol usage in young persons, it is important to obtain regular population prevalence estimates of their use.

In 1984, we conducted a national study among Australian secondary schoolchildren which showed a higher prevalence of smoking among girls than boys (but a higher consumption level among boy smokers than girl smokers), and a higher prevalence and consumption of alcohol among boys than among girls.[3] The aims of this study were to replicate our earlier study in order to determine secular trends over three years and to extend our earlier study so as to obtain additional data on sources of supply, type of product used and exposure to relevant health education at school. As with the earlier study, it was conducted as a collaborative project by state member organizations of the Australian Cancer Society and other bodies in various states.

Subjects and methods

During 1987, a total of 20 337 students in school year levels 7 to 12 (which included 19 166 students who were 12 to 17 years of age) was sampled from schools in all states and territories, except for South Australia where official permission to conduct the survey was received too late for action. To ensure

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Adolescents' responses to cigarette advertisements: links between exposure, liking, and the appeal of smoking

Jeffrey Jensen Arnett, George Terhanian

Abstract

***Objective*—To evaluate adolescents' responses to cigarette advertisements for different brands.**

***Design*—Adolescents were shown one print advertisement for each of five cigarette brands (Camel, Marlboro, Kool, Benson & Hedges, and Lucky Strike). They indicated on a structured questionnaire how many times they had seen the advertisement (or one almost like it), how much they liked it, whether or not they thought it made smoking more appealing, and whether or not it made them want to smoke cigarettes of that brand.**

***Setting*—Middle school and high school classrooms, seven schools in four states in the United States (New York, Pennsylvania, Ohio, and Texas). The classrooms were selected randomly within each school.**

***Participants*—534 adolescents in grades 6–12 (ages 11–18 years) from seven schools in four states, 54% female, 76% white.**

***Results*—The advertisements for Camel and Marlboro were more likely than the advertisements for the other brands to be seen, to be liked, to be viewed as making smoking appealing, and to influence adolescents to want to smoke cigarettes of that brand. More than 95% of the adolescents had seen an advertisement featuring Joe Camel or the Marlboro Man at least once, and more than 50% had seen these advertisements six or more times. Nearly half believed that the Joe Camel advertisement makes smoking more appealing, and 40% believed that the Marlboro Man advertisement makes smoking more appealing. Adolescent smokers were more likely than non-smokers to believe that the advertisements for Camel and Marlboro make smoking more appealing.**

***Conclusions*—The advertisements most popular among adolescents are for two of the brands they are most likely to smoke—Marlboro and Camel. The results of the study are consistent with the view that certain cigarette advertisements enhance the appeal of smoking to many adolescents.**

(*Tobacco Control* 1998;7:129–133)

Keywords: adolescents, advertising, brand preferences

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Introduction

In the past decade, criticism of tobacco advertising has become especially intense. At the centre of the criticism is the assertion that tobacco advertising appeals to children and adolescents in a way that leads many of them to take up smoking as minors. The tobacco industry has long maintained that the aim of their advertising is to persuade adults to switch brands or to maintain their brand loyalty, and that the industry does not target its advertising to adolescents.[1] However, studies indicate that 90% of adult smokers begin smoking by age 18,[2] and public health officials and advocates have charged that tobacco advertising is directed especially at adolescents,[3 4] to draw them into the market and to establish an initial brand preference that they will maintain into adulthood.[5]

Three factors have especially contributed to the growing criticism of tobacco advertising over the past decade. First, tobacco industry documents have been released in the course of litigation against the tobacco companies that provide evidence that tobacco advertising has been directed toward adolescents. The documents show a strong concern with the characteristics of adolescents that lead them to take up smoking, and describe research conducted to investigate these characteristics. Some of the documents make explicit references to minors. For example, a planning document for 1977–1986 produced by the RJ Reynolds Tobacco Company states, "Evidence is now available to indicate that the 14 to 18 year old group is an increasing segment of the smoking population. RJR *must soon* establish a successful *new* brand in this market if our position in the Industry is to be maintained over the long term"" (emphasis in the original).

A second reason for the growing criticism of tobacco advertising is the Joe Camel advertising campaign, which ran from 1988 to 1997. This campaign featured a cartoon camel, described in the advertisements as a "smooth character" and depicted typically in leisure situations such as playing cards with friends or presiding over a lively party of young people. Although RJR Nabisco (maker of Camel cigarettes) denies that the advertisement campaign was directed toward adolescents, there is substantial evidence that the campaign was most successful among those aged 12–17 years. Before the initiation of the campaign, the market share for Camel among underage smokers was virtually non-existent, less than

1%.[3] However, 18 months after the Joe Camel advertisement campaign began, Camel's market share among 12–17 year olds had risen to 8%, and by 1993 it had risen to more than 13%.[7] The increase in market share that Camel attained among 12–17 year olds was greater than for any other age group.[4] Furthermore, rates of adolescent smoking rose in the early 1990s,[8] and many public health advocates suggested that the Joe Camel campaign contributed to the increase.[1 3 4] Studies have found that adolescents are more likely than adults to find Joe Camel advertisements "cool" and "interesting",[3] and that even adolescent non-smokers name Joe Camel advertisements as their favourite cigarette advertisements.[9 10] In response to growing criticism of the campaign, RJR Nabisco discontinued the Joe Camel theme in mid-1997.

The third reason for increased criticism of tobacco advertising is the growing research evidence of the role of advertising in smoking initiation among adolescents. Numerous important studies on this topic have appeared in the past decade. In one study, Pollay and colleagues traced tobacco companies' advertising expenditures in relation to rates of smoking among adolescents (aged 12–18) and adults over the period 1979–1993, and concluded that the effect of advertising on brand choice was *three times as strong* for adolescents as for adults.[11] In another study, Pierce and colleagues examined trends in smoking initiation from 1944 to 1988.[12] They found that, for girls aged 14–17, a sharp rise in smoking initiation coincided with the introduction of three brands marketed to females—Virginia Slims, Silva Thins, and Eve—during 1967–1973. There was no such increase during this period for girls aged 18–20 or 10–13, nor for males. The advertisement campaigns were most effective among adolescent girls aged 14–17, the age range when smoking initiation is most likely to take place.

We investigated adolescents' responses to cigarette advertisements for five different brands: Marlboro, Camel, Kool, Benson & Hedges, and Lucky Strike. Marlboro was included because it has long held the dominant market share among minors and adults. Camel was included because of the evidence for the appeal of Joe Camel to young people. The other three brands were included because their current advertisement campaigns include themes that may be expected to appeal to young people. Like previous studies, we examined the degree of adolescents' self-reported exposure to cigarette advertisements, but for a wider range of brands than in most previous studies. Using a variety of brands allows for comparisons of how adolescents respond to advertisements for the most popular brands among adolescents, Marlboro and Camel, in contrast to less popular brands.

Methods

PARTICIPANTS

Adolescents in grades 6–12 (ages 11–18 years) participated in the study. The adolescents were from a convenience sample of seven schools in four states (New York, Pennsylvania, Ohio, and Texas). States and schools were chosen because the second author had done research in these schools previously and because the schools were believed to provide some degree of regional and ethnic diversity. Classrooms were chosen randomly within each school. Students were told that the study involved responses to cigarette advertisements and that their participation would be anonymous. All the students in class on the day of data collection participated in the study. There were 534 participants, including 121 in grades 6 and 7, 203 in grades 8 and 9, and 207 in grades 10–12. There were 129 smokers (24%) in the sample (who answered "yes" in response to the question, "Do you smoke cigarettes?"). Fifty-four per cent of the participants were female; 76% were white, 6% black, 9% Hispanic, 3% Asian, and 6% other.

MATERIALS

Participants were shown one print advertisement (in colour) for each of the five brands. The Marlboro advertisement depicted the "Marlboro Man" taking a cigarette out of a pack of Marlboros. The Camel advertisement depicted Joe Camel flipping a chip of the kind used as a gambling token. The Kool advertisement depicted three people skiing down a mountain slope. The Benson & Hedges advertisement depicted a party on the roof of a building. The Lucky Strike advertisement depicted a young man standing on a street next to a motorcycle. For all advertisements, the brand name of the cigarette was not concealed or disguised; rather, the advertisement was shown as it appeared in print.

On a structured questionnaire, participants indicated for each advertisement how many times they had seen it (never, once or twice, three to six times, or more than six times); how much they liked the advertisement (like very much, somewhat like, somewhat dislike, dislike very much); whether or not they thought the advertisement makes smoking more appealing (yes/no); and whether or not the advertisement made them want to smoke cigarettes of that brand (yes/no). For the two brands that use the same character in a variety of advertisements—Joe Camel and the Marlboro Man—participants were asked whether or not they recognised the character. Participants were also asked whether or not they smoked (yes/no). Demographic questions were included as part of the questionnaire.

PROCEDURE

The adolescents were shown pictures of the advertisements as they had appeared, although without the magazine context. Different groups of students were shown the advertisements in rotating order, so that the order of presentation varied. The students completed the questionnaire portion for each advertisement following its presentation.

The study was conducted during January 1997.

Results

The demographic characteristics of the sample are described above. The frequencies regarding exposure and responses to the advertisements appear in table 1.

As table 1 shows, most of the adolescents had seen the advertisements for Camel, Marlboro, and Kool more than six times. The highest level of exposure was for the Camel advertisement, followed by Marlboro, Kool, Benson & Hedges, and Lucky Strike. Furthermore, 98% of the adolescents indicated that they recognised the Joe Camel character and 92% recognised the Marlboro Man. Most of the adolescents had never seen the advertisements for Benson & Hedges (65% never) or Lucky Strike (75% never).

The degree of adolescents' exposure to the advertisements was related to the degree to which they liked ("like very much" or "somewhat like") the advertisements (table 1). The advertisement liked by the greatest proportion of adolescents was for Camel, followed by Marlboro, Kool, Benson & Hedges, and Lucky Strike.

Table 1 Exposure and responses to cigarette advertisements, smokers and non-smokers

	Seen (>6 times) (%)			Like (%)			Appealing (%)			Want (%)		
	All	S	NS	All	S	NS	All	S	NS	All	S	NS
Marlboro	63	75	60	44	74	35	40	53	37	22	61	9
Camel	76	78	75	64	88	57	49	61	45	17	43	8
Kool	56	56	56	38	52	33	30	35	29	9	28	3
Benson & Hedges	6	10	5	26	41	22	21	18	22	6	13	3
Lucky Strike	3	5	3	26	38	22	24	26	24	6	14	3

S = smokers (n = 129), NS = non-smokers (n = 403).
The figures for "Like" combine the responses of "Like very much" and "Somewhat like".

Table 2 Regression analyses, Exposure and Liking

	Grade	Gender	Ethnicity	Smokers/ non-smokers	R^2
Exposure					
Marlboro	0.13**	−0.08*	−0.11**	−0.10*	0.05***
Camel	0.06	0.08	−0.01	−0.02	0.01
Kool	0.09*	0.17***	0.04	−0.02	0.04***
Benson & Hedges	0.10*	0.03	0.03	−0.08	0.02*
Lucky Strike	0.10*	−0.07	−0.05	−0.05	0.02*
Liking					
Marlboro	0.13**	0.10**	0.09*	0.41***	0.20***
Camel	0.05	0.09*	−0.01	0.38***	0.15***
Kool	0.05	−0.01	−0.08	0.19***	0.04***
Benson & Hedges	−0.02	−0.08	−0.01	0.17***	0.04***
Lucky Strike	-0.04	0.06	0.07	0.14**	0.03**

*p<0.05; **p<0.01; ***p<0.001.
The numbers shown (except for the far right column) are the beta weights.

Table 3 Logistic regression analyses, Appealing and Want to smoke

	Grade	Gender	Ethnicity	Smokers/ non-smokers
Appealing				
Marlboro	1.14**	1.05	1.15	2.14***
Camel	1.21***	0.86	1.02	2.16***
Kool	1.20***	0.56**	1.13	1.54
Benson & Hedges	1.18**	0.69	0.96	0.87
Lucky Strike	1.20**	0.92	0.87	1.18
Want to Smoke				
Marlboro	1.23**	1.28	1.21	20.48***
Camel	1.29***	1.44	1.06	10.43***
Kool	1.66***	0.85	1.11	19.66***
Benson & Hedges	1.46**	1.48	0.78	5.79***
Lucky Strike	1.46**	2.07	0.68*	6.75***

*p<0.05; **p<0.01; ***p<0.001.
The numbers shown are odds ratios.

The Camel and Marlboro advertisements were also the ones that were most likely to be viewed by the adolescents as making smoking more appealing (table 1). The rank order was similar to the responses for exposure and liking, with the advertisement for Camel having the highest appeal rating, followed by those for Marlboro, Kool, Lucky Strike, and Benson & Hedges. A similar rank order was found for responses to the question of whether or not an advertisement made them want to smoke cigarettes of that brand, but with Marlboro highest, followed by Camel, Kool, and the other two brands.

Analyses were conducted concerning the relations between the advertisement variables and smoking status, with grade, gender, and ethnicity as covariates. Because ethnic differences in brand preferences have revealed patterns distinctive to African Americans but not other ethnic groups,[2] ethnicity was analysed as a dichotomous variable comparing African Americans (n = 33) to all other adolescents. Regression analyses were conducted for Exposure and Liking. Because the dependent variables for some brands violated the assumption of a normal distribution that is made in regression analyses, the logs of the Exposure and Liking variables were used as the dependent variables. Logistic regression analyses were conducted for the Appealing and Want to Smoke variables because these variables were dichotomous. For the regression analyses as well as for the logistic regression analyses, smoking status and the covariates were entered simultaneously into the equations.

The results of these analyses are shown in tables 2 and 3. With respect to Exposure, smokers reported higher exposure to advertisements for Marlboro but not the other brands. Older adolescents reported more exposure to advertisements for all brands except Camel. With respect to Liking, smokers expressed higher liking than non-smokers for the advertisements of all five brands.

With respect to their perceived appeal (table 3), for the Marlboro and Camel advertisements, smokers were more likely than non-smokers to believe that the advertisements make smoking more appealing. For all five advertisements, older adolescents were more likely than younger adolescents to believe that they make smoking more appealing. With respect to whether the advertisements made them want to smoke that brand, smokers were more likely than non-smokers to respond affirmatively to this question, for all five brands. Similarly, older adolescents were more likely than younger adolescents to respond affirmatively to this question, for all five brands.

Discussion

Our data support the concerns expressed by public health advocates over the Joe Camel and Marlboro Man advertising campaigns. The advertisements for these brands are the ones that adolescents have seen most, like the best, and believe are most likely to make smoking more appealing. Adolescents who smoke are

especially prone to like them and to believe they make smoking more appealing.

It is worth noting that adolescents' reported exposure to the advertisements corresponds roughly, but not exactly, to tobacco companies' advertising budgets for each brand. In the first ten months of 1996, the rank order of advertising budgets for the brands included here were as follows[13]: Marlboro ($84 million), Camel ($40 million), Kool ($36.5 million), Benson & Hedges ($12.6), and Lucky Strike ($882 000). This rank order generally corresponds to adolescents' responses of how much they had seen the advertisements, as well as how much they liked them, whether or not they found the them appealing, and whether or not they made them want to smoke a cigarette of that brand. However, the notable exception is for the Joe Camel advertisement. Although less than half as much money was spent in the first 10 months of 1996 on the Joe Camel campaign as on advertisements featuring the Marlboro Man, Joe Camel advertisements were reported by adolescents in our study to have been seen most often (perhaps indicating that they were more likely than Marlboro advertisements to be *noticed* by adolescents), and were also the advertisements most liked and most likely to be seen as making smoking appealing. This indicates that the Joe Camel campaign was uniquely effective in its appeal to adolescents.

Much of the criticism of the Joe Camel advertising campaign has been based on findings of high rates of recognition of the Joe Camel character among young children. In a study that took place shortly after the Joe Camel campaign began, a high proportion of children aged 3–6 years matched Joe Camel with cigarettes, with the proportion rising with age to 91% of the six year olds.[14] The authors of the study concluded that recognition of the brand in childhood may translate to use of the product later in life. However, two other studies, although similarly finding high rates of recognition of the Joe Camel character among young children, also found that the children's attitudes toward cigarettes were overwhelmingly negative.[15 16] The authors of these two studies concluded that, in the light of the negative views of cigarettes held by children, high exposure to advertisements featuring Joe Camel may make them less likely to smoke cigarettes years later, because the exposure would only intensify their negative sentiments toward cigarettes.

Our data support quite a different conclusion. The adolescents in our study (which took place in January 1997) would have been exposed to the Joe Camel advertising campaign (which began in 1988) for nearly 10 years. Virtually all of them reported that they had seen a Joe Camel advertisement at least once, and more than three-quarters reported seeing them *at least* six times. Yet their attitudes toward the advertisements were far from negative, and a substantial proportion viewed the advertisements as making smoking more (not less) attractive. Two-thirds indicated that they liked the advertisements, and nearly half indicated that they make smoking more appealing. A similar pattern was found for Marlboro advertisements—high exposure along with a high level of liking and a substantial proportion who believed they make smoking more appealing. Furthermore, adolescent smokers were even more likely than non-smokers to like the advertisements and to believe they make smoking more appealing.[3 8]

Our findings are consistent with the view that cigarette advertising plays a role in making smoking attractive to adolescents. The advertisements the adolescents have seen the most often are also the ones they like the most and are for the brands they are most likely to smoke. Advertisers have long relied on the power of what is known as "mere exposure", the psychological principle that repeated exposure to a stimulus leads to favourable attitudes toward it—familiarity leads to liking, in other words.[17] This principle has been verified in numerous social psychology studies, and these studies have found that it applies to children as well as adults.[18 19] Although studies also find that, for children, the preferences of parents can override the effects of mere exposure,[20] it could be expected that for adolescents, who are in the process of becoming more independent from parental influences, the principle of mere exposure would assert itself more strongly than for children. Mere exposure may, in fact, be stronger for adolescents than for adults as well—research by Pollay *et al* has found that the relationship between cigarette advertising expenditures and cigarette brand choice is three times stronger for adolescents than for adults.[11]

Research on advertising has also established that exposure to advertisements leads not only to favourable attitudes toward the brand being advertised (for example, Camel) but also toward the product (cigarettes) more generally,[21] and that this favourable attitude leads to intention to buy the product and to actual purchase of the product.[22] However, recent research in this area has stressed that affect (emotion) is a critical link between exposure and purchase.[22] Memory alone is not enough; the memory must also be associated with a favourable affect toward the product. It is evident from our results that the Joe Camel and Marlboro Man campaigns have succeeded in promoting not only a widespread awareness of these advertisements among adolescents but also a positive affect toward these brands and toward smoking, as indicated in the findings that most adolescents like the advertisements and nearly half believe that they make smoking more appealing.

Furthermore, it is of considerable interest that adolescent smokers like the Joe Camel and Marlboro Man advertisements even more than adolescent non-smokers, and are more likely than non-smokers to believe that they make smoking more appealing.[23] This may indicate that the advertisements for these brands promote smoking among adolescents. It is notable that as adolescents move beyond grades 6–7 and into the period of highest risk for smoking initiation, grades 8–12, they are more likely to rate the advertisements as making smoking

more appealing and as making them want to smoke cigarettes of the advertised brand.

Another possible interpretation of the results regarding smoking status and responses to the advertisements is that adolescent smokers view the advertisements more favorably because they naturally have an interest in advertisements for a product they already use. However, previous research indicates that even among adolescents who are non-smokers, the non-smokers who are most at-risk for smoking initiation also tend to be the most receptive to tobacco advertising.[9] It is also notable that, although smokers are more likely than non-smokers to agree that certain advertisements make smoking more appealing, this applies not to all advertisements but only to those for Marlboro and Camel, two of the brands that adolescents are currently most likely to smoke. This may indicate that smokers respond more strongly to the Marlboro and Camel advertisements, not simply because these advertisements make them think of cigarettes generally, but because they strike a resonant chord in their developmental needs as adolescents and in their individual personalities. It may be that the capacity of the advertisements to strike those chords in them was one of the factors that led to smoking initiation for them but not for their non-smoking peers.

The study contains limitations that should be noted. Schools were chosen for data collection not randomly but as a convenience sample on the basis of contacts from previous research by the second author. Our sample of adolescents was clustered within these schools, which is less desirable than sampling randomly from many more schools, because the clustering may magnify any characteristics specific to a particular school. Also, in retrospect it would have been preferable to collect information on cigarette brands smoked by the smokers in the sample, to relate their brand preference to their brand-specific responses. Furthermore, the study was cross-sectional rather than longitudinal; this limits the extent to which conclusions about causality can be drawn.

The 1994 report on youth smoking by the Institute of Medicine observed, "The question is not, are advertising and promotion the causes of youth initiation, but rather, does the preponderance of evidence suggest that features of advertising and promotion tend to encourage youths to smoke?"[24] It is increasingly evident that the answer to this question is yes. The implication of this answer should be no less evident: in the interest of reducing smoking among adolescents, cigarette advertising and promotion should be banned or restricted to adults-only venues.

The views and conclusions expressed are those of the authors and do not necessarily represent those of the Gordon S Black Corporation, for whom GT is a project manager.

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COUNTERING TOBACCO MARKETING, ADVERTISING, AND PROMOTION

Luis Pinillos Ashton

Why should cigarette advertising and promotion be banned?

As the poet Browning said, "Let me count the ways."

One reason was put most directly by a former chairman of the BBC: "Cigarette advertising," he remarked with classic British disdain, "is simply uncivilized." He was right, of course.

At the most basic level, the issue of cigarette advertising is ethical. A civilized society does not permit the promotion of a highly addictive product which cannot be used safely and which kills about one-fourth of those who use it.

Furthermore, tobacco firms now focus their marketing efforts in developing countries, where good information about tobacco's dangers is unavailable to many citizens. To use advertising to build a market among the poor, the uneducated, and the vulnerable for the most wasteful and hazardous product that the world produces violates the most basic standards of conduct by one human being to another, by one nation to another.

But there are also many practical reasons that tobacco advertising should be controlled:

First, cigarette advertising and promotion contributes to a social environment that supports smoking and convinces many to start.

By associating tobacco with success, glamour, and independence and making smoking seem more common than it actually is, cigarette advertising adds to the social pressures that influence young people to start smoking and discourages many smokers from quitting.

Second, cigarette advertising's messages undermine the effectiveness of health warnings. Images that portray smokers as healthy (even athletic), glamorous, and attractive draw attention away from health information about the dangers of tobacco.

By portraying smoking as a common, harmless practice, advertising masks tobacco's addictive nature as well as the lethal effects of its use.

Third, many of the images and themes used in cigarette advertising and promotion are known to appeal to children and young people. Often, ads exploit the insecurities of children, influencing some who are on the threshold of considering tobacco use to make that fatal decision—the decision that will lead to a life of cigarette addiction and disease.

As most young people have difficulty understanding the concept of addiction or the long-term health threat posed by tobacco, allowing advertising to twist and distort the truth about smoking is especially dangerous.

Fourth, cigarette advertising exploits the fears and frustrations of women and people of color. Ads targeted at women associate smoking with romance, social acceptability, sexual attractiveness, and independence.

To the lonely, the ads promise friends and romance. Ads targeted at the poor and oppressed associate smoking with prosperity, success, social liberation, and independence. To the downtrodden, the ads promise hope. All false; all lies.

Fifth, groups who receive money from the tobacco industry through advertising and sponsorship are paid to keep silent about the dangers of cigarettes. News media that depend on cigarette advertising money avoid reporting news about tobacco-related disease. Accepting sponsorship and promotional money from tobacco companies destroys the freedom of organizers and community groups who take the money to write or speak openly and appropriately about tobacco's hazards. This "self-censorship" is a threat to both free speech and good health.

Sixth, the sponsorship of sporting and cultural events gives the tobacco industry a legitimacy it does not deserve. Sports promotions deceptively link smoking with health and athletic ability. Sponsorship of cultural and artistic programs are designed to portray the industry as responsible corporate citizens. Such false impressions work to hide the fact that the tobacco industry produces, and markets aggressively, the largest cause of preventable death in the world.

Would we accept money from the Medellín cartel? Are Philip Morris and R.J. Reynolds hands any cleaner?

If there were no cigarette industry, or if there were a cigarette industry with even the minimum of ethical responsibility, we would need no further arguments. The companies would accept their responsibility and cease promoting their foul product.

But this is an industry that has just been labeled by a United States Federal judge, "the king of deception and disinformation."

So the industry and its paid liars, the public relations firms, concoct false arguments against taking action to eliminate advertising and promotion—arguments that may convince the unwary and the uneducated.

So we must—each of us—be ready to answer these arguments wherever they appear—to combat lies with truth.

Here, then, are the most common industry arguments—and good, truthful answers to each of them.

First, the industry argues there's no scientific proof that cigarette advertising increases tobacco use.

We answer: Common sense tells us that the billions of dollars spent to make smoking romantic, mature, successful, [and] the thing that "beautiful" and healthy people do will attract some people, especially young people, to take up smoking who might not otherwise have done so and will influence some smokers who might have quit to keep on smoking.

Shouldn't the industry that promotes this lethal product be responsible for proving that cigarette advertising does not induce anyone to smoke or keep anyone from quitting?

Several studies performed by scientists not hired by the tobacco industry do demonstrate that cigarette advertising can increase smoking.

Almost all studies and experts cited by the tobacco industry are funded by them. These industry "experts" use the same dishonest and distorted arguments against the effects of advertising as they use to deny the dangers of smoking.

A second industry argument is that there is no scientific evidence that advertising bans or restrictions reduce smoking.

Many protobacco spokespeople, using flawed or dishonest scientific analysis, claim that advertising bans and other restrictions have no effect on tobacco consumption. They argue that even with advertising, smoking rates are going down in some areas, while countries that have never had tobacco advertising have increasing smoking rates.

This just isn't true. Close study of many countries before and after an advertising ban show that tobacco consumption is much lower than it would have been without the ban.

A study by the Toxic Substances Board of New Zealand examined the relationship between government tobacco promotion policies and tobacco consumption trends in 33 countries between 1970 and 1986. It found that:

> Government [as opposed to self-imposed industry] tobacco advertising bans and controls are accompanied by enhanced rates of fall in tobacco consumption; in the absence of any such control, consumption increases.
>
> Total tobacco promotion bans for health reasons are, on average, accompanied by falls in tobacco consumption which occur four times faster than in partial ban countries.

Data from 18 countries demonstrates that legislation banning tobacco promotion has had the effect of reducing the numbers of young people who begin smoking.

A third industry argument is that advertising does not increase consumption; it merely encourages smokers to switch brands.

Tobacco industry experts claim that cigarette advertising is not designed to make smoking seem acceptable or inviting to nonsmokers, but merely to lure current smokers to their own brand. They argue that those who think otherwise have made a simple-minded error.

It is common sense that any advertising or promotion that makes the smoking of a particular brand attractive also makes smoking attractive.

Of course tobacco companies are looking for new smokers—their customers are dying! An estimated 5,600 smokers each day quit or die. The industry must find replacement smokers in order to remain viable.

Advertising experts (outside of the tobacco industry) say that the basic purpose, and result, of advertising is to increase consumption of the brand by expanding the overall market, as well as promoting brand-switching. If cigarette advertising affected only brand choice, it would be a waste of money for the industry, as fewer than 10 percent of all smokers switch brands each year, and many of those switch to another brand owned by the same company.

The thrust of most cigarette advertising promotes a smoking lifestyle, not the specific merits of a particular brand.

A fourth industry argument is that advertising bans interfere with consumers' freedom of choice.

But advertising bans don't interfere with the choice of the adult smoker to continue smoking—only with the license of the cigarette advertisers to stimulate smoking and reinforce it as a desirable social norm.

Most smokers begin smoking when they are too young to understand the risks, and by the time they are old enough to make an informed choice, their addiction undermines their freedom of choice.

Most cigarette advertising contains very little product-specific information; it generally promotes only a false image of smoking as healthy and glamorous.

A fifth industry argument is that cigarette advertising includes warnings about the suspected risks of smoking, so that ads are a good source of information about lower tar and nicotine cigarettes.

This argument includes three premises which are largely false: (1) that health warnings on cigarette ads are effective as they are currently presented; (2) that lower tar and nicotine cigarettes are less dangerous than regular cigarettes; and (3) that the risks of smoking are only "suspected," "alleged," or "possible." Refute these claims, and point out that no health information would be banned if tobacco advertising is restricted.

A sixth industry argument isn't really an argument at all but a deceptively appealing slogan: If tobacco is legal to sell, then advertisers should be free to market it.

But the tobacco industry's argument, "If it is legal to sell, it must be legal to advertise," is not logical. The marketing of many legal products is regulated. In fact, if tobacco were a new product, to which a substantial portion of the adult public were not already addicted, there is no doubt that all civilized governments would ban its sale. We can answer by pointing out the unique dangers of tobacco and widespread regulation of advertising abuses in civilized countries.

A seventh industry argument is that advertising bans interfere with tobacco companies' freedom of speech.

Tobacco industry public relations experts, lawyers, and lobbyists seek to portray themselves not as profit seekers, but as defenders of fundamental freedoms. So they invoke "freedom of speech" in defense of tobacco advertising. In fact, the "free speech" that many countries protect almost always refers to political and artistic speech, while nearly all governments retain the power to "regulate commerce." Most countries that protect such "free" political speech

simultaneously regulate commercial speech, for example, making it illegal to advertise untruthfully or misleadingly.

Make sure that the protobacco spokesperson doesn't associate himself or herself exclusively with freedom. Note that freedom from exploitation, addiction, and disease is just as important, and that tobacco companies regularly silence free speech about health in magazines where they advertise.

The industry also argues that bans on promotion deprive sports, arts, and communities of essential support.

As the public increasingly questions the legitimacy of an enterprise that promotes and profits from "pushing" a lethal, addicting drug, the industry seeks to buy respectability through heavily publicized community sponsorship and philanthropy.

But we can respond by reminding our audience that cigarette companies are not charitable institutions; their support is part of their calculated effort to promote their products and to weaken community support for smoking control efforts. Tobacco money can be used for honorable purposes, but it is always dirty money.

Especially in less developed countries, the tobacco industry argues that it can (and does) regulate its own advertising through voluntary codes and acceptance of limited bans.

Protobacco advocates will claim that no mandated ad ban is necessary because tobacco advertising is already self-regulated through voluntary agreements and/or limited bans (on broadcast ads, for example). Such voluntary actions are designed to prevent stronger action by governments.

But we must make it clear that leaving the protection of public health to tobacco industry "volunteerism" is inadequate and irresponsible policy. You can reinforce this position by citing the repeated failures of the tobacco industry to enforce its own codes or even to live up to the spirit of those limited laws that have been passed.

In its most hypocritical argument, the industry insists that since smoking is for adults, not children, so are the ads; they are designed to help adults make an informed brand choice.

If the issue of the effect of tobacco advertising on children is raised, protobacco advocates will argue that cigarette advertising is not for children and that the way to prevent smoking among young people is to prevent the sales, not the ads.

But we can respond with solid statistics that show that almost all new smokers are children and with evidence of tobacco advertising and promotional practices that are clearly aimed at young people. It is easy to find many examples.

In hard economic times, perhaps the strongest argument in less developed countries is that tobacco ads can help our country economically.

As a crop that commands one of the highest prices per acre in the world, tobacco is a very attractive choice for many countries, especially in the developing world. Industry spokespeople may argue that advertising restrictions, and other measures to discourage tobacco use, will have harmful effects on the economy, both by hurting the tobacco industry and by damaging the media that accept the advertising.

But we can respond to this by pointing out the enormous social and economic costs that go with tobacco and its advertising: death, health care costs, and the censorship of important health information that will add to the death toll.

These are just a few of the good answers to the bad arguments of the tobacco companies.

The new ACS guide, "Ending the Lies," which each of you will receive, supplies these and other answers to all the industry arguments and supports the answers with scientific research and the words of the world's leading authorities on tobacco and health.

As you plan your national and regional campaigns, and as you return to your countries, you will be armed with these guides as your weapons. Your ammunition is the truth!

The Norwegian ban on advertising of tobacco products

Has it worked?

Some facts from

Norwegian Cancer Society

Norwegian Health Association

INTL 98.07

Norwegian Cancer Society

(in Norwegian: Den Norske Kreftforening)

is a non-governmental health organisation whose objective is to fight cancer through

- prevention, diagnosis and treatment of cancer
- cancer research
- information on the causes, manifestations and treatment of cancer
- help to cancer patients and their relatives.

The Society is a constituent member of the International Union Against Cancer (UICC).

Norwegian Health Association

(in Norwegian: Nasjonalforeningen for folkehelsen)

is a non-governmental health organisation which was founded to fight tuberculosis. In recent decades it has expanded its activities to other fields, as cardiovascular diseases, care for elderly people, care for children and families, and musculo-sceletal disorders. The Association's involvement includes research, prevention, information and education, and various practical measures of assistance. It is a nation-wide member organisation, and is working through more than 1000 local branches.

The Association is a constituent member of the International Union Against Tuberculosis and Lung Disease (IUATLD), and – through its Council on Cardiovascular Disease – a member of World Heart Federation (WHF).

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Oslo, June 1998

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ISBN 82-90187-94-7

INTRODUCTION

On 1 July 1975, the Norwegian government enforced its *Tobacco Act*, which introduced a total ban on all advertising of tobacco. This ban also applies to indirect advertising, that is to say, tobacco products and scenes showing persons smoking must not be incorporated into advertisements for other goods and services. Further sections of the 1975 Act impose a requirement to label all cigarette and tobacco packages with a health warning and a prohibition on sales to minors, and give the Ministry of Health the authority to issue regulations concerning the content of tobacco products*.

When the Act was introduced it was strongly underlined that legislation was only one part of the plan, and that other elements, such as information, education and cessation activities are vital components of a comprehensive smoking control programme. It is the *ban on advertising*, however, that has attracted international interest.

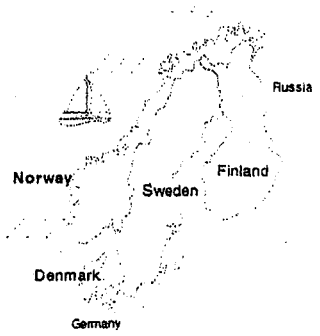
From the very beginning we have seen how friends and foes from all parts of the world have increasingly fixed their eyes on our small corner of the world, with a demand for data: What has your advertising ban accomplished? Sometimes this is felt to be a burden, that the fate of legislation in other parts of the world depends upon the degree of success obtained in Norway. We have also observed how anxious the antagonists are to prove that the advertising ban has been a failure and has had no effects whatsoever upon smoking rates and tobacco consumption.

Effects of advertising can be examined using different scientific approaches, such as

- **econometric research** ("is there a macro-level correlation between expenditures on tobacco advertising and aggregate tobacco consumption?")
- **hermeneutical content analyses** ("what is the meaning or message in the ads?")
- **inter- and intrapsychological approaches** ("how does tobacco advertising operate in the human mind; how do people in fact respond?")

The complimentarity of using strict quantitative and qualitative methodological approaches when collecting knowledge about possible causal effects of tobacco advertising have been acknowledged [1, 2]. Scientist should be allowed, however, to also apply some common sense reasoning when discussing the effects of advertising [3, 4]. The present paper should be viewed in this context. The aim is just to present some facts on what actually happened after the ad ban was introduced in Norway more than 20 years ago. What has happened to tobacco consumption and to smoking prevalence in young people? Have the warnings put forward by the antagonists of the ban turned out to be correct? Could the results of the ad ban have been better?

* The history of the Tobacco Act is presented in ref. 5–7, where the politicians' motitives for legislation are also discussed. An English translation of the Act, ref. 8, can be obtained from The Norwegian National Council on Tobacco and Health, P.O. Box 8025, N-0030 Oslo, Norway, tel. +4722 248 990, fax +4722 360 166, e-mail: post@tobakksskade.no.



Norway

- with an area of 323 886 km², constitutes the western part of the Scandinavian peninsula. It is a mountainous country with numerous deep fjords and thousands of islands. A small and homogeneous population of 4.4 million is scattered over a large area; 13.6 inhabitants per km². People live mainly in towns and tiny villages along a long coastline of 2,650 km. The largest city is the capital, Oslo, with around 700,000 inhabitants, suburbs included.

Norway's development into one of the world's richest countries is mostly associated with extensive industrialisation, easy access to hydroelectric power, and close proximity to important export markets in Europe. Today oil production is the most important source of income, and petroleum contributes to about 30 % of all Norwegian export. Fisheries are also significant on an international scale.

The standard of living is high, unemployment is low; in January-April 1998 averaging 2.7 % of the labour force. Levels of prices and wages are relatively high.

The health of the population is fairly good, life expectancy figures being some of the highest in the world. The health service and social security system are well developed.

A democratic form of government and a separate judicial system ensure everyone freedom of expression, the right to vote, and protection under law. The welfare state is based on ideals of equality and justice, which are clearly stated in its legislation: everyone has the right to employment, a place to live, an education, social security and health service.

Children start school at the age of six and are required to attend for ten years.

More newspapers are published per capita than in most other countries.

Norway does not grow tobacco, but has a tobacco industry with a long tradition.

Based mainly on: Facts about Norway, 24th edition. Oslo: Schibsted, 1996.

per manufactured cigarette (figure 2). In 1975, the weight of one manufactured cigarette was one gram, since then it has decreased gradually to about 0.75 gram from the mid-1980s onwards.

This discussion is a red herring, because it *constantly distracts attention from the feature that is most important – that sales levelled off at the time when the Parliament decided to introduce legislation.* If the consumption had continued to rise at the same speed as before 1970, it would now have been about 80 per cent higher than it actually is today (figure 2). This levelling off took place at a rate of consumption that is only half the Canadian, UK and US peak level. In Norway, the tobacco wave was stemmed at an earlier phase than in these other countries [10].

This positive development may be expected to accelerate in the future, when a lower consumption in the younger generations (see below) will have an increasing impact on total consumption.

Today, lung cancer mortality in Norway is only half that already experienced in countries with a history of longer and heavier smoking [7]. Given the new trend of consumption in Norway since 1975 the country will never reach these countries' high level of mortality. An essential health benefit has been achieved already. As a matter of fact, since 1985 onwards there has been no further increase in incidence of lung cancer in males [11].

SMOKING RATES IN YOUNG PEOPLE

Studies that examine changes in aggregate consumption can be accused of being too crude and of masking variations within the various market segments. There are reasons to believe that young people are more perceptive to advertising than adults are [12, 13]; hence, an ad ban is presumed to affect smoking *incidence rates in the younger age groups* more than it affects *smoking cessation rates in adults.* Therefore, it is of interest to compare smoking prevalences among persons who grew up in a climate free of advertising with those of persons who had their adolescence before the ad ban was introduced.

SCHOOLCHILDREN

Already in 1957, the Norwegian Cancer Society conducted a nation-wide study of smoking habits among Norwegian school children in the upper grades of the compulsory school. The study was carried out in a representative sample of Norwegian schools [14]. The Cancer Society repeated the study in 1963 [15].

From 1975 onwards, the National Council on Tobacco and Health has

In 1950–75 the tobacco industry ran extensive advertising campaigns aimed especially at a female market.

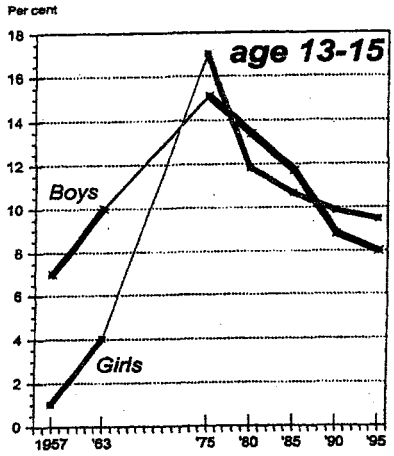


Figure 3 – Per cent daily smokers in boys and girls aged 13–15, Norway. Results of nationwide surveys conducted in 1957 and 1963 by the Norwegian Cancer Society and in 1975, 1980, 1985, 1990 and 1995 by the National Council on Tobacco and Health, Norway. The number of pupils of each sex included in each survey varies between 2000 and 3000, in 1963 somewhat less [14,15,17].

carried out surveys every fifth year among *all* schoolchildren in the upper grades of the compulsory school throughout the country, with attendance rates of more than 90 per cent. From this universe (results for more than 150,000 students), a representative sample has been drawn and sent to the Council for statistical analysis [16].

The results from these surveys are presented in figure 3. Two features are striking: First, up to 1975, smoking rates rose considerably in both sexes, particularly among girls, whose smoking rates increased from 1 per cent in 1957 to 17 per cent in 1975. During these years, the tobacco industry ran extensive advertising campaigns aimed especially at a female market, showing mature, sophisticated, elite women in luxurious surroundings (see page 5). The Norwegian advertising agencies increased their turnover by 125 per cent from 1960 to 1970 for all media. For magazines, however, which are read by women in particular, the increase was 600 per cent [2].

The second feature from this figure: In 1975, the Tobacco Act was enforced. By 1980, smoking rates among young people were declining for both sexes, and have continued to do so.

Industry spokesmen have attacked this presentation of smoking rates among Norwegian schoolchildren. It is underlined that nothing is known what happened between 1963 and 1975, and so the peak year does not necessarily coincide with the enforcement of the advertising ban. However, another series of surveys carried out annually in the age group 15-21 in the cities of Oslo and Bergen show that the peak was reached in the mid-70s [18, 19]. The highest percentage of daily smokers was found in Oslo in 1974 and in Bergen in 1975.

Also, industry spokesmen have accused the Council for using "obsolete, outdated and inaccurate survey methods" [20]. They refer to a so-called WHO-study which has "conducted in depth research" showing that smoking rates are higher among Norwegian school children than among children in countries which do not have an advertising ban. However, the Council's studies were designed by Professor Leif Edvard Aarø, who also was the first author of the so-called WHO-study [21]. Professor Aarø states that both surveys apply the same kind of modern, reliable and sophisticated kind of survey methodology[22]. Also, Professor Aarø has stated that the industry's spokesmen are misusing the WHO-study (Aarø LE, personal communication). He emphasises that single point prevalences studies, like the WHO-study, cannot be used to evaluate smoking control programmes. Analyses of trends, like the Council's surveys, are a more valid way of evaluating such programmes [22].

It has been emphasised too that the presentation in figure 3 is based on data from two different sources [23], which is correct. However, when Professor Aarø planned the Council surveys he took specific measures to ensure that the results could be compared with the earlier studies conducted by the Cancer Society.

YOUNG ADULTS

This age group may also have been increasingly influenced by the ad ban.

Since 1973, at the request of the National Council on Tobacco and Health, Statistics Norway (earlier the Central Bureau of Statistics) has carried out annual surveys of smoking habits in representative samples of the adult Norwegian population aged 16–74.

Figure 4 shows the percentage daily smokers by age and sex in young adults aged 16–24. As a whole, in the years following the enforcement of the advertising ban, there were clear downward trends in both sexes. Since the late 1980s, however, these trends have levelled off.

The authors acknowledge that the ideal method for assessing an effect of the ad ban on smoking incidence would be to use a longitudinal design, with data on the individual level for otherwise fully comparable groups of young people, one group having been exposed and the other not exposed to an ad ban. In the absence of such a design, however, probably the best method is to use repeated cross-sectional data in time series.

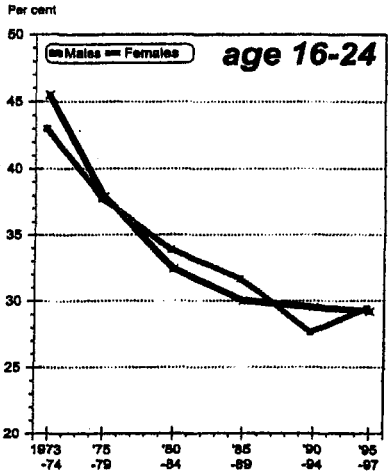


Figure 4 – Per cent daily smokers in men and women aged 16–24, Norway. Mean 1973–74 + five year means 1975–94 + mean 1995–97.
Number of persons interviewed in the respective periods:
Males: 429, 1141, 1185, 1235, 940
Females: 380, 1078, 1157, 1132, 976
Source: Statistics Norway/National Council on Tobacco and Health [17].

SMOKING RATES IN THE TOTAL POPULATION

As underlined above, it is young people's smoking rates in particular that matter in the present context. Smoking rates in the *total* population may be of interest as background information

In the series of surveys carried out by Statistics Norway, the figures for the *total adult population aged 16–74* show, as a whole, a downward trend for men and a fairly stable trend for women. In 1997 the percentages of daily smokers were 34.5 for men and 32.7 for women. Mean cigarette consumption in daily smokers was 13.7 per day for men and 11.2 cigarettes per day for women.

However, crude rates for a total population may disguise important developments in different age groups [17]. Broken down by age and sex, smoking rates in males aged 45–64 have dropped by more than one third since 1973. For females, only small changes are seen, except in the youngest age group, 16–24 years (see above). In women aged 55 and over the trend is upward.

When interpreting the data for middle-aged and elderly women, it is necessary to take into account a marked cohort effect, as described elsewhere [2, 24]. In previous years, smoking was uncommon in these age groups. After World War II, there was a dramatic increase in smoking among younger women, who maintained their smoking as they grew

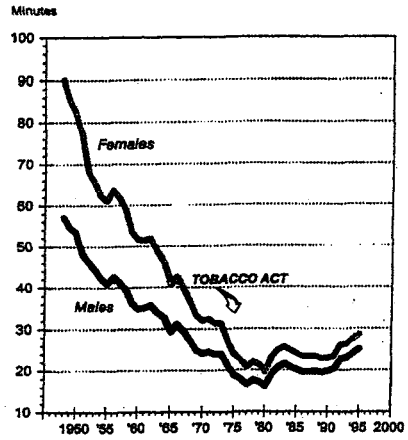
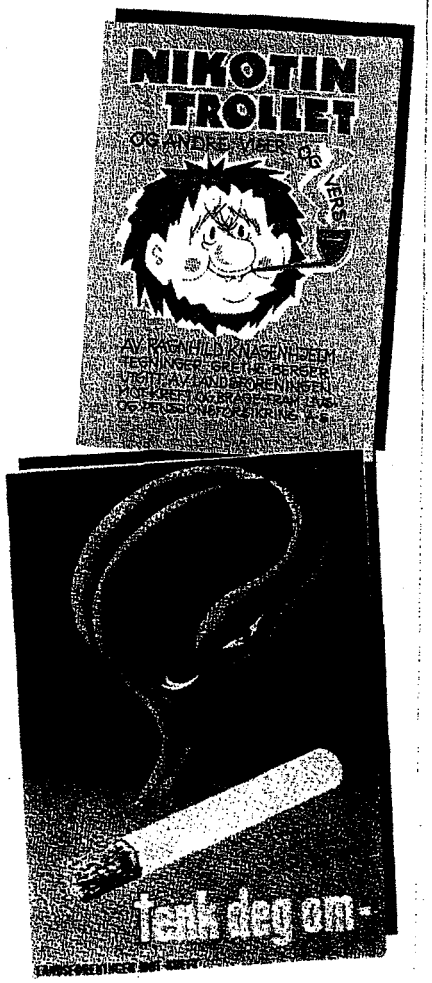


Figure 5 – Trends in relative prices of manufactured cigarettes, Norway, 1948–95. Number of minutes an average male and an average female industrial worker needs to work in order to earn a wage equivalent to the price of 20 manufactured cigarettes [2].



Information material issued by the Norwegian Cancer Society in the 1960s. Top brochure: "The Nicotine Troll", a songbook for small children. Bottom poster: "Think about it –".

older. In the individual female cohorts, however, there is a distinct drop in smoking prevalence.

Another series of data are available from the nation-wide surveys carried out by the National Health Screening Service in the age group 40–42. In recent years, there has been a clear downward trend in smoking rates for both women and men of this age [25].

THE DECREASE IN SMOKING – OTHER EXPLANATIONS?

As shown, there is no doubt that the overall tobacco consumption and the prevalence of smoking among young people have decreased in Norway. The question remains whether or not this could be explained by factors other than the advertising ban.

One possibility might be *steadily higher tobacco prices*, which have been shown to have a strong influence on teenage smoking [26, 27].

Figure 5 shows the development in the relative prices of manufactured cigarettes, calculated as the number of minutes the average female and male industrial worker has to work in order to earn the amount equivalent to the price of a package of 20 manufactured cigarettes [2]. From the years just after World War II and up to the early 1980s, the relative prices measured in this way decreased steadily, and most important, continued to do so in the years immediately following the introduction of the ad ban.

From the early 1980s on, the relative price levelled out, and in the 1990s showed a slight increase. Somewhat surprisingly, the decrease in smoking rates in young adults levelled out at the same time.

Another possible explanation of the decrease in consumption and of smoking rates among young people could be that *educational campaigns* started at the same time as the ad ban was introduced. One should bear in mind, however, that the Norwegian Cancer Society had run campaigns about the hazards of smoking ever since the early 1960s. In connection with the introduction of the ban governmental information campaigns were included in the total smoking control package; for example, by newspaper advertisements explaining the motives of the ban. These campaigns did not, however, represent an activity which was, in principle, something new.

A third possible explanation might be severe *restrictions on smoking in public places and at work*. However, there was no such restrictions by law in the 1970s. The relevant legislation was not introduced until 1988, when it was included in the Tobacco Act [17].

A study employing econometric techniques has suggested that the Norwegian Act enforced in 1975 brought about a long term reduction in tobacco consumption of 9-16 per cent [28]. It is not possible to quantify exactly how much of this reduction can be attributed to the advertising ban itself, but, in the view of the minor nature of the other provisions of the Act, the ad ban is likely to have accounted for the major part.

NEGATIVE EFFECTS OF THE ADVERTISING BAN?

During the legislative process in the early 1970s the tobacco and advertising industries warned strongly against the proposed ban on advertising. Some of their arguments are repeated here – along with some data on what actually happened during the years after the ban was enforced [7, 29].

The antagonists claimed that an ad ban would:

- **WEAKEN THE COMPETITIVE SITUATION OF THE NORWEGIAN ADVERTISING INDUSTRY**

There has been a continuous increase in the annual turnover of the advertising agencies, and figure 6 shows mean annual change in the two 8-year periods *before and after* enforcement of the ban. The average increase in sales was *higher after* enforcement; it was 3.6 per cent before, and 4.3 per cent after the ban was introduced [7].

- **WEAKEN THE COMPETITIVE SITUATION OF NORWEGIAN MANUFACTURERS VERSUS FOREIGN PRODUCERS**

As mentioned earlier, the cigarettes most commonly smoked in Norway are *hand rolled*. Before the ban, Norwegian brands accounted for about 95 per cent of smoking tobacco used for hand rolled cigarettes. This fraction has remained fairly constant over the years since the ban. Figure 7 gives the market share of Norwegian brands of *manufactured cigarettes* 1965-88. This share has declined *at the same rate* throughout the whole period; it dropped by about two thirds from 1965 to 75, and by about two thirds from 1975 to 85, the ten year periods *before and after* enforcement of the ban [7].

- **CAUSE REDUCED EMPLOYMENT IN NORWEGIAN INDUSTRY**

The number of employees *in the tobacco industry* has dropped continuously before and after introduction of the ban (figure 8). The mean annual change was about the same in the two 10-year periods before and after enforcement; 2.7 per cent reduction *before* and 2.6 per cent *after*. There is no evidence that the ban has had any influence upon the general employment situation in Norway [7].

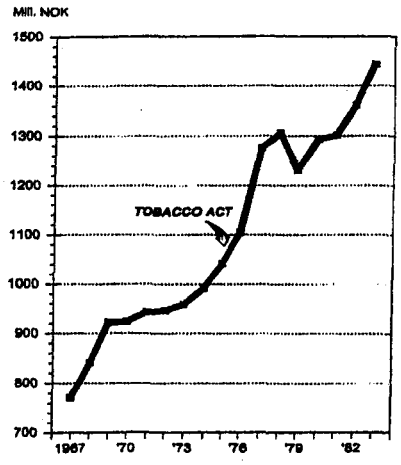


Figure 6 – Total sales of advertisements by Norwegian agencies, 1967–83. Sales adjusted to 1979-prices, expressed as Norwegian Kroner (NOK); V.A.T. not included. Source: Norwegian Association of Advertising Agencies [7].

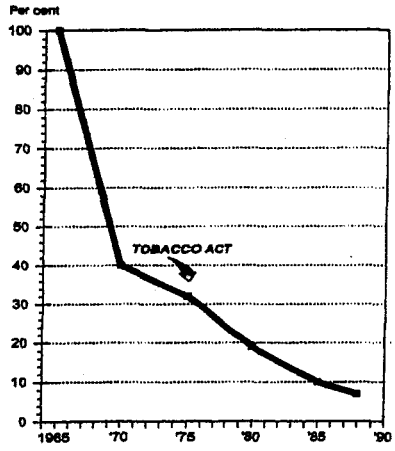


Figure 7 – Norwegian brands' market share of manufactured cigarettes 1965–88. Per cent domestically produced manufactured cigarettes, Norway, 1965, 1970, 1975, 1980, 1985, 1988. Source: Eikeland S, J.L. Tiedemanns Tobaksfabrik, Oslo [7].

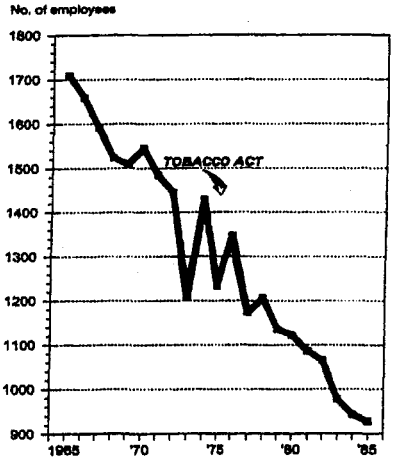


Figure 8 – Employment in the Norwegian tobacco industry 1965–85. Number of employees in the Norwegian tobacco industry 1965–85. Source: Statistics Norway, Oslo [7].

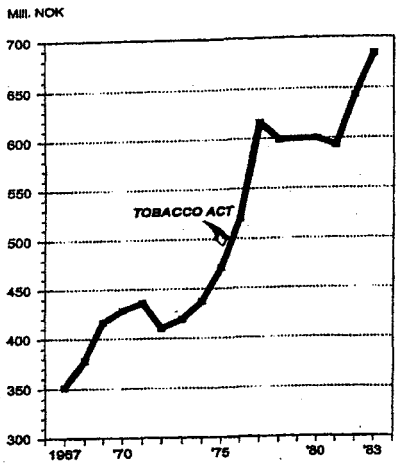


Figure 9 – Total sales of advertisements *to newspapers* by Norwegian agencies, 1967–83. Sales adjusted to 1979-prices, expressed as Norwegian Kroner (NOK); V.A.T. not included.
Source: Norwegian Association of Advertising Agencies[7].

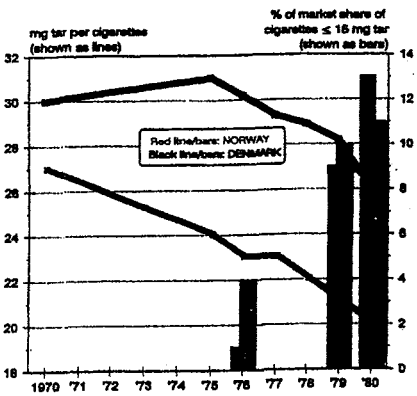


Figure 10 – Trend in tar content of manufactured cigarettes in Denmark and Norway 1970–80. Denmark had no ad ban in the actual period; Norway enforced a ban in 1975. *Lines:* average mg tar per cigarette. *Bars:* percentage market share of cigarettes with a tar content ≤15 mg.
Source: Mørck et al[30]. Bjartveit & Enarson[29]. Reproduced with permission from Richmond R. (ed) Educating Medical Students About Tobacco: Planning and Implementation. Chapter 16.

• WORSEN THE ECONOMIC SITUATION OF THE PRESS

From 1967 to 1975, eight years *before* the ban, sales of advertisements – of all kinds – to Norwegian newspapers increased annually by a mean of 3.9 per cent, as against a 5.6 per cent annual increase in the 8-year period *after* enforcement; that is to say a *higher increase after the ban* (figure 9)[7].

• PRECLUDE THE STEERING OF CONSUMPTION OVER TO LESS HAZARDOUS PRODUCTS

Denmark and Norway differ as regards restrictions on advertising; Denmark has never had a ban. Figure 10 shows that, in the years following the ban, the average tar content per cigarette sold has decreased as rapidly in Norway as in Denmark, and proportions of cigarettes with tar yields up to 15 mg increased at least as fast in Norway as in Denmark[7, 29, 30]. Another example: In 1984, one company introduced a new cigarette, claiming that tar delivery was as low as one milligram. This was reported by the press, but there were no advertisements. Nevertheless, within one year the market share of this particular brand increased from 0 to 6 per cent. So, the ad ban has *not* obstructed a shift to low tar cigarettes[7].

It may be concluded that the pessimistic and tragic events forecast by the antagonists have not occurred. It appears that the difficulties were highly exaggerated. Nobody has suffered, no values have been lost, and no one has seriously advocated a return to tobacco advertisements.

COULD THE RESULTS HAVE BEEN BETTER?

The ad ban was intended to be one element of a comprehensive package, which should include the full range of anti-tobacco measures[31].

Regrettably, this did not turn out so well as hoped for. The resources available for information and education, and for cessation activities, have been meagre, and have by no means reached the level achieved in many other parts of the world. This was the case in the 1980s especially. Only in the late 1990s was there a marked increase in government funding for these purposes. Also, price mechanisms have been used to only a minor degree (cf figure 5).

There is little doubt that the Government did not fully exploit the advantage of the ad ban. However, in light of recent signals from the political authorities we may be able to recover some of the lost ground.

Conclusion: see the back cover

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CONCLUSION

Tobacco consumption and young people's smoking rates have decreased considerably since the mid-1970s. One may ask: what is the cause of this marked break in trends? Something *new* must have happened in the 1970s which had not been experienced before. No data substantiate that this change was due to huge price increases or educational campaigns, or to restrictions on smoking in public places and at work.

A cautious conclusion would be that the advertising ban as from 1975, with the concomitant publicity throughout the legislative process, *has* had an impact on consumption and young people's smoking, and in combination with the continued educational efforts was a causal factor in the new trend.

This view is also shared by the political authorities. In June 1997 the **former Health Minister, Professor Gudmund Hernes, Ph D**, made the following statement in a letter to Dr. Judith Mackay, Director of the Asian Consultancy on Tobacco Control, when an ad ban was being discussed by the legislative authorities in Hong Kong:

"...there is no doubt that the Norwegian advertising ban has had a clear and substantial influence on total consumption in general, and smoking rates among school children in particular. In my view the reduction brought about by the advertising ban will have a positive and marked impact on the future incidence of smoking-related diseases, and consequent mortality."

And in a letter of May 1998 to the authors of this paper the **present Health Minister, Mr. Dagfinn Høybråten**, says:

"I share the view that the ban on advertising of tobacco products has had a marked and beneficial influence upon tobacco consumption and young people's smoking rates in Norway. In my opinion, however, the effect of legislation could have been even better if the ban had been accompanied by a much more active and offensive use of other smoking control measures, in particular, health information and education. Shortly after I took office, I presented a proposal to increase substantially the grant for such activities. My intention is to maintain a considerably higher involvement in a comprehensive smoking control programme, including legislative measures."

Professor Gudmund Hernes PhD (Labour Party).
Minister of Health 1995–1997.

Mr. Dagfinn Høybråten (Christian Democratic Party).
Minister of Health 1997–.

ISBN 82-90187-94-7

A number of other factors are known to influence the percentage of dietary cholesterol absorbed, such as the quantity of fat in the diet, the intestinal transit time, and the presence of dietary fiber or plant sterol; in some but not all studies the type of dietary fat also proved to be an important factor. One study showed that only about 30 percent of a group of subjects with normal or elevated serum cholesterol levels had an increase in serum cholesterol level in response to an increase in dietary fat and cholesterol.[9] Less efficient absorption of cholesterol was one major source of variability; another was the relative sensitivity of endogenous cholesterol synthesis to feedback inhibition. McNamara has estimated that after corrections for differences in body weight and the proportion of dietary cholesterol absorbed, only about one fourth of the population will be sensitive to dietary cholesterol and have a significant increase in serum cholesterol levels in response to an increase in dietary cholesterol.[6]

Kern's elderly subject had an estimated rate of cholesterol synthesis very close to the rates in his control subjects eating a high-cholesterol diet. The actual amount of cholesterol absorbed was only about 25 percent higher in the patient than in the control subjects because of the low fractional absorption. Thus, the rate of cholesterol synthesis was suppressed to approximately the same degree as in the controls. For this reason, the rate of cholesterol synthesis does not appear to have been a major determinant of the response of Kern's patient.

Another major adaptive mechanism is the rate of conversion of dietary cholesterol to bile acid and the loss of either cholesterol or bile acid in the stool. In 1972 Lofland et al. found that hyporesponsive monkeys had increased biliary excretion of cholesterol.[10] A similar mechanism has recently been described by Overturf et al. in a genetically bred strain of New Zealand white rabbits in which hypercholesterolemia does not develop when they are fed a diet containing 0.25 percent cholesterol. These rabbits maintained serum cholesterol levels of less than 30 mg per deciliter (0.78 mmol per liter), whereas the normal rabbits given the same diet had levels exceeding 300 mg per deciliter (7.76 mmol per liter).[11] The studies of Overturf et al.[11] suggest that the resistant rabbits maintain low cholesterol levels by increasing the synthesis of bile acid.[12]

In summary, the findings to date indicate that the two most likely mechanisms for adaptation to a high dietary intake of cholesterol are a decrease in the efficiency of cholesterol absorption and an increased conversion to, and excretion of, bile acid. The latter mechanism results in an up-regulation of hepatic LDL-receptor activity, which permits more efficient clearance of LDL cholesterol from the blood.

Until we understand these mechanisms better, prudence concerning cholesterol intake would appear to be in order, particularly for the 36 percent of adult Americans who are at high risk of coronary heart disease because they have hypercholesterolemia.[13] We cannot definitively state what proportion of the population will be as resistant to dietary cholesterol as the man described by Kern. About one fourth to one third would be expected to be sensitive to dietary cholesterol on the basis of earlier studies. Whether dietary cholesterol would negate the cholesterol-lowering effect of such drugs as the inhibitors of 3-hydroxy-3-methylglutaryl–coenzyme A reductase is not known. In addition, the effect of dietary cholesterol on the risk of coronary heart disease that is independent of changes in serum cholesterol should not be ignored. Finally, for people who do consume large amounts of cholesterol, it is possible that reducing the intake of total fat or saturated fat in conjunction with increasing the fiber and plant-sterol content of the diet will decrease the absorption of cholesterol.

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SOUNDING BOARD

THE MARLBORO GRAND PRIX*

Circumvention of the Television Ban on Tobacco Advertising

COVERAGE of motor racing in the mass media has grown dramatically in recent years. Hardly a day now goes by in the United States without a nationally televised automobile, motorcycle, "monster truck," or

*Presented in part at the Seventh World Conference on Smoking and Health, Perth, Australia, April 3, 1990.

powerboat race on either a major network or a cable network devoted to sports.[1] Major daily newspapers now cosponsor auto races, most notably the Atlanta Journal 500, and blend advertising for the events with stepped-up news coverage. Organized motorcycle, dirt-bike, and kart racing for teenagers and children attracts an increasing number of participants each year.[2]

Yet, in contrast to the widespread attention given to head injuries in boxing, football, and diving, little has been written about the risk of death or injury to those who race motor vehicles — or to impressionable young fans who try to emulate them. Indeed, no registry exists to record and study fatalities and injuries in the numerous forms of motor racing.[3] In the absence of such data, any perception young people (or the public in general) have of motor racing as extreme risk-taking behavior must take a back seat to its well-publicized image of healthy competition, guts, and glory.

The mystery of why motor racing has had virtual immunity from serious scrutiny by sports commentators and the mass media becomes clear when one considers that the sponsors of racing are the country's largest advertisers: tobacco companies, brewers, and automobile manufacturers. In the United States, auto races receive more financial sponsorship ($276 million in 1988) than any sporting event except the Olympics.[4]

Anyone who attends motor races (general admission to which usually costs $25 or more, with discounted or free entry for children), visits the sponsors' exhibits and souvenir stands, watches races on television, or reads racing magazines is struck by the intense loyalty of the fans, as well as their detailed knowledge of vehicles, drivers, sponsors, and past races. Motor racing in all its forms, from "midgets" to Formula 1, ranks as the second largest spectator sport in the United States after football.[4] There is little doubt that efforts to appeal to such a vast audience will generate increased sales of automobiles, automotive products, and other consumer goods.

Television has greatly enhanced the visibility of auto racing and its sponsors, whose logotypes appear on the cars, the drivers, the pit crews, and signs around the track. A race-car driver can sell advertising space on his chest, back, shoulders, and helmet, and the higher the logo is on his clothing, the higher the price. Nor is such visibility confined to the racetrack crowd or the television audience. Photographs of the winning driver, plastered head to toe in sponsors' logotypes, appear in magazines and newspapers and make their way into publications aimed at young boys, many of whom have adopted the fashion of wearing clothing with the logotypes of alcohol and tobacco companies sponsoring motor racing.

Sponsorship of motor racing has become one of the major promotional activities used by the tobacco industry. As expenditures for cigarette advertising have tripled in the past 20 years (to $3.3 billion in 1988, more than for any other consumer product), the proportion of advertising expenditures allocated to promotional activities such as the sponsorship of motor racing and other sports has increased from about one quarter in 1975 to two thirds in 1988.[5]

Through its Winston and Camel cigarette brands, the R.J. Reynolds Tobacco Company, the major profit-producing subsidiary of RJR Nabisco, has become the leading sponsor of automobile and motorcycle racing in the United States.[6] Since 1971 — the first year in which cigarette advertisements were no longer permitted on television — the company has sponsored several entire categories of racing, including the annual Winston Cup Auto Racing Circuit of 29 televised stock-car races, Winston Drag Racing, Camel GT Series, Camel Mud and Monster Series, and Camel Motocross. In 1990 the tobacco company's newest cigarette, Magna, was promoted with an automotive theme and was made the title sponsor for a 150-city tour of a popular auto show, featuring special appearances by the Teenage Mutant Ninja Turtles.

Philip Morris, the nation's largest cigarette manufacturer, has also increased its stake in motor racing. Through its Marlboro brand, the company now sponsors several auto and motorcycle teams, as well as four nationally televised races: the Marlboro Grand Prix, Marlboro 500, Marlboro Challenge, and Laguna Seca Marlboro Motorcycle Grand Prix. It is thus not unusual to watch a race in which the sponsor is Marlboro, the officials wear Marlboro logotypes, and two or more of the competing cars and drivers are emblazoned with the name Marlboro. Thus, although cigarette advertising is forbidden on television, Marlboro still receives millions of dollars in low-cost national television exposure. Indeed, although Philip Morris will invest $30 million in 1991 and 1992 to promote its Marlboro brand on Indy-style cars in televised races (including $3 million in the Indianapolis 500),[7] this amount is likely to be far less than the purchase of an equivalent amount of television advertising time. The number of viewer "impressions" of a brand name or logotype per telecast is the standard for measuring the effectiveness of sponsorship.[8,9] According to *Sponsors Report*, a publication that measures the amount of in-focus exposure auto-racing sponsors receive and then computes dollar-value estimates on the basis of the cost of a conventional 30-second advertisement, Marlboro is perennially the most seen of the 43 team sponsors of the CART (Championship Auto Racing Teams, Indy style) racing series. For example, during the 15 races of the 1989 CART season, Marlboro received 3 hours, 26 minutes, and 50 seconds of in-focus exposure, as well as 146 mentions of the brand name, for a value of $8.4 million, not including the exposure to fans at the racetrack.[10] In the Indianapolis 500, the most widely watched auto race in the United States, Marlboro received more than $2.6 million in advertising exposure.[10]

An intriguing development in the past decade has been the joint sponsorship of motor-racing teams by tobacco and automobile companies. Moreover, in its newspaper and television advertisements, General Motors includes prominent verbal and visual references to R.J. Reynolds' Winston brand name, as well as photographs of the Skoal Oldsmobile, Kodiak Pon-

tiac, and Levi Garrett Chevrolet race cars (Skoal, Kodiak, and Levi Garrett are brands of "spitting," or smokeless, tobacco). Advertisements for Nissan cars feature the Camel logotype, and those for Honda feature Marlboro.

At the races themselves, hospital trauma centers advertise their services in the official programs, and ambulances and health professionals from these institutions are conspicuous in the pit. A portion of the proceeds from some races is earmarked for health charities, such as the Cystic Fibrosis Foundation. In return, the charities may assign volunteers to work in the tobacco-company sponsor's "activity pavilion," where visitors receive free packs of cigarettes, have their photograph taken with a "hospitality hostess" or race car, and play various racing-related games to win caps, mugs, sunglasses, six-pack coolers, and other prizes with the sponsor's cigarette logotype.

Coverage of racing has spawned several weekly programs on cable-television networks, including "SpeedWeek," "NHRA [National Hot Rod Association] Today," "The World of Speed and Beauty," and "Inside Winston Cup Racing." During a single month in racing's off-season (January 1989), "Inside Winston Cup Racing" (shown four times each Sunday) included 584 mentions of the Winston brand name and 58 minutes, 28 seconds of television exposure of the Winston logotype on race cars, drivers, billboards, and elsewhere.[11]

In an effort to verify the extent of television exposure of cigarette brands in spite of the ban on such promotions, a videotape recording was made of a nationally telecast automobile race, the Marlboro Grand Prix, which was shown on July 16, 1989. An observer, a medical student with a moderate interest in automobile racing, viewed the 1½-hour program six times. During the first viewing the observer made a list of categories to enable him to tabulate the various kinds of visual exposure to the Marlboro brand. On the second viewing, he measured the length of time the word Marlboro or its red chevron logotype was visible on the screen. On the third viewing, he counted the smaller billboards and banners that were posted along the raceway retaining wall (clustered primarily at the locations of the two main camera views of the race). The fourth time through, the observer counted the number of spoken mentions of Marlboro, as well as the number of exposures of the Marlboro car, which remained in almost constant view regardless of its standing in the race. During the fifth and sixth viewings, the observer counted all other visual exposures of Marlboro.

The observer noted that at no time did the television announcers refer to the race as the Marlboro Grand Prix, but rather as the "New Jersey Meadowlands Grand Prix presented by Nissan." This was in spite of the fact that race officials wore Marlboro Grand Prix shirts and caps, the winner received a Marlboro Grand Prix trophy, and the backdrop in front of which the televised presentation of awards was made included 40 logotypes (counted as 1 by the observer) with the words Marlboro Grand Prix. Table 1 summarizes the number of times the Marlboro name or logotype appeared during the telecast.

Motor racing, tobacco, and television are now so closely associated as to be inseparable. Fan loyalty, the involvement of media corporations, the support of cosponsors, and the influence of various racing publications are such that efforts to restrict tobacco-company sponsorship would be met with stiff resistance. Indeed, in September 1990, a congressional bill (H.R. 5041) sponsored by Rep. Henry Waxman (and endorsed by numerous health organizations) that would have banned tobacco-company sponsorship of sports was stripped in subcommittee of all provisions to limit tobacco promotion.[13]

But given the extent to which cigarettes and other tobacco products are advertised at motor races that are televised, health advocates seeking to end tobacco promotion may well find their best ammunition in the straight-faced denials by tobacco-company, television, and racing officials that these promotions are intended to encourage the use of tobacco products by young people.[14]

The reality is that automobile, motorcycle, and "monster truck" racing has become extremely popular among adolescents and children. *Days of Thunder*, a movie about race-car drivers, drew millions of teenagers in 1990. Several toymakers, including Mattel (a sponsor of a sprint-car team in the 1991 World of Outlaws Series, sponsored principally by United

Table 1. Exposure of the Marlboro Logotype during the 1989 Marlboro Grand Prix Telecast.*

Type of Exposure	No. of Exposures
Small raceway sign	4998
Large billboard	519
Marlboro car	249
Start–finish overpass	57
Crew member in Marlboro jumpsuit	31
Graphic of standings	18
Marlboro helmet	11
Marlboro driver in jumpsuit	10
Marlboro jacket	7
Marlboro cap	4
Sign on large screen	4
Wife of Marlboro driver in jumpsuit	4
Marlboro umbrella	3
Marlboro trophy	2
Marlboro cap on another crew member's arm	1
Marlboro written out	1
Marlboro patch on wife's neck	1
Marlboro shirt	1
Awards-presentation backdrop	1
Spoken mention	11
Total no. of times Marlboro seen or mentioned	5933
Total length of broadcast (min)	93.62
Total time Marlboro seen (min)	46.17
Percent of time Marlboro seen	49.32

**Sponsors Report* calculated the value of Marlboro's television exposure in the telecast to be $1,028,505 for 18 minutes, 42 seconds of clear, in-focus air time, plus $100,835 for 11 verbal references.[12] This was based on the network's price of $27,500 per 30-second commercial. The discrepancy between the calculations in this table and those of *Sponsors Report* lies in the definition of clear and in focus, especially in regard to the visibility of the smaller raceway signs (which are nonetheless 2 to 3 m [6 to 10 ft] long). Because the Marlboro logotype was found to be immediately recognizable regardless of focus, the data presented here can be considered a reliable estimate of the magnitude of illicit tobacco advertising in televised auto racing. In view of promotions by the network leading up to the race, as well as replays of highlights of the event on the nightly sports news, the data here may underestimate the overall exposure the Marlboro brand received.

States Tobacco, the makers of Skoal),[15] have manufactured toy racing cars with Marlboro and Camel decals that are sold at toy and hobby shops. Other toy cars with the names of such brands of "spitting" tobacco as Chattanooga Chew, Copenhagen, and Skoal have been manufactured by the Ertl Company. In Australia in 1983, "Pole Position," a video-arcade game popular among children, was discovered to feature race cars and roadside billboards with Marlboro logotypes.[16] In spite of denials at the time that the tobacco company condoned such use of its brand names, Marlboro again appeared on roadside billboards in 1989 in "Super Monaco GP" and other popular video car-racing games.[17] The newsletter of the Inside Winston Cup Racing Sports Club includes a page of racing-related puzzles and games for children entitled "Kids' Korner." The winning entry of *National Dragster* magazine's 1989 drawing contest for children 10 to 16 years of age was a sketch of a Skoal drag-racing car.[18] At the racetracks, children sport caps, T-shirts, patches, pins, and pajamas with cigarette logotypes that can be purchased or won as prizes.

Because the bond of racing fans to the cars, drivers, and competitions is so strong and because attendance is at record levels, it is unlikely that the existence of any form of motor racing would be jeopardized by the replacement of tobacco companies with other sponsors. The only foreseeable way in which such a change could come about, however, would be through enforcement of the law against advertising cigarettes on television, which would in itself be likely to lead to a substantial withdrawal of support by tobacco companies.

The Public Health Cigarette Smoking Act of 1969, which prohibits the promotion of cigarette brands on television, calls for enforcement of the law by the Attorney General of the United States and a $10,000 fine for each violation of the law. Were the law to be applied to the telecast of the Marlboro Grand Prix, complete with the levying of a fine of $59,330,000 (based on the 5933 Marlboro logotypes televised during the 1989 race) (Table 1), neither media corporations nor tobacco companies could afford to continue televising tobacco-sponsored sporting events. The ruling by the Australian Supreme Court in 1990 that such sports telecasts are indeed cigarette promotions strengthens the case for enforcement of the American law.[19] Australia has also taken the world lead during the past few years in undermining tobacco promotions creatively. Legislation adopted by several states in Australia, most notably Victoria, not only bans several types of tobacco sponsorship but also earmarks the revenue from increased tobacco excise taxes for a Health Promotion Foundation, which provides funding to sports and cultural organizations that might otherwise have depended on tobacco companies for support.[20] This innovative approach, emulated by New Zealand in 1990, muted the opposition of certain sports associations that had feared the loss of lucrative tobacco-company sponsorship. Unfortunately, in an era of increasing privatization and given the absence of a tradition of government financing of sports, such a proposal would have little possibility of passage in the United States.

Another approach that could lead to limitations on the amount of automobile racing on prime-time television (and a resultant pullout by tobacco sponsors due to the reduced exposure of their brands to young viewers) would be to make the disproportionately high level of motor vehicle–related deaths among teenagers the subject of a major public health campaign. Research into the influence of motor-vehicle racing on the driving habits of young people might well yield insights into ways to reduce or prevent risk-taking behavior.

It is regrettable that there exists neither a registry of deaths and injuries in motor racing nor research into public health strategies to reduce the number of these violent public fatalities. The Center for Environmental Health and Injury Control of the Centers for Disease Control should aid in establishing such a registry.

As it stands, tobacco-company sponsorship of motor racing can only serve to hamper the efforts of governmental and voluntary health organizations to curtail the use of tobacco. At the same time, these agencies have failed for the most part to approach the tobacco epidemic by studying and confronting tobacco manufacturers that promote tobacco use through the sponsorship of auto races.

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I am indebted to Chris LaVergne, who viewed the tape of the Marlboro Grand Prix; to Kevin Reidy, Arthur Blasberg, M.D., Rick Richards, M.D., Paul Fischer, M.D., and John Slade, M.D., for their helpful suggestions; and to Jim Smith, coordinator of the Doctors Ought to Care Tobacco Archive.

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THE INFLUENCE OF THE U.S. TOBACCO INDUSTRY ON THE HEALTH, ECONOMY, AND ENVIRONMENT OF DEVELOPING COUNTRIES

ALTHOUGH tobacco was first used in Central and South America in religious ceremonies, it was the arrival of Christopher Columbus in the New World and the subsequent exportation of tobacco to Europe that led to widespread smoking.[1] Thus, there has been a long history of tobacco exportation from the Americas to overseas markets. The earliest antitobacco campaign was in 1604, when King James I imposed a tax on tobacco imported from the New World in an attempt to limit the "custome lothesome to the Eye, hatefull to the Nose, harmefull to the Braine, dangerous to the Lungs."[2] Today, over $3.27 billion is spent by U.S. cigarette manufacturers on domestic cigarette advertising and promotion, according to data from the Federal Trade Commission.[3] Despite these expenditures, over the past two decades the consumption of cigarettes in the United States has begun to decline, whereas between 1970 and 1980 it increased 33 percent in Africa and 24 percent in Latin America and skyrocketed in Asia.[4] Since the 1964 report of the Surgeon General's Advisory Committee on Smoking and Health, 38 million adults in the United States have quit smoking — nearly half of all those who ever smoked.[5] In contrast, during almost the same period (from 1960 through 1980), cigarette consumption rose by 400 percent in India and by 300 percent in Papua New Guinea.[4]

In response to declining sales in the developed world, the transnational tobacco corporations have begun to look to foreign markets, especially those in newly developed countries. With cigarette sales in developing countries growing at least three times as fast as elsewhere, a recent analysis in an advertising trade paper concluded that the decision by Philip Morris to set its sights overseas to increase profitability "is looking in the right direction."[6] The United States has become the number-one exporter of cigarettes, with total exports of 118.5 billion cigarettes in 1988 — an astounding 18 percent increase in volume in one year.[7] This article reports on the expansion of the U.S. tobacco industry into less-developed countries and explores the potential consequences for health and the environment of exporting an addictive and hazardous product.

The international trade in tobacco products is dominated by six multinational tobacco conglomerates, three of which are based in the United States (Philip Morris, R.J. Reynolds, and American Brands). Together, these six companies account for 40 percent of the world cigarette production and almost 85 percent of the tobacco leaf sold on the world market.[8] In 1954, tobacco became eligible for inclusion in the Food for Peace program, under which the U.S. Department of Agriculture shipped millions of dollars in tobacco products per year along with food to the hungry countries of the world.[9] Although this practice was abandoned in the 1980s, the United States is still the largest exporter of tobacco; 31 percent of the total crop is exported. Cigarette manufacturers are now pressuring foreign markets that had been closed to open themselves to further trade.[10,11]

Once trade is open to a U.S. conglomerate, the marketing of cigarettes in the developing world is far less restricted by advertising bans, required package labeling, and cumbersome health warnings than in the United States. In 1986, only 55 countries worldwide had enacted laws to control cigarette advertising, with only 6 countries requiring a rotating series of health warnings on packages.[11] If they are not restricted by the laws of a host country, U.S. manufacturers are currently permitted to export cigarettes to less-developed countries without any warning labels, even though they are required to place such labels on the same packages for sale in the United States. Few foreign countries have enacted legislation requiring U.S. manufacturers to print similar warnings.[11]

Tobacco advertising is pursued aggressively in less-developed countries, with the advertising budget for a given country at times surpassing its national budget for health research. The advertising budget in Brazil for the first seven months of 1986 for Philip Morris alone was $15.2 million.[12] Brazil is a country where cigarette-related disease now leads infectious diseases as the principal cause of death.[13] In Kenya, cigarettes with brand names such as Life and Sportsman are promoted as the passport to success, health, and a Western lifestyle; in Taiwan, most smokers prefer Long Life, Prosperity Island, or New Paradise.[14,15] The tobacco industry promotes consumption in the developing world by sponsoring sporting events and art, distributing free samples, and even arranging for discos to grant free admission in exchange for empty cartons of cigarettes.[8,10]

A recent strategy of the U.S. tobacco industry to open foreign markets, especially in Asia, has involved an amendment to Section 301 of the 1974 Trade Act.[8,11] This amendment enlists the cooperation of the executive branch of the federal government in threatening trade sanctions against countries not permitting the sale of U.S. tobacco products.[11] In the past few years, the U.S. Trade Office has used this threat to open the cigarette markets of Japan, Taiwan, and South Korea, with impressive results. Two years

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Smoking Behavior of Adolescents Exposed to Cigarette Advertising

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Synopsis

The purpose of the study was to explore the relationship between the exposure of adolescents in the seventh and eighth grades to cigarette advertising and their being smokers. A survey questionnaire given to 602 adolescents assessed their exposure to cigarette advertising and provided measures of their smoking behavior, demographic characteristics, and some psychosocial variables.

The results indicated that exposure to cigarette advertising and having friends who smoked were predictive of current smoking status. Adolescents with high exposure to cigarette advertising were significantly more likely to be smokers, according to several measures of smoking behavior, than were those with low exposure to cigarette advertising. The findings extend previous research identifying factors that may play a role in the initiation and maintenance of smoking among adolescents.

CIGARETTE SMOKING is the leading preventable cause of mortality and morbidity in the United States and has been described as the "most important public health issue of our time" (*1*). More than 40,000 studies have provided evidence on deleterious effects of cigarette smoking. A growing body of clinical and epidemiologic research demonstrates cigarette smoking to be associated with cancer, cardiovascular disease, and chronic obstructive lung disease (*1–3*). Cigarette smoking has been identified as the most widespread form of drug dependence in our society (*2*).

Cigarette smoking has declined in prevalence from more than 50 percent of the population during the late 1940s and early 1950s to about 25 percent (*4*). The reductions, in large measure, are the result of widespread public health campaigns on the national, State, and local levels by government and voluntary organizations. Other contributing factors have been legislative actions, such as banning cigarette advertising on electronic media, requiring warning labels on cigarette packages and cigarette printed advertising, and more recently, legislation restricting cigarette smoking in public

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Table 1. Periodicals read by respondents to a survey of 602 adolescents, showing total number of pages, total cost of cigarette advertising in the periodical, and periodical ranking by dollar amount of cigarette advertising, 1986

Periodical	Total pages	Total dollars	Rank
TV Guide	327.48	32,252,868	1
Sports Illustrated	290.74	27,698,692	2
People	324.53	23,576,525	3
Time	156.92	21,560,209	4
Newsweek	132.28	12,821,946	5
Better Homes	117.40	11,654,745	6
Family Circle	124.58	10,115,265	7
Women's Day	128.29	9,575,703	8
Cosmopolitan	141.94	6,910,964	12
U.S. News and World Report	100.49	6,688,071	14
Field and Stream	95.77	5,026,825	18
Life	71.00	4,406,555	19
Rolling Stone	132.50	4,166,607	20
Ebony	96.31	3,279,056	21
U.S.	139.86	2,832,560	24
Outdoor Life	83.85	2,831,335	25
Home Mechanix	61.60	1,903,289	39
Esquire	50.70	1,502,996	48
Psychology Today	51.02	1,324,067	53
House and Garden	38.00	921,433	60
Discover	31.70	671,644	66
Harpers	17.00	131,175	93

Table 2. Newspapers read by respondents of a survey of 602 adolescents, showing the number of column inches and pages devoted to cigarette advertising, January–September 1986

Newspaper	Column inches	Pages
New York Times	9,464	75.11
New York Post	5,960	85.14
New York Daily News	9,582	114.07
Newsday	2,520	30.00

places and on commercial passenger aircraft within the United States.

However, despite such encouraging developments, concerns about adverse consequences of cigarette smoking and little meaningful reduction in smoking onset rates among adolescents (*5, 6*) have led to growing interest in the passage of other legislation that would impose a total ban on cigarette advertising.

Cigarettes are the most heavily promoted product in the country (*7*). Currently, $352 million is spent annually on advertising cigarettes in periodicals (*8*). More than $119 million was spent in 1988 to advertise one brand of cigarettes, Marlboro (*8*). Since the 1971 ban on cigarette advertising in electronic media, advertisers have dramatically increased their expenditures for cigarette advertising in periodicals and other types of promotion (*9*). Although cigarette manufacturers have maintained that the sole purpose of advertising is to compete with other brands among current smokers, the tobacco industry aggressively recruits new smokers. Tye and coworkers (*10*) estimated that more than 5,000 children and adolescents would need to begin smoking every day to maintain the current size of the smoking population. Since tobacco companies are not permitted to market cigarettes to children directly, advertising appeals are made indirectly. Tobacco companies sponsor sporting events; sell souvenirs; display brand-associated cartoon characters on billboards; show cigarette brands in movies designed for young people; and ignore the sale by candy manufacturers of candy cigarettes having cigarette brand logos, overlooking copyright infringements (*11–14*).

Research on the relationship between cigarette advertising and adolescent smoking has generally focused on two factors: awareness of cigarette advertising and cigarette brand identification. In general, research has shown that there is a relationship between awareness of cigarette advertising messages and adolescent smoking (*15–17*) and that cigarette advertising may impact on children as young as 3 years of age. Aitken and coworkers (*18*) found that children as young as 6 years were aware of the presence of cigarette advertisements and that primary school children were able to identify correctly cigarette brands in advertisements when brand identifications were deleted (*19*). In a more recent study, Fisher and coworkers (*20*) found that 30 percent of 3-year-olds surveyed were able to match correctly Old Joe, the cartoon camel, with the tobacco brand.

Children and adolescents are responsive to the visual images and messages of cigarette advertisements. Advertisers present images of smoking that downplay health concerns and instead associate smoking with positive attributes, such as beauty and youth. The majority of advertisements portray healthy, enthusiastic, young people engaged in outdoor or social activities, sports, or feats of personal achievement (*21*). Since experimentation with new social behaviors often begins with the imitation of attractive models, who appear to be rewarded for their behavior (*22*), carefully crafted advertisements using attractive models are likely to increase the possibility that children and adolescents will try cigarettes.

Little empirical evidence concerns the actual process of advertisement exposure and behavioral imitation. Atkin and coworkers (*23*), in a study designed to assess teenage exposure to alcohol

advertising and its impact on teenage drinking, developed an overall index of their exposure. The index consisted of a measure of the reading habits of teenagers reading various periodicals, weighted by the average number of advertisements in each periodical, the number of advertisements typically noticed, the proportion of advertisements viewed for at least 5 seconds, the number of advertisements remembered in six categories of advertisements of alcoholic beverages, an estimate of the number of times the advertisements were viewed, the amount of attention paid to these advertisements, and the number of times other advertisements had been viewed for the particular beverage. A dose-response relationship was found between exposure to alcohol advertising and adolescent drinking behavior, with the higher exposure group reporting the most drinking. In addition, drinking behavior was found to be less related to such factors as peer influence, social status, community size, viewing television characters consuming alcohol, or viewing public service announcements.

Our study was designed to extend our understanding of the relationship between cigarette advertising and smoking among junior high school students. The majority of research studies assessing the impact of advertising on adolescent tobacco use have focused primarily on the relationship between smoking and cigarette brand identification, or have been statistical studies correlating the relationship between demand and promotional expenditures. The focus of this research was the exposure of adolescent-aged persons to tobacco advertising in popular periodicals and the effect that periodical advertising has on their smoking habits.

Methods

Subjects. In the spring of 1986, 602 junior high school students from grades seven (28 percent) and eight (72 percent) participated in our survey. The sample was 48 percent male, 82 percent white, and included students from four middle-class, suburban schools. Most lived in intact families (75 percent). More than one-third of the students indicated that both their mother and father had attended college.

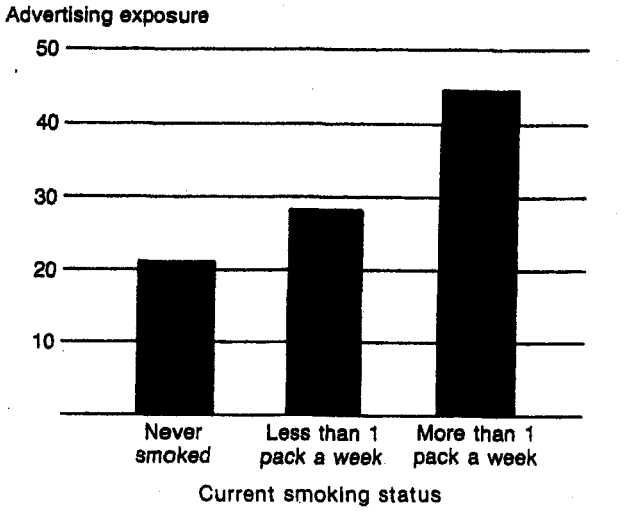
Measures. Four measures of smoking behavior were on the questionnaire. The 7-point current smoking measure assessed how often the subject smoked currently, with possible responses ranging from never to more than a pack a day. Students were asked questions to determine the number of cigarettes they had smoked the day before, in the past week, and in the past month. Their intention to smoke in the future was assessed by asking the students if they intended to smoke 2 years later.

'If a dose-response relationship does exist between cigarette smoking and advertising exposure, African American adolescents may now be at increased risk for becoming cigarette smokers, since cigarette advertisers appear to have increased the amount of advertising directed to that population.'

Demographic characteristics were assessed using items structured in a multiple choice format. Included were items concerning race or ethnicity, grade, sex, age, and family structure. To assess social influences to smoke, data were collected on the smoking habits of others, such as friends, siblings, and parents; attitudes of parents and peers toward smoking; and prevalence of smoking by peers and adults. Smoking by friends was measured using a 5-point scale for the number who smoked, ranging from none to all. Smoking by older siblings was measured on a 4-point scale for the number who smoked, ranging from none to three or more. Smoking by parents was assessed by separate questions for the respondents' father and mother, with response categories including have no father (mother), no, used to but quit, and yes. The perceived attitudes of respondents' parents toward their smoking was assessed on a 5-point scale ranging from strongly against to strongly in favor. Perceived smoking by peers and adults was measured with six categories for each item ranging from none to all.

Ten true or false items were used to assess smoking-related knowledge. Included were items concerning the immediate and short-term consequences of smoking, smoking prevalence among adults and peers, and social acceptability. Assertiveness was measured using a shortened, 14-item version of the Assertion Inventory (*24*). Items were included on substance refusal assertiveness, saying "no" when someone tries to get you to smoke, and social assertiveness skills, such as complimenting friends. Responses were measured on a 5-point Likert-type scale ranging from never to always. Locus of control was assessed using five items from the Norwicki and Strickland Locus of Control Scale for Children (*25*).

Relationship between exposure to cigarette advertising and current smoking status, respondents to a survey of 602 adolescents, March—September 1986



Exposure to cigarette advertising was assessed using a composite measure to determine how many cigarette advertisements that adolescents reported reading, defined as "looked at for 5 seconds or more," weighted by how frequently they were exposed to each of the periodicals listed, shown in tables 1 and 2, in the period of March through September, 1986. The number of cigarette advertisements that adolescents looked at in each periodical was assessed on a 5-point Likert-type scale ranging from none to most. The frequency of exposure to these periodicals was assessed on a 5-point Likert scale ranging from none to almost always.

In this way, exposure to cigarette advertising was assessed both in terms of overall level of exposure to periodicals containing cigarette advertisements and level of exposure to cigarette advertisements within each periodical. Scores were obtained for each periodical and summed across all periodicals included in the study. One-week test-retest reliability for the advertisement exposure measure was 0.84.

Magazine and newspaper selection criteria. A review of the literature did not provide a basis for determining which periodicals adolescents are likely to read with any regularity and which of those contain cigarette advertising. Forty-five subjects in 6 focus groups of about 5 to 12 students were conducted with both urban and suburban junior high school students (grades 6 to 10). Information obtained in preliminary focus groups showed that although the main sources of cigarette advertising were in printed material directed to adults, such material was readily available to adolescents and of interest to them. From the details gathered in the focus groups, a list of 23 periodicals and 5 newspapers was constructed, limited to periodicals found to have the highest percentage of cigarette advertising.

Table 1 lists 22 periodicals read by respondents, with the total number of pages and the total dollar cost of the cigarette advertising in each publication in 1986. Information on an additional periodical read by respondents was not available. Table 2 presents similar information concerning the amount of cigarette advertising contained in four of the five newspapers read by respondents, measured in the number of column inches and pages devoted to cigarette advertising. Information was not available for the local newspaper.

Table 3 shows the periodicals included in the study and two measures of the amount of cigarette advertising contained in each magazine for the period of the study, March through September 1986. Cigarette advertising is measured both in terms of (*a*) the percentage of all advertisements that are for cigarettes, which is the total number of cigarette advertisements divided by the total number of all advertisements in each magazine and (*b*) the percentage of cigarette advertisement pages, the total number of cigarette advertising pages divided by the total number of advertising pages.

The first measure provided an indication of the number of cigarette advertisements relative to the total number of advertisements. The second provided an indication of the number of cigarette advertisement pages relative to the total number of all advertising pages. The two measures yield similar percentages; differences between the measures are the result of differences in the size of the advertisements. Table 1 ranks the periodicals by the total cost of cigarette advertising carried by the periodical in 1986.

Procedure. Data were collected using group administration of the study questionnaire in regular school classes. Students were told that their answers would be confidential and would only be seen by members of the project staff. For the purposes of the study, subjects were told that their definition of reading (for the readership survey) should include "browse, look through, or pick up." Subjects who had questions were told by the project staff to "do the best you can" or "answer to the best of your knowledge."

Results

Relationship between smoking and advertising. The results indicate that exposure to cigarette advertising is significantly correlated with reported smoking behavior. The number of cigarettes smoked per day produced the highest correlation with exposure to cigarette advertising ($r = 0.50$, $P = < 0.001$). The figure shows the relationship between exposure to cigarette advertising and level of cigarette smoking. The seven categories of smoking were collapsed into three categories: never (those who had never smoked), less than a pack a week (those who indicated they smoked from about one cigarette per week to about a pack a week), and more than a pack a week (those who indicated that they smoked from more than a pack a week to more than a pack a day). As the figure shows, subjects who smoked more than a pack a week had the highest exposure to cigarette advertising, measured in the numbers of cigarette advertisements in the publications the respondents reported reading.

Factors associated with exposure to cigarette advertising. Cor-relations were computed between the advertisement exposure index and the demographic, psychosocial, social influence, and knowledge variables. A parental smoking index was constructed by combining the reported smoking behavior of the subject's mother and father. Strong associations were found between exposure to cigarette advertising and smoking by the subjects' friends ($r = 0.28$, $P = < 0.001$). Similarly, subjects' estimates of smoking prevalence among their peers ($r = 0.18$, $P = < 0.001$) and among adults ($r = 0.17$, $P = < 0.001$) were associated with exposure to cigarette advertising. Exposure to cigarette advertising was not found to be associated with smoking by students' fathers, mothers, or older siblings. Finally, an association was found between locus of control and exposure to cigarette advertising ($r = 0.13$, $P = < 0.01$).

Concurrent predictors of cigarette smoking. In addition to the correlational analyses presented, several multiple regression analyses were used to examine the role of cigarette advertising in promoting and supporting cigarette smoking. All of the variables included in this data set, along with the advertisement exposure measure, were used to predict current smoking. Table 4 shows separate regressions that were computed for each of the smoking variables. The two most important predictors of cigarette smoking were friends' smoking status and exposure to cigarette advertising.

Table 3. Periodicals read by respondents to a survey of 602 adolescents, ranked by percentages of all advertisements that are for cigarettes, and percentages of all advertising pages that have advertisements for cigarettes, March–September 1986

Periodical	*Percent cigarette advertising*	*Percent cigarette advertising pages*
TV Guide	19	18
U.S.	17	21
Psychology Today	13	15
Life	12	11
Field and Stream	9	9
People	8	19
Better Homes	8	9
Women's Day	8	9
Rolling Stone	8	8
Sports Illustrated	7	11
Ebony	7	9
Family Circle	7	9
Outdoor Life	6	9
Discover	6	10
Home Mechanix	6	10
Time	6	6
Harpers	5	7
U.S. News and World Report	5	6
Cosmopolitan	5	5
House and Garden	4	5
Esquire	3	5
Newsweek	3	5

Table 4. Results of regression analysis of variables as predictors of cigarette smoking by respondents to a survey of 602 adolescents, 1986

Variable	*beta*	*t*
Current smoking status:		
Friends smoking	0.48	[1]7.88
Exposure to advertising	0.17	[1]3.38
R^2	0.37	. . .
Smoked yesterday:		
Friends smoking	0.25	[1]3.75
Exposure to advertising	0.30	[1]5.51
R^2	0.24	. . .
Smoked last week:		
Friends smoking	0.23	[1]3.48
Exposure to advertising	0.37	[1]7.03
R^2	0.28	. . .
Smoked last month:		
Friends smoking	0.38	[1]6.10
Exposure to advertising	0.24	[1]4.76
Siblings smoking	0.10	[2]2.02
R^2	0.36	. . .

[1] $P < 0.001$, [2] $P < 0.05$.

Table 5 shows the results of the regression using the same set of independent variables and the intention to smoke in the future as the dependent variable. Exposure to cigarette advertising and friends' smoking status emerged as the most significant predictors. Other less significant predictors of

Table 5. Results of regression analysis of variables as predictors of intention to smoke in the future by respondents to a survey of 602 adolescents, 1986

Variable	beta	t
Friends smoking	0.40	[1]6.99
Exposure to advertising	0.18	[1]3.96
Sibling smoking	0.10	[2]2.06
Locus of control	0.12	[3]2.61
Assertiveness	−0.15	[3]−3.22
Single parent household	0.11	[2]2.41
R^2	0.44	...

[1] $P < 0.001$, [2] $P < 0.05$, [3] $P < 0.01$.

Table 6. Likelihood of survey respondents being cigarette smokers, by degree of exposure, 602 adolescents, 1986

Variable	Number of respondents: Low exposure	Number of respondents: High exposure	Rate ratio[1]	95 percent CI
Ever smoked	95	173	1.44	1.19–1.75
Smoked in past month	42	93	1.77	1.27–2.45
Smoked in past week	26	54	1.67	1.08–2.59
Smoked in past day	22	44	1.60	0.98–2.60
Currently smoke	32	78	1.93	1.32–2.82
Intend to smoke	47	90	1.52	1.11–2.08

[1] Low exposure group is the referent.

intention to smoke in the future included an external locus of control, low assertiveness, smoking status of older siblings, and living in a single-parent household. The data show that exposure to cigarette advertising is an important predictor of current smoking and intention to smoke in the future.

Smoking risk and cigarette advertising. To examine more fully the role played by exposure to cigarette advertising, we performed a median split on the advertisement exposure index; adolescents who scored 14 or lower on the index were placed in a low exposure group, and adolescents who scored greater than 14 were placed in a high exposure group. Following the median split, rate ratios and confidence intervals were calculated to evaluate differences on the various smoking measures between high and low exposure groups. Rate ratios for the smoking measures were calculated using the low exposure group as the reference group.

Table 6 shows the proportion of adolescents in the high and low exposure groups who were likely to smoke. Adolescents in the high exposure group were 1.44 times more likely than adolescents in the low exposure group to have tried cigarette smoking, 1.93 times more likely be a current smoker, 1.77 times more likely to have smoked in the past month, 1.67 times more likely to have smoked in the past week, and 1.52 times more likely to report that they intended to smoke in the future.

Discussion

Many environmental and psychosocial risk factors predispose adolescents towards starting to smoke cigarettes, such as parental smoking and low self-esteem (*26*). The results of this study point to an additional risk factor: the level of exposure to cigarette advertising. Exposure to cigarette advertising was found to be correlated with several measures of adolescent smoking behavior, and it was found to be an important concurrent predictor of current smoking and intention to smoke in the future. Adolescents who reported a high level of exposure to cigarette advertising were between 1.44 and 1.93 times more likely to be smokers than those reporting a low level of exposure. They were 1.5 times more likely to indicate that they intended to smoke in the future.

The findings are consistent with social learning theory concerning the power of attractive models in promoting the adoption of specific behaviors, such as smoking, which are repeatedly presented as facilitating the acquisition of desired characteristics or goals (*22*). The results support ideas resulting from research in self-enhancement that suggest that a modeled behavior is adopted if one identifies with the image portrayed by the model (*27*). If the models depicted in cigarette advertisements portray the personal ideal of an adolescent, the self-image, as well as the self-esteem of the adolescent, can be enhanced by adopting the smoking behavior.

Some support for the modeling hypothesis can be shown through statistics on cigarette sales. In 1968, when Philip Morris launched the first major promotional campaign directed to women (*14*), only 8.4 percent of teenage women smoked (*28, 29*). Other tobacco companies followed with their own version of cigarettes for women. Soon after, cigarette products for women became one of the most heavily advertised products in periodicals for young women. Associated with this phenomenon was a significant increase in the proportion of teenage women smoking cigarettes, which nearly doubled between 1968 and 1974 to 15.3 percent (*29*). Today, the prevalence of cigarette smoking among teenage women is slightly higher than it is among teenage men (*6*). Young women may be particularly suscep-

tible to cigarette advertising images that portray women smokers as slim, attractive, sophisticated, intelligent, and independent.

While the findings of our study provide empirical support for the hypothesis that cigarette advertising plays a role in the smoking initiation process, these findings must be regarded as suggestive rather than conclusive because of the nature of the study and its reliance on correlational data. An alternative explanation of these findings is that the observed association between smoking and advertising exposure might be the result of selective attention on the part of smokers, rather than an indication that exposure to cigarette advertising causes people to become smokers. If that were the case, that would support the consistency theory idea that people selectively attend to information that is consonant with their personal behavior (*30*).

A second limitation concerns the population studied. Because the majority of the participants in the study were white, middle-class adolescents, the findings cannot be generalized to other populations. Previous research has documented racial differences in cigarette advertising. Cummings and coworkers (*31*) found that periodicals directed to African American readers contained significantly more cigarette advertising and more advertising for menthol cigarettes than periodicals similar in content but directed to white readers. If a dose-response relationship does exist between cigarette smoking and advertising exposure, African American adolescents may now be at increased risk for becoming cigarette smokers, since cigarette advertisers appear to have increased the amount of advertising directed to that population. However, although higher rates of smoking have been observed among adult African Americans relative to that of whites, rates are currently lower among African American youth (*3*).

A third limitation is that to some extent the results of this study may have been confounded by promotional efforts of cigarette companies other than advertising. As Blum indicated, cigarette companies spend a considerable amount of money on other types of promotional activities, such as sponsoring sports events, point-of-sale promotions, coupons, sample give-aways, and other activities designed to promote brand name recognition (*11*).

However, evidence from this and other studies suggests that there may be a causal relationship between cigarette advertising and smoking initiation. In addition, a temporal association has been observed between cigarette advertising campaigns and increased adolescent smoking (*29*). Taken together, there would appear to be ample evidence to warrant more careful scrutiny by legislators of the impact of cigarette advertising on children and adolescents.

Future research is needed to extend the findings of this study to other populations to better understand the relationship between advertising and smoking in general and among specific racial and ethnic groups in particular. One issue concerns the relative impact of cigarette advertising on smoking behavior at different points during the adolescent period. However, like many other types of phenomena, the strongest evidence concerning the role of advertising in the promotion and maintenance of smoking can best be obtained from longitudinal research.

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Taking Action on Tobacco

A Submission to the Office of Tobacco Control,
Health Canada, Respecting *Tobacco Control:*
A Blueprint to Protect the Health of Canadians

January 1996

The **Canadian Cancer Society** (CCS) is a national, community-based organization of 350,000 volunteers and covering 3,000 urban and rural communities Canada-wide. The Society's mission is the eradication of cancer and the enhancement of the quality of life of people living with cancer.

The CCS achieves its mission through research, education, patient services and influence on public policy, supported by volunteers and funds raised in communities across Canada.

Tobacco use is the cause of 30% of all cancers, including 85% of all lung cancers. Because positive associations with tobacco use have been confirmed for deaths from cancers of the mouth, oesophagus, pharynx, larynx, lung, pancreas and bladder, the CCS has made the fight against the tobacco epidemic a nation wide priority. Considering that tobacco-induced diseases and deaths are preventable, the CCS works for the adoption of strong tobacco legislation, including legislation implementing measures recommended by the International Union Against Cancer (UICC) and the World Health Organization (WHO).

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2. Summary Analysis of *Tobacco Control: A Blueprint to Protect the Health of Canadians*.

3. Rothmans cigarette case.

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Executive Summary

The federal government's proposed tobacco control policy, as described in *Tobacco Control: A Blueprint to Protect the Health of Canadians* released December 11, 1995, deserves wide public support. The Canadian Cancer Society (CCS) believes that implementing the measures contained in the *Blueprint* will reduce smoking among Canadians, especially among teenagers. The federal government is to be congratulated for its far-sighted leadership.

This submission stems from a decision made by the CCS Board of Directors, meeting in Toronto on October 15, 1995, to call upon the federal government to give immediate priority to establishing a new regulatory framework for tobacco.

The CCS has over the years committed a great deal of effort on its own health promotion approaches to the tobacco epidemic. However we do not believe that the tobacco control efforts of the CCS and those of its sister organization, the National Cancer Institute of Canada, can have a long term positive influence on cancer control without a supporting national legislative framework to restrain tobacco industry promotion of its lethal products.

The magnitude of the tobacco epidemic requires strong, effective action. The need for wise policy and good legislation is made all the more important not only by unacceptably high levels of tobacco use, but also by increases in smoking prevalence in specific age groups and regions of Canada. We are particularly concerned about trends among adolescents.

Nicotine Control Act

A draft bill, entitled the *Nicotine Control Act*, is included with our submission. Hopefully our suggestions in this draft bill will be useful to Health Canada in developing strong legislation. Such a bill would create the authority to implement the measures described in the *Blueprint*. The Bill also includes amendments to other federal statutes to improve the government's tobacco control strategy.

Legislative Framework

The legislative framework proposed in the *Blueprint*, including incorporation and improvement on the frameworks found in the *Hazardous Products Act* and the *Food and Drugs Act*, would certainly be a suitable mechanism to regulate tobacco, a harmful, addictive

and lethal drug. The government should ensure that such a framework applies to all nicotine delivery devices, not just tobacco products.

Advertising

The CCS strongly supports the federal government's intention to completely ban advertising. The complete ban of tobacco advertising is a necessary component of an effective and comprehensive tobacco control policy. There is ample evidence that advertising can increase tobacco consumption in a variety of ways. Some of this evidence has arisen since the passage of the *Tobacco Products Control Act* (*TPCA*) in 1988. Partial restrictions on advertising short of a full ban would be completely inadequate for effective cancer control. History has shown that tobacco manufacturers exploit any opportunity to circumvent restrictions short of a total ban. Sufficient evidence and rationale exist to withstand a constitutional challenge to a complete ban on tobacco advertising. The tobacco industry's recently announced voluntary code restricting advertising is extremely weak. The Code is an attempt to convince the public that the tobacco industry is making concerted efforts to police itself. Such voluntary codes have not proven effective in the past.

Sponsorships

Sports and cultural sponsorship advertising certainly influences our youth. Sponsorship promotions are akin to lifestyle advertising, and their elimination is easily justifiable from a constitutional point of view given the Supreme Court of Canada's decision in *RJR-Macdonald v. Canada (Attorney General)*. The proposed restrictions on sponsorship promotions, though an improvement over previous restrictions, do not go far enough. For example, brand names and brand colours would continue to appear in sponsorship promotions. From a public health point of view, this would be unacceptable. There should be a complete prohibition on the use of sponsorships to promote tobacco products. To facilitate such a prohibition, the government should consider imposing a new tax on manufacturer profits (or a fee under the legislative framework) to raise money to provide alternate funding for arts and sports organizations. These organizations, of course, may have other suggestions for replacing sponsorship money. Instead of arts and sports events being used for pro-tobacco promotions, these events can be used for "Quit" anti-tobacco promotions. This style of alternate funding has been successfully implemented in Australia and New Zealand.

Tobacco Trademarks on Non-Tobacco Goods

The ban on the use of tobacco trademarks on non-tobacco goods and services, contained in the *Blueprint*, is a crucial component of a comprehensive tobacco control policy. Failure to include such a provision would open up massive promotional opportunities for tobacco companies.

Point of Sale Promotions

The *Blueprint* suggests important reforms controlling point of sale promotions. The ban on self-service displays, the restrictions on other product displays, and the reduction in the number of price signs are all worthy of support. However, the government should go further by requiring that product displays be out of the view of children behind the counter, not higher than one metre from the floor, by requiring that price signs not be legible from outside the store, by reaffirming that sophisticated advertising in the form of brand colours or designs resembling brand designs will be eliminated, and by eliminating manufacturer promotional allowances to retailers. The government should require mandatory health messages at point of sale, as well as mandatory promotions for alternative nicotine products. The government could permit or require Tobacco Product Information Books at retail outlets. These products would contain detailed information respecting all nicotine products available for sale in the store. It is important that all legitimate nicotine replacement products be regulated in an appropriate fashion.

Youth Access

The proposed ban on mail-order sales and on self-serve displays is commendable. However, the government should clarify whether it intends to completely ban cigarette vending machines. The precedent set up by Ontario and Nova Scotia should be emulated. Tobacco manufacturers should have a financial incentive to discourage youth smoking, such as by imposing a fee based on a company's market share among adolescents. Federal legislation prohibiting the sale of tobacco to minors should be improved in a number of ways, including a requirement that clerks ask for photo identification any time a customer appears to be under the age of 25.

Packaging and Labelling

The government's intention to maintain the prominence of existing health messages is good, as is the proposal to expand the package listing of toxic constituents. However, with regard to packaging, a clear priority for the CCS is to see action on the pressing need to implement plain packaging regulations. Including this measure would be a significant way to improve the *Blueprint* principles.

Health warning messages on packages should be increased in number and include information which is not sometimes seen as health related, such as cost for example. Pictures should be used as part of package messages. Importantly, package space should be allocated to promote nicotine alternative products. Further, the government should require detailed health information on packages (as is presently the case in Australia), require package inserts containing further detailed health information, require a listing on packages of all ingredients contained in the product, control terms such as "light" and "mild", print a 1-800 Quit Line telephone number on packages, ban the use of extraneous information on both the inside and outside of the package, and amend Bill C-117 to re-enact subsection 9(3) of the *TPCA*, which is worded as follows:

> This section does not affect any obligation of a distributor, at common law or under any Act of Parliament or of a provincial legislature, to warn purchasers of tobacco products of the health effects of those products.

Such a section is important because it explicitly makes clear that the ability of provinces to enact provincial health warnings is not pre-empted. Omitting subsection 9(3) may result in needless litigation as the tobacco industry might claim that provincial health warnings are an unconstitutional intrusion into federal jurisdiction.

Subsection 9(3) is also desirable because it would ensure no pre-emption of common law obligations. Given existing civil actions before the courts in Canada, and given the potential for further actions to be initiated, it is not desirable to open a line of defence (albeit mostly temporarily) that has been used so successfully in U.S. litigation.

Product Design

While the *Blueprint* indicates that the new legislation would create the authority to control product design, no specific measures are outlined. In fact, sufficient rationale exists to take a number of steps: ban the use of flavouring such as menthol; ban slim cigarettes; eliminate luxury length cigarettes; exercise control over the colour of cigarette paper and the filter overwrap; control the printing of trademarks on cigarettes; ban smokeless tobacco; and require that all products be registered with Health Canada prior to being marketed or modified.

Reporting

The enhanced reporting requirements in the *Blueprint* are desirable, namely reporting trademarks information, manufacturing specifications of tobacco products, sales data from wholesalers in addition to manufacturers, export sales data, and information respecting sponsorship activities and expenditures. However, reporting requirements should also be extended to: detailed product characteristics; expenditures for all types of marketing (not just sponsorships); samples of all packaging and promotional material; copies of all product research, market research and marketing documents; financial statements; and selected reports from suppliers to manufacturers. There should be a presumption that these reports would be accessible to the public.

Enforcement

The government should ensure that the new tobacco control legislation contains clear provisions to ensure effective enforcement, including the authority to make administrative "cease and desist" orders.

Other Important Measures

Further measures not included in the *Blueprint* should be added: the government should be mandated to prepare an Annual Report on Tobacco Control; the tax deductibility of tobacco marketing expenses should be removed; there should be a ban on the sale of tobacco in government buildings, schools, and health facilities including pharmacies, as well as from vending machines; candy tobacco products should be banned; duty-free sales of tobacco should be banned; and the government should remove existing advertising restrictions on alternative nicotine products.

Economic Issues

The response contained in this submission refutes tobacco industry arguments that such tobacco control measures will cause economic harm and decrease the overall number of jobs in Canada.

Introduction

On December 11, 1995, the Hon. Diane Marleau, then Minister of Health, released *Tobacco Control: A Blueprint to Protect the Health of Canadians* (the "*Blueprint*"). Overall, the *Blueprint* demonstrates real leadership by the Health Minister and by the Government of Canada. The *Blueprint* outlines a clear commitment to protect the health of Canadians from the ravages of tobacco use. Many of the measures outlined in the *Blueprint* are ground-breaking and set important precedents. We congratulate the federal government for its intelligent and far-sighted proposals. The measures in the *Blueprint* deserve wide public support.

This submission from the Canadian Cancer Society (CCS) is ultimately the result of a decision made by the CCS Board of Directors, meeting in Toronto on October 15, 1995, to call upon the federal government to give immediate priority to establishing a new regulatory framework for tobacco.

Our brief provides detailed comments on all aspects of the *Blueprint*. Reasons to support proposed measures are given. Where proposed measures do not go far enough, or where desirable measures have not yet been proposed, suggested improvements are presented together with supporting rationale.

Appendix 1 to the brief contains a draft bill for the government's consideration. This draft bill, entitled the *Nicotine Control Act*, is comprehensive in nature. It not only would implement the legislative framework proposed by the government, but it would also amend other statutes to improve overall tobacco control policy. The draft bill, which is accompanied by Highlights and by Explanatory Notes, is an integral part of this submission. Perhaps this draft will reduce the time required to prepare new legislation.

Appendix 2 contains a summary analysis of the provisions in the *Blueprint* as well as a listing of potential provisions which have not been included. This document hopefully will be seen as a handy reference describing the *Blueprint* as well as how the *Blueprint* can be improved.

The magnitude of the tobacco epidemic requires strong, effective action. The need for wise policy and good legislation is made all the more important not only by unacceptably high levels of tobacco use, but also by increases in smoking prevalence in specific age groups and regions of Canada. We are particularly concerned about trends among adolescents.

Tobacco use is the cause of 30% of all cancers, including 85% of all lung cancers. Because positive associations with tobacco use have been confirmed for deaths from cancers of the mouth, oesophagus, pharynx, larynx, lung, pancreas and bladder, the CCS has made the fight against the tobacco epidemic a nation wide priority. The CCS has over the years committed a great deal of effort on its own health promotion approaches to this problem.

We do not believe however that the tobacco control efforts of the CCS and those of its sister organization, the National Cancer Institute of Canada, can have a significant long term positive influence on cancer control without a supporting national legislative framework to restrain tobacco industry promotion of its lethal products. Most smokers have been recruited since the cancer causing effects of smoking were confirmed by the scientific and medical community. The tobacco industry has had it too easy too long. No other product as destructive to public health as tobacco is even allowed on the market. Tobacco products must be regulated in a manner commensurate with the disease and death caused.

Legislative Framework

The government plans to establish a legislative framework incorporating and improving on the frameworks found in the *Hazardous Products Act* and the *Food and Drugs Act*. The framework would set out broad prohibitions and would delegate authority to the Governor in Council to adopt regulations.

Support for such a framework is extremely important. The government is to be commended for its intention to take this critically important step. A properly drafted framework will provide the government with the necessary comprehensiveness and flexibility to effectively regulate tobacco.

The Case for a Comprehensive Legislative Framework

A "permissive" legislative framework prohibits the sale, importation and marketing of tobacco products and nicotine delivery devices, subject to what may be permitted by regulation.

The government already has comprehensive legislative authority over tobacco products in the *Food and Drugs Act* and Bill C-7, the *Controlled Drugs and Substances Act*. Though the government could choose to enact extensive regulations respecting tobacco under

these statutes, the government has open to it the alternative of addressing tobacco in a separate statute dealing exclusively with tobacco. This is the option put forward in the *Blueprint*.

At present, the government has exercised broad authority over nicotine products when nicotine is contained in products such as "the patch" or gum (pursuant to the *Food and Drugs Act*), but not when nicotine is found in far more harmful tobacco products such as cigarettes. A legislative framework for tobacco would merely create authority over tobacco products that already exists for other nicotine products.

The *Hazardous Products Act* contains a legislative framework established so that the sale, importation and advertising of a hazardous product are banned except as permitted by the regulations. There is no reason why the authority over tobacco products should be any less stringent than that over hazardous products.

When nicotine is contained in pesticides, the product is subject to broad legislative authority under the *Pest Control Products Act*. When nicotine is found in products intended for human consumption, the legislative authority should be at least as strong.

In British Columbia, a comprehensive legislative framework has been in place under the *Tobacco Sales Act*[1] since 1972. Since then, regulations at various times have dealt with advertising, package warnings, package size, health promotion signs at retail, and sales of tobacco to minors.

In the U.S., the Food and Drug Administration (FDA) has taken steps to enable regulation of cigarettes under the *Food, Drug and Cosmetic Act*. This Act gives the FDA comprehensive authority over cigarettes. We believe that the authority in Canada should be at least as comprehensive as in the U.S.

A legislative framework would add speed and flexibility when implementing tobacco control initiatives -- actions which are certainly appropriate to containing an epidemic. In this context, adopting regulations rather than amending statutes, which are subject to the vagaries of crowded legislative agendas, is highly appropriate. This flexibility can be beneficial when the government needs to strengthen provisions which have proven to be

[1]This Act was previously named the *Tobacco Product Act*.

weak and also when there is a need to relax provisions which are unintentionally too broad.

The framework is justified given the nature of the product. Unlike all other products, tobacco is a product where the government should justifiably try to eliminate usage over the long term.

The framework will establish the authority for product modification to make tobacco products less palatable or less likely to cause cancer.

The framework is necessary given the nature of the industry. The tobacco industry has a large financial interest in frustrating any effort at tobacco control. It has a long history of exploiting flaws in legislation, and of using creative legal interpretations to stall enforcement.

By presuming in a legislative framework that tobacco is illegal, there is an improved likelihood that legislation would survive a constitutional challenge.

The framework can be used as a legislative means to discourage tobacco use and to encourage use of alternative nicotine delivery devices such "the patch" or chewing gum. While regulations under the framework can place severe restrictions on the marketing of tobacco products, at the same time regulations can place fewer restrictions on the marketing of nicotine alternatives and put in place measures to actually encourage the sale of these alternatives to tobacco products.

Ensuring the Framework is Effective

The framework should apply to all nicotine delivery devices, not just tobacco products. As the draft bill in Appendix 1 recommends, the focus of enabling legislation should be on the control of nicotine delivery devices.

At the same time, the framework should apply to tobacco supplies, such as for example cigarette assembly kits, cigarette holders, cigarette or tobacco carrying or storage cases, package sleaves, cigarette papers, cigarette filters, cigarette tubes, items intended to be affixed to packages, pipes, and other items of this nature.

These "tobacco supplies" are an important part of tobacco consumption. Cigarette papers and tubes are consumed in whole or

in part by the smoker. Cigarette filters and holders can affect the yield of toxic constituents. Cigarette assembly kits are used to place tobacco sticks in cigarette tubes and thus affect the final design of a product. Tobacco carrying and storage cases, packages sleaves, and items (e.g. adhesives) intended to be affixed to packages can all affect the packaging and labelling of tobacco products. Unfortunately, these products could cover up, or substitute for, existing packages containing messages and information. Without including these products under the legislative framework, the health benefits of conveying package warnings and information would could be undermined.

Appendix 3 contains a Rothmans cigarette case made of tin and featuring a stylized cover. This promotional case was purchased January 1, 1996 in a duty-free store in the airport in Tampa, Florida. This case is an example of the type of item which must be covered by the framework. The importance of including cigarette cases, etc. becomes all the more important with the implementation of plain packaging. With the neutralization of tobacco packages, manufacturers should not be able to promote fancy package alternatives, even if those alternatives carry no tobacco trademark.

The *Tobacco Sales to Young Persons Act* applies to cigarette tubes, papers and filters. This is a good start at recognizing that legislation should apply to tobacco supplies, but the list of supplies covered by the *Tobacco Sales to Young Persons Act* is too limited.

Advertising

The *Blueprint* recommends a total ban on tobacco advertising. This measure is an absolutely necessary cancer control measure. The CCS believes that there is sufficient evidence to successfully defend a Charter challenge brought by manufacturers on the grounds that a total ban on advertising is an unjustified infringement of freedom of expression. Some of the evidence supporting a total ban has arisen since 1988 when the *TPCA* was adopted by Parliament. One important change since 1988 is the emergence of greater competition in the nicotine market. Tobacco manufacturers have to compete not only among themselves, but they also compete with manufacturers of alternative nicotine products such as nicotine gum and patches. A ban on tobacco advertising may help alternative nicotine products gain greater public acceptance.

Ways in Which Tobacco Advertising Can Increase Consumption

Tobacco companies argue that advertising only affects brand share, and that advertising has no impact on overall demand. This is nonsense. Tobacco advertising can increase consumption in the following ways[2]:

1. Inducing non-smokers to start
2. Inducing non-smokers to start earlier than would otherwise be the case
3. Encouraging smokers to smoke more cigarettes per day
4. Discouraging the smoking of fewer cigarettes per day
5. Discouraging smokers from quitting
6. Delaying when smokers quit after the decision to quit has been made
7. Inducing ex-smokers to start smoking again
8. Discouraging smokers from switching to nicotine alternative products
9. Encouraging users of nicotine alternative products to switch to tobacco products, in whole or in part
10. Persuading smokers to switch to a cheaper tobacco product alternative to cigarettes, such as sticks or fine cut, as an alternative to quitting or cutting down
11. Fostering lower prices (through price competition), leading in turn to higher consumption
12. Promoting self-censorship of media news coverage of tobacco and health issues as a way to not offend tobacco advertisers (reduced health information in the hands of the public can lead to increased smoking)
13. Persuading smokers to use smokeless tobacco products in places where smoking restrictions prevent smoking

General Issues Which Should Be Addressed to the Tobacco Industry

1. If tobacco advertising does not increase consumption, then why does the tobacco industry spend more than US$6 billion per year in the US in advertising and promotion?

2. If a ban on tobacco advertising would not decrease consumption, why are manufacturers opposing a ban, especially when profits would increase by perhaps $100 million per year due to reduced costs?

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[2]A comprehensive overview is Kenneth E. Warner. *Selling Smoke: Cigarette Advertising and Public Health.* American Public Health Association. Washington, 1986, 112p.

3. Tobacco companies deny that anyone has ever died from using their products. If they do not tell the truth on this matter, how could Canadians believe their claims that advertising has no impact on smoking?

4. Many countries in which there have been only one tobacco company, a monopoly, have still had extensive advertising. Why would a tobacco monopoly advertise if advertising had no impact on consumption?

5. Monopoly industries in Canada advertise. One example is cable TV. As well, telephone companies advertised long distance service even before there was long distance competition. If advertising had no impact on consumption, then why would such monopolies advertise?

6. To argue that advertising has no impact on tobacco consumption means, to be consistent, there would be agreement with the proposition that anti-smoking education or advertising had no impact on consumption. There is ample evidence however from California and from the one time "Fairness Doctrine" practised by the U.S. Government that anti-smoking publicity does reduce smoking.

7. Many industries promote their products through generic advertising. Examples include advertising for milk, eggs, beef, pork and butter. If advertising had no impact on consumption, would this type of generic advertising regardless of brand be undertaken?

8. Tobacco companies claim the purpose of advertising their products is provide customers with information. However, why have tobacco companies decades steadfastly refused to supply consumers with critically important information on the additives in cigarettes and the health risks of smoking?

9. Manufacturers claim they should have the freedom to advertise. Is not what we really need for our children freedom from manipulation by the trans-national tobacco companies and freedom from addiction to a deadly product?

10. The potential effectiveness of a measure in reducing smoking can often be measured by the vigour of industry opposition. Is not their very strong opposition to restrictions on tobacco marketing a further indication that such measures would reduce smoking?

11. Most new smokers are children. If the tobacco industry does not recruit more teenage smokers, would not the industry eventually go out of business?

12. Research in U.K. shows that children overestimate the proportion of adult population who smoke. This might be partially explained by the presence of tobacco advertising. Does not the perception that more people smoke than is actually the case lead to greater social acceptability of smoking and to a greater risk that the young person will begin smoking?

13. It is not the claim that advertising does not increase overall cigarette sales analogous to arguing that millions of dollars spent advertising individual ski resorts does not promote or reinforce the sport of skiing?

14. Would it make any economic sense for tobacco companies to advertise if there were no increase in overall demand? Net shifting of market share between companies is only about 1-2% per year, and part of this is attributable to demographics.

    The small increase in market share is not worth the vast amounts spent on marketing, especially when calculated using a discounted cash flow. The decreased market share for both RJR-Macdonald and RBH during the 1980's would not have been worth the millions they spent on advertising.

15. If it were true that tobacco companies advertised only to encourage brand switching, then would this not be evidence that they would not object to their industry declining, as all current smokers will eventually die?

16. If it were true that marketing had no impact on consumption, then logic dictates that not all companies would oppose an ad ban. With an advertising ban in place, the market share of some companies would be better off than would be the case if advertising were not banned. There is evidence from some countries, acknowledged by the industry, that the dominant company in a market tends to benefit most when advertising is banned. This suggests that, assuming that tobacco advertising has no impact on primary demand, Imperial Tobacco is a market share beneficiary of advertising restrictions and should welcome an ad ban. All of this is apart from the fact that companies would save tens of millions of dollars of advertising expenditures as a result of a ban. During the period the *TPCA* was in force, Imperial Tobacco's market share

has climbed from 56.2% in 1988 to about 68% in 1995, a significant increase in seven years.

Evidence That Tobacco Advertising Increases Consumption

There is ample evidence that tobacco advertising increases consumption. The evidence includes corporate documents, industry admissions, expert opinion, conference materials, anecdotal reports, and international documents. Much of this evidence has been documented elsewhere. A select number of points are included in this brief with respect to the ability of tobacco advertising to increase consumption:

- A 1995 U.S. FDA report looked at and cited considerable evidence and concluded that advertising does impact on consumption.[3]

- The FDA just received a large number of submissions respecting their proposed restrictions on tobacco advertising. Many of these submissions provide further support that advertising increases consumption and therefore should be carefully examined by Health Canada.

- The conclusions of the U.S. Surgeon General with respect to the impact of advertising on consumption are even stronger in the 1992 and 1994 reports than in previous reports.

- Ample evidence was gathered through written submissions and oral testimony before the House of Commons Standing Committee on Health during a study into plain packaging. After hearing all of this evidence, the Committee recommended the implementation of plain packaging, a policy measure designed to curb packaging as an advertising medium.

[3]Food and Drug Administration, Department of Health and Human Services, "21 CFR part 801, et al. Regulations Restricting the Sale and Distribution of Cigarettes and Smokeless Tobacco Products to Protect Children and Adolescents; Proposed Rule Analysis Regarding FDA's Jurisdiction Over Nicotine-Containing Cigarettes and Smokeless Tobacco Products; Notice" *Federal Register* (August 11, 1995) Part V.

- A House of Commons Committee in the United Kingdom held hearings on tobacco advertising and concluded that there was a relationship between advertising and consumption.[4] The Committee's report, and the oral and written evidence before the Committee, provide further support regarding the impact of advertising on consumption.

- A U.S. court decision, *Penn Advertising v. Baltimore*,[5] upheld municipal restrictions as to the location of tobacco ads. The court said the restrictions survived the *Central Hudson* test, which is similar to the *Oakes* test in Canada. The court accepted the view that tobacco advertising increases consumption. In considering the minimal impairment issue, the court did not make a distinction between types of tobacco advertising, e.g. that which was said to promote brand preference only and that which did not.

- Imperial Tobacco prevalence data show that the average annual prevalence decline between 1989-1993 was far greater than at any time prior to the ban during the period 1971-1988. The following table provides data for the time periods 1971 to 1982 (no legislation or significant tax increases), 1983 to 1988 (significant tax increases), and 1989 to 1993 (legislation and significant tax increases):[6]

	1971-82	1983-88	1989-93
Average Annual Decline in Prevalence	0.67%	0.78%	1.16%
Average Annual % Decline Based on Start of Period	1.43%	1.98%	3.33%

(Note that Imperial Tobacco has not released prevalence data for 1994 and 1995.)

- All living former U.S. Surgeons General have gone on record as supporting a ban on advertising.

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[4] U.K., House of Commons Health Committee, *Second Report: The European Commission's Proposed Directive of Tobacco Products* (London: H.M.S.O., 1992) at xvii.

[5] (U.S. Dist. Ct. for Dist. of Maryland, August 11, 1994).

[6] Imperial Tobacco Ltd., "The Canadian Tobacco Market at a Glance" (1989), Exhibit AG-31, *RJR-Macdonald Inc. v. Canada (Attorney General)* p.2; Imasco Ltd., *Annual Report 1993* p.18.

- In *RJR-Macdonald v. Canada (Attorney General)*, all nine judges on the Supreme Court of Canada agreed that there was a rational connection between advertising and consumption; that is to say, tobacco advertising increases consumption.

  Here are the views endorsed by six of the nine members of the court as written by Mr. Justice La Forest (with Justices Gonthier, Cory, L'Heureux-Dubé/ concurring, and with the concurrence on this point of Chief Justice Lamer and Justice Iaccobucci):

  > [I]t is difficult to believe that Canadian tobacco companies would spend over 75 million dollars every year on advertising if they did not know that advertising increases the consumption of their product... The evidence can be conveniently subdivided into three categories: internal tobacco marketing documents, expert reports, and international materials...
  >
  > Perhaps the most compelling evidence concerning the connection between advertising and consumption can be found in the internal marketing documents prepared by the tobacco manufacturers themselves. Although the appellants steadfastly argue that their marketing efforts are directly solely at maintaining and expanding brand loyalty among adult smokers, these documents show otherwise. In particular, the following general conclusions can be drawn form these documents: the tobacco companies are concerned about a shrinking tobacco market and recognize that an "advocacy thrust" is necessary to maintain the size of the overall market: the companies understand that, in order to maintain the overall numbers of smokers, they must reassure current smokers and make their product attractive to young and to non-smokers; they also recognize that advertising is critical to maintaining the size of the market because it serves to reinforce the social acceptability of smoking by identifying it with glamour, affluence, youthfulness and vitality. (pp.82-83)
  >
  > The internal marketing documents introduced at trial strongly suggest that the tobacco companies perceive advertising to be a cornerstone of their strategy to reassure current smokers and expand the market by attracting new smokers, particularly among the young. (pp.87-88)

- The popular press from around the world contains many opinion articles authored by informed commentators that tobacco advertising increases consumption.

- Articles in the popular press, in marketing publications, and in tobacco industry trade journals contain admissions by tobacco industry representatives about the positive relationship between advertising and consumption.[7]

- An extensive set of tobacco industry documents have made their way on to the public record in 1994 and 1995. These documents provide extensive admissions about corporate knowledge and strategies, about the impact of advertising, and about the competitive threat brought about from nicotine alternative products.[8] These documents enhance the extensive information about industry marketing practices exposed during the trial regarding the constitutionality of the *TPCA*.

- A ban on tobacco advertising was one of the recommendations coming out of a 1965 National Youth Conference on Tobacco and Health. This recommendation has been reiterated by the National Strategy to Reduce Tobacco Use.

- Recent studies have documented a high awareness and recall of tobacco advertising among children and adolescents, with Joe Camel (the cartoon character which promotes Camel cigarettes) being just as recognizable among six year olds as Mickey Mouse.[9] A study published in 1994 found that in "girls younger than 18 years, smoking initiation increased abruptly around 1967, when tobacco advertising aimed at selling specific brands to women was introduced. This increase was particularly marked in those females who never attended college."[10] A study published in 1995 provides evidence that tobacco marketing was a stronger influence in encouraging

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[7]For example: Editorial, "More advertising" (1956) 166:10 United States Tobacco J. 4; P. Waldman, "Tobacco Firms Try Soft, Feminine Sell" *The Wall Street Journal* (19 December 1989); D. Daniels, *Giants, Pygmies and Other Advertising People* (Chicago: Crain Communications, 1974).

[8]Journal of American Medical Association, July 1995 Vol.274 no 3.

[9]P.M. Fischer et al., "Brand logo recognition by children aged 3 to 6 years. Mickey Mouse and Old Joe the Camel" *Journal of the American Medial Association* 1991;266:3145-8; J.R. DiFranza et al., "RJR Nabisco's cartoon camel promotes Camel cigarettes to children" [published erratum appears in *JAMA* 1992;268:203-4] *Journal of the American Medical Association* 1991;266:3149-53.

[10]J.P. Pierce et al., "Smoking Initiation by Adolescent Girls, 1944 through 1988. An Association with Targeted Advertising" *Journal of the American Medical Association* (1994) 271(8):608.

adolescents to initiate the smoking uptake process than exposure to peer or family smokers or socio-demograhic variables including perceived school performance.[11]

Three items which provide an excellent overview of how tobacco advertising can increase consumption and include many helpful references, are as follows:

a. Ken Warner, *Selling Smoke: Cigarette Advertising and Public Health* (Washington, D.C.: American Public Health Association, October 1986).

b. *Pushing Smoke: Tobacco advertising and promotion* (WHO Regional Office for Europe and Commission of European Communities, about 1988).

c. Joe Tye et al, "Tobacco Advertising and Consumption: Evidence of a Causal Relationship" *Journal of Public Health Policy* (Winter 1987) 492-508.

The Inadequacies of a Partial Ban

A total ban on tobacco advertising is necessary for the protection of public health. Any partial restriction would be specific in nature and the ability to advertise outside the scope of this specific restriction would be only restricted by the imagination of the tobacco industry. This has been the historic experience in Canada and in other countries.

For example, when Canadian tobacco manufacturers removed advertising from radio and television in 1972, the companies shifted advertising dollars to other media, despite previously indicating that such shifting would not occur. In the U.S., a similar shift in marketing expenditures following the cessation of broadcast tobacco advertising occurred in the early 1970's.

In Canada, after the *TPCA* banned tobacco advertising, the industry broadly interpreted an exception permitting corporate name sponsorships and exploited this exception. Sponsorship promotions -- indirect, but effective tobacco advertising -- quickly took the place of tobacco advertising. Spending on sponsorships and sponsorship promotions soared by more than 400%.

[11]Nicola Evans et al., "Influence of Tobacco Marketing and Exposure to Smokers on Adolescent Susceptibility to Smoking" *Journal of the National Cancer Institute* 1995;87(20):1538-1545.

A law which simply bans advertising directed at minors is completely inadequate. First, the question is not whether advertising is directed at minors, but whether advertising has an impact on minors. There is considerable evidence that advertising impacting minors does have an impact on smoking, regardless of the intentions of the advertiser. Second, it is impossible to design an ad which has no impact on a young person before his or her 18th or 19th birthday, but only begins to have an impact when he or she wakes up and turns 18 or 19. Third, it is impossible to design ads directed at persons who have reached age 18 or 19, but not directed at classmates who have not reached this age. Fourth, the minimum age to be sold tobacco varies across the country (18 or 19) thus further impeding efforts not to advertise to people below one set age. Fifth, it is impossible to know whether tobacco companies are advertising to minors. Even the companies claim they are not. The voluntary code in place prior to the *TPCA* stipulated that tobacco companies would not advertise to minors under the age 18. Notwithstanding this unambiguous and much-touted rule, Imperial Tobacco explicitly directed advertising at teenagers aged 12-17.[12] The only way to prevent children from being exposed to tobacco advertising is to prevent tobacco advertising altogether.

Partial restrictions limited to a ban on lifestyle advertising would be unsatisfactory, simply because it is impossible to ban lifestyle advertising. Whatever the restrictions imposed, tobacco companies will find a way around it. A ban on showing people in ads still leaves open the use of cartoon characters, the use of animals (such as a powerful lion or a colourful butterfly), or the use of situations suggestive of humans e.g. sports equipment in a locker room, a glass of champagne and concert tickets, or a yacht moored on a secluded sandy beach. These examples show the potential for negative smoking-related role models for children.

An ad which limited the pictures in advertising to only a depiction of the package is not immune to the dissemination of lifestyle images. For example, Philip Morris has sold Marlboro cigarettes in the U.S. with the Marlboro Man directly on the package. In Canada, the cigarette brand Canadian Classics depicts a nature scene of forest and mountains covering the entire package. Reproducing this package in an ad could be just as effective as including the nature scene directly in the ad.

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[12] Imperial Tobacco Ltd., "Fiscal '80 Media Plans" Exhibit ITL-13, *RJR-Macdonald Inc. v. Canada (Attorney General)*; Imperial Tobacco Ltd., "Fiscal '81 National Media Plans" Exhibit AG-223, *RJR-Macdonald Inc. v. Canada (Attorney General)*.

A ban on the use of pictures in advertising still permits lifestyle images to be communicated in text-only ads (e.g. "For people who want to taste luxury", "Looking good -- Feeling better", "Slim and sassy", "The smoke for a man", "For the women who wants it all", etc.).

The industry's ingenuity to avoid restrictions and to continue to use lifestyle images is well exhibited by experience in France, as described in this excerpt:

> A former French law restricting advertising to product information, trademarks and package presentation was avoided in a number of ways. The package of one brand carried pictures, all of which were reproduced when advertisements showed the package. For another brand, full page ads were taken out but product information was only placed in the top quarter. The remaining three-quarters of the page were subcontracted to Club Med, whose advertisements contributed to a lifestyle association for the brand. For other brands, lifestyle advertisements identical to those permitted prior to the enactment of the law were published, except that these ads were for boots or lighters instead of for cigarettes.[13]

If advertising is limited to text only and information only, tobacco companies can still create lifestyle images through the choice of brand names. "Kool", "Sportsman", "Players", and "Holiday" are all examples of brands which have been sold in Canada. The brand names are all suggestive of positive lifestyle images. The use of "slims" in a brand name, such as in "Matinée Slims" or "Craven "A" Superslims", is suggestive of slimness and sexual attractiveness for women.

Partial restrictions on tobacco advertising which continued to permit informational advertising would be unsatisfactory. Informational advertising respecting price can lead to lower prices through competition; lower prices in turn lead to increased consumption. Informational advertising can inform consumers of lower cost sources of supply, such as mail order cigarettes shipped (perhaps illegally) from low tax jurisdictions. Access to lower cost cigarettes increases consumption. Informational advertising can induce consumers to switch to a lower cost tobacco product, such as roll-your-own cigarettes instead of tailor-made cigarettes, instead of quitting altogether. Informational advertising can

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[13]Rob Cunningham, "*RJR-Macdonald Inc.* v. *Canada (Attorney General)*: Reflections from the Perspective of Health" (1995), 40 *McGill Law Journal* 229 at p.264, citing L. Joosens, "Strategy of the Tobacco Industry Concerning Legislation on Tobacco Advertising in Some Western European Countries" in *Proceedings of the 5th World Conference on Smoking and Health*, vol. 1 (Ottawa: Canadian Council on Smoking and Health, 1983), at 552-553.

induce consumers to switch to menthol or so-called "light" cigarettes instead of quitting altogether because these labels may give a false impression that they are safer to use. Informational advertisements may induce smokers to consume smokeless tobacco in places where smoking is prohibited.

A complete ban on tobacco advertising is supported by every major health and medical organization in Canada, the Consumers Association of Canada, the International Union Against Cancer, the World Health Organization, and the International Organization of Consumers' Unions.

A total ban on tobacco advertising is found in a growing number of countries including Australia, France, New Zealand, Singapore, Thailand, France, Sweden, Iceland, Norway, Finland, Portugal, Italy, Lithuania. Governments in these countries have come to the conclusion that a complete ban on tobacco advertising is necessary to protect public health.

An international convention on tobacco control has been proposed. Provisions in the proposed convention include a complete ban on tobacco advertising.

A complete ban on tobacco advertising was supported by a resolution at the 1994 9th World Conference on Smoking and Health held in Paris.

Evidence justifying restrictions on tobacco advertising can be found in papers delivered at World Conferences on Smoking and Health in 1990, 1992 and 1994. Some papers deal with how manufacturers get around partial restrictions. Numerous other conferences in various parts of the world have had resolutions supporting a complete ban on tobacco advertising, or have had relevant papers delivered.

GATT has upheld a total ban on tobacco advertising in Thailand, notwithstanding American arguments that such advertising has had no impact on consumption but only on market share.[14] The World Health Organization participated in the GATT hearing arguing in support of the advertising ban.

Canadian Cabinet documents now on the public record indicate that in 1971 tobacco manufacturers were of the view that a

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[14]GATT, *Restrictions on Importation of and Internal Taxes on Cigarettes. Report of the Panel adopted on 7 November 1990*, GATT Doc. DS10/R, 46th sess., 37th supp. B.I.S.D.

worldwide ban on tobacco advertising was inevitable. If the inevitable is going to happen, it should happen sooner as opposed to later.

A 1995 *McGill Law Journal*[15] article contains some evidence and reasoning regarding how advertising increases consumption and why a partial ban on tobacco advertising would be inadequate. The article is included as Appendix 4.

The Industry's Voluntary Code

On December 20, 1995, the Canadian Tobacco Manufacturers' Council (CTMC) released a new voluntary code restricting advertising. The new Code took effect immediately. While the industry claimed that it was acting reasonably, in fact the restrictions are cleverly designed to be ineffective, allowing continuation of widespread tobacco advertising. We see the Code as a public relations exercise. Below is our analysis of the Code:

- The code states that billboard advertising greater than six square metres will not be located within 200 metres of the entrance of elementary and secondary schools. However, there are no location restrictions on sponsorship advertising, which teenagers believe to be cigarette advertising anyway. As well, advertising in stores located near schools and frequented by teens can continue, as can ads on bus shelters near schools and ads on public transit vehicles carrying kids to school. Since location restrictions only apply to within 200 metres of the school *entrance* instead of school property, billboards can still overlook school grounds.

- The Code says that all advertising will be directed at adults. However, despite the previous Code banning advertising directed at people of less than 18 years, Imperial Tobacco documents show that the company has in the past explicitly targeted 12-17 year olds as the most important target group for some brands.

- The industry claims the Code bans lifestyle advertising. This is false. The only restriction is that "people" will not continue to appear in ads. Lifestyle ads can continue with images such as the pristine outdoors, expensive yachts, sports cars, a guitar, and so on.

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[15]Rob Cunningham, "*RJR-Macdonald Inc.* v. *Canada (Attorney General)*: Reflections from the Perspective of Health" (1995), 40 *McGill Law Journal* 229.

- Despite claims to the contrary, cigarette brand names can continue to appear on clothing and other non-tobacco goods.

- Health warnings will be placed at the bottom 20% of billboards and 15% of other ads (not at the top where it can be seen more clearly). The warning is not required to be prominent, only "clearly legible".

- In some respects the Code is weaker than it was in 1976 when the Code prohibited promotion of sponsorship events on television and radio (permitted by the present code), and placed a cap on total industry advertising and sponsorship spending to 1971 levels, adjusted for inflation (there is no cap in the present Code).

- The previous Code was routinely violated. The Non-Smokers' Rights' Association produced a *Catalogue of Deception* documenting violations of almost every rule in that Code.

- When the tobacco industry decided that they did not like a provision in the Code for which they were criticized as not obeying, the industry on occasion simply weakened the provision in question by amending it. The industry has the ability to amend the Code at any time.

- There are no penalties for violating the Code. In fact, because the Code is voluntary, manufacturers are really under no obligation whatsoever to comply with the Code.

- The Code does not apply to anyone who is not a member of the CTMC. Thus manufacturers and importers other than the big three would unfortunately be exempted, as would be retailers, many of which have advertised in the past (such as by advertising sale prices). The CCS has reported such violations of the *TPCA*.

- Around the world, voluntary codes have been used to prevent the adoption of meaningful legislation. In Canada in 1971, Health Minister John Munro introduced Bill C-248 to ban cigarette advertising. Several months later, the industry amended its voluntary code to take advertising off television and radio and to place a (weak) warning on packages. The bill died on the Order Paper without even being debated.

- Prior to introduction of the Tobacco Products Control Act, the CTMC proposed to Health Minister Jake Epp that the Code be amended as a way to avoid the need for legislation. Epp rejected the industry proposal.

- U.S. President Bill Clinton has rejected U.S. industry proposals to amend the American voluntary code. The American government is instead moving forward with legislation.

- A recent example of the inadequacy of voluntary commitments comes from the United States. In an effort to stave off government regulation of tobacco marketing, Philip Morris announced and promoted its voluntary "Action Against Access" programme. One provision was to end promotional allowances to retailers convicted of making illegal sales of tobacco to children. A citizen wrote to Philip Morris to inform the company of 17 Minnesota retailers who had been so convicted. Philip Morris refused to follow through on its promise stating that it had to receive information from the government: "Where this information is received directly from the state or an authorized agency or municipality, we will be able to set up a process to ensure that out (sic) stated criteria are met and that our objectives are consistently implemented." However when state Attorney General Hubert Humphrey III subsequently informed Philip Morris of violators, Philip Morris said it could not alter their contracts with retailers.[16]

Sponsorship

The Proposed Restrictions

According to the *Blueprint*, the government intends to place further restrictions on the use of sponsorships to promote tobacco products. Unfortunately the *Blueprint* would permit tobacco companies to be able to sponsor sporting and cultural events, subject to the following restrictions:

- The use of brand-identifiable elements on non-tobacco promotional items associated with a sponsored activity or event would be prohibited
- The incorporation of brand-identifiable elements in the name of the sponsored activity event or venue would be prohibited
- Testimonials and personal endorsements by athletes, celebrities and other people would be prohibited
- Health messages would have to be prominently displayed on all sponsorship advertising and signage
- Advertising would have to be linked to the sponsored activity, event or venue - corporate marketing would be prohibited

[16]"Inaction Against Access" *Tobacco Access Law News* No. 30, (October 1995) p.1.

- Advertising of sponsored activities or events at point of sale would be prohibited
- The period of advertising before and after event would be limited
- Broadcast and electronic advertising for the promotion of sponsored events, activities or other venues would be prohibited

Improving the Proposal

Despite these restrictions on sponsorship promotions, the language in the *Blueprint* indicates that there will remain plenty of room for tobacco companies to use sponsorships to promote their products. The CCS strongly feels that the failure to include provisions to eliminate the ability of cigarette companies to use sponsorships to advertise and promote their deadly products is a glaring weakness in the *Blueprint*.

Under the proposals in the *Blueprint*, there could still be a sponsorship promotion stating for example "du Maurier presents the Canadian Open" using du Maurier red, having the "du Maurier" as the most prominent text in the ad, and even depicting an open package of cigarettes. Another example of a permitted promotion would be an ad saying "Craven "A" presents Country Music" with the ad featuring an exuberant young couple. These sponsorship promotions could continue to appear, albeit with a warning, on billboards near schools, on transit vehicles carrying children, on poster ads in shopping malls frequented by teenagers, and so on. Unless the scope for sponsorship promotions is closed, manufacturers will still have the ability to use imagery to promote tobacco products.

One of the problems with the sponsorship provisions in the *Blueprint* is that instead of describing what types of promotions would be permitted, there is a series of restrictions leaving open all other forms of promotion.

One excellent method to phase-out sponsorships -- through a tax or fee on tobacco manufacturers to provide alternative sponsorship funding -- was not included in the *Blueprint*. The availability of alternative funding means that these events could then be promoted using a "Quit" anti-smoking theme instead of a pro-smoking theme. The tax or fee on tobacco companies would have no adverse affect on manufacturer profits since money currently spent on sponsorships would simply be shifted to pay the tax/fee. This alternative funding is based on successful experience in Australia and New Zealand.

The money raised through a tax on manufacturer profits, or through a fee imposed by regulation under the legislative framework, could be given to a number of bodies for subsequent distribution to arts and sports groups. The responsibility for distribution could be given for example to the federal department of Canadian Heritage or to bodies such as Sport Canada and the Canada Council. If recipients of alternative funding are to be required to promote their events as "Quit" events, which we recommend, then the best policy may be to have Health Canada responsible for the administration of funding.

International Efforts to Restrict Sponsorships

Globally, an increasing number of countries, including Australia, New Zealand and France, are prohibiting sponsorships as a vehicle to promote tobacco products. Australia and New Zealand are nations known for their love of sport. France is known for its excellence in the arts. In the U.S., the Clinton Administration is moving forward with a ban on tobacco sponsorship promotions through regulations under the U.S. *Food, Drug and Cosmetic Act*.

The World Health Assembly has called for an end to the use of sponsorships to promote tobacco. The theme for the forthcoming World No-Tobacco Day in May 31, 1996, organized by the World Health Organization (WHO) is "Sports and the arts without tobacco".

The Case for Ending Sponsorships as a Means to Promote Tobacco

There is a tremendous difference between corporations giving financial support to activities supporting an artistic or sport event, for example to promote attendance or participation, and money spent on advertising the sponsorship of such events. Sport sponsorship advertising is, therefore, a way for tobacco companies to shift the image of cigarettes from disease and death to one of physical fitness and the healthy outdoors. What better endorsement could du Maurier have than a female teenage tennis star playing on centre court and on national television at the Canadian Open? du Maurier is the leading brand in Canada smoked by teenage girls.

Sponsored events are carefully chosen to build a certain image for the brand in question. Matinée cigarettes, for example, are targeted at women. The Matinée Ltd. Fashion Foundation focuses on women's clothing. Export "A" Inc. cigarettes are targeted at men, thus Export "A" Inc. sponsors sporting events enjoyed by men. du Maurier seeks to create a sophisticated, upscale image. Thus du

Maurier Ltd. sponsors arts events, equestrian events, and upscale sports such as tennis and golf.

Studies show that students believe sponsorship promotions to be cigarette advertisements. Recent research funded by the Robert Woods Johnson Foundation (Appendix 5) found that students consider sponsorship promotions to be cigarette advertising.

Research conducted by Dr. Mark Taylor has found similar results to the Robert Woods Johnson funded research.

In 1995, the Addiction Research Foundation and an Ontario Task Force on Cancer called for Canada's advertising restrictions to be enhanced to include a ban on sponsorship.

Sponsorships add social acceptability to tobacco products. And the greater the social acceptability of tobacco, the greater its use will be. Sponsorships portray cigarettes as an everyday, innocuous product, something which is far from the truth.

Tobacco companies say that an acknowledgement of their sponsorship in an event program is not going to induce someone to begin smoking. Nevertheless, young persons may associate their favourite athletes or artists with the smoking experience. Tobacco executives fail to publicize the fact that sponsorship promotions are everywhere: on television, in corner stores, on billboards near schools, on transit vehicles carrying children to school, and so on. We are critical of such sponsorships because major portions of sponsorship money goes to the advertising of the event -- not in producing the event per se. An example is the Matinée Fashion Foundation which gives bursaries to "would be" designers -- which would represent only a tiny proportion of the population. However, its sponsorship advertising in various magazines, on transit cards, and so on reaches a wide audience of young women.

If tobacco sponsorships do not promote increased consumption, one would logically ask why there companies spend so many millions of dollars on sponsorship promotions. When the *TPCA* banned tobacco advertising, companies in Canada dramatically increased their sponsorship spending from $12.5 million to $40-80 million or more. (The amount spent is an estimate and depends on how spending is defined, e.g. whether billboards, point of sale promotions count. The exact amount is not publicly known.) That so much would be spent on sponsorships is evidence that tobacco companies feel that sponsorship advertising is an effective communications vehicle. Here is an excerpt from Maclean's magazine:

> "Company officials said that they value the golf connection -- including sponsorship of the $600,000 du Maurier Classic on the pro women's circuit -- because that helps to instil confidence in a brand and spurs positive associations in smoker's minds with a so-called upscale event. ... Donald Brown, Imperial's vice-president of marketing said that even less affluent smokers may favour the brand because of its link with a comfortable lifestyle and because that "says something about you"."[17]

If a ban on tobacco sponsorships would not decrease consumption, then why are manufacturers opposing such a ban, especially when expenses would decrease by $40-80 million per year?

Tobacco companies deny that anyone has ever died from smoking. They equally have no credibility when they claim that advertising and sponsorships have no impact on smoking.

Many sponsored events are watched by children either at the site of the event or on television. These children are too young to be sold cigarettes.

Allowing sports and arts events to continue to promote tobacco contradicts the educational messages children receive in schools.

There is no credible evidence that sponsorship promotions have no impact on smoking prevalence. Until there is such evidence, the government must not take chances with the future health of the youth of Canada.

The argument that cigarettes are a legal product is an empty one. So is the argument that a ban on the use of sponsorships to promote tobacco will lead to restrictions on other types of sponsorships. Tobacco is a unique product. If cigarettes were invented today, they would never be allowed on the market -- given everything we know about their consequences for health. Cigarettes are the only product which can be lethal when used exactly as the manufacturer intends. Unlike other products which also sponsor arts and sporting events, cigarettes have no socially redeeming value. The 1988 cigarette advertising ban has not led to advertising restrictions on other products such as alcohol or cars.

The bottom line for tobacco companies is of course profit. No one disagrees with that. These profits are very healthy indeed. If tobacco companies care about the arts or sports, they will

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[17]"Golf/Special Report. Openly Canadian The third-oldest national title is now a big-time draw". *Maclean's*. April 1995 p.62.

continue to fund these events even after regulations have been passed preventing them from using arts and sport events to promote tobacco products.

The prime motivation of tobacco companies is not freedom of expression. At the 1994 du Maurier Ltd. Canadian Open (for women), Physicians for a Smoke-free Canada (PSC) put up signs saying "Cigarettes Kill Women" on city light poles outside the event grounds. The signs were quickly taken down by event staff. As well, PSC was refused a request to place advertising -- describing health hazards caused by smoking -- in the event program. Similarly, at a 1995 whitewater rafting event sponsored by Canadian Classics Adventures Inc., a team entered by Physicians for a Smoke-free Canada was not allowed to compete because team members wore T-shirts with an anti-smoking message.

The federal government has had a policy since 1985 of refusing to fund amateur sports which accept tobacco sponsorships. This policy followed high profile criticism by Canadian skiing stars Steve Podborski and Ken Read of the sponsorship by Export "A" of the Canadian ski championships. Podborski and Read had refused to accept awards they earned in the "Export "A" Cup. The government's commendable existing policy should be extended and made consistent to ensure that no arts or sports event is used to promote tobacco.

Recipients of Sponsorships

Many events once sponsored by tobacco now have new non-tobacco sponsors including the men's Canadian Open in golf (once du Maurier, now Bell Canada), and the international women's tennis tour (once Virginia Slims, now Corel).

It is ironic and sad that the tobacco industry is trying to use the arts community, which has lost so many of its own to AIDS -- and which is active in trying to reduce AIDS, to maintain the ability to promote a product which annually kills 45 times more Canadians than does AIDS.

Sponsorship Restrictions and the Charter

Sponsorship promotions convey no information with respect to tobacco products. These promotions only convey imagery -- lifestyle -- messages and are thus able to be prohibited according to the Supreme Court's decision. All nine members of the Court agreed that the government was justified in prohibiting lifestyle advertising.

Promotion

Free Distribution

The ban on free distribution in s.7(1) of the *TPCA* would be continued under the *Blueprint*. This subsection of the *TPCA* was upheld by the Supreme Court of Canada.

This provision could be improved by also prohibiting distribution in return for nominal consideration.

Incentive Promotions

The government intends to continue the ban on the offering of gifts, cash rebates, rewards, prizes or other similar incentives. This ban is found in s.7(2) of the *TPCA* and was upheld by the Supreme Court of Canada.

Tobacco Trademarks on Non-Tobacco Goods and Services

A provision banning the sale and advertising of non-tobacco goods and services featuring a tobacco trade mark is essential if there is to be the elimination of tobacco advertising and promotion.

Countries which have banned tobacco advertising but have not banned trademarks on non-tobacco goods have found that the trademarks work in place of advertising. Manufacturers have simply shifted marketing dollars from direct advertising of cigarettes to indirect advertising. In France, companies spent vast amounts of money promoting inexpensive matches and lighters, using the identical advertisement previously used to promote cigarettes. In one such ad, Camel matchboxes, displayed in a corner of the ad where a package of Camel cigarettes used to be, were coloured in such a way as to resemble a Camel cigarette package.

In Malaysia, where tobacco advertising is banned on television, tobacco companies advertise Salem vacations instead. In Thailand, holidays can be advertised using a cigarette brand name, but the cruise ship which is the subject of one such advertisement was not scheduled to be in port for two years. In China, where direct tobacco advertising is banned, there remain large billboards featuring the Marlboro cowboy. Philip Morris claims that because there is no reference or depiction of

cigarettes, and because Marlboro clothing is sold in the country, the billboards cannot be considered tobacco advertisements.

Permitting the placing of tobacco brand names and logos on T-shirts and hats is to permit children to become walking billboards promoting cigarettes. In the U.S., "specialty item distribution" has risen dramatically to $776 million (U.S.) in 1993, fully 12.5% of total industry marketing expenditures.

The dissemination of tobacco logos is a way to enhance the imagery of a particular brand. One prime example of this is tennis star Martina Navratilova playing at Wimbledon in a tennis dress designed to resemble a Kim cigarette package. Kim is a brand targeted at women.

Every time that a person sees a brand name or logo, whether on a lighter, a T-shirt, or a racing car, the person is reminded of the so-called positive imagery aspects of a brand.

Tobacco brand names and logos on non-tobacco goods can be a way to reinforce to smokers social acceptability of smoking. Smokers feel good when their chosen brand is prominently seen by others, or is implicitly endorsed by someone wearing or using a product featuring the smoker's brand. These positive feelings of reassurance mitigate the negative feelings many smokers have about their smoking behaviour and the health risks involved.

In the Supreme Court's decision, it should be noted that while Justice McLaughlin did not agree that reasoning supported the justification of the section banning tobacco trademarks on non-tobacco goods, the decision of Justice Iaccobucci made no reference to this issue. It should also be noted that this issue was little discussed in the judgements of the lower courts and that it was not discussed at all in the written argument of the federal government. Such absence of argument would not be present in a future trial. It appears that the majority made its decision in the absence of evidence. In a new trial, evidence from other countries, some of which is referred to above, could be introduced to demonstrate that a ban on the use of tobacco trademarks on non-tobacco goods and services is necessary. The absence of such a ban means that the industry would aggressively exploit the loophole.

Use of Brand-Identifiable Elements of Non-Tobacco Products on Tobacco-Products

The government is proposing to ban the use of brand-identifiable elements of non-tobacco products on tobacco products. For example, this would prohibit the use of Harley-Davidson or Yves St. Laurent trade names or logos on tobacco product packages. Selling Harley-Davidson cigarettes would be illegal. This type of provision echoes a provision included in the regulations proposed in the U.S. by the FDA.

Testimonials and Personal Endorsements

The *Blueprint* includes a ban on all testimonials and personal endorsements. This is a desirable measure. Past advertisements have included testimonials from doctors, athletes, and entertainers. While this measure would be made substantially redundant by the total ban on advertising, the measure remains appropriate. The measure should apply to packaging to prevent the use of testimonials from being placed on packaging.

Point of Sale Promotions

The Importance of Point of Sale Promotions

Point of sale merchandising is comprised of four main components: (a) manufacturer rental of shelf space and display areas; (b) advertising and sponsorship, including shelf talkers, at point of sale; (c) price signs; and (d) manufacturer promotional allowances (rebates and free product) to retailers as an incentive for retailers to sell more products.

Apart from a general contribution to an increase in smoking in the ways that advertising can increase smoking, point of sale promotions increase smoking in a couple of specific ways. First, point of sale promotions contribute to spontaneous purchases. Roughly 20% of smokers are non-daily smokers. Cigarette purchases by members of this segment are not consistent and can be stimulated by a point of sale reminder to purchase.

Point of sale promotions weaken the resolve of ex-smokers to remain smoke-free. The highly visible presence of cigarettes provides an extremely large temptation for an individual craving nicotine. Just one purchase can turn an ex-smoker back into a daily smoker.

Prior to the *TPCA*, point of sale promotions were an extremely significant part of the marketing mix for tobacco companies. In fiscal 1987, Imperial Tobacco spent $15.9 million (39%) of its $40.8 million dollar marketing budget on retail initiatives.[18] In 1987, RJR-Macdonald spent $20.3 million (57%) of its $35.3 million advertising and promotion spending budget on retail initiatives.[19] In 1993 in the U.S., promotional allowances amounted to $1.6 billion, fully 25.8% of the total industry marketing expenditures.

After the *TPCA* came into force, point of sale was one of the communication vehicles which remained open. Tobacco companies increased their emphasis in this area. Product displays became larger and more numerous.

In the early 1990's, the drugstore chain Big V (southern Ontario)[20] voluntarily placed all tobacco products below counter height and removed tobacco advertising from its store as an interim step prior to having tobacco removed from its shelves. This corporate decision to eliminate point of sale promotions was an acknowledgement that such promotions could increase sales.

Displays

In the *Blueprint*, the government proposes to ban counter top displays and to provide that only one sample per brand offered could be exposed with the remaining stock required to be stored out of sight. Both of these measures are worthy of support. They will substantially reduce the proliferation of large point of sale displays which has occurred. The proposed measures represent an important reform.

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[18]Imperial Tobacco Ltd., "Domestic Advertising Expense Summary" Exhibit AG-30A, *RJR-Macdonald Inc. v. Canada (Attorney General)*.

[19]RJR-Macdonald Inc., "Advertising and Promotion Spending" Exhibit RJR-3, *RJR-Macdonald Inc. v. Canada (Attorney General)*.

[20]Big V was taken over by Shoppers Drug Mart in 1995.

Nonetheless, the measures can be improved. There should be a requirement that exposed products be located behind the counter and not higher than one metre from the floor. This would reduce the promotional value of prominent eye level displays. As well, small children would not be able to see over the counter and thus would not be exposed to the display of tobacco products.

Allowing one sample per brand still allows there to be a proliferation of brand extensions which could take up a large amount of space. The proposal could be improved by allowing the display of only the individual package, and not the carton, of any brand extension. As well, displayed products should not be able to be displayed in the customer counter if the counter is made in whole or in part of glass or other transparent material making the tobacco products visible.

The ban on self-serve counter top displays has a number of benefits. These displays facilitate access to minors. A young person can steal products from such displays without a clerk asking for identification. Nova Scotia has banned such self-service displays. The U.S. Food and Drug Administration is proposing a similar ban.

Self-service displays located on counters can be important promotional tools. These displays, often located next to candy displays, increase the social acceptability of tobacco products. Counter-top displays are an effective way to make close contact with consumers.

It should be noted that the Ontario Court of Appeal has held that "the display of goods and wares for sale" is not a form of expression protected by s.2(b) of the Charter.[21] There is, therefore, some legal justification that restrictions which prevent prominent shelf displays do not violate freedom of expression and do not even have to be justified under s.1 of the Charter.

Brand Advertising

The *Blueprint* proposes to implement a total ban on tobacco advertising (which includes advertising at retail) and to ban sponsorship promotions located in retail outlets. This is a continuation of the previous policy under the *TPCA*, except with the extremely important addition that sponsorship promotions will not be permitted at point of sale.

[21] *R. v. Greenbaum* (1991), 77 Dominion Law Reports (4th) 334, reversed but not on this point [1993] 1 Supreme Court Reports 674.

In 1995, well after the phase-in provisions of the *TPCA* were in place, manufacturers were continuing to use sophisticated advertisements at retail to promote their brands. These advertisements included signs with brand colours or with designs resembling designs on packages. These signs were placed as "talkers" lining shelves on which products sat, placed beside price signs, and placed alongside tobacco displays. These signs are clearly intended to promote tobacco products given that manufacturers go to the time, expense and effort to design, print, distribute and install these signs. The designs draw a customer's eye and attention to the display, remind the customer of imagery associated with a particular brand, and reinforce that imagery. Such promotions should not be allowed. An elimination of this type of promotion is not confirmed or referred to specifically in the *Blueprint,* but should be included.

Price Signs

In the *Blueprint*, the government proposes to limit price signs to one per store, in black and white, and referring only to the generic name of the product and price and no other information. A maximum size would be specified. This is an improvement over previous regulations permitting 2 - 4 signs per store.

It is important that price signs be located inside the store and that the signs not be legible from outside the structure in which the retailer is located. Signs outside the store have been used by gas stations and other retailers to promote relatively low priced cigarettes. Cigarettes have sometimes been sold below cost as a "loss-leader" to promote other products offered by the gas station/retailer. This in turn forces other retailers to lower prices as well. Lower prices lead to increased consumption.

Price signs visible outside a store could serve as a cue for a spontaneous purchasing decision by consumers, including by occasional smokers. This leads to increased consumption.

In general, tobacco price signs visible throughout the community increase the social acceptability of tobacco, which in turn leads to increased rates of tobacco use.

It would be desirable that the price listed on the sign include all taxes, including provincial sales taxes and the federal Goods and Services Tax. Price signs for gasoline include all taxes. In Ontario, price listings for alcoholic beverages in Brewers' Retail and L.C.B.O. outlets include all taxes.

The advantage of requiring prices to be listed as including all taxes is that this increases the *perceived* price in the eyes of consumers. A carton of cigarettes selling for $46 sounds a lot more expensive than a carton selling for $40 (plus tax).

Promotional Allowances

The *Blueprint* is silent on promotional allowances. This type of promotional activity involves the offering of manufacturer rebates or free product to stores purchasing product in a certain volume or at certain times. For example, a retailer would be given a 5% rebate (or perhaps a free carton) if the retailer purchased at least a certain quantity of product before the end of the month, 10% (or perhaps two free cartons) if a higher quantity were purchased, etc. The value of these promotions is significant and is included in the 1987 retail promotion figures cited above.

These allowances encourage retailers to sell more cigarettes, in part because of more per unit profit. This could result in being lax in enforcing laws against sales to minors, stores maintaining longer opening hours, adding more prominent display of cigarettes, and even delaying a decision to stop selling tobacco.

Though such rebates and free product can be interpreted as being illegal under s.7(2) and s.7(1) respectively of the *TPCA*, the government has not agreed with this interpretation. The government should either review its interpretation of s.7 of the *TPCA*, or it should take new steps to end promotional allowances.

Health Promotion at Point of Sale

The government should require anti-tobacco educational material at point of sale. This might take the form of mandatory signs containing health information and messages discouraging tobacco use. It could also take the form of promoting a 1-800 Quit Line, or of the mandatory display of brochures with tips on how to quit smoking.

Importantly, there should be a mandatory display at retail of signs or other types of advertising promoting alternative nicotine products such as nicotine gum and nicotine patches. Manufacturers of these alternative nicotine products may be willing to assist in the design of these advertisements.

Given the importance of point of sale as a communications medium, the government should begin to use promotions at this location as part of its health promotion strategy discouraging tobacco use. Apart from package messages, mandatory point of sale anti-tobacco material may be the most cost-effective tobacco-related health promotion vehicle available.

Five provinces have required health messages on signs at point of sale: British Columbia, Ontario, New Brunswick, Nova Scotia and Newfoundland. While existing signs are of varying degrees of effectiveness, and all can be improved, the fact that such signs have been legislatively required establishes a helpful precedent for the federal government.

Tobacco Product Information Books

A Tobacco Product Information Book could be permitted or required in tobacco retail outlets. Each retailer having a book would have to include information for all brand extensions of all tobacco products. The book would be in both official languages and any other language desired. The book's pages would contain loose leaf pages for easy updating. Each page would also contain messages discouraging smoking. Tobacco products would be listed alphabetically by brand family for each type of tobacco product (cigarettes, fine cut, chewing tobacco, etc.). Information in the book would be included in a standard prescribed format, in a standard font and font size, and with black ink on a white background. The cover of the book could contain an anti-tobacco message in picture format.

The tobacco product information book would allow manufacturers to communicate information to consumers and would allow consumers to receive information. In that respect, this would address the concern of the majority of the Supreme Court that the *TPCA* resulted in the total elimination of the ability of consumers to receive information.

Possible content of the Tobacco Product Information Book could be suggested by individuals and organizations, including tobacco manufacturers. The Book could contain at least the following information:

1. Maximum yield and average yield for tar, nicotine, carbon monoxide.
2. Bioavailability of nicotine.
3. Maximum yield and average yield for 4-amino biphenyl, benzene, nitric oxide, nitrogen dioxide, benzo(a)pyrene, total aldehydes, formaldehyde, acrolein, hydrogen cyanide, and other substances.
4. pH level
5. Length in millimetres
6. Width in millimetres
7. Weight per cigarette and weight of tobacco per cigarette

8. Additives in tobacco (including chemical and brand name, and name and address of additive manufacturer and importer)
9. Additives in filter, paper, or added to foil wrap or packaging (including chemical and brand name, and name and address of additive manufacturer and importer)
10. Country of manufacture
11. Material used in filter
12. Colour of filter overwrap
13. Ventilation used in filter (with diagram).
14. Whether product contains cellophane wrap, foil wrap
15. Materials used in cigarette paper and their proportions.
16. Colour of cigarette paper; if white whether paper/pulp has been bleached.
17. Type of tobacco used (Virginia flue-cured, burley, etc.)
18. Description of tobacco blend (i.e. combination of grades, use of reconstituted tobacco)
19. Cigarettes per package (#)
20. Date brand extension on market.
21. Any changes to info in last year with explanation as to effect of changes.
22. Whether cigarette is identical or virtually identical to another brand.
23. Ink used for trademark insignia and what ink is made out of.
24. Whether manufacturer is Canadian or foreign controlled.
25. Other information as decided.

Youth Access

Self-service Displays

The government proposes to ban self-service displays. Such displays are already banned in Nova Scotia and are proposed to be banned in the U.S. by the Food and Drug Administration (FDA).

Self-service displays, typically on a counter top, increase youth access to tobacco products. These displays facilitate theft. As well, a clerk may be less likely to ask for identification if a young customer has a package in hand than if the clerk has to hand the package to the customer.

A 1995 California survey by the Department of Health Services found that tobacco obtained through self-service was more likely to result in an illegal sale than tobacco requested from a clerk (46% vs. 33%).[22]

[22] *Tobacco Access Law News*, No. 30 (October 1995), p.3.

Mail Order Sales

The government is proposing to ban mail order sales of tobacco products. This is a desirable measure. There is no way to verify the age of a consumer when tobacco products are supplied through the mail.

A ban on mail order sales also has the benefit of reducing contraband. Mail order companies have arisen to sell cigarettes from low tax jurisdictions (such as in central Canada or the U.S.) to high tax jurisdictions (such as in Western Canada or Newfoundland). The supply of low priced cigarettes undermines the health benefits of high prices, namely lower consumption.

In the U.S., a ban on mail order sales has been proposed by the FDA.

Vending Machines

There should be a complete ban on tobacco vending machines, and not just the partial ban now in place by virtue of the *Tobacco Sales to Young Persons Act*. Complete bans on vending machines currently exist in Ontario and Nova Scotia. A complete ban has been proposed by the FDA.

It may be that the *Blueprint* contains reference to a complete vending machine ban in that there is a proposed requirement that all tobacco sales be made face-to-face. This needs to be clarified.

Other Measures

There should be a requirement that photographic identification be requested of all persons who appear to be under 25. Several U.S. jurisdictions have a statutory requirement of this nature. Such a provision ensures that all persons who may possibly be under age are asked for identification. Such a provision removes doubt as to when a clerk should and should not request identification.

At present, the *Tobacco Sales to Young Persons Act* only applies when tobacco products are sold or furnished "in the course of a business". These words should be deleted. No provincial law dealing with tobacco sales to minors contains similar wording. The result of the current federal wording means that there are numerous occasions where the supply of tobacco to teenagers would be permitted. Examples include a teacher giving cigarettes to a

student, a youth detention centre supplying cigarettes to residents, an adult in a store receiving money from a minor and then purchasing cigarettes for the minor, a local fair giving out cigarettes as a prize for an athletic event, etc.

Other measures to improve the enforceability of the prohibition on selling tobacco to minors are included in the draft bill found in Appendix 1.

Packaging and Labelling

Plain Packaging

The proposed legislative framework in the *Blueprint* would create the authority for plain packaging regulations. Although the *Blueprint* refers to regulations controlling aspects of form, size and symbols of packaging, the *Blueprint* fails to specifically focus on plain packaging among the various proposed measures. The CCS hopes that the government's position on this will be strengthened and that plain packaging will be implemented.

The tobacco package itself is the key to promoting tobacco use. The packages themselves contain the majority of tobacco advertising in Canada. When children see tobacco package advertising, it appears to be accompanied by adult or peer endorsement.

The complete case for controlling tobacco package advertising through a requirement for plain packaging has been made elsewhere. Appendices 6 - 8 include the CCS's submission to the House of Commons Standing Committee on Health respecting plain packaging, a further submission to the Committee entitled "Responses to Arguments Against Plain Packaging of Tobacco Products", and an article in the journal *Tobacco Control* entitled "The case for plain packaging". Appendix 9 contains signed statements from 23 marketing professors agreeing with the view that it is more likely than not that plain packaging would reduce tobacco use.

Plain packaging has been recommended by the House of Commons Standing Committee on Health. Subsequent to the Committee's recommendation, two new major studies into plain packaging have provided further evidence that plain packaging would reduce smoking. One study was commissioned by Health Canada.[23] The other is included in Appendix 5.

The position of the CCS is that the Supreme Court of Canada's judgment respecting the *TPCA* opens the door to the constitutionality of plain packaging. Plain packaging only affects the imagery characteristics of tobacco advertising/packaging. Imagery characteristics are akin to lifestyle advertising, a type of advertising which the Supreme Court unanimously upheld as being a justified restriction on freedom of expression. Plain packaging does not impair the communication of information. All types of information -- as opposed to imagery -- found on packages will be able to continue: name and address of manufacturer, yields of toxic constituents, description of product contents, brand name, health messages, and tax-paid markings.

Plain packaging is an exceedingly important tobacco control measure. It was endorsed by delegates to the Ninth World Conference on Smoking and Health. Implementation of plain packaging in Canada would set a precedent bound to be emulated in other parts of the world. The potential effectiveness of plain packaging is evidenced by the strong opposition to the measure by the tobacco industry.

Minimum Package Size

A minimum package size of 20 cigarettes is currently found in the *Tobacco Sales to Young Persons Act*. The *Blueprint* suggests that this measure will continue, clearly a desirable step. "Kiddie packs" of fewer than 20 cigarettes make cigarettes more affordable to young people. Smaller packages also make it easier for a teenager to conceal cigarettes from a parent, a teacher, or a store employee.

[23]Expert Panel Report, "When Packages Can't Speak: Possible impacts of plain and generic packaging of tobacco products." Prepared at the request of Health Canada. (March 1995).

Using the same reasoning, a minimum package size of 20g might be specified for smokeless tobacco. Skoal bandits, a product currently on the market, has been criticized as being targeted at youth. This product comes in packages of 10g. A minimum package size of 20g would eliminate this product in its current form from the market.

Minimum package sizes of 20 tobacco sticks and 20g of fine cut tobacco could also be implemented.

Messages on Packages

The government should improve the messages found on packages. This could be done in a number of ways. The first would be to add a colour marker word such as "Attention" or "Warning" above the warning. Another would be to add an illustration to accompany each message. For example, accompanying a health message about lung cancer could be a picture of a black lung. A picture can say a thousand words and can be far more effective at communicating a truer image of the results of smoking than can words alone. The package can be transformed into a graphic anti-smoking advertisement.

The government should provide more detailed explanations of required health messages, as is the case in Australia. Appendix 10 contains the detailed explanations included on the backs of packages in Australia to accompany the warning printed on the front.

More detailed health information should be included as inserts in packages. Further messages, whether of a health or non-health nature, should be included inside the package on the foil wrap, on both sides of the sliding portion of slide and shell packages, and on the portion of the inside of flip top packages which becomes visible when the flip top is opened.

Some messages could deal with non-disease related issues, or with health subjects not traditionally included on packages. Some such anti-tobacco messages might have a more immediate impact on teenagers who perceive themselves to be immortal and at no risk of contracting a smoking-caused disease.

The package can be used as an important promotional medium to advertise nicotine alternative products, which at the moment are principally nicotine gum and the nicotine patch. Marketing professionals from the manufacturers of these products may be willing to help design the advertisements. Not only would

legislated promotion of the nicotine alternatives reduce tobacco use, but it help underlie the point that tobacco manufacturers are competing for brand share not only with other tobacco manufacturers but also with manufacturers of other nicotine products.

While the government is taking steps to give manufacturers the option of attributing messages to Health Canada, the government should specify that when the attribution option is chosen, the space required for the attribution should increase substantially.

Health Canada could also undertake research to determine whether attributed messages are any less effective than attributed messages. Obtaining research results that unattributed warnings are more effective would provide evidence to satisfy the concerns of the Supreme Court of Canada.

Bill C-117

Former Health Minister Diane Marleau introduced Bill C-117 in the House of Commons on December 12, 1995. This bill, which ensures that health warnings will stay on packages, will provide manufacturers with an option of attributing health warnings. This bill is worth supporting. In a straightforward way, this bill will ensure that prominent health warnings remain on tobacco packaging.

Nonetheless, the bill can be improved. Bill C-117 as presently drafted re-enacts in modified form subsection 9(1) of the *Tobacco Products Control Act (TPCA)*. The bill is silent on re-enacting subsection 9(3) of the *TPCA*, a subsection worded as follows:

> This section does not effect any obligation of a distributor, at common law or under any Act of Parliament or of a provincial legislature, to warn purchasers of tobacco products of the health effects of those products.

This subsection is presently of no force or effect because all of section 9 was ruled to be unconstitutional by the Supreme Court of Canada. This section is desirable because it explicitly makes clear that the ability of provinces to enact provincial health warnings is not pre-empted. The governments of British Columbia, Manitoba, Ontario and Nova Scotia all have authority under their respective tobacco control laws to require health warnings on packages. One province, B.C., has had warnings mandated by provincial legislation as recently as 1994. Omitting subsection 9(3) may result in needless litigation as the tobacco industry

might claim that provincial warnings are an unconstitutional intrusion into federal jurisdiction.

Subsection 9(3) is also desirable because it ensures there is no pre-emption of common law obligations. Given existing civil actions before the courts in Canada, and given the potential for further actions to be initiated, it is not desirable to open a line of defence, however temporarily, that has been used so successfully in U.S. litigation.

Inserting subsection 9(3) into the bill would not be controversial. It is recommended that the government support an amendment in Committee to re-enact subsection 9(3) of the *TPCA*, or in the event that Parliament is prorogued, that the re-enactment of subsection 9(3) be included in a revised and reintroduced bill.

Extraneous Information

In the *Blueprint*, the government proposes to ban all extraneous information on the outside of packages. This is a desirable measure in that it helps to reduce the package as an advertising medium. However, the ban on extraneous information should not be restricted to the outside of the package. Doing so ignores the fact that manufacturers can and do use the inside of packages for promotional messages.

The ban on extraneous information in the *TPCA* did not make a distinction between the outside and inside of the package. The government should not introduce such a distinction thereby weakening a previous measure.

If plain packaging is implemented and all aspects of packaging characteristics (outside and inside of package) are specified by regulation, then a ban on extraneous information becomes somewhat redundant.

Toxic Constituent Information

The government is proposing to expand the listing of toxic constituent information on packages. This is critically important. Consumers are entitled to this data. This puts the consumer in a greater position of informed consent.

In 1986, during discussions respecting a revised voluntary code, Health and Welfare Canada proposed[24] the reporting to the government of yields from cigarette smoke for the following substances: tar, nicotine, carbon monoxide, nitric oxide, nitrogen dioxide, benzo(a)pyrene, aldehydes, formaldehyde, acrolein, and hydrogen cyanide. This list is indicative, but not exhaustive, of the types of substances the yields of which can be included on packages. Other possible substances include benzene and 4-amino biphenyl.

The prospect of effective legislation in line with the *Blueprint* give an excellent opportunity to operationalize this long standing issue. **Average yields** can be extremely misleading to a smoker. The average yields currently found on packages are based on the yield from a smoking machine. Many smokers do not smoke like a smoking machine and thus inhale substantially higher yields of toxic constituents than is reported on the package. This can happen if a smoker takes longer puffs, takes more frequent puffs, or smokes the cigarette closer to the butt than does the machine. A smoker might also place fingers or lips over ventilation holes;[25] this allows air to enter thus lowering toxic constituent yields. Ventilation holes remain uncovered when cigarettes are tested by the smoking machine.

To provide consumers with meaningful information, the package reporting of toxic constituents should therefore also include **maximum yields** of toxic constituents. Maximum yields account for variations in smoker behaviour.

In deciding the format for the listing of toxic constituent yields on packages, the English and French listings should be separated for improved readability. Further, each toxic constituent should be listed on a separate line as illustrated below:

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[24]"National Health and Welfare Objectives with Respect to Tobacco Advertising and Promotion", Appendix II. This document was enclosed with an October 9, 1986 letter from Jake Epp, Minister of National Health and Welfare, to Norman McDonald, President of the Canadian Tobacco Manufacturers' Council.

[25]See L.T. Kozlowski et al., "The misuse of 'less hazardous' cigarettes and its detection: Hole-blocking of ventilated filters" *American Journal of Public Health* 1980;70:1202-1203.

Poisonous Contents	Average Yield	Maximum Yield
Tar	XXmg	XXmg
Nicotine	X.Xmg	X.Xmg
Carbon Monoxide	XXmg	XXmg
etc.		

The package should contain a description of the various toxic constituents listed. In Australia, package information describes tar as "condensed smoke containing many chemicals, including some that cause cancer". Nicotine is described as "a poisonous and addictive drug". Carbon monoxide is described as "a deadly gas which reduces the ability of blood to carry oxygen".

For cigarette filters with ventilation holes, packages could contain, for example, a diagram showing, for example, the circular butt end of three cigarettes. The circles could be darkened to simulate what happens when a smoker's or lips fingers block ventilation holes, partially block the holes, and do not block the holes. Blocking the ventilation holes on a cigarette means that the stain on the filter will tend to be visible on the entire butt end. Not blocking the holes will tend to leave a "bullseye" stain in the centre of the butt with the surrounding portion of the butt end unstained. An illustration explaining the difference is found in section 4 of Appendix 11. On the package, the diagram could include approximate toxic constituent yields which would be associated with the different butt stains. The darker the stain, the higher the yields.

The purpose of including such a diagram on packages is to provide further information to consumers outlining how different smoking techniques can have significant impact on the yields of toxic constituents inhaled by consumers.

Additives

Packages, including cartons, should be required to disclose all ingredients in the product inside. This disclosure is required for thousands of packaged food products intended for human consumption. Tobacco products should receive similar treatment.

Consumers have a right to be informed about any additives used in their products. This enhances wise consumer choices. If a consumer is allergic to a particular additive, the importance of the consumer being informed of the presence of the additive increases significantly.

It should be noted that disclosure of product information would not infringe the Charter of Rights and Freedoms. The Supreme Court of Canada had no objection to the mandatory reporting of yields of toxic constituents.

Terms Such as "Light" and "Mild"

There is no such thing as a safe cigarette. However, many consumers inaccurately believe that so-called "light" cigarettes are safe alternatives to quitting, or that these cigarettes significantly reduce health risks. Tobacco companies have done nothing to correct such misperceptions.

Ideally, there should be a ban on the use of terms such as "light" or "mild". Alternatively, there should be standardized categories of strength so that "light" has a consistent meaning across all brands. At present, the fact that there is no consistency is highly misleading to consumers. A "light" cigarette in one brand family could have higher tar and nicotine yields than a regular cigarette in another brand family. The different categories of strength could be named "Regular toxins", "High Toxins", and "Extra High Toxins" instead of "Regular", "Light" and "Extra Light".

The misleading nature of existing labelling is well described in a January, 1995 article in *Reader's Digest* entitled "The Filtered Truth". This article is included as Appendix 12. Appendix 11 contains a publication of the Addiction Research Foundation entitled "Low Tar Cigarettes Are Hazardous to Your Health".

False and Misleading Claims

The government proposes to ban false and misleading claims on packages. For obvious reasons, this is a desirable measure.

1-800 Quit Line

Packages should contain a toll free 1-800 telephone line where consumers can obtain information on smoking cessation. In Australia, a "Quit Line" number is included on packages.

We suggest that Health Canada undertake discussion with health community on how such a line could be operated and financed. Services should include assistance to individuals in determining the most appropriate support in quitting smoking including counselling, emotional support, referral to appropriate local resources and the mailing out of appropriate information packages.

An easily accessible Quit Line would beneficial in reaching smokers in rural and remote areas. These smokers might otherwise not have access to smoking cessation information. A Quit Line would also be beneficial in that it can provide timely information when a smoker is motivated to quit. This motivation might come after a tax increase, when smoking is banned in the worker's workplace, when a relative or friend is diagnosed with a smoking-caused disease, when an anti-tobacco advertisement is observed, when new warnings appear on packages, when a woman becomes pregnant, etc. Importantly, a Quit Line is accessible while a person is still motivated. If a person is motivated to quit but has no means or knowledge to act on that motivation, then a good opportunity for cessation may be lost forever.

In 1989, the CCSH ran a 1-800 Quit line for three weeks. Approximatively 13,000 calls were received. This certainly indicates interest on the part of consumers.

Product Design

In the *Blueprint*, the government proposes to create authority to regulate product design, notably with respect to product constituents and smoke emissions, but to enact no measures until further research is completed.

While there may be reason to wait for further research before mandating controls on nicotine content, there are other policies related to product design which do not need to wait for further research.

Flavouring

There should be a ban on flavouring, such as menthol, used in tobacco products, including smokeless tobacco. This flavouring enhances marketing by providing a better taste. Flavouring may facilitate the onset of smoking among a segment of smokers by masking harshness. Flavouring may also delay the quitting process. Menthol, for example, may mask throat irritation. Menthol may also result in deeper inhalation of smoke resulting in greater health risks.

The 1989 U.S. Surgeon General's report contained the following:

> "Menthol in cigarettes provides a sensation of cooling, which may promote deeper, prolonged inhalation of cigarette smoke. This may help explain why blacks (who are much more likely to smoke menthol cigarettes) have higher mortality rates from certain smoking-related diseases (e.g. lung cancer, heart disease, and cerebrovascular disease) than whites despite smoking fewer cigarettes per day ..." [other possible reasons for increased mortality rates among blacks are also mentioned][26]

Flavouring is used in many products, including medicines, in order to make the product more palatable and more likely to be consumed. In the case of tobacco products, which are addictive and hazardous, there is no justification to make the product more palatable and more likely to be consumed.

The ban on flavouring should include a ban on flavouring in cigarette paper, in the filter, and in the packaging. These are all possible techniques to deliver flavouring. For example, menthol placed on foil can sublimate into cigarettes after manufacture.

There is evidence that more women than men smoke menthol cigarettes and as a result a ban on flavouring would be a policy intervention of disproportionate benefit to women. A 1987 survey of 15-24 year olds completed for RJR-Macdonald found that 4% of females smoked menthol cigarettes, compared to only 1% of males.[27]

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[26]U.S. Department of Health and Human Services, *Reducing the Health Consequences of Smoking: 25 Years of Progress. A Report of the Surgeon General* Public Health Service, Centres for Disease Control, Centre for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health. DHHS Publication No. (CDC) 89-8411, 1989, p.317.

[27]The Creative Research Group Ltd., "Youth '87" (prepared for RJR-Macdonald), Exhibit RJR-6, *RJR-Macdonald Inc. v. Canada (Attorney General)*, p.45.

Width and Length

Product design is an essential component of the marketing mix for a tobacco product. The appearance of a cigarette can contribute to the image of a brand. This explains why manufacturers have placed luxury length cigarettes (e.g. 100mm or 120mm) and slim cigarettes (e.g. Matinée slims) on the market. Long and/or slim cigarettes contribute to the image of femininity, fashionability, and slimness/weight loss that manufacturers seek to create in a women's cigarette. "Slims" cigarettes are targeted at women and girls.

There should therefore be requirements for specified width and length. For example, there should be a ban on cigarettes (including the filter) of longer than 87 millimetres. These cigarettes play on insecurities respecting physical appearance and weight loss.

Slim and long cigarettes contribute to a product's imagery characteristics in the same way that advertising does. Eliminating these brands would eliminate the "fashionability segment". It could impact the number of girls who start smoking or continue to smoke for reasons of fashion, glamour and appearance.

A 1987 survey done for RJR-Macdonald found that 3% of females aged 15-24 smoked cigarettes longer than King Size and that 0% of males in the same age group did so.[28] Thus a ban on luxury length and slim cigarettes would be disproportionately beneficial in reducing smoking among females as compared to males.

Colour of Cigarette Paper and Filter Overwrap

There should be research undertaken on the impact of the colour of cigarette paper. For example, should there be a prohibition on the bleaching of paper used in cigarettes or used for cigarette paper? White may suggest purity and cleanliness to some smokers. An unbleached paper may appear to be dirtier, less attractive, and even suggestive of impurities being consumed when a person is smoking.

Another option for study is a requirement for cigarette papers to be an unattractive colour. Manufacturers already colour the papers of some brands (e.g. More cigarettes) indicating the feasibility of requiring cigarette paper being a specific colour.

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[28] *Ibid.*

A look should be taken at controls on the colour of paper used in filter overwraps (also referred to as tipping paper). For example, should there be a ban on the imitation cork paper used in many brands? The appearance of such paper may be suggestive of effective filtration when in fact the colour of the overwrap makes no contribution to filtration. The overwrap, however, does indicate to smokers that the cigarette in almost finished.

Trademarks on Cigarette Paper and Filter Overwrap

There should also be research on the impact of trademarks on tobacco products. The cigarette itself should not be a vehicle for advertising. Ideally, the current practice of using extremely attractive logos and brand names on cigarettes should be prohibited. These trade marks reinforce brand imagery in the minds of smokers, non-smokers, and smokers of other brands every time these trade marks are observed. Further, colour bands on a cigarette, typically associated with a brand's colours, should be prohibited. There is no justifiable health reason to permit manufacturers to make the appearance of cigarettes more attractive.

On February 8, 1994, the government announced that it would require tax-paid markings through a standard coloured band directly on cigarettes. This measure has yet to be implemented, but should be.

If trade marks currently on cigarettes are deemed to be desirable as a means to prevent counterfeiting, manufacturers could substitute the trade mark for a unique product registration number. This number could be printed on the filter overwrap portion of the cigarette. There should be no printing on the cigarette paper portion of the cigarette.

Smokeless Tobacco

Smokeless tobacco can cause cancer and other diseases. It is not a safe alternative to cigarettes. Several jurisdictions have legislated an outright ban on smokeless tobacco including some Australian states, New Zealand, Hong Kong, Israel, and most parts of the European community.

The government should implement a total ban on smokeless tobacco products. An alternative would be to ban certain categories of smokeless tobacco. Possible categories include chewing tobacco, nasal snuff and oral snuff. A further alternative would be to ban smokeless tobacco in those provinces/territories

where smokeless tobacco use is particularly low, and then to phase-in the ban in other provinces/territories over time.

The use of smokeless tobacco is at such low levels that it would be feasible to ban tobacco products of this nature without the risk of resulting contraband.

Product Registration

Prior to selling or promoting a tobacco product, manufacturers and importers should be required to register each product with the federal government. Registration should also be required prior to the marketing of a brand with changed product characteristics (e.g. nicotine yields, tobacco blends, length of filter overwrap, etc.). Product registration information should be publicly accessible, and should be accompanied by a detailed description of product characteristics. (A list of such characteristics is included later in the section dealing with reporting.)

Product registration is currently required for pesticides, including pesticides which contain nicotine. The *Pest Control Products Regulations* (see Appendix 13) provide a good model for the preparation of regulations requiring product registration for tobacco products.

Administration of the product registry should be on a cost recovery basis with revenues generated from product registration fees.

Filter Ventilation

One idea for further study is a requirement that any filter ventilation be visible to the naked eye and located a minimum distance from the butt end of cigarettes. This may help consumers avoid smoking cigarettes in such a way as to inhale a quantity of tar and nicotine substantially higher than that reported from the smoking machine. The reason for this is that when the ventilation holes are placed near the top of cigarette, they are more likely to be blocked by smokers' fingers.

pH level

Another product design option to consider is controlling pH levels in tobacco products. By requiring adjustments to pH, cigarettes could become more difficult to inhale. This might

inhibit addiction among new users and encourage cessation among existing users. Policy in this area may have tremendous potential, but further research should first be initiated. A good place to start is to require the reporting of pH levels in tobacco products.

"Fire-safe" cigarettes

Each year, smoking causes needless fires resulting in otherwise preventable injury, loss of life, and damage to property. American reports have provided recommendations respecting cigarette product design which, if implemented, would dramatically reduce the likelihood that smouldering cigarettes would cause fires. Given that American research has been completed respecting the design of "fire-safe" cigarettes, and that standards have been proposed, there may be a compelling case for the federal government to adopt appropriate standards through regulations under the legislative framework. The case for action has been increased by a December 8, 1995 verdict of a coroner's jury in Toronto. The jury made the following recommendations:

1. That the federal government of Canada require by law that all cigarettes sold in Canada meet the condition of being fire-safe.

2. The Federal Government should issue standards regarding the manufacture and sale of cigarettes in Canada. There are presently standards developed in the United States of America which define fire-safe cigarettes that may be studied and implemented in Canada.

Legislation should allow the Governor in Council to make regulations with respect to higher safety requirements for tobacco products.

Reporting

Sales Data

The *Blueprint* indicates that the government intends to expand the reporting requirement respecting sales data. This is a positive step. Sales data are essential to monitoring market developments as well as progress in tobacco control, all of which may vary by province.

Requiring sales data from wholesalers in addition to manufacturers enhances the quality of information regarding exactly what is happening in the marketplace.

Requiring export sales data by brand will assist in monitoring any future manufacturer activity which undermines anti-smuggling efforts.

It is important that all reports by brand include each brand extension and each stock keeping unit. Thus separate figures should not only be provided for du Maurier King Size, du Maurier Light King Size, du Maurier Light Regular, etc. but there should be separate figures reported for different package sizes (e.g. 20 cigarettes or 25 cigarettes), type of package (e.g. slide and shell, flip top, tin), and so on.

Sales data should be reported by province and territory, not just by province.

Product Characteristics

The *Blueprint* proposes to expand reporting of product information, such as manufacturing specifications regarding products and product components, possibly including additives in papers and filters.

That the government intends to require reporting of additives in papers and filters is desirable. However, such reporting is already required. Regulations under the *TPCA* presently require the reporting of all constituents in each tobacco product. Filters and cigarette papers are clearly part of tobacco products.

Reporting of product characteristics should include the following (much of which is similar to the list of possible contents of a retail Tobacco Product Information Book previously described):

1. Maximum yield and average yield for tar, nicotine, carbon monoxide.
2. Bioavailability of nicotine.
3. Maximum yield and average yield for 4-amino biphenyl, benzene, nitric oxide, nitrogen dioxide, benzo(a)pyrene, total aldehydes, formaldehyde, acrolein, hydrogen cyanide, and other substances.
4. pH level
5. Length in millimetres
6. Width in millimetres
7. Weight per cigarette and weight of tobacco per cigarette
8. Additives in tobacco (including chemical and brand name, and name and address of additive manufacturer and importer)
9. Additives in filter, paper, or added to foil wrap or packaging (including chemical and brand name, and name and address of additive manufacturer and importer)
10. Country of manufacture
11. Material used in filter
12. Colour of filter overwrap

13. Ventilation used in filter (with diagram).
14. Whether product contains cellophane wrap, foil wrap
15. Materials used in cigarette paper and their proportions.
16. Colour of cigarette paper; if white whether paper/pulp has been bleached.
17. Type of tobacco used (Virginia flue-cured, burley, etc.)
18. Description of tobacco blend (i.e. combination of grades, use of reconstituted tobacco)
19. Cigarettes per package (#)
20. Date brand extension on market.
21. Any changes to info in last year with explanation as to effect of changes.
22. Ink used for trademark insignia and what ink is made out of.
23. Whether manufacturer is Canadian or foreign controlled.
24. Other information as decided.

Manufacturers/importers should be required to submit a minimum number of samples of actual products to the government.

Reporting of product characteristics should be required prior to any new product being placed on the market, and prior to any products with changed characteristics being placed on the market.

Trademark Information

The *Blueprint* states that the government intends to require reporting of trademark information on a brand by brand basis. This is desirable. Information to be reported should include a copy of all trademarks and trademark registrations, the trademark owner, trademark licensees, and the cost (if applicable) of acquiring or licensing the trademark.

Marketing Expenditures

The *Blueprint* indicates that the government will require information respecting sponsorship activities and expenditures. This is desirable and will assist in monitoring the use of sponsorships to promote tobacco products. For example, sponsors should distinguish between sponsorship undertaken prior to and after sporting and artistic events.

However, the reporting requirement for sponsorship expenditures should be expanded for all types of marketing expenditures. For each type of marketing activity (e.g. sponsorships, point of sale display space, retail allowances, etc.), monthly and annual expenditures should be reported by brand family/extension and by province/territory.

Samples of Labelling and Promotional Material

Manufacturers and importers should be required to provide, annually, at least five samples of all packages including cartons. A similar requirement has been proposed by the FDA in the U.S. This will assist with enforcement. New samples should be required prior to any change in packaging.

Manufacturers and importers should also be required to provide a copy of all sponsorship promotions and other promotional material permitted by regulation under the legislative framework. Given that the government is proposing a complete ban on tobacco advertising, there is no need to require submitting of samples of all advertising, a measure which clearly would be desirable if any advertising were to be permitted.

Product Research

Manufacturers should be required to submit to Health Canada copies of all product and behavioural research. Revelations in 1994 and 1995 of previously secret industry documents have uncovered that manufacturers have long had knowledge about the effects of nicotine and tobacco use that was not previously disclosed to health departments, to the scientific community, or to consumers. Given the epidemic caused by tobacco use, such information should be in the public domain, or at least in the hands of Health Canada. History has repeatedly demonstrated that the tobacco industry is unwilling to disclose critical health and scientific knowledge. Reporting of all product research, including health research, will correct past omissions and prevent future examples of non-disclosure.

Marketing Documents

Health Canada should determine what types of market research undertaken by tobacco companies should be copied and sent to Health Canada. These documents could provide valuable information to the government in designing its tobacco control strategies.

Previous marketing documents disclosed during litigation respecting the *TPCA* included regular surveys of prevalence (broken down by demographic characteristics), description by demographic characteristics of target groups for each brand, research into why teenagers smoke, strategies of how to counter those "forces" seeking to reduce smoking, research into consumer knowledge of the health consequences of smoking, research respecting consumer

behaviour, research into new products, focus groups examining the effectiveness of possible advertisements, and so on. All of this is clearly valuable to the preparation and monitoring of a tobacco control strategy.

For competitive reasons, there might be a moratorium on public disclosure of those parts of documents containing commercially sensitive information. The moratorium should last for a specified period of time, such as two-three years.

Financial Statements

There should be a requirement that all manufacturers and importers of restricted products report quarterly and annual financial statements.

Reporting of financial statements is something that all publicly traded companies must do already. Further, until recent amendments to the *Canada Business Corporations Act*, this was something that many private companies had to do as well.

Financial statements provide valuable information on which to base policy decisions, such as whether a new policy has adversely affected profitability, the relative strengths of various companies in the market, and so on.

Due to securities laws, two of the three major manufacturers in Canada already publicly provide financial statements. A similar obligation should be placed on all manufacturers and importers.

Reporting by Suppliers to Manufacturers

In certain circumstances, there should be required reports from leaf processors, suppliers of raw leaf tobacco, and suppliers of other inputs into tobacco products.

Apart from names, addresses, and designated contacts for the various suppliers, other types of information could be reported. Examples include sales data for each product supplied, and additives added by leaf processors.

Requiring manufacturer suppliers to provide reports helps to monitor the accuracy of reports supplied by manufacturers.

Public Disclosure

Health Canada should determine which reports to the government should be accessible by the public under the *Access to Information Act*. Authority could be made by regulation to provide that certain reports, or parts of certain reports, not be disclosable.

Under the *TPCA*, reports from the three major manufacturers respecting sales data and yields of tar, nicotine and carbon monoxide levels of tobacco products was disclosed to the public under the *Access to Information Act*.

In Canada, evidence from the *TPCA* trial indicates that the three major manufacturers have -- since at least the early 1970's -- shared extensive information amongst themselves, including sales data and marketing expenditures. This means that such information has not been treated as commercially confidential. This is a further reason justifying mandated public disclosure.

In the United States, the Federal Trade Commission publishes an annual summary of tobacco industry marketing expenditures by type of expenditure.

Public disclosure of reports assists health organizations in efforts to reduce smoking. It also assists researchers examining nicotine addiction, smoking behaviour, product design, and numerous other questions.

Enforcement

The *Blueprint* does not provide much detail regarding the enforcement provisions which would be included in a new statute. However, the *Blueprint* does indicate that administrative enforcement provisions would be included. This is clearly a positive step.

The tobacco industry frequently violated the provisions in the *TPCA*, even after being informed by the government that specified activities were illegal, and even after being charged with violations. CCS files contain many examples. Administrative enforcement provisions give the government a remedy pending completion of a trial, or even as a faster and more effective alternative to litigation.

The draft bill in Appendix 1 contains detailed provisions with respect to enforcement, including provisions which facilitate the litigation process. These provisions have been compiled following a review of other existing consumer protection legislation at the federal and provincial levels.

The provisions in the draft bill include the authority to make "cease and desist" orders. If a company is infringing the law, the government could order that the company comply with the law. Failure to comply with an order would itself be an offence. The company could appeal an order, but meanwhile must comply. The availability of cease and desist orders means that the government has an effective available remedy which avoids the delays inherent in the litigation process.

Other Important Measures

Annual Report

A tobacco statute should require the preparation of an annual report on tobacco. The responsibility for the report could be designated to the Minister of Health, to the Director of the Office of Tobacco Control,[29] or to some other official. Federal legislation in the U.S. requires that the Surgeon General submit an annual report to Congress. Over several decades, these reports have made a very important contribution to tobacco control efforts.

The contents of the report might do the following:

(a) outline progress in reducing nicotine addiction and tobacco consumption and prevalence, and the harms therefrom;
(b) describe compliance with, and enforcement action regarding, the Act and regulations;
(c) provide recommendations to improve the government's nicotine and tobacco control strategy, including amendments to the Act and regulations; and
(d) contain other matters deemed expedient.

[29]This office could be renamed "Office of Nicotine Control".

An annual report does not need to be long to be valuable. In the same way that a corporation is required to provide an annual report to shareholders, an annual tobacco control report would describe progress at meeting pre-determined goals. An annual report is also an institutionalized forum to call for action, to invite comment on new proposals under consideration, and to inform the public -- including smokers -- of new knowledge in the area of tobacco and health.

Tax Deductibility of Marketing Expenses

The *Income Tax Act* should be examined for the feasibility of amending the elimination of the tax deductibility of tobacco industry marketing expenses. Such a proposal would discourage industry marketing, including any marketing permitted during a phase-out period.

While the tobacco industry might argue that such a restriction impairs freedom of expression as protected in the Charter, industry arguments might not get very far. An end to tax deductibility does not actually prevent expression, it only removes a government subsidy for that expression. There is no reason why the government should be forced to subsidize a form of expression that the government does not agree with. The *Income Tax Act* presently denies the tax deductibility of advertising placed by Canadians with American broadcasters or periodical publishers.

Control on Where Tobacco May be Sold

The government should take steps to reduce the number of outlets which sell tobacco. The federal government already restricts the location from which other drugs may be sold, such as, in the case of prescription drugs, prohibiting the sale except in pharmacies. Existing federal legislation deals with the restriction of locations which can sell firearms and alcoholic beverages.

As a first step, the government should prohibit tobacco sales in any government buildings, with the possible exception of controlled outlets on armed forces bases.

The government could prohibit the sale or supply of tobacco from school premises, including post-secondary facilities, as well as from youth centres. The sale of tobacco in pharmacies, hospitals and other health facilities could also be prohibited, as the Ontario government has done in the *Tobacco Control Act*.

As previously discussed, the partial ban on tobacco vending machines found in the *Tobacco Sales to Young Persons Act* should be extended to a total ban.

Appendix 14 contains an article entitled "Why Banning Tobacco Sales in Pharmacies Should Reduce Tobacco Use" and published in the *Canadian Pharmaceutical Journal*. This article describes reasons and evidence why a reduced number of outlets could reduce smoking. The reasons include making it easier to enforce laws preventing the sale of tobacco to minors, reducing spontaneous purchases, reducing point of sale promotions, and sending a consistent educational message.

A segment of smokers, including some occasional smokers, associate smoking and drinking. Tobacco use combined with alcohol increases the risk of throat cancer. Also, eliminating tobacco sales from premises which serve alcoholic beverages would be a helpful step in eliminating environmental tobacco smoke (ETS) in restaurants and bars, a move clearly beneficial to public health by decreasing health risk to bar and restaurant workers and customers who are non-smokers. ETS is a cause of lung cancer in healthy non-smokers.

Candy Tobacco Products

There should be research into the benefit of controlling confectionary products intentionally resembling tobacco products. A ban on such products exists in parts of Australia and in Thailand, as well as in an unproclaimed section of the Nova Scotia *Tobacco Access Act*. Candy cigarettes, bubble gum resembling chewing tobacco, and other such products may increase the social acceptability of tobacco use among children. Children may feel that while they are not yet old enough to use tobacco, a candy product can provide an interim substitute. Candy tobacco products legitimize tobacco use in the youngest of eyes. They allow children to "model" adults' tobacco use. Modelling is a way that children learn new behaviour.

As early as 1967, the U.S. Federal Trade Commission complained that the American tobacco industry's voluntary code permitting the sale of candy and bubble gum in packages that resembled those of actual cigarette brands amounted to "an indirect form of

advertising aimed at children".[30] A recent study has found that repeated candy cigarette purchases by children was significantly correlated with experimental tobacco use.[31]

Duty-Free Sales

There should be a ban on the sale of tobacco products from duty-free stores, whether at border crossings, in airports or terminals, or on board Canadian carriers. Singapore has taken such a step and the European Community is moving in this direction.

Duty-free tobacco sales provide a low cost source of supply which in turn leads to higher tobacco consumption. Permitting such sales also creates an opening which can and has lead to increased contraband.

An elimination of duty-free sales would lead to increased government revenue. At present, the government is permitting millions of dollars of potential tax revenue to go uncollected.

Advertising Restrictions on Alternative Nicotine Products

Under the *Food and Drugs Regulations*, consumer advertising of prescription drugs is not permitted. As a result, manufacturers of nicotine patches are unable to promote their products through advertising, as is presently permitted in the United States. The *Food and Drug Regulations* should be amended to permit such consumer advertising in Canada for alternative nicotine products. In this way, nicotine alternatives can better compete with tobacco products, the advertising of which will be banned.

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[30]"Ban candy 'cigarettes,' FTC asks tobacco code" *Advertising Age* 1967;38(8):191, as cited in U.S. Department of Health and Human Services, *Preventing Tobacco Use Among Young People: A Report of the Surgeon General* (Atlanta: U.S. Department of Health and Human Services, 1994), p.170.

[31]J.D. Klein et al., "Candy cigarettes: do they encourage children's smoking?" *Pediatrics* 1992;89(1):27-31.

Responses to Arguments that Marketing Restrictions Will Cost Jobs

The tobacco industry has often advanced arguments that tobacco control measures should not be pursued because the measures will result in job loss and economic harm. This part of the brief seeks to anticipate and respond to those arguments.

During the Bill C-51 debate in 1987-88, there were many claims that the proposed Tobacco Products Control Act would cause massive job loss, but these claims never materialized. Indeed the advertising industry said in 1994 that advertising companies were able to adjust without difficulty. Robert Reaume, president of the Outdoor Advertising Association of Canada told Kentucky's *Louisville Courier-Journal* that lost cigarette revenues were replaced by ads for other products. Canadian Advertising Foundation president Suzanne Keeler said ad agencies had not suffered either. "There was concern that if ads for this product are banned it would lead to other bans," but so far that has not happened she said. The Chairman of Magazines Canada, which represents the biggest magazines, said the ad ban "wasn't calamitous."[32]

Marketing restrictions prevent foreign companies from penetrating the Canadian market, which at present has an exceptional 99% market share held by domestic manufacturers. In the seven years since the adoption of the Tobacco Products Control Act, the market share for foreign cigarettes has remained at less than 1%. In fact, cigarette imports into Canada have fallen from 661 million in 1988 to 271 million in 1993.[33]

The tobacco industry is making record profits, despite sales which were, until recently, declining. Imperial Tobacco's annual return on capital approaches 100% at a time when senior citizens earn 5.25% on Canada Savings Bonds. Imperial Tobacco's annual return on capital is more than five times what most industries receive.

Tobacco companies have had decades of warning since the 1963 announcement by Health Minister Judy LaMarsh that smoking was a cause of lung cancer and that the government would start an anti-

[32]Andrew Woolfson, "Canada's ad ban puts cigarettes out of sight" *Louisville, Ky Courier-Journal* (August 4, 1994) p.1 at 4.

[33]Statistics Canada, *Imports by Commodities*, Catalogue 65-007, December 1988 and December 1993 issues.

smoking programme. Since 1963, the industry has enjoyed a regulatory reprieve far longer than the industry once anticipated. The industry's total sales volume in 1995 remains higher than it was in 1963.

Since implementation of Canada's anti-smoking programme in 1963, adult smoking prevalence has fallen from about 50% to about 30%. This has been done without harming the viability of tobacco manufacturers. Indeed, manufacturers are more profitable than ever. Part of the reason for sustained manufacturer success has been that decreases in prevalence have been offset by a growing population.

Because of the addictiveness of nicotine, an extremely successful anti-smoking programme would still mean that future declines in industry volume would be slow, especially since a decrease in per capita sales would continue to be offset by higher population. Any slow decline in sales could be handled by reduced jobs through attrition.

The tobacco manufacturing sector is small at about 4900 workers, with all jobs in this sector totalling less than one tenth of one percent of jobs in Canada.

The number of employees in the tobacco industry has been declining as a result of technology. To underline the impact of automation and rationalization, note that total industry sales in 1992 were higher than in 1962, but the number of tobacco industry employees fell from 9,081 to 4,930 over the same period.[34]

There are very few jobs actually in tobacco manufacturing plants. Cigarette factories are among the most automated of any industry with machines able to produce 14,000 cigarettes per minute. A proportion of industry workers remain employed at cigarette factories regardless of whether sales volumes increase or decrease.

The tobacco industry fails to point out that if Canadians spend less on cigarettes, spending will be shifted to other areas thus increasing jobs in other sectors.

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[34]Statistics Canada, *Beverage and tobacco products industries*, Catalogue No.32-251.

All three tobacco companies in Canada are subsidiaries of foreign-controlled multinationals. These multinationals remove industry profits from Canada.[35]

Tobacco results in a net economic loss to society. Thus any decrease in smoking is beneficial to the economy. Tobacco use is harmful to the economy in several ways:

- Health care costs
- Costs of disability
- Insurance costs
- Absenteeism and sick pay since smokers are sick more often than non-smokers
- Lost productivity: smokers are less productive than non-smokers, in part because smokers take smoking breaks
- Premature death of workers results in forgone income and lost productivity
- Environmental and property loss due to smoking-caused forest, industrial and residential fires.
- Repair costs, such as for cigarette burns.
- Tobacco use can be a gateway to increased use of harsher illicit drugs; these drugs cause further costs to the economy
- There are also incalculable intangible costs of losing a friend or loved one.

Health Canada estimates in 1993 that the economic costs associated with tobacco use total $11 billion.[36] In 1982, the economic costs of tobacco use in Canada were estimated at more than $7 billion.[37]

In the U.S. in 1993, it has been estimated that health care costs attributable to smoking totalled US$52 billion. The total

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[35]Léo-Paul Lauzon. *Analyse socio-économique. L'industrie du tabac 1987 à 1993*. Mai 1994

[36]Health Canada, *Internal Report (Work in Progress)*, 1995, as cited in Health Canada, *Tobacco Control: A Blueprint to Protect the Health of Canadians* (December 1995) p.4.

[37]Neil E. Collishaw and Byron Rogers, "Tobacco in Canada" (1984) 117 *Canadian Pharmaceutical Journal* 147.

economic burden rises to more than US$100 billion when lost productivity is taken into account.[38]

A senior economist at the World Bank has concluded that on a global basis, when everything is netted out, that tobacco represents a net US$200 billion economic loss to the world.

The World Bank argues that on economic grounds alone, tobacco should be controlled. The World Bank, which at one time actively lent money to support tobacco growing and processing, has policies against bank funds being used for tobacco production, assists countries diversify away from tobacco, includes anti-tobacco activities in its health sector work, and provides that agreements with the Bank respecting trade liberalization will not cover tobacco or tobacco products.

If the government is prepared to reduce government jobs to fight the deficit, it should not have a problem with a small number of jobs being reduced by attrition or shifted to other economic sectors in order to save lives.

Tobacco Farmers

The reason many Canadian tobacco farmers remain in business is because of regulation, namely provincial marketing boards which artificially inflate the price farmers receive. This price is far above world prices for raw leaf tobacco.

Tobacco farmers are on average richer than other farmers in Canada. The average Ontario tobacco grower still earns three times the income of the average non-tobacco farm.[39]

The average tobacco farm generated a new cash income in 1990 that exceeded the income of two-thirds of Ontario families.[40]

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[38]Cited in World Health Organization, "Tobacco Costs More Than You Think" [World No-Tobacco Day Advisory Kit 1995], p.20.

[39]Robert C. Allen, "The False Dilemma: The Impact of Tobacco Control Policies on Employment in Canada" (February 1993), p.16.

[40]Statistics Canada, *Family Incomes: Census Families*, 13-208, 1990, p.23 as cited in Robert C. Allen, "The False Dilemma: The Impact of Tobacco Control Policies on Employment in Canada" (February 1993), p.16.

A substantial portion of crops grown by tobacco growers are exported outside of Canada. These exports are unaffected by domestic sales and market conditions. The CCS advocates against the import of tobacco in all its forms and its export to foreign markets, particularly developing countries.

Further Reading

Further information respecting the economics of tobacco and tobacco control can be found in these sources:

Robert C. Allen, "The False Dilemma: The Impact of Tobacco Control Policies on Employment in Canada" (February 1993).

World Health Organization, "Tobacco Costs More Than You Think" [World No-Tobacco Day Advisory Kit 1995].

Conclusion

In conclusion, the CCS declares that we are at a public health crossroads. While each of us have important roles to play, now is the time for comprehensive federal government action in response to the tobacco epidemic in our country. The *Blueprint* along with the improvements outlined above should quickly become the basis of strong legislation and then active enforcement. The CCS's mission is the eradication of cancer. Tobacco use is the leading preventable cause of a variety of cancers. The partnership of the federal government in establishing the proper legislative environment to stop the carnage is crucial to our own success and to improving public health generally.

Response to Tobacco Industry Arguments Against Bill C-71, the *Tobacco Act*

Canadian Cancer Society

February, 1997

CANADIAN CANCER SOCIETY | SOCIÉTÉ CANADIENNE DU CANCER

Response to Tobacco Industry Arguments Against Bill C-71, the *Tobacco Act*

Canadian Cancer Society
February 1997

This document outlines a number of arguments which have been put forward in opposition to Bill C-71, the *Tobacco Act*. A response follows each argument.

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Executive Summary

Below is a summary of the responses of the Canadian Cancer Society to 13 arguments (in italics) put forward by the tobacco industry in opposition to Bill C-71. The full text is found later in the document.

1. *The bill goes too far.*

   No. The bill contains only a partial ban on tobacco advertising even though total bans have been adopted by some countries including Australia, New Zealand, France, Portugal, Sweden, Norway, Finland and Italy.

   The bill does not ban tobacco sponsorships even though the United States has adopted a law that will ban all tobacco sponsorship advertising effective August 28, 1998.

2. *The bill is being rushed through Parliament.*

   The bill has been before Parliament for more than two months and implements measures first announced by the government in December, 1995.

3. *The regulatory authority in the bill is too broad.*

   The regulatory authority created by the bill is less than for products covered by the *Hazardous Products Act* -- yet tobacco is much more dangerous. The nicotine patch is more strictly regulated under the *Food and Drugs Act* than cigarettes will be under Bill C-71.

4. *Events now sponsored by tobacco companies will have to be canceled.*

   The bill does not ban sponsorships -- it only regulates the use of tobacco brand elements in sponsorship advertising. Prominent former tobacco sponsorship recipients now have non-tobacco sponsors. In 1988, the Royal Canadian Golf Association testified before a parliamentary committee that du Maurier could not be replaced as a sponsor of the men's Canadian Open. The event is now sponsored by Bell Canada.

5. *The bill will cost jobs in the tobacco industry.*

   In some ways, Bill C-71 protects jobs in the Canadian tobacco industry because advertising restrictions make it difficult for foreign companies to penetrate the Canadian market. Even if there would be some job impact, public health must take

priority. To argue otherwise is akin to arguing that World War II should have continued to prevent job losses in munition factories.

6. *There will be a significant adverse impact on retailers.*

In 1987-88 the tobacco industry claimed that Bill C-51 (*Tobacco Products Control Act*), which was eventually passed by Parliament, and which banned tobacco advertising, would cost thousands of jobs. This did not happen.

7. *The tobacco industry was inadequately consulted.*

The industry met with the Minister prior to the release of the tobacco *Blueprint*, made a written submission on the *Blueprint*, and had face-to-face meetings with government officials, and testified before the House of Commons Standing Committee on Health.

8. *The bill amounts to a de facto total ban on advertising.*

No, the bill permits tobacco advertising in publications read primarily by adults, in direct mail to adults and in places where minors are prohibited by law. Scope remains for ample advertising, much to the chagrin of the health community.

9. *The bill infringes on provincial jurisdiction.*

Restricting tobacco marketing was strongly upheld by the Supreme Court of Canada in 1996 as being within federal jurisdiction.

10. *Tobacco is a legal product.*

There are other legal products or activities the advertising of which is restricted. Prescription drugs are legal, but consumer advertising of prescription drugs (including the nicotine patch) is illegal. There is no such thing as the Prozac Tennis Championship or the Valium Arts Festival. Prostitution is legal, but soliciting prostitution is illegal.

11. *The bill infringes the Charter of Rights and Freedoms.*

The government has gone to great lengths to respond to the Supreme Court's majority judgement. Bill C-71 contains a partial ban on advertising, not a total ban. Lifestyle advertising is banned, but product information can still be communicated to consumers in a manner directed primarily to adults.

In the view of many health organizations, Bill C-71 is too weak, and the government was too generous in its interpretation of the Supreme Court's judgement.

12. Education is the answer.

Education alone is not enough to reduce smoking. Educational interventions cannot compete with the multimillion dollar advertising campaigns of the tobacco industry.

13. There is no evidence advertising increases smoking.

- A 1996 U.S. FDA report examined considerable evidence and concludes that advertising does impact on increasing consumption.

- The U.S. Surgeon General has concluded that tobacco advertising increases consumption.

- A House of Commons Committee in the United Kingdom held hearings on tobacco advertising and concluded in 1992 that there was a relationship between advertising and consumption.

- Imperial Tobacco prevalence data show that the average annual prevalence decline between 1989-1993 (during which the *Tobacco Products Control Act* was in full force) was far greater than at any time prior to the advertising legislation (1988 and before) during the period 1971-1988. The following table provides data for the time periods 1971 to 1982 (no legislation or significant tax increases), 1983 to 1988 (significant tax increases), and 1989 to 1993 (legislation and significant tax increases):

	1971-82	1983-88	1989-93
Average Annual Decline in Prevalence	0.67%	0.78%	1.16%
Average Annual % Decline Based on Start of Period	1.43%	1.98%	3.33%

(Note that Imperial Tobacco has not released prevalence data for 1994-96.)

- In *RJR-Macdonald v. Canada (Attorney General)*, all nine judges on the Supreme Court of Canada agreed that there was a rational connection between tobacco advertising and increased consumption.

- Recent studies have documented a high awareness and recall of tobacco advertising among children and adolescents, with Joe Camel (the cartoon character which promotes Camel cigarettes) being just as recognizable among six year olds as Mickey Mouse.

1. The bill goes too far.

In fact, although this bill is supported by the health community, the bill does not go far enough. The government has announced, for example, that it will not proceed with requiring plain packaging for tobacco products, despite a recommendation to do so from the House of Commons Standing Committee on Health. Bill C-71 will continue to allow extensive promotion at point of sale. Bill C-71 contains only a partial ban on advertising even though a total ban has been recommended by the World Health Organization and has been adopted by about 30 countries in the world including Australia, New Zealand, France, Portugal, Sweden, Norway, Finland, Iceland, Italy and Singapore. The bill contains only partial restrictions on sponsorship, even though a growing number of countries such as France are implementing total bans on sponsorship advertising. Even the United States has adopted a law which will ban all tobacco sponsorship advertising effective August 28, 1998.

In many respects, the bill is weaker than the tobacco control Blueprint released by the government on December 11, 1995. The Blueprint called for a total ban on advertising, a total ban on the use of trademarks on non-tobacco goods, a limit on point of sale package displays to one package per brand, a ban on extraneous information on packages, and administrative enforcement measures. None of these provisions are found in Bill C-71 as they were initially proposed by the government.

The tax increase announced with the bill is extremely small compared to the massive reduction which occurred in February, 1994. In Ontario, for instance, there was a total federal/provincial rollback in 1994 of $19.20 per carton; since then, federal and provincial taxes have gone up in Ontario by a total of just $2.00 per carton.

Tobacco companies claim they want to provide customers with information in advertising. Yet these same tobacco companies have for decades steadfastly refused to supply consumers with various kinds of information, such as the additives in cigarettes.

The freedom of tobacco companies to advertise should not take precedence over the freedom of our children to be free from addiction and from manipulation by wealthy multinational corporations.

2. The bill is being rushed through Parliament.

The bill has already been before the House of Commons for more than two months. There are no new arguments which will come out that have not already been made. The House of Commons Standing Committee on Health heard testimony from all groups who asked to be heard -- 23 in all. The Committee gave the bill detailed clause by clause consideration resulting in 22 amendments.

In any event, proposals for new tobacco legislation have been before the public for more than a year. The government's announcement of its tobacco Blueprint was in December, 1995. This was followed by a period of public consultation involving solicitation of written submissions, and then meetings with key stakeholders on all sides of the issue.

Bill C-71 is not the first bill to respond to the Supreme Court of Canada's invalidation of parts of the *Tobacco Products Control Act*. Bills C-117, S-14, C-24, C-346, and S-5 responded in various ways, although none of them has become law. (Bills C-24 and S-5 were similar to Bills C-117 and S-14 which died on the Order Paper when Parliament was prorogued.) The issue of new legislation has come up on numerous occasions in question period in the House of Commons and in the Senate, and in parliamentary committees. The issue of new tobacco legislation has been before Parliament long enough.

In a broader sense, the issue of controlling the marketing of tobacco has been before Parliament for some 34 years since the first bill restricting tobacco marketing was introduced in 1963. In 1969, an all-party report of the Standing Committee on Health, Welfare and Social Affairs recommended the adoption of a ban on cigarette advertising. Over a period of decades, the issue has been debated in Parliament and studied in committee on many occasions.

3. The regulatory authority in the bill is too broad.

While it is certainly true that the government can enact regulations under the bill, the regulatory authority created by the bill is less than that under the *Hazardous Products Act* or under the *Food and Drugs Act*. Tobacco causes more harm than other hazardous products, yet is subject to less regulatory authority. Nicotine is a drug, but the regulatory authority for cigarettes containing nicotine is far less than for the nicotine patch.

In the United States, the Food and Drug Administration is operating under a much broader regulatory authority found in the *Food, Drug and Cosmetic Act* than is found in Bill C-71. British Columbia has a broader regulatory authority under the provincial *Tobacco Sales Act* than is found in Bill C-71.

A comprehensive regulatory framework is necessary when dealing with tobacco. Flexibility and speed of response are essential when dealing with a major public health problem like the tobacco epidemic. As well, such a framework is needed when dealing with the tobacco industry, an industry which has a history of exploiting loopholes in legislation.

The industry argues that the making of regulations involves no public or parliamentary scrutiny. The regulatory process, however, offers a full opportunity for public participation and parliamentary oversight. The publication of draft regulations in the *Canada Gazette* is followed by a formal public consultation period. Public response may result in a draft regulation never being adopted, as was the case in 1996 with a regulation dealing with cheese. MPs can at any time debate the content of regulations in the House of Commons or in committee. Parliament at any time can overturn or amend a regulation adopted by Cabinet.

4. Events now sponsored by tobacco companies will have to be canceled.

The tobacco industry is helping to organize sporting and cultural groups to oppose Bill C-71. The Alliance for Sponsorship Freedom receives funds from the tobacco industry and is operated by a tobacco industry public relations firm. The industry knows that others have more credibility in public debates than do tobacco manufacturers.

Bill C-71 does not place restrictions on tobacco companies giving sponsorship money. The bill only places restrictions on sponsorship advertising using tobacco brand elements. Tobacco companies will remain free to be as philanthropic as they want to be.

Some prominent former recipients of tobacco sponsorship money now have non-tobacco sponsors. The women's international tennis circuit was once sponsored by Virginia Slims; now it is sponsored by Corel. The Australian Open in tennis once had a cigarette sponsor; now the event has a non-tobacco sponsor. The Canadian Open (men's golf) was once sponsored by du Maurier; now the event is sponsored by Bell Canada. In 1988, the Royal Canadian Golf Association testified before a parliamentary committee that du Maurier could not be replaced as a sponsor. This prediction was clearly wrong.

Several countries have announced total bans on sponsorship promotions, including France, the U.S. and Belgium, although the American law is not yet fully in effect, and the Belgian law still has to be approved by the Belgian Senate. New Zealand and Australia have a near total ban on sponsorship advertising.

Claims that the Toronto and Vancouver IndyCar races will be canceled lack credibility since American races in the U.S.-based circuit will be prohibited from having sponsorship advertising starting in August 1998 pursuant to U.S. federal law. Similarly, Formula One Grand Prix races in Great Britain, Germany, France and Belgium have been or will be prohibited from having tobacco sponsorship advertising. (The Belgium law is before the country's Senate.) If these countries can have bans on brand name sponsorship advertising for Formula One races, then Canada can have

partial restrictions. In France, the Formula One circuit actually announced the cancellation of the French Grand Prix while the law was before Parliament. However, once the law was in place, the "threat" was never carried out.

5. The bill will cost jobs in the tobacco industry.

Claims of threatened job losses are regularly used as part of efforts to oppose tobacco control legislation. Similar previous claims have not materialized. Arguments that a ban on broadcast advertising would seriously harm small radio stations (1969), that a total ban on advertising would cost jobs in billboard companies (1988), and that a ban on the sale of tobacco in pharmacies would mean that pharmacies would close (1994) were totally empty.

During the Bill C-51 debate in 1987-88 regarding a ban on advertising, the industry told a parliamentary committee that up to 25,000 jobs were at risk, a claim that never materialized.

There are actually very few jobs in the tobacco manufacturing industry (about 5000) due to the extremely high level of automation. Factories are dominated by giant machines.

In important ways, Bill C-71 protects jobs in the Canadian tobacco industry because advertising restrictions make it extremely difficult for foreign companies to penetrate the Canadian market. At present, the Canadian industry is 99% dominated by an oligopoly of three firms based in Canada.

Even if there would be some job impact, public health must take priority. Are a small number of jobs worth 45,000 deaths per year? Should car accidents be encouraged to protect jobs in auto body shops? Should World War II have been continued an extra year to protect jobs in munitions factories?

6. There will be a significant adverse impact on retailers.

The tobacco industry has argued that Bill C-71 will impose significant hardship on retailers. This argument should be rejected as being unfounded. The initial provision in the Blueprint to limit point of sale displays to one package per brand was not included in legislation, to the dismay of health groups.

It is important to note that tobacco manufacturers have been attempting to generate opposition to Bill C-71 among retailers. Manufacturers have written to retailers, and have at times sent blank forms which can be sent in to Members of

Parliament. The industry recognizes that retailers are more credible opponents of legislation than are tobacco manufacturers.

In 1987-88 the tobacco industry claimed that Bill C-51, which banned advertising, would cost thousands of jobs among retailers. These predictions proved to be groundless once the bill became law. Similarly, there is no credible evidence that Bill C-71 will reduce the number of jobs among retailers which sell tobacco products.

7. The tobacco industry was inadequately consulted.

The tobacco industry was consulted during the process leading to legislation. The industry met with the Health Minister prior to the release of the Blueprint. The industry made a written submission on the Blueprint, and subsequently had a face-to-face meeting with government officials. The industry made numerous further representations to the government. There is no doubt that the industry's point of view was understood by the government prior to the introduction of legislation. The industry testified before the House of Commons Standing Committee on Health.

8. The bill amounts to a *de facto* total ban on advertising.

The industry has argued that the provisions in Bill C-71 constitute a total ban on advertising, and that there is no legal precedent for re-enacting a provision previously ruled unconstitutional. However, the *Tobacco Products Control Act* imposed a total ban on advertising while Bill C-71 only contains a partial ban. The bill permits advertising in publications primarily read by adults, in direct mail to adults, and in places where minors are not permitted by law. Manufacturers will be able to use these media to convey truthful information about the characteristics of their products, such as yields of tar and nicotine, price, type of tobacco used, filter material and design, additives, availability, health effects, and so on. Scope remains for ample advertising, much to the chagrin of the health community.

9. The bill infringes on provincial jurisdiction.

The bill is within federal jurisdiction. The 1988 *Tobacco Products Control Act*, which banned tobacco advertising and regulated other forms of tobacco marketing, was upheld by seven of nine judges on the Supreme Court of Canada as being within federal criminal law power. The other two of nine judges held in an *obiter dictum* (an aside) that the Act was within the federal government's power to legislate for the peace, order and good government of Canada (p.o.g.g.). A unanimous judgement of the Quebec Court of Appeal held that the bill was within the p.o.g.g. power and thus within federal jurisdiction.

It should be noted that the subject matter being addressed in the *Tobacco Products Control Act* was much the same as that now found in Bill C-71. Both address the marketing of tobacco products. Among other things, the TPCA dealt with advertising at point of sale, and also regulated, to a limited extent, package displays at point of sale. It should be noted that the *Food and Drugs Act*, a federal law with a health purpose, regulates in detail the sale and advertising of prescription drugs, and some other drugs, including at point of sale.

10. Tobacco is a legal product.

There are other legal products/activities the advertising of which is banned. Prescription drugs are legal, but consumer advertising of prescription drugs (including the nicotine patch) is illegal. There is no such thing as the Prozac Tennis Championship or the Valium Arts Festival. Prostitution is legal, but soliciting prostitution is illegal.

It is only an accident of history that tobacco is a legal product. Cigarettes were in widespread use long before the health consequences of the product were well understood. If cigarettes were a new product today, they would never be allowed on the market.

Tobacco is unique: it is the only product legally available on the market which is lethal when used exactly as the manufacturer intends. Tobacco is also unique in that it is the only legally available product which the government would like to make illegal but does not. There is no other currently legal consumer product which the government would like eventually to have eliminated from the market.

Some have argued that if tobacco is really all that hazardous, then it should be banned altogether. An outright prohibition, however, is impossible. Widespread contraband would quickly undermine the ban. There are too many Canadians addicted to nicotine for a total ban to be successfully enforced.

11. The bill infringes the Charter of Rights and Freedoms.

The government has gone to great lengths to respond to the Supreme Court's majority judgement. Bill C-71 contains a partial ban on advertising, not a total ban. Lifestyle advertising is banned, but product information can still be communicated to consumers in a manner directed primarily to adults. In the Supreme Court judgement, Mr. Justice Iaccobucci, speaking for two members of the majority, placed reduced value on the profit-motivated commercial expression (as compared to political expression for example) arising from tobacco advertising. He said that the constitutionality of advertising restrictions was often due to their partialness, and

suggested indirectly that just a little bit of "tailoring" might have led to the upholding of the law's constitutionality.

Imperial Tobacco has criticized some of the advertising restrictions in Bill C-71, stating that the Supreme Court judgement dealt with the content of advertising, not the placement. However, the Supreme Court only listed some of the advertising limitations which would have been justifiable, not all of them. The industry itself recognizes that controls on the placement of advertising are necessary to protect young people. The industry's voluntary code has restrictions on the placement of advertising, such as no outdoor ads near schools.

In the view of many health organizations, Bill C-71 is too weak, and the government was too generous in its interpretation of the Supreme Court's judgement. The health community is of the view that the evidence today is sufficient to justify a total ban on advertising, not just a partial ban. Had the evidence available today been before the Court last time, we believe the legislation would have been upheld.

12. Education is the answer.

Education can work to reduce smoking. But education alone is not enough. Despite educational efforts over a period of several decades, many of which have had some success, a large segment of young people continue to take up smoking. Restrictions on the marketing of tobacco combined with education is far more effective than just education alone. Indeed, the continued presence of marketing -- marketing which portrays lifestyles attractive to youth -- undermines educational efforts. As well, educational interventions cannot compete with the multimillion dollar advertising campaigns of the tobacco industry.

It should be noted that those who oppose advertising restrictions but support education have an inconsistent point of view. How is it possible that anti-tobacco educational messages can work to reduce smoking, but more professional, more extensive, pro-tobacco advertising messages have no impact on smoking behaviour? The reality is that both anti-tobacco and pro-tobacco messages can have an impact.

13. There is no evidence advertising induces increased smoking.

There is ample evidence that tobacco advertising increases consumption, including important evidence that has arisen since the trial respecting the *Tobacco Products Control Act*. The evidence includes academic studies, logic, anecdotal reports, corporate documents, industry admissions, expert opinion, conference materials, and international materials. Much of this evidence has been documented elsewhere. A select number of

points are included in this brief with respect to the ability of tobacco advertising to induce increased consumption:

- A 1996 U.S. Food and Drug Administration (FDA) report examines and cites considerable evidence and concludes that advertising does induce greater consumption.

- The FDA received a large number of submissions respecting the proposed restrictions on tobacco advertising. Many of these submissions provide further support that advertising increases consumption.

- The conclusions of the U.S. Surgeon General with respect to the impact of advertising on consumption are even stronger in the reports of 1992 and 1994 than in previous reports.

- Ample evidence was gathered through written submissions and oral testimony before the House of Commons Standing Committee on Health during a 1994 study into plain packaging. After hearing all of this evidence, the Committee recommended the implementation of plain packaging, a policy measure designed to curb packaging as an advertising measure.

- A House of Commons Committee in the United Kingdom held hearings on tobacco advertising and concluded that there was a relationship between advertising and consumption.[1] The Committee's report, and the oral and written evidence before the Committee, provide further support regarding the impact of advertising on consumption.

- Imperial Tobacco prevalence data show that the average annual prevalence decline between 1989-1993 (during which the *Tobacco Products Control Act* was in place) was far greater than at any time prior to the legislation (1988 and before) during the period 1971-1988. The following table provides data for the time periods 1971 to 1982 (no legislation or significant tax increases), 1983 to 1988 (significant tax increases), and 1989 to 1993 (legislation and significant tax increases):[2]

	1971-82	1983-88	1989-93
Average Annual Decline in Prevalence	0.67%	0.78%	1.16%
Average Annual % Decline Based on Start of Period	1.43%	1.98%	3.33%

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[1]U.K., House of Commons Health Committee, *Second Report: The European Commission's Proposed Directive of Tobacco Products* (London: H.M.S.O., 1992) at xvii.

[2]Imperial Tobacco Ltd., "The Canadian Tobacco Market at a Glance" (1989), Exhibit AG-31, *RJR-Macdonald Inc. v. Canada (Attorney General)* p.2; Imasco Ltd., *Annual Report 1993* p.18.

(Note that Imperial Tobacco has not released prevalence data for 1994-96.)

- In *RJR-Macdonald v. Canada (Attorney General)*, all nine judges on the Supreme Court of Canada agreed that there was a rational connection between advertising and consumption, namely that tobacco advertising increased consumption. Members of the majority were of the view that the government had failed to put forward any evidence that certain forms of advertising other than lifestyle advertising increased consumption (the minority of four judges said that there was "ample" evidence justifying a total ban on advertising).

  Here are the views endorsed by six of the nine members of the Court as written by Mr. Justice La Forest (with Justices Gonthier, Cory, L'Heureux-Dubé concurring, and with the concurrence on this point of Chief Justice Lamer and Justices Iaccobucci):

  > [I]t is difficult to believe that Canadian tobacco companies would spend over 75 million dollars every year on advertising if they did not know that advertising increases the consumption of their product...The evidence can be conveniently subdivided into three categories: internal tobacco marketing documents, expert reports, and international materials...
  >
  > Perhaps the most compelling evidence concerning the connection between advertising and consumption can be found in the internal marketing documents prepared by the tobacco manufacturers themselves. Although the appellants [the tobacco companies] steadfastly argue that their marketing efforts are directed solely at maintaining and expanding brand loyalty among adult smokers, these documents show otherwise. In particular, the following general conclusions can be drawn from these documents: the tobacco companies are concerned about a shrinking tobacco market and recognize that an "advocacy thrust" is necessary to maintain the size of the overall market: the companies understand that, in order to maintain the overall numbers of smokers, they must reassure current smokers and make their product attractive to young and to non-smokers; they also recognize that advertising is critical to maintaining the size of the market because it serves to reinforce the social acceptability of smoking by identifying it with glamour, affluence, youthfulness and vitality.
  >
  > The internal marketing documents introduced at trial strongly suggest that the tobacco companies perceive advertising to be a cornerstone of their strategy to reassure current smokers and expand the market by attracting new smokers, particularly among the young.

- Articles in the popular press, in marketing publications, and in tobacco industry trade journals contain admissions by tobacco industry representatives about the relationship between advertising and consumption.

- An extensive set of tobacco industry documents have made their way on to the public record in 1994, 1995 and 1996. These documents provide extensive admissions about corporate knowledge and strategies, about the impact of advertising, and about the competitive threat brought about from nicotine alternative products. These documents enhance the extensive information about industry marketing practices exposed during the trial regarding the constitutionality of the TPCA.

- In 1996 the National Cancer Institute of Canada reviewed research on marketing and youth tobacco use and found that "the weight and consistency of the evidence strongly support the conclusion that marketing plays a significant role in youth tobacco use". In a report entitled "Tobacco Marketing and Youth: Examination of Youth Attitudes and Behaviour to Tobacco Industry Advertising and Sponsorship", an international team of 25 experts found that:

  1. Tobacco advertisements appeal to youth.
  2. Youth are aware of tobacco marketing.
  3. Awareness and perceptions of marketing are linked to smoking intentions and behaviour.
  4. Tobacco marketing campaigns increase youth tobacco use.
  5. Youth are particularly likely to smoke highly marketed brands.

- Recent studies have documented a high awareness and recall of tobacco advertising among children and adolescents, with Joe Camel (the cartoon character which promotes Camel cigarettes) being just as recognizable among six year olds as Mickey Mouse.[3] A study published in 1994 found that in "girls younger than 18 years, smoking initiation increased abruptly around 1967, when tobacco advertising aimed at selling specific brands to women was introduced. This increase was particularly marked in those females who never attended college."[4] A study published in 1995 provides evidence that tobacco marketing was a stronger influence in encouraging adolescents to initiate the smoking uptake process than exposure to peer or family smokers or sociodemographic variables including

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[3]P.M. Fischer et al., "Brand logo recognition by children aged 3 to 6 years. Mickey Mouse and Old Joe the Camel" *Journal of the American Medial Association* 1991;266:3145-8; J.R. DiFranza et al., "RJR Nabisco's cartoon camel promotes Camel cigarettes to children" [published erratum appears in *JAMA* 1992;268:203-4] *Journal of the American Medical Association* 1991;266:3149-53.

[4]J.P. Pierce et al., "Smoking Initiation by Adolescent Girls, 1944 through 1988. An Association with Targeted Advertising" *Journal of the American Medical Association* (1994) 271(8):608.

perceived school performance.[5] A 1996 study found that teenagers were three times more sensitive to cigarette advertising than adults.[6]

- Three studies providing an excellent overview of how tobacco advertising can increase consumption, and which include many helpful references, are as follows:

  a. Ken Warner, *Selling Smoke: Cigarette Advertising and Public Health* (Washington, D.C.: American Public Health Association, October 1986).

  b. *Pushing Smoke: Tobacco advertising and promotion* (WHO Regional Office for Europe and Commission of European Communities, about 1988).

  c. Joe Tye et al., "Tobacco Advertising and Consumption: Evidence of a Causal Relationship" *Journal of Public Health Policy* (Winter 1987) 492-508.

- If tobacco advertising does not increase consumption, then why do companies spend so many millions of dollars on advertising? If a ban on tobacco advertising and promotion would not decrease consumption, then why are manufacturers opposing such a ban, especially when profits would increase by about $200 million per year? Net switching (overall change in a company's market share) represents about $20 million profit per year, yet companies are spending $200 million competing for just $20 million in potential gain (or worse, loss).

- In the United States, the tobacco industry spends roughly $5 billion (U.S.) per year in advertising and promotion. How can the industry claim that none of this has any impact on consumption?

- Tobacco companies deny that anyone has ever died from smoking. As a result, one must question their credibility on public statements related to tobacco policy issues, such as their claim that advertising has no impact on smoking.

- Countries in which in the past there have been only one tobacco company, a monopoly, have still had advertising. Examples include Japan, Austria and Cameroon. Why would a monopoly advertise if advertising had no impact on

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[5]Nicola Evans et al., "Influence of Tobacco Marketing and Exposure to Smokers on Adolescent Susceptibility to Smoking" *Journal of the National Cancer Institute* 1995;87(20):1538-1545.

[6]Richard W. Pollay et al., "The Last Straw? Cigarette Advertising and Realized Market Shares Among Youths and Adults, 1979-1993" *Journal of Marketing* 1996; 60:1-16.

consumption? This experience is strong evidence that advertising increases consumption.

- Monopoly industries in Canada advertise. One example is cable TV. As well, telephone companies advertised long distance service even before there was long distance competition. If advertising has no impact on consumption, then why do these monopolies advertise?

- To argue that advertising has no impact on consumption means that one also has to agree with the proposition that anti-smoking education can have no impact on consumption. In the U.S., there is evidence, including from California and from the "Fairness Doctrine" era, that anti-smoking publicity does reduce smoking.

- Many industries promote their products through generic advertising. Examples include advertising for milk, eggs, beef, pork and butter. If advertising had no impact on consumption, then this type of generic advertising regardless of brand would not be done.

- The potential effectiveness of a measure in reducing smoking may in fact be measured by the vigour of industry opposition against legislation. The very strong opposition to restrictions on marketing is powerful evidence that such measures would reduce smoking.

- Almost all new smokers are children. If the tobacco industry does not recruit more teenage smokers, then the industry will go out of business.

- Research in Britain shows that children overestimate the proportion of adults who smoke. This might be explained by the presence of tobacco advertising. The perception that more people smoke than is actually the case leads to greater social acceptability of smoking and to a greater risk that the young person will begin smoking.

- The claim that advertising does not increase overall cigarette sales is analogous to arguing that millions of dollars spent advertising individual ski resorts do not promote or reinforce skiing per se.

- It makes no economic sense for tobacco companies to advertise if there is no positive impact on overall demand. Net shifting of market share between companies is only about 1-2% per year. The small increase in market share is not worth the vast amounts spent on marketing. It goes without saying that the decrease in market share for RJR-Macdonald and Rothmans, Benson & Hedges Inc. is not worth the millions expended on advertising. The economic benefit to Canadian tobacco companies of a total ban on advertising and promotion would

be enhanced by virtue of the fact that such a ban would protect Canadian companies from foreign competition.

- If it were true that marketing had no impact on consumption, then logic dictates that not all companies would oppose an ad ban. With an advertising ban in place, the market share of some companies would be better off than would be the case if advertising was not banned. There is evidence from some countries, acknowledged by the industry in its testimony before the Health Committee, that the dominant company in a market tends to benefit most when advertising is banned. Assuming that tobacco advertising has no impact on primary demand, this suggests that Imperial Tobacco is a market share beneficiary of advertising restrictions and should welcome an ad ban. All of this is apart from the fact that companies would save several hundred million dollars of promotional expenditures as a result of a ban. During the period the *Tobacco Products Control Act* was in force, Imperial Tobacco's market share has climbedfrom 56% in 1988 to about 67% in 1995, a significant increase in seven years.

- Tobacco advertising boosts cigarette consumption at the expense of other nicotine products. Even if the tobacco advertising only competed for market share, the market in question is not just tobacco products, but nicotine delivery products. Cigarettes compete, partially, with nicotine gum, the nicotine patch, and with other nicotine replacement products. In the quitting process, some smokers cut down, or choose a different brand, such as a "lighter" or a menthol product. Others choose nicotine replacement.

- The World Health Organization has urged a total ban on all direct and indirect advertising and promotion of tobacco products. This recommendation should be taken seriously.

- About 30 countries in the world have total bans on advertising. Dozens more have partial restrictions. The conclusions of legislatures from around the world that tobacco advertising increases consumption should be given weight.

Compilation of Complaints Made Under the Tobacco Industry Voluntary Packaging and Advertising Code, and Responses to Complaints

Prepared by:
Canadian Cancer Society

1997

Chronology

Sept. 21, 1995	Supreme Court of Canada narrowly strikes down key portions of federal *Tobacco Products Control Act.*
Dec. 11, 1995	Health Minister Diane Marleau releases *Tobacco Control: A Blueprint to Protect the Health of Canadians.* The *Blueprint* recommends a total ban on tobacco advertising to be included in new federal legislation.
Dec. 19, 1995	Canadian Tobacco Manufacturers' Council announces adoption of the Tobacco Industry Voluntary Packaging and Advertising Code (the "Code"). Enforcement of the Code is to be the responsibility of the Tobacco Advertising Supervisory Committee (comprised of three representatives of advertising trade associations) and of John Urie and Keith Flanagan, two former judges working at the Ottawa law firm of Scott & Aylen. The Code is criticized by health organizations as being inadequate, with a number of provisions weaker than the Code in place in 1988.
Dec. 20, 1995	Canadian Tobacco Manufacturers' Council places full page ads in daily newspapers in a public relations effort to promote the new Code.
Mid-Feb. 1996	Direct cigarette advertising by major manufacturers resumes.
Feb. 20, 1996	The Non-Smokers' Rights Association issues a news release stating that an advertisement for Export "A" Smooth cigarettes is located directly across the street from a Hull, Quebec high school. Public criticism reported in the media results in quick removal of the ad.
Feb. 28, 1996	Dr. David L. Mowat, M.D., Medical Officer of Health for Kingston, Frontenac and Lennox & Addington, writes to Rothmans, Benson & Hedges Inc. complaining of five advertisements near schools. One ad was as close as 30 metres from a school. The ads, for Canadian Classics cigarettes, were quickly removed.
Mar. 12, 1996	*The Chronicle* reports that Export "A" Smooth advertisements were located near three Oshawa, Ontario schools and that the ads were coming down.
Mar. 26, 1996	Heather J. Selin of the Non-Smokers' Rights Association complains that a Sportsman cigarette advertisement in *La Presse* violates the Code because the package featured in the ad depicts people, and the Code contains a ban

on the use of people in advertising.

April 17, 1996 — Patrick McDougall, President and C.E.O. of the Association of Canadian Advertisers Incorporated, replies to the March 26, 1996 complaint of Heather Selin. The complaint is rejected. In coming to his decision, Mr. McDougall reports that he consulted with the tobacco manufacturers, but there is no indication that the retired judges or the other members of the Tobacco Advertising Supervisory Committee were involved in the decision. The complainant was given no opportunity to reply to the representations of the manufacturers.

April 25, 1996 — Canadian Cancer Society files lengthy complaint against the three major manufacturers alleging 90 violations of the Code in the Ottawa-Hull area, including the following:
- 31 examples of advertisements within 200 metres of schools
- advertising depicting people
- improper sponsorship advertising
- placing advertisements having warnings which are illegible
- placing advertisements having warnings obscured from public view
- placing advertisements having no warnings: (a) on point of sale ads shaped like guitars; (b) on point of sale "shelf strips"; c) on point of sale "backdrops" intended to be located behind package displays; (d) on point of sale price signs

Copies of the complaint are transmitted to the Chief Executive Officers of the three manufacturers. Responses are received from Imperial Tobacco (April 29, 1996) and RJR-Macdonald (April 30, 1996), but not from Rothmans, Benson & Hedges.

April 29, 1996 — Dr. Edward Ellis, Associate Medical Officer of Health for the Regional Municipality of Ottawa-Carleton, files a complaint about the legibility of du Maurier and Player's advertising at the Corel Centre as seen during an Ottawa Senators hockey game. From where he sat in the upper deck, he could not read the warning though he could easily read the remainder of the advertisement. Nor could he read the warning with aid of binoculars. During the intermission, he could not read the warning from even 40 metres away.

May 8, 1996 — Dr. Ellis receives an acknowledgement of his complaint from Marc Jolicoeur, a lawyer at the firm Scott & Aylen, indicating that the complaint has been sent to Patrick McDougall. Apart from this acknowledgement, Dr. Ellis never receives a reply to his complaint.

May 9, 1996

Rob Cunningham of the Canadian Cancer Society writes to John Urie and Keith Flanagan of Scott & Aylen with respect to the April 25, 1996 complaint. Mr. Cunningham requests that a hearing be held so that all parties can fairly respond to the positions of the other side. Mr. Cunningham objects to the Tobacco Advertising Supervisory Committee being involved with respect to resolution of disputes related to the Code because of conflict of interest and reasonable apprehension of bias. Mr. Cunningham also requests copies of any submissions made by the manufacturers related to the complaint. None of the requests were ever granted.

May 29, 1996

Responsibility for pre-clearing tobacco advertising is transferred from John Urie and Keith Flanagan at Scott & Aylen to the Canadian Advertising Foundation. This change is announced June 4, 1996.

June 4, 1996

A response to the April 25, 1996 complaint is forwarded. The tobacco companies receive a response on June 4, 1996. The next day, on June 5, 1996, the Canadian Cancer Society first learns that there has been a ruling on the complaint when contacted by the media, despite being earlier assured by Patrick McDougall, Chair of the Tobacco Advertising . Supervisory Committee, that all parties would receive the ruling at the same time.

Seventy-eight of the 90 instances complained of were upheld as violations. The ruling confirmed that advertising in stores within 200 metres of schools was a violation of the Code. The industry responds to this on June 5 by announcing that it will weaken the Code to permit such advertisements to continue. The ruling affirmed that advertisements displayed without a warning or with an obscured warning were also violations of the Code.

The ruling gave manufacturers 15 days to either cure the violations or to withdraw the advertisements in question.

Although the Code purports to ban the depiction of people in advertising but, the ruling asserted that depictions of people in ads will be allowed provided the people are part of a trademark. Complaints with respect to improper sponsorship advertising and non-obscured but still illegible health warnings were dismissed. With respect to these issues, the ruling ignored and was not responsive to some of the arguments respecting interpretation made by the Canadian Cancer Society.

A cover letter from Patrick McDougall states that "the sole purpose for

appointing the Tobacco Advertising Supervisory Committee was to protect the right of commercial free speech and to ensure that companies involved in the sale of legally-produced goods and services in Canada have the right to advertise those same goods and services in a manner acceptable to Canadians." He does not state that the purpose of the Committee is to ensure fair and independent enforcement of the Code.

June 10, 1996 — Ken Kyle, Director of Public Issues for the Canadian Cancer Society, writes to Patrick McDougall (Chair of the Tobacco Advertising Supervisory Committee) requesting, among other things, the following:
- information as to whether anyone investigating the complaint actually saw the advertisements which were the subject of the complaint for illegible health warnings
- copies of the written material submitted by the tobacco companies to the Tobacco Advertising Supervisory Committee or to Scott & Aylen in response to the complaints, including the material of RJR-Macdonald cited in the ruling
- copies of draft rulings and information as to who saw those draft rulings
- information as to whether certain ads received pre-clearance

June 17, 1996 — Patrick McDougall replies to the June 10, 1996 letter stating that there will be no response to the information requests.

June 20, 1996 — Canadian Tobacco Manufacturers' Council releases formal amendments to the Code, saying that these amendments came into effect on June 10, 1996.

June 26, 1996 — The Canadian Cancer Society files a complaint against RJR-Macdonald and Imperial Tobacco for 28 violations in the following categories:
- Failure to obey the June 4, 1996 compliance order that advertisements violating the code be corrected or removed within 15 days.
- Advertising without a health warning.
- Advertising with a health warning obstructed.

RJR-Macdonald Inc. issues a news release indicating that the time period to correct the violations had been extended to 30 working days (from 15 days). The Canadian Cancer Society had never been informed that the June 4, 1996 order had been amended to allow an extension (see reference below to July 18, 1996 letter).

June 26, 1996 — Physicians for a Smoke-free Canada files a complaint for a violation of the Canadian Code of Advertising Standards respecting sponsorship advertisements for Craven "A" Today's Country, Rothmans Racing, and Benson & Hedges Symphony of Fire. The ads were alleged to violate

section 2 of the Code of Advertising Standards which states "No advertisement shall be presented in a format or style which conceals the commercial intent."

July 16, 1996 — Rob Cunningham of the Canadian Cancer Society asks Mary Trudelle of RJR-Macdonald to provide a copy of the order granting an extension of time to remedy violations identified in the ruling of June 4, 1996. She agrees without conditions.

July 18, 1996 — Mary Trudelle of RJR-Macdonald forwards to Rob Cunningham copies of correspondence related to the extension of the time period. As it turns out, the extension -- an amendment to the ruling -- was granted *orally* on June 5, 1996, in the absence of any authorizing section in the Code, without an opportunity for the Canadian Cancer Society to make representations, without the Canadian Cancer Society even being informed of the amendment to the ruling or the proposed amendment to the ruling, and without ever being confirmed in writing until after the July 16 request for a copy of the extension.

Ms. Trudelle's letter purports to unilaterally impose conditions of secrecy with respect to the use of the material enclosed with the letter.

July 19, 1996 — Canadian Cancer Society files complaint against Imperial Tobacco for violation of the Code for failing to place a warning on price signs. This was a reformulation of a part of the June 26, 1996 complaint.

July 26, 1996 — In Case #2301, the Canadian Advertising Foundation, Advertising Standards, dismisses the June 26, 1996 complaint of Physicians for a Smoke-free Canada filed under the Canadian Code of Advertising Standards (that sponsorship advertising was advertising concealing commercial intent).

Aug. 21, 1996 — Canadian Cancer Society files a complaint against Rothmans, Benson & Hedges Inc. for the use of an in-store sales representative promoting Rockport tobacco sticks to consumers through person-to-person selling. This was alleged to violate the prohibition for advertising without a health warning as well as the ban on the use of people in advertising.

Canadian Cancer Society files a complaint against RJR-Macdonald for the following:
- obstructed health warnings
- shelf strips with no health warning

Sept 9, 1996

Canadian Advertising Foundation advises that on September 17, 1996, the Advertising Standards Council will deal with the complaints against Imperial Tobacco (Case #2325, filed July 26,1996), Rothmans, Benson & Hedges Inc. (Case #2342, filed August 21, 1996) and RJR-Macdonald (Case #2343, filed August 21, 1996).

Sept. 16, 1996

Canadian Cancer Society files complaint against Rothmans, Benson & Hedges Inc. for the following violations:
- advertising without a health message on a Benson & Hedges shelf strip;
- advertising without a health message on the inside and outside of Canadian Classics matchbooks
- having an obstructed health warning on matchbooks
- having a warning on matchbooks without the text required by the Code
- failure to pre-clear advertising

Sept. 19, 1996

Canadian Advertising Foundation releases decisions of the Advertising Standards Council.

Case #2325, Imperial Tobacco

- upholds the complaint for failure to place a warning on a price sign. The company was given 30 working days to withdraw or amend the advertising in question.

Case #2342, Rothmans, Benson & Hedges Inc.

- upholds complaint that person-to-person advertising was advertising within the scope of the Code and that the activity complained of constituted a violation. The company was given 48 hours to desist this type of promotional activity. The company was also notified that any future activity of this nature would require pre-clearance. The issue as to whether person-to-person advertising constituted lifestyle advertising was left to the next meeting of the Council.

Case #2343, RJR Macdonald

- confirms that a display apparatus for Export "A" cigarettes obstructed the health warning thus violating the Code. There were approximately 4200 such obstructed advertisements in distribution in Canada. The company was given 30 working days to remove the advertisements.
- dismissed the complaint respecting a lack of health warnings on shelf strips, stating that shelf strips did not constitute advertising under the voluntary code. This ruling is inconsistent with the June 4, 1996 ruling.

Sept. 20, 1996 — Rothmans, Benson & Hedges appeals the Sept. 19, 1996 judgement in Case #2342. The Canadian Advertising Foundation, Advertising Standards stays the decision in the case pending appeal. The stay was granted without even giving the Canadian Cancer Society, a party to the complaint, the opportunity to make submissions as to whether the stay should be granted.

The Canadian Cancer Society was informed that it would not be permitted to respond to the arguments made by the tobacco company on appeal, to receive a copy of the arguments made on appeal, or to even attend the appeal. Only the appealing party could participate in the appeal, the decision in which would be final.

Sept. 20, 1996 — Canadian Cancer Society withdraws the portion of the Sept. 16, 1996 complaint which deals with RJR-Macdonald (failure to pre-clear advertising).

Oct. 8, 1996 — Physicians for a Smoke-free Canada files complaint with respect to signs inside 7-11 stores. The signs were said to have warnings which were not legible and which did not contain the required text.

Oct. 9, 1996 — Canadian Cancer Society files a complaint against National Tobacco Co. over an ad for Skoal Flavour Packs with text encouraging consumers to use the product in places where smoking is banned. The complaint alleges that this is a violation of s.3.3 of the Code which states "No tobacco product advertising shall have any purpose other than that of increasing or maintaining brand share."

Canadian Cancer Society files a complaint against Rothmans, Benson & Hedges Inc. for failing to place an advertisement on display cases for Captain Black cigars (found at point of sale) and for failing to obtain pre-clearance for these items.

Oct. 16, 1996 — Physicians for a Smoke-free Canada files complaints stating that the "principal purpose" of certain sponsorship advertisements is not the promotion of the sponsored event or activity, as required by the Code.

Nov. 1, 1996 — Canadian Tobacco Manufacturers' Council announces a further weakening of the voluntary code. Instead of requiring the "principal purpose" of sponsorship advertising to be the promotion of the event or activity, new provisions merely require that tobacco trademarks comprise not more than 25% of the ad, and that tobacco trademarks not be larger than the name of the event or activity. This weakening responded to the complaint of

October 16, 1996 scheduled to be considered by the Advertising Standards Council on Nov. 5, 1996 (see reference below to November 13, 1996 letter to Physicians for a Smoke-free Canada). As well, a new regulation exempted person-to-person advertising from the application of the Code. Such advertising was the subject of an August 21, 1996 complaint, violation ruling on September 19, 1996, and filing of an appeal on September 20, 1996. These amendments were the second and third examples of occasions where the industry weakened the code in response to complaints instead of merely complying with the Code. The first was amending the Code to permit in-store advertisements within 200 metres of schools to continue.

There were further amendments to the Code, some of which were new restrictions, such as a prohibition on outdoor sponsorship advertising within 200 metres of the perimeter of school grounds.

Nov. 7, 1996

Canadian Advertising Foundation releases decisions of the Advertising Standards Council. The Council dismissed the complaint against National Tobacco Co. (Case #2387). With respect to the decision, and interpretation of the Code, the Canadian Cancer Society receives orally a further explanation that advertising which encouraged tobacco users to increase daily consumption was permitted under the Code provided that advertising did not encourage non-users of tobacco to become users.

The Council dismissed the complaint against Rothmans, Benson & Hedges Inc. (Case #2386, filed October 9, 1996, failure to place warning on display case used at retail).

Nov. 7, 1996

Physicians for a Smoke-free Canada is advised that its complaint respecting point of sale signs without the required warnings is dismissed. The decision (Case #2388) stated that retailers were not covered by the Code, only advertisers (e.g. manufacturers).

Nov. 13, 1996

The Canadian Cancer Society is advised that further consideration of case #2342 (person to person advertising constituting lifestyle advertising) was withdrawn at the meeting of the Advertising Standards Council on Nov. 5 because of the amendments to the Code announced on Nov. 1. The amendments permitted the activity described in the complaint. The Society was further advised that Cases #2358 and #2359 (Rothmans, Benson & Hedges, filed Sept. 16, 1996; dealing with shelf strips, matchbooks) were withdrawn from the agenda of the November 5 meeting because Nov. 1 amendments to the Code meant that there was no violation.

Nov. 13, 1996 — The Canadian Cancer Society appeals decisions in Cases #2386 (Rothmans Benson & Hedges Inc.), #2387 (National Tobacco Co.), #2358 (Rothmans, Benson & Hedges), #2359 (Rothmans, Benson & Hedges).

Nov. 13, 1996 — Physicians for a Smoke-free Canada is advised by the Canadian Advertising Foundation that its complaint of October 16, 1996 (respecting the principal purpose of sponsorship advertising) has been affected by the recent amendments to the Code. The complainant is asked to file an amended complaint.

Nov. 21, 1996 — The Canadian Cancer Society files detailed written argument in support of its appeals.

Around this time, the Society was informed that tobacco companies would be permitted to participate in the appeals, and that in future that the complainant and the company would be permitted to participate in all appeals, regardless of which side was appealing. This development reversed the previous policy which provided that only the appellant would be allowed to participate in the appeal.

Notwithstanding the fact that the Canadian Cancer Society had been repeatedly informed by the Canadian Advertising Foundation, Advertising Standards, that the Society was entitled to appeal under the Code, a decision was later communicated that under the Code only tobacco manufacturers were allowed to appeal, not complainants. Tobacco manufacturers had objected to the Canadian Cancer Society being able to appeal.

Note: Repeatedly through the complaints process, the Canadian Cancer Society objected to the fact that tobacco companies were able to make submissions in secret respecting complaints, and that the Society was denied the opportunity to respond to the arguments. Despite these objections, this process was accepted by tobacco manufacturers.

CMA POLICY SUMMARY

TOBACCO AND HEALTH

Tobacco is an addictive and hazardous product, and the CMA believes that its production, promotion, sale and use should be strictly regulated. The CMA recommends a comprehensive approach to tobacco control, including:

- **legislation to control promotion, packaging, access, product content and price;**
- **programs to reduce tobacco use in high-risk populations;**
- **measures to control second-hand smoke;**
- **measures to hold the tobacco industry accountable for its actions; and**
- **programs to enhance the provision of smoking-prevention and smoking-cessation services.**

Tobacco is an addictive and hazardous product, and the CMA believes that its production, promotion, sale and use should be strictly regulated, as they are for other hazardous products.

Tobacco is the number one cause of preventable disease and death in Canada; it is estimated that as many as 45 000 deaths each year are attributable to tobacco use.[1,2] Tobacco imposes a heavy burden on society in the form of hospital care, disability, absenteeism and loss of productivity. Direct health care costs attributable to tobacco use were approximately $3 billion in 1993.[3]

The smoking rate among Canadians, which dropped sharply during the 1970s and 1980s, stabilized in the mid-1990s. However, there is grave concern that in some populations, notably young people, tobacco use is on the rise. Other populations at risk, such as women, Aboriginal peoples and people with low incomes, have also been identified.

The CMA issued its first public warning concerning the hazards of tobacco in 1954 and has continued to oppose its use strongly ever since. The CMA believes that the most effective approach to reducing tobacco use in Canada is a comprehensive, coordinated program containing a variety of measures. The following is a description of the elements that should be included in such a program.

Legislation and Regulation

The CMA supports initiatives by federal and provincial governments to enact and enforce strong legislation specifically designed for tobacco control. Such legislation should cover all areas of tobacco control comprehensively and should operate from the premise that tobacco must be manufactured and marketed only as permitted by legislation or regulations (i.e., within a permissive framework). The following specific areas should be addressed.

Advertising and promotion: Traditionally, tobacco manufacturers have marketed their product to the public in the same way as most other consumer products — with major promotional campaigns and few restrictions on access. However, tobacco causes more death and disability than do addictive drugs whose use and availability are strictly regulated. The CMA supports a total ban on the promotion of tobacco; this includes advertising in all forms and the sale of nontobacco products displaying tobacco brand names, logos or colours. It also supports a ban on all tobacco-brand marketing associated with the sponsorship of sports, cultural and other events.

Packaging: The CMA recommends that tobacco products be sold in plain packages with simple and powerful health warnings prominently displayed. Packages should also display a list of toxic ingredients and additives and should include inserts containing additional information on product content and health risks.

Access: The CMA recommends that existing regulations involving the sale of tobacco to minors be strictly enforced, with substantial fines for violators. Buying tobacco products should be made as difficult as possible. In addition to supporting existing bans on cigarette vending machines and self-service displays, the CMA recommends limiting the number of outlets where tobacco products can be purchased. If tobacco is widely available, it becomes very difficult to regulate.

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Product regulation: The CMA recommends that the federal government set ceilings on the content of toxic ingredients such as tar, nicotine and carbon monoxide in cigarettes, and lower these ceilings progressively. Government and the industry should also consider modifying tobacco products to make them fire-safe, for example, by developing self-extinguishing cigarettes. The federal government should be granted strong powers to enforce product regulation and should exercise these powers.

The CMA recommends that any product changes made by the tobacco industry be studied and evaluated by an independent research body.

Financial disincentives: Price controls are one of the most effective means of discouraging smoking, particularly among young people;[4] a 10% rise in cigarette prices has been associated with a 14% decrease in tobacco use by teenagers. Although high prices for tobacco products have also been associated with smuggling, the CMA continues to support high prices and recommends that the government progressively raise tobacco taxes to the highest level compatible with discouraging illegal trade, as a disincentive to use. The CMA recommends that the federal government pursue a program to harmonize tobacco prices with those of other countries.

In addition, the CMA supports levying a specially designated tax on tobacco products at the point of manufacture, with the revenue to be used for health-promotion programs to discourage tobacco use and encourage a smoke-free environment and for offsetting the health care costs attributable to tobacco use.

Reduction of Tobacco Use in High-Risk Populations

Research has identified specific population groups that are at high risk for tobacco use.

Young people: Most current smokers in Canada started smoking before the age of 17, many before the age of 12.[5] Chewing tobacco is becoming increasingly popular among young people, adding to the already considerable risk that they will become predisposed to cigarette use. The CMA believes that, despite its recent claims to the contrary,[6] the tobacco industry intends to promote and market its products to young people, who are particularly vulnerable to peer pressure and to tobacco-promotion tactics. The CMA supports continued health-promotion programs aimed at addressing the reasons why young people use tobacco, preventing them from starting to use tobacco and encouraging them to quit. These campaigns should be continuously available in schools and should begin in the earliest primary grades. The CMA also recommends to boards of education that tobacco use be banned on school property.

Women: Tobacco use is now higher among young women than among young men;[7] the incidence of tobacco-related diseases among women is increasing. Tobacco use by women is often related to factors such as low self-esteem, stress or a perceived need to control weight.

Aboriginal peoples: Tobacco has ceremonial significance among Aboriginal peoples; the harm associated with tobacco arises not from its ceremonial use but from its daily, repeated abuse. It is estimated that almost 60% of Aboriginal people smoke.[8]

The CMA recommends that tobacco-intervention programs be created specifically for populations at risk. These programs should address the concerns of target groups empathetically and in a culturally sensitive manner and should be designed with their input.

Control of Environmental Tobacco Smoke

The risk of second-hand or environmental tobacco smoke, particularly among high-risk groups such as small children, pregnant women and people with respiratory problems, is increasingly recognized.

The CMA recommends that smoking be prohibited in all enclosed workplaces and public areas. It also recommends that all levels of government enact "smoke-free" legislation and commends businesses that voluntarily decide to become smoke-free.

The CMA recommends that steps be taken to eliminate smoking in all places frequented by pregnant women, young children and adolescents, and encourages all smokers to restrict their smoking to areas where they will not jeopardize the health of others.

Accountability of the Tobacco Industry

Evidence suggests that the tobacco industry has known for many years about the dangerous and addictive nature of its products but has consistently suppressed this knowledge when promoting these products to the public.[9] The CMA recommends that the federal government initiate a focused investigation of the practices of the tobacco industry.

The CMA advocates eliminating the Canadian tobacco-growing and tobacco-manufacturing industries and deplores the domestic manufacture of tobacco products for export.

The CMA recommends that Health Canada impose stringent reporting requirements on the tobacco industry concerning all aspects of manufacture, distribution and sale; this information should be made available to the public regularly. The CMA supports in principle efforts to hold the tobacco industry legally accountable for the health care costs attributable to tobacco use.

Enhancement of the Role of Physicians and the Health Care Sector

The CMA believes that the health care sector should act decisively to prevent and reduce tobacco use. Smoking should not be permitted in hospitals. Since pharmacies are part of the health care sector, sales of tobacco products in pharmacies should be banned.

Smoking is prohibited at the CMA and at all its offici

and social functions. The association has a long-standing policy of refusing to accept advertising from tobacco companies for any of its publications and refusing to purchase or hold tobacco-product stocks in investment portfolios for its members.

Although only 8% of physicians are regular smokers, the CMA recommends that these physicians become nonsmokers. In addition, it recommends that physicians ban tobacco use in their waiting rooms, refrain from stocking magazines that carry tobacco advertising and refuse to invest in tobacco-industry stocks.

Canadians perceive physicians to be a highly credible source of information on tobacco and other health risks. Physicians can discourage tobacco use by practising systematic clinical tobacco interventions, which may include:

- routinely counselling children and youth against starting to smoke or chew tobacco;
- taking advantage of "teachable moments," such as pregnancy or respiratory illness, to empathetically motivate smokers to quit;
- asking each patient about current smoking status and readiness to change; and
- offering personalized care to smokers, which may include setting a target quit date and offering behavioural counselling and nicotine-replacement therapy.

The CMA recommends that clinical tobacco intervention be recognized as an essential part of medical care and a core medical service. Nicotine replacement has been established as an effective therapy for smoking cessation[10] and should be made affordable for patients who require it. The CMA has taken an active role in developing and disseminating tobacco-control resources for physicians, their office staff and their patients through its participation with divisions and other partners in the Mobilizing Physicians for Clinical Tobacco Intervention project, its endorsement of the Guide Your Patients to a Smoke-Free Future program of the Canadian Council on Smoking and Health and its input into the development of Canadian clinical practice guidelines for smoking cessation.

The CMA will continue to oppose the promotion and use of tobacco products and to inform the public of the devastating burden of tobacco use in Canada.

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The ethics of tobacco advertising and advertising bans

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In this chapter, I will examine the main ethical parameters of the arguments pertaining to the alleged 'right' to advertise tobacco products and those maintaining that it should be banned. In particular, I will explore the ethics of the adoption of 'partial' bans on tobacco advertising, since there are now few countries which do not restrict tobacco advertising in some way.

The banning of all forms of tobacco advertising and promotion has long been regarded as a central platform of comprehensive tobacco control policy. Ruth Roemer's 1993 review of the regulation of tobacco lists 27 nations which claim to have totally banned tobacco advertising, with a further 77 having some form of restriction[1]. More recently, Bulgaria, Hungary, Lithuania, Moldova, Slovakia, Ukraine and Russia have also been reported to have implemented bans.

The research and public health policy literature on tobacco advertising has burgeoned as moves to ban advertising have become increasingly contested. This literature has been recently reviewed[2–4] and its scope covers the nine areas listed below (these are referenced with particularly important examples of each).

1. Documentation and commentary on changing expenditure on tobacco advertising and promotion[5], including how this expenditure ranks with other commodity advertising.
2. Econometric research into the relationship between the volume of tobacco advertising and changes in tobacco consumption[6].
3. Research into the recognition, recall, approval of, or liking for tobacco advertising[7] and sponsorship[8], usually by children; and research into the relationship between reaction to such advertising and children's subsequent use of tobacco[9].
4. Reports of ways by which tobacco advertisers circumvent voluntary codes and legal bans and restrictions[10], including evidence for product placement in films[11] and television programs[12].
5. Studies of the relationship between tobacco advertising and the (usually reduced) coverage of smoking and health by newspapers, magazines, and other media[13].

British Medical Bulletin 1996;**52** (No. 1):121–131

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6. Evidence and commentary on the apparent targeting of non-smokers by tobacco advertisers, especially women[14], children[15] and communities with low smoking rates[16].
7. Semiotic and other interpretive studies of tobacco advertising, examining the likely intentions of advertisers in constructing text and visual copy[17]; also qualitative audience studies examining the perceptions of target audiences of this advertising[18].
8. Studies about self-reported reasons for taking up smoking, where advertising is examined as one potential reason. Such studies are commonly promoted by the tobacco industry[19].
9. Evidence relating to the buying of political and community support from groups in receipt of tobacco sponsorship and advertising[20].

With notable exceptions[21–23], the core ethical questions at the heart of proposals to both maintain or ban tobacco advertising have been assumed rather than explicated in this literature. Supporters of tobacco advertising tend to base their support on an assumed equivalence of tobacco with all other retail products and services, allowing them to point to restrictions on the advertising of their product as discriminatory and unfair. They summarise this purported equivalence in the slogan 'if a product is legally sold, it should be legally advertised', which is examined below. Those seeking to ban tobacco advertising argue that tobacco ought not to be considered an ordinary good, but one self-evidently deserving of extraordinary regulatory attention by the state because of the burden of disease caused by tobacco use.

Ethical questions about advertising generally

Part of the debate about the ethics of tobacco advertising involves consideration of ethical questions about advertising *per se*. Advertising is the attempt by owners of goods and services to persuade current and potential consumers to continue or start purchasing. The intention of advertisers is, therefore, to portray products in ways that will maximise their desirability to potential consumers. Some commentators on the ethics of advertising have sought to draw a distinction between its informative and persuasive functions, arguing that pure 'information' in advertising (as said to be exemplified by classified advertisements and yellow page telephone directory listings) is 'moral' because it facilitates rational decision-making and choice. However, 'persuasive' advertising is argued to be unethical because, drawing on Kantian ethics, it affects consumers' 'autonomy' by convincing them to purchase goods which they do not 'need'[24]. This argument has been severely criticised as resting on a false or simplistic dichotomies of wants and needs and of

information and persuasion[25]—information can be highly persuasive, and the persuasive associations lent to a product by advertising can be argued to be as much part of the true 'meaning' or reality of that product to consumers as its physical properties.

Information in tobacco advertising?

One of the cornerstones of the argument in favour of advertising generally is that advertising provides consumers with information about products and services being offered for sale. Classical economists argue that efficiency is optimised when all parties in an economic transaction have maximum information. The usual sorts of information exemplified in such arguments include price, the attributes of a product and notice of availability.

Does tobacco advertising provide such information and help facilitate choice? Mention of price is virtually absent in tobacco advertising, except at point of sale, where discounting is rampant in tobacco retailing. Descriptions of product yield attributes are common in advertising and brand naming, but these are frequently specious ('fresh'), patently subjective ('luxury', 'super'). Also, because many smokers block the tiny air vent holes with their fingers or lips, thereby greatly increasing the yields of tar and nicotine they inhale when compared to the smoking machine determined yields cited in advertising and on packs, cigarette advertising is in this respect arguably misleading[26]. The argument that tobacco advertising provides information is thus largely bankrupt when examined against actual practice.

Some have argued that so-called 'tombstone' advertising—advertising showing only the cigarette pack with the product name—ought to be considered a benign non-persuasive form of tobacco advertising which might be said to satisfy the basic criteria for 'information only' advertising. The assumption here is that tombstone advertising essentially is 'here it is!' advertising, informing consumers about the name of the brand, its packaging, the number of cigarettes in it, and sometimes the tar and nicotine yields. Putting aside manipulative efforts such as *Marlboro*'s Belgian initiative during the 1980s of putting the picture of the *Marlboro* cowboy on the pack in anticipation of overcoming a move to tombstone advertising, it is fallacious to argue that pack-only advertising is somehow devoid of persuasive intent. A great deal of research goes into the selection of names, pack design[27] and into the selection of seemingly bland words in the slogans that accompany pictures of packs. Every effort is made to make tombstone advertising as enticing as possible.

Selectivity

Because there are limits to the time or space any advertisement occupies in the media, its content cannot possibly cover all aspects of a product's

qualities, its origin, its various uses, all consequences that might conceivably flow from its use and so on. Instead, advertisers cannot avoid being selective about what they say and infer about their products. Understandably, in needing to be selective and in intending that advertising should persuade consumers, advertisers select emphases that are predicted to make products seem desirable.

We do not expect an advertiser of cars to take up the limited advertising space and time available drawing consumers' attention to the possible adverse financial consequences of owning a car, to the statistical probabilities of car drivers being killed or injured, or to the relative merits of using public transport. Yet all of these issues are plainly relevant to car buyers. Parallel questions can be asked about advertising for any product, including tobacco. The ethical questions arising here ask whether, in the inevitable exercise of selectivity in constructing advertisements, any consumer deception is involved. Is advertising intrinsically misleading to consumers if it fails, as it always does, to fully describe every possible facet of a product and consequence of its use?

If the answer to this is yes, then such a radical standard for determining consumer deception will condemn all advertising as unethical and provides no insight into whether tobacco advertising is in any way exceptional, warranting the special treatment it gets.

Are tobacco advertisements lies?

Lying is *prima facie* unethical. Can it be said that tobacco advertising constitutes lying? A lie is a statement made by one who does not believe it with the intention that someone else shall be led to believe it[28]. There are three critical elements to this definition when applying it to tobacco advertising: determining what it is that tobacco advertising proposes to its audiences; establishing that tobacco advertisers know these propositions to be false; and a conception of the audience as those who believe any 'false' claims made in tobacco advertising to be true.

The first of these elements is most problematical. Most contemporary tobacco advertising makes very few written or verbal propositions about the tobacco advertised that can be simply assessed as true or false. Rather, the advertisements seek to position a set of carefully market researched associations in apposition to the brands being advertised in the attempt to forge positive associations about tobacco, smoking and smokers. The associations are designed to attach attributes to particular brands so that consumers will identify these brands as compatible with their desired presentation of self in everyday life, or to offer solutions to contradictions in the lives of consumers or in their feelings about smoking[17]. Here, cigarette advertisements and brand names make

semiotic propositions about (for example) personal potency to the socially impotent, relaxation to the harried, a sense of modernity to those fearful of being seen as conservative, or a sense of belonging to the lonely (one Australian brand is named *Escort*, a Filipino brand *Hope*).

These are no more 'lies' or false statements than the proposition that 'Coke adds life'. These are simply commercially motivated attempts at socially constructing particular meanings for smoking or *Coca Cola*. For every person who insists that the 'real' meaning of smoking is something to do with disease and addiction, there are many who associate smoking with the meanings portrayed in tobacco advertising. It is specious to argue that one meaning is 'true' while others are false, and hence to then demonstrate that tobacco advertisers 'knew' that a suggestion in their advertising that smoking equals sophistication was false. While tobacco advertising remains a largely connotative form of communication, demonstrating that it peddles lies and demonstrable falsehoods will be difficult.

Deception through omission?

Another way of approaching the question of whether advertising is misleading is to ask whether there are aspects of a product which if omitted from advertising, would result in consumers being misled. For example, consumer protection laws in many countries insist that financial services advertising make explicit claims about terms of credit, so serious are the consequences for consumers should they be misled. The questions arising here concern whether there are fundamental issues about a product that should be mandatory in any advertising for it. With tobacco advertising, many argue that the risks of use are so high that, at very least, advertising should be accompanied by detailed health warnings worded so as to maximise their comprehensibility and resonance.

However, here many have pointed out the tobacco industry's long record in constructing advertising designed to mock, distract and generally undermine such health warnings. In Australia in 1995, Rothmans modified its pack design after bold new warnings were introduced[29] so that a warning on the front of the flip-top box such as 'Smoking when pregnant harms your baby' is accompanied by the contemptuous advertising slogan 'Anyhow . . . have a Winfield' printed on the inside of the flip-top box. This mockery has recently reached its apotheosis with the launch and promotion of *Death* cigarettes in the Europe[30]. Here *Death*'s owners have turned health warnings into an 'in your face' gesture of proud defiance so that the risks of smoking are not only acknowledged, but held out as a badge of audacity, risk-taking and scorn on safe living.

The advent of the *Death* brand illustrates perhaps more completely than all previous argument, the ability of advertising to appropriate virtually any appeal—even a message overtly antithetical to the product—and turn it into a marketing edge using the massive advertising budgets available to the industry. This ability would appear to transcend all guidelines and thematic restraints on advertising copy and hence act to largely neutralise the intent of health warnings for some people.

Tobacco is an extraordinary product

Some commentators have argued that the ethics of advertising should be inextricably linked to questions about the 'goodness' of the products being advertised. Leiser[31] and Lee[32] argue that 'the advertisement of a bad product cannot be good', with Leiser arguing that persuasive and seductive appeals can be ethically defensible if they have been put to the service of promoting beneficial ends (for example, using nostalgic appeals to country life to sell fruit and vegetables or using scare tactics to persuade people not to drink alcohol before driving). This emphasis on the product rather than on the way it is advertised is at the heart of all concern about tobacco advertising. Critics of the RJ Reynolds' *Joe Camel* cartoon character's appeal to very young children have not been critical of the use of an anthropomorphic cartoon character in itself (cartoons have been often used to promote health), but rather of the use of the cartoon to promote *Camel* cigarettes to children. Critics of the use of sexuality to sell cigarettes are not generally opposed to sensual or erotic imagery, but to the use to which it is put: to make cigarettes seem attractive.

Herein lies the nub of opposition to tobacco advertising. Its critics argue that whatever its effects (and using reductionist methodologies, these are extraordinarily difficult to dissect from the contemporaneous influence of other tobacco control strategies[33]) the intention of tobacco advertisers is by definition to promote tobacco use. The 'brand switching' argument is quite irrelevant to this concern, for a brand cannot be promoted without promoting smoking itself. If governments have policies to reduce tobacco use, policies that allow tobacco advertising are simply inconsistent with these.

By any standard, tobacco is no ordinary product. A recent US Surgeon General stated in the preface to the 1990 Surgeon General's report on smoking: 'it is safe to say that smoking represents the most extensively documented cause of disease ever investigated in the history of biomedical research'. The first section of this book documents the effects of tobacco use still further. Efforts to ban tobacco advertising have not been mounted because of ethical concerns for the imagery and persuasive rhetoric

employed, but because the intention of this advertising is to promote tobacco use. And there is a wealth of evidence that it succeeds in doing so[4].

Being no ordinary product in causing the catastrophic degree of harm and cost to both individuals and the state that it does throughout populations, advocates of banning advertising argue that it is reasonable that tobacco should be subject to extraordinary controls designed to reduce this harm. Controlling advertising is but one form of such control

Is there a 'right' to advertise?

Defenders of tobacco advertising tend to assume a free marketing philosophy where any restrictions on advertising are seen as ethically offensive to the sovereignty of business interests. As Milton Friedman has written: 'few trends could so thoroughly undermine the very foundations of our free society as the acceptance by corporate officials of a social responsibility other than to make as much money for their shareholders as possible'[34]. However, governments intervene in marketplaces in many ways, ranging from the outright banning of products already in a marketplace (e.g. thalidomide) or of newly developed products (e.g. many instances of unsafe toys, furniture, etc.), through restrictions on sales, packaging and advertising information requirements, to restrictions and bans on advertising. At one extreme of regulation, governments frequently exercise their rights to ban products outright, typically citing consumer protection from unsafe goods as their rationale. In many countries, certain therapeutic goods are available only through registered pharmacies with consumer access requiring a doctors' prescription. In many countries, the supply of alcohol, firearms and explosives, while not illegal, is strictly regulated and conditional. In Australia, it is illegal to sell high powered motorcycles to people with (beginners') provisional licenses. Finally, in some countries drugs such as strong analgesics and bronchodilators are freely available to consumers through pharmacies, but are not permitted by law to be advertised directly to the public because of concerns that advertising may promote inappropriate use.

This range of government intervention illustrates that restrictions on advertising represent only one strategy in the attempt to control the use of products that have known potential to affect adversely either those who use them or the general public. There is no more a 'right' to advertise than there is a 'right' to sell. Both activities are frequently subsumed by broader considerations of public benefit, welfare and safety. These considerations can be paternalistic[35] (justified by concern to protect individuals from the consequences of their own behaviour, particularly when it can be demonstrated that individuals have inadequate or

erroneous knowledge about the range, probability and severity of these consequences), or Millean[36] (based on concerns to restrain individual liberty if its expression has adverse consequences for others).

Some libertarians argue that paternalism is ethically unjustified—people should be free to risk harm to themselves provided that they can demonstrate that they are fully informed about the probability of, and the nature of, the harm they risk. While many people living in nations which have histories of health education about the risks of tobacco use are informed in general terms about smoking, their knowledge is often inadequate to any usual test of informed consent. This is much more the case in nations with high illiteracy rates and poor records in health education. And even if it could be established that smokers were well-informed about the risks they face, Goodin argues: 'we do not leave it to the discretion of consumers, however well-informed, whether or not to drink grossly polluted water, ingest grossly contaminated foods, or inject grossly dangerous drugs. We simply prohibit such things, on grounds of public health, by appeal to utilitarian calculations of one sort or another (p587)'[22].

No nation prohibits tobacco, and no internationally recognised public health agency has called for tobacco to be banned in the way that Goodin's argument above might imply. Almost all international public health agencies, though, have called for tobacco advertising to be banned.

The cornerstone of arguments used by proponents of the continuation of tobacco advertising is that the only factor relevant to whether a product should be advertised is its current legal status. By this argument, the industry would agree that illicit drugs should not be advertised, but would presumably (along with most in public health) support the lifting of any restrictions on the advertising of condoms. This insistence on the current legal status of tobacco is indifferent to the history of research into tobacco whereby its consequences to health only became established long after its use and manufacturing infrastructure became widespread. As many have argued, if tobacco had been recently 'invented' and subject to the tests of safety required of food and drugs, no nation would release it onto the market in the way it is sold today.

The rejoinder to this by defenders of tobacco advertising is to make hollow calls for governments to declare tobacco illegal if they are sincere in their concerns. When governments ignore such taunts, supporters of tobacco advertising allege hypocrisy on the part of governments, pointing to their appetite for tobacco excise tax.

As argued above, concern to control use of any product can be addressed through a variety of policies, of which outright banning is the furthest extreme. Considerations of proportionality—making sure that restrictions and controls imposed are no broader than necessary to

achieve the desired ends—can make a decision to ban advertising while not banning the product entirely reasonable.

Is advertising 'free speech'?

Proponents of tobacco advertising have sought to argue that commercial speech is a form of free speech and, therefore, sacrosanct under constitutional guarantees in many democracies[37]. This argument has been repeatedly rejected by courts which, in the USA, have ruled on matters as diverse as casinos and commercial activities on university campuses that governments have a right to restrict commercial speech through concern about wider community issues[21].

Tobacco advertising and children

In many countries, it is illegal to sell tobacco to children. This is of critical relevance to any discussion on the ethics of tobacco advertising. Where laws forbid the sale of tobacco products to children, it is because children are said to be below an age where their informed consent can be assumed. It is, therefore, reasoned that tobacco advertising appeals directed at them or which can be shown to appeal to them are unethical in that they seek or cause to influence consent in people deemed legally incapable of consenting.

It has been repeatedly shown that children do indeed see, recall, admire, discuss and generally relate to advertising in the same sort of ways that adults are intended to do by tobacco advertisers. Apart from the obvious point that the tobacco industry makes much money from sales to underage smokers[38], the research on the impact of advertising on children makes nonsense of any pretence that advertising is 'targeted' only to adult smokers.

With the exception of premises where children are forbidden by law from entering (for example casinos, legal brothels, some premises licensed to sell alcohol), there are no advertising sites nor media to which children do not have the same access as adults. Some countries have arrangements, usually in the form of voluntary codes negotiated with the tobacco industry, that tobacco advertising will be 'restrained' in various ways. In entering such voluntary agreements, the tobacco industry typically asserts that it is not intent on targeting its advertising at children, further asserting that it regards smoking as 'an adult custom' and does not wish children to smoke.

For example, several countries in the past have endorsed voluntary agreements with the industry whereby cigarette advertisements will only

be screened on television late at night, and not placed on billboards closer than 200 metres from schools. In such arrangements, an admission is being made by government and industry, as parties to these agreements, that there is a case for trying to minimise the exposure of children to such advertising—that if they were exposed, the advertisements might succeed in the same intent that they have for adults.

In practice, the logic of partial or selective tobacco advertising bans is equivalent to the ambition to be 'a little bit pregnant'. Many children do not go to bed before the arbitrary times after which cigarette advertising is screened, and with the popularisation of video recorders, many children record programs including advertisements screened after their bedtime. The logic of banning tobacco billboards adjacent to schools is even more absurd. Here, it is being suggested that a child sighting such a billboard 195 metres from a school might be influenced by its message, but the same child sighting the same advertisement 205 metres from a school would somehow be immune from its persuasions.

Partial bans carry with them an ethical conviction that tobacco advertising should be controlled, but belie this conviction by allowing the very same advertising that is banned to be displayed in the different media still permitted to carry such advertising. Such absurdity can only be interpreted as the product of an ethical duplicity cynically put to the service of collusive governmental and industry posturing about their responsibilities to children.

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ACKNOWLEDGMENTS

This paper was presented in part at the 18th National Meeting of the Public Health Conference on Records and Statistics and preliminary results were reported in the conference proceedings. The authors wish to thank Dr. Jack L. Paradise and Dr. Colin White for comments which were helpful in presenting and interpreting the results of the study. The technical assistance provided by Robert Pokras, NCHS, and the administrative assistance of Marla DeMusis in the preparation of this manuscript are also acknowledged. Data were obtained from NCHS and the National Technical Information Service in the form of micro data public use tapes. The estimates, conclusions, and interpretation are solely those of the authors and should not be construed as representing those of the National Center for Health Statistics.

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Brand Preference and Advertising Recall in Adolescent Smokers: Some Implications for Health Promotion

SIMON CHAPMAN AND BILL FITZGERALD

Abstract: A survey on brand preference and cigarette advertising recall in 1,195 school children was conducted in Sydney, Australia. Four of the 130 available brands accounted for the cigarettes smoked by 78.7 per cent of smokers. Smokers were nearly twice as likely to correctly identify edited cigarette advertisements and slogans than were nonsmokers. Brand preference is considered an important descriptor of smoking profiles. (*Am J Public Health* 1982; 72:491–494.)

As part of an anti-smoking school education program,* items were included in a pre-test survey on brand preference and cigarette advertising recall. It was hypothesized that: 1) outstanding patterns of brand preference would be found in the sample; 2) smokers would be more familiar with cigarette advertisements than would non-smokers; and 3) advertisements most familiar to smokers would be those brands most smoked by them.

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*Report available from principal author.

Methods

Thirty secondary schools were randomly selected from a numbered, alphabetical list of all schools in the Sydney metropolitan area. Nineteen agreed to run the educational program in April 1980.

Participating seventh and eighth grade teachers were requested to administer the questionnaire to all their pupils. Considerable inter-school variation in numbers of children receiving the program occurred because of varying teaching loads. Any conclusions arising from the study may not warrant generalization to school children at large, but to school children in schools with teachers interested in running such a program. The sample (Table 1) overrepresented the New South Wales school population in females and grade 8 students, but was representative of social class population distribution, as measured by parental occupational status. Data in Tables 2–6 derive from affirmative responses to the question "Have you smoked in the last four weeks?", the question considered to define the outer limit of the definition of a recent or current smoker.

In order to determine whether any relationship existed between brand smoked and rate of smoking, brand preference was cross tabulated with data from three questions that discriminated between light, medium, and heavy smoking (Table 3).

Subjects were presented with photographs of eight print media cigarette advertisements that had been edited to remove all identifying writing. Advertisements for five heavily advertised brands (Winfield, Marlboro, Dunhill,

TABLE 1—Age and Sex Distribution of Sample

Age (years)	Per Cent Male (n = 484)	Per Cent Female (n = 706)	Per Cent Total* (n = 1190)
14	9.9	9.9	9.9
13	43.6	45.9	45.0
12	42.2	38.4	40.0
11	4.3	5.8	5.2
TOTAL	40.7	59.3	100.0

*47.9% grade 7; 52.1% grade 8. Data missing in 5 cases.

TABLE 2—"What Brand of Cigarette Do You Usually Smoke?" (%)

Brand	% Male (n = 90)	% Female (n = 130)	% Grade 7 (n = 84)	% Grade 8 (n = 136)	% Total (n = 220)	% Sydney Smokers 16 + # (n = 341)
Winfield	45.6	50.0	51.2	46.3	48.2	28.7
Benson & Hedges	7.8	10.0	8.3	9.6	9.1	13.8
Alpine	6.7	4.6	8.3	3.7	5.5	5.0
Marlboro	5.5	2.3	4.8	3.0	3.6	5.0
All Others	7.8	6.2	4.8	8.1	6.8	47.5
"Any"	14.5	10.0	10.7	12.5	11.8	—
Not stated	12.2	16.9	11.9	16.9	15.0	—
TOTAL	100.0	100.0	100.0	100.0	100.0	100.00

Data from July 1980 survey of 341 Sydney Smokers by Roy Morgan Research Pty. Ltd., Sydney N.S.W.

TABLE 3—Smoking Rate by Brand Smoked

Brand	Number	Per Cent Distribution		
		Heavy	Medium	Light
Winfield	106	50.0	27.4	22.7
All Others	55	27.3	38.2	34.6
"Any"	26	7.7	34.6	57.7
TOTAL	187	37.4	31.4	31.0

*Heavy: usually smoke every day.
Medium: usually smoke one or more times a week.
Light: smoked in last four weeks

Alpine and Longbeach) and three less frequently advertised brands (Kent, Craven Mild and one example from a multifarious Benson and Hedges campaign) were used to test hypothesis 2 (Table 4). The corresponding slogans used in the advertisements were similarly edited and presented in a different order to the edited photographs to form slogan completion exercises (Table 5).

To test the hypothesis that smokers would be more likely to be aware of cigarette advertisements generally than would non-smokers, the total number of advertisements and slogans (range 0–8) were used as the two dependent variables in two separate, two-way analyses of variance (ANOVA). The two independent variables were smoking status and sex (Table 6).

Results

Of more than 130 different brands of cigarette then retailed in Australia, Table 2 shows that just four brands (Winfield, Benson and Hedges, Alpine, and Marlboro) account for cigarettes smoked by 78.9 per cent of the smokers confirming hypothesis 1.

The brand preferences of our sample reflected those of adult smokers in Sydney found in another survey taken three months later, but differed in proportion. This was chiefly due to a much greater proportion of children smoking the Winfield brand (Table 2).

Compared with smokers of other brands (including indiscriminate brand smokers) Winfield smokers have a

TABLE 4—Correct Identification of Edited Cigarette Advertisements

Advertisements	% Smokers (n = 220)	% Non-smokers (n = 975)
Winfield	88.2	45.2
Marlboro	87.8	46.5
Dunhill	70.0	34.2
Longbeach	36.9	18.3
Alpine	55.5	24.1
Kent	2.8	4.8
Craven Mild	9.1	4.0
Benson and Hedges	2.3	1.1

significantly greater proportion of heavy smokers, while smokers claiming no brand preference are more likely to be light infrequent smokers ($\chi^2 = 21.99$, df = 4, $p < 0.01$) (Table 3).

In every case but one, nearly twice the proportion of smokers were able to correctly recognize both advertisements and slogans than could non-smokers. (Tables 4, 5, 6), thus confirming hypothesis 2.

Comparing the left hand columns of Tables 4 and 5 with the data in Tables 2 and 3, we find that with the exception of the cases of Dunhill and Benson and Hedges, hypothesis 3, that the preferred brands of adolescent smokers would correspond with the advertisements and slogans most recognized by them, is generally borne out. Benson and Hedges, while being the second most smoked brand, was the least identified advertisement and the third least recognized slogan among both smokers and non-smokers. This may be the result of the particular Benson and Hedges advertisement selected (being one of perhaps a dozen different advertisements in the brand's series) rather than any contrary case against our hypothesis. The Dunhill advertisement and slogan both scored highly, but the brand was smoked by very few (n = 5) children. We believe this also may have been because the advertisement used featured a Dunhill pack with the identifying wording blocked out, but which still could be identified as Dunhill. The high score for the Dunhill slogan appears the only case against our hypothesis.

Discussion

Despite the first clause in the Australian media industry's self regulatory code for cigarette advertising which states "cigarette advertising should be directed only to adult smokers . . ."[1] our data clearly show that adolescents are well aware of advertisements.

The predictable tobacco industry response to adolescent brand preference figures would be to claim that their "primary cause" is peer influence. To this one need only ask how it is that such peer influence becomes established along the brand loci that it does—a function of advertising the industry has never denied in the case of adults.

In May 1980, a complaint organized by the Australian public interest group—the Movement Opposed to the Promotion of Unhealthy Products (MOP UP)—that the advertising of Winfield by a popular celebrity breached a clause in the Voluntary Advertising Code for Cigarettes, was upheld and the use of the celebrity ceased.[2] The complaint was upheld on the basis that the celebrity's "major appeal" was to children and adolescents. The data in this paper are further testimony to the justice of this decision. Winfield and, to a much lesser extent, the other three leading brands, virtually account for the smoking habits of Sydney adolescents.

Our finding that young smokers who smoke "any" brand tend more toward the light-medium range of smoking rates than do smokers who are brand loyal is of special interest. It suggests that part of the "career" of becoming a regular smoker is to adopt a preferred brand. Established, regular smokers are thus particular brand smokers more so than are casual smokers, yet health promotion efforts have generally ignored such a pronounced phenomenon.

The role played by advertising in the decision to smoke clearly needs refining conceptually so the appropriate questions may be asked in research. Following Fishbein,[3] we believe that tobacco advertising is most instructively seen as a cue to smoking behavior, whether this be already established or something that could develop in the future.

As a cue, it may operate specifically in the way that the behavior of other smokers has been found to cue smoking,[4] or more generally as a cue to setting into train an appealing

TABLE 5—Correct Completion of Edited Cigarette Slogans

Slogan	% Smokers (n = 220)	% Non-smokers (n = 975)	Slogans
Winfield	90.5	48.0	Anyhow (have a Winfield)
Marlboro	11.4	5.8	Come to where the (flavor is Marlboro country)
Dunhill	57.3	30.3	The house of (Dunhill)
Longbeach	24.1	8.8	25 of life's (simple pleasures)
Alpine	18.2	9.6	Fresh is the (flavor of Alpine)
Kent	2.3	1.8	Come for the filter (you'll stay for the taste)
Craven Mild	1.9	0 6	Mild as can be, yet (they satisfy me)
Benson and Hedges	6.9	3.7	Pocket a little (gold)

TABLE 6—Correct Identification of Edited Cigarette Advertisements and Slogans Mean Number Correct by Smoking Status and Sex*

	Male	Female	Grand Mean
	Advertisements		
Smokers	3.69 (89)	3.38 (131)	3.51 (220)†
Non Smokers	3.07 (395)	2.90 (575)	2.97 (970)†
Grand Mean	3.18 (484)	2.99 (706)	3.07 (1190)
	Slogans		
Smokers	2.12 (89)	2.11 (131)	2.11 (220)††
Non Smokers	1.77 (395)	1.80 (575)	1.79 (970)††
Grand Mean	1.84 (484)	1.86 (706)	1.85 (1190)

*Numbers in each category in parentheses.
†F(1, 1186) = 22.34 p < .001 (ANOVA)
††F(1, 1186) = 12.63 p < .001 (ANOVA)

sense of self-identity suggested by the specific themes used in different brand advertising.[5]

Cigarette smoking is generally considered for research and educational purposes as a "generic" behavior. As Gertrude Stein might have put it, "a smoker is a smoker is a smoker". We believe that rather than considering any given smoker as simply a smoker, investigators would be wise to make a conceptual shift and consider several categories of smokers classified by brand smoked.

Following from this, important implications may exist for anti-smoking education programs tailored to meet not simply the pressures to be a smoker, but those to be a certain sort of smoker. Health promoters would do well to incorporate the same principles of audience and market research used by tobacco companies to sell cigarettes, in the planning of their efforts to *unsell* smoking.

It should be recognized that cigarette advertising's cultural function is much more than the selling of cigarettes. Its collective images represent a corpus of deeply rooted cultural mythologies that are not simply pieces of advertising creativity, but icons that pose solutions to real, experienced problems of identity. As such, the concentration around four brands by adolescent smokers should serve as a clue to the cultural role that cigarettes are increasingly playing in the lives of youth.

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ACKNOWLEDGMENT

This paper was produced from research undertaken under a Health Services Research and Development Grant from the Commonwealth Department of Health, Canberra Australia.

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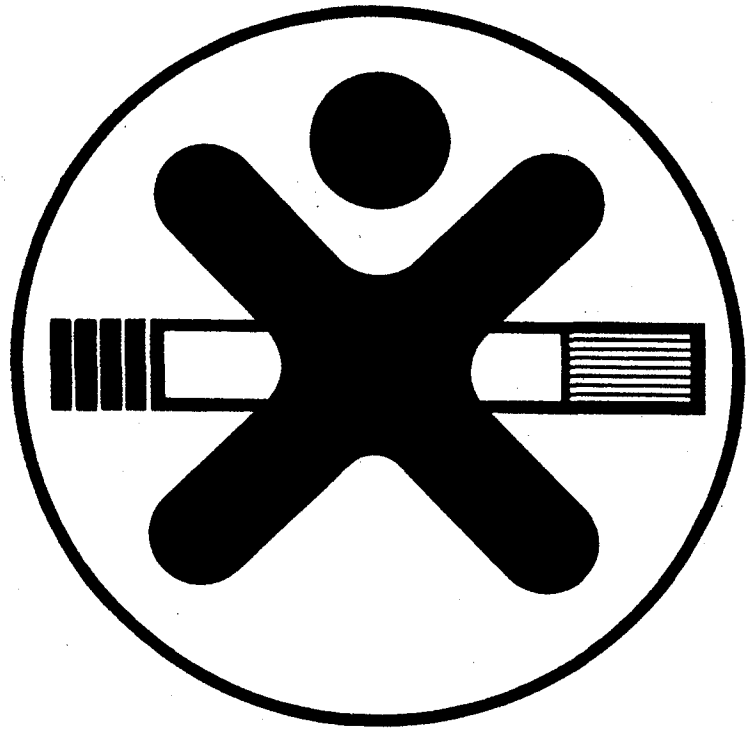
Pushing Smoke

Tobacco advertising and promotion



Smoke-free Europe: 8

BMA

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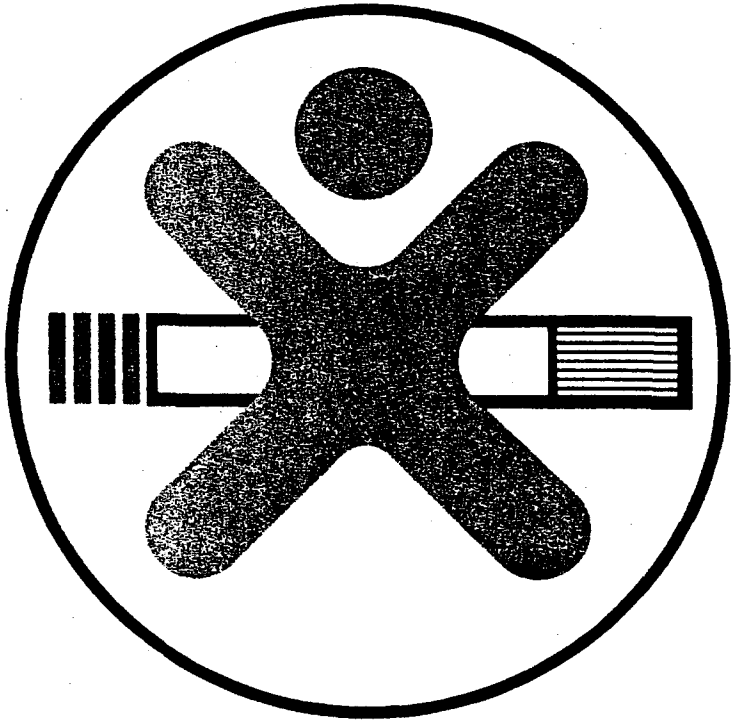
Pushing Smoke

Tobacco advertising and promotion



Smoke-free Europe: 8

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Acknowledgements

This booklet is part of a series written to support the Action Plan on Tobacco adopted by the World Health Organization's Regional Committee for Europe in September 1987 and the "Europe Against Cancer" programme of the European Community.

It has been co-produced by the WHO Regional Office for Europe and the Commission of the European Communities.

We thank the British Medical Association for permission to reprint "Cigarette Advertising & Smoking: A Review of the Evidence" (1985) and we gratefully acknowledge their assistance in the production of the present booklet.

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Series editor: Patti White.

The views expressed are those of the authors and do not necessarily represent the decisions or policies of the co-producers.

The text may be reproduced or translated on request to the WHO Regional Office for Europe (Public Information Office), Scherfigsvej 8, DK–2100 Copenhagen Ø, Denmark.

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Preface

This booklet deals with one of the most hotly disputed areas of tobacco control policy – promotion of tobacco products. The battle lines are drawn between public health advocates and those with a vested interest in the continuance of tobacco promotion, the tobacco and advertising industries.

The public health position on tobacco advertising is that it promotes not only individual products but the habit of tobacco use itself. By using compelling imagery, tobacco advertising can promise glamour, excitement, social and sexual success to current and prospective customers. What it delivers is, sadly, much less attractive. It is, perhaps, an indication of the power and effectiveness of this imagery that accounts for the vigour with which the tobacco industry defends its 'right' to promote this addictive and uniquely dangerous product.

The first of the two papers printed here, 'Cigarette Advertising & Smoking: a review of the evidence', was first published in the United Kingdom in 1985 by the British Medical Association. Its purpose was to distl the existing evidence on the tobacco advertising for decision-makers and all those interested in acting to control the tobacco epidemic.

'Cigarette Advertising & Smoking: a review of the evidence' gives a broad overview of the tobacco industry's defence of its advertising practices and the arguments against it. The author shows that the true function of tobacco promotion is to encourage the idea that smoking is sophisticated, 'grown-up' behaviour and that its very existence undermines the credibility of health education messages about tobacco. Readers acquainted with the 1985 text may notice that some very small changes have been made in the version printed here. This was partially to bring the text up to date, but also to minimize the overlap with the second paper in the booklet.

This paper, 'Children and Cigarette Advertising', is a revealing look at cigarette advertising from the child's point of view. Children are the prime marketing target for the tobacco industry. As long-term smokers are killed off by their habit and increasing numbers of survivors give it up, the pool of smokers must be replenished in order to maintain the profits of the industry. The new smokers who are recruited are almost exclusively children and adolescents.

Readers of 'Children and Cigarette Advertising' will be surprised at the degree of receptiveness and awareness children have of cigarette advertising. Many children can identify cigarette advertisements that show no brand names and can identify cigarette brand imagery in 'brand stretching' ads — that is, ostensibly for holidays, clothing or other non-tobacco goods and services. Moreover, simple cigarette advertisements are capable of enabling children to make a connection between brand names and exciting cigarette-sponsored sports such as Grand Prix motor racing.

The conclusion to be drawn from this booklet is that unless public authorities are prepared to end all forms of tobacco advertising and promotion, they are diluting their own efforts to warn the public adequately about the health risks of tobacco. This takes on special force when one considers that the money that the wealthy tobacco companies are able to devote to pushing their wares will always vastly outweigh the meagre resources available to give consumers a more realistic view of tobacco use and its consquences. Now is the time for planners and decision-makers, not only in public health but in industry, finance and other areas of government, to decide if the corporate health of the tobacco companies is more important than the health of the people.

PART ONE
CIGARETTE ADVERTISING AND SMOKING: A REVIEW OF THE EVIDENCE

Summary

— All major health, medical and consumer groups have identified a ban on all forms of tobacco advertising as an essential component of a comprehensive smoking control programme.

— Tobacco advertising promotes the idea that smoking is acceptable, desirable and glamorous.

— It undermines the credibility of government health education campaigns against smoking.

— It stops the flow of full information about the health risks of smoking because many magazines and newspapers do not wish to offend their tobacco advertisers.

— If tobacco were discovered tomorrow, no government would permit its sale, let alone its advertising. The argument that legally sold products can be advertised ignores the fact that the health risks of smoking were realized long after its use had become widespread.

— Tobacco advertising redistributes the market share of different brands and also swells demand by influencing nonsmokers. Advertising by state tobacco monopolies is indisputable evidence of this.

— Children are the future of the tobacco industry and therefore primary targets for tobacco advertising. There is ample evidence of their interest in, and recall of, tobacco advertising.

— There is no evidence that tobacco advertising provides any information that encourages smokers to switch to less dangerous cigarettes.

1

Introduction

Cigarette advertising is the cutting-edge of the world tobacco industry's efforts to market cigarettes, a product which the World Health Organization's expert committee on smoking control described as "responsible for one million premature deaths each year" worldwide (1) and control of which "could do more to improve health and prolong life . . . than any other single action in the whole field of preventive medicine" (2).

Smoking kills prematurely one in four men who smoke 20 or more cigarettes a day. In famine-ridden countries of the developing world it competes with food for scarce arable land and the marginal survival incomes of millions of people (3). Because of flue curing, it is thought to be responsible for one in eight of all trees felled throughout the world (4), a problem acknowledged by the British Economist Intelligence Unit to have "serious ecological overtones" (5). Smoking also causes over 50% of fires. Above all, the WHO expert committee on smoking control stated unequivocally "the international tobacco industry's irresponsible behaviour and its massive advertising and promotional campaigns are, in the opinion of the committee, direct causes of a substantial number of unnecessary deaths" (6).

Consequently, all major international health, cancer and heart disease agencies, medical colleges and consumer organizations, notably the World Health Organization (1,2,6), the International Union against Cancer (7) and the International Organization of Consumers' Unions have agreed that all forms of tobacco promotion should be banned. By 1986, 58 countries had some sort of restrictions on certain kinds of advertising. Of these, 20 have banned tobacco advertising completely (8).

This booklet deals with one of the most hotly disputed areas of tobacco control policy – promotion of tobacco products. The battle lines are drawn between public health advocates and those with a vested interest in the continuance of tobacco promotion, the tobacco and advertising industries.

The public health position on tobacco advertising is that it promotes not only individual products but the habit of tobacco use itself. By using compelling imagery, tobacco advertising can promise glamour, excitement, social and sexual success to current and prospective customers. What it delivers is, sadly, much less attractive. It is, perhaps, an indication of the power and effectiveness of this imagery that accounts for the vigour with which the tobacco industry defends its 'right' to promote this addictive and uniquely dangerous product.

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The conclusion to be drawn from this booklet is that unless public authorities are prepared to end all forms of tobacco advertising and promotion, they are diluting their own efforts to adequately warn the public about the health risks of tobacco. This takes on special force when one considers that the money that the wealthy tobacco companies are able to devote to pushing their wares will always vastly outweigh the meagre resources available to give consumers a more realistic view of tobacco use and its consequences. Now is the time for planners and decision-makers, not only in public health but in industry, finance and other areas of government, to decide if the corporate health of the tobacco companies is more important than the health of the people.

Why Ban Tobacco Advertising?

Tobacco advertising promotes the idea that smoking is normal, good and glamorous. Tobacco advertising continually tells people that smoking is desirable. It undermines the credibility of government statements which say that smoking is bad for health. It is therefore incompatible with a government's wider smoking control policy and leads to a widespread cynicism about health education messages. In Britain in 1983, 44% of smokers questioned in a government national survey agreed that "smoking can't be really dangerous or the government would ban cigarette advertising" (9). A child who grows up exposed hundreds of times a day to cigarette advertisements is less likely to accept the arguments of parents and teachers that smoking is dangerous. While the government avoids any serious restriction of tobacco promotion, its commitment to reducing smoking remains empty rhetoric.

Advertising just one factor

Tobacco advertising is not the only factor that promotes smoking. No one would argue that all a government needs to do to reduce smoking is to ban advertising. But it is of special concern because it affects other influences to smoke (like peer group and social pressures) by suggesting, for example, that a dangerous, costly and addictive behaviour is widely held to be "grown up", "relaxing", "sociable" or "attractive". Tobacco advertising clearly perpetuates such ideas. To argue that smoking is influenced by peer pressures at school begs the questions of where such pressures originate and who will benefit from them.

Far from being the hallmark of "freedom of expression", tobacco advertising has inhibited the flow of information on the hazards of tobacco use. There is now abundant evidence that dependence on tobacco advertising revenue persuades editors and publishers to ignore the tobacco issue or to minimize its importance in their publications (10).

Tobacco manufacturers have cancelled ads in periodicals publishing articles critical of smoking. One example of this was provided when cigarette companies withdrew advertising from the London *Sunday Times* after a critical article on smoking and disease named the brands smoked by heart transplant patients (11). When *Newsweek* magazine ran a story on the "uncivil war over smoking" in June 1983, all tobacco advertisers withdrew from the magazine (12).

The fear of losing the large accounts of tobacco advertisers prompts self-censorship in the media. A survey of 10 popular American women's magazines that accept cigarette advertising found that between 1967 and 1979 a total of only eight articles on the risks of smoking or how to give it up were published in these magazines. Four of the magazines carried no antismoking articles in the entire 12-year period (13). Similarly, a study of five major British women's magazines found that out of more than 1000 articles on health published in 1982, only seven were about smoking (14).

Journalists have reported instances of copy being altered by editors to minimize the importance of smoking as a cause of disease. One of the most striking examples of this occurred when two major news magazines, *Time* and *Newsweek*, deleted text referring to smoking from personal health care supplements written by medical associations (15).

In recent years the giant tobacco transnationals have acquired non-tobacco businesses through merger and takeover. This enhances their potential as advertisers and thus their influence on editorial policy may increase. The industry is not hesitant to use its financial clout, a fact that was dramatically demonstrated when a United States-based tobacco and food conglomerate abruptly withdrew an advertising account worth 84 million US dollars a year from an advertising agency. Why? The agency, which worked only for the foods division of the conglomerate, had made a television commercial publicizing an airline's decision to ban smoking on all its US domestic flights (16). Clearly, the conglomerate found that casting a favourable light on smoke-free air travel was a threat to its most profitable business.

2

The tobacco industry's public position on advertising

Industry Claim No. 1: "If it's Legal to Sell it, it should be Legal to Advertise it"

This argument tries to win sympathy by portraying the tobacco industry as the victim of an anomalous and therefore unjust principle. Several points are worth making about this argument.

First, the rhetoric of the first clause ("If it is legal to sell it . . .") forces us to concede that tobacco is sold legally. The implication is that if tobacco is legal, it cannot be that bad. We now lose sight of the real issue, which is not tobacco's legal status, but its public health status as the leading cause of death in the developed world. This argument suggests that governments would be justified in outlawing advertising for an illegal product, but since tobacco is legal, an advertising ban would be incongruous. Thus, the industry tries to deflect public thinking away from considering whether promoting tobacco is in the public interest, and on to the wider issue of whether the principle should be violated, regardless of the product in question.

The argument is highly misleading. If tobacco was invented in a laboratory tomorrow, with all the information known about it available, no government would permit it to be sold. However, the health risks of tobacco were realized long after it had become widely established. If the health consequences of smoking had been known when it was introduced it is extremely doubtful that it would have become so popular, let alone been allowed to develop as an industry.

Prohibiting social drugs like alcohol and tobacco is neither feasible nor desirable, but using advertising and promotion to encourage their use is logically distinct from the issue of their legality. The argument

may sound reasonable, but it is insensitive to the history of smoking, where the factors which would have influenced a decision had not yet been determined. The slogan therefore remains a convenient ruse to justify the perpetuation of tobacco advertising.

It is important to stress that tobacco is not sold freely: in many countries it is illegal to sell tobacco to children. However, all children are exposed to tobacco advertising in the same ways as are adults.

"Freedom" to advertise

Hand-in-hand with this slogan is the industry's plea that it has the right to be free to advertise its product. "Freedom" is an emotive word carefully chosen so that the advocates of a ban can be dismissed as the enemies of freedom. But of what does this freedom really consist?

Freedom for the tobacco advertiser is the freedom to persuade people to use nicotine, an addictive drug. Tobacco, having induced a strong dependency, will kill prematurely one cigarette smoker in four. It is quite different to the freedom experienced by most smokers, who want to stop smoking but find after many attempts that they still can not. It is the freedom to use glossy images to distract from the fact that smoking kills and pollutes. It is the freedom to corrupt the language by calling a carcinogenic product "mild", and using terms like "luxury" and "fresh" to describe it.

The "thin end of the wedge . . ."?

A further deception is the industry's appeal: "Where will they stop?" The industry argues that if advertising is stopped because tobacco is dangerous, then advertising for cars, motor cycles, alcohol, sugar, aircraft travel and any other potentially dangerous product could also be banned. All of these products can endanger health, but they are dangerous only when abused. Tobacco is the only advertised product which is hazardous when used as intended.

Industry Claim No. 2: Tobacco Advertising does not Influence the Total Demand for Tobacco, but only Redistributes Market Share among Competing Brands

Logically, effective tobacco advertising might do four things:

— influence smokers to change brands

— influence smokers to smoke more

— influence nonsmokers to start smoking

— discourage or delay smokers from giving it up.

The tobacco industry argues that it only influences smokers to change brands. But as a writer in the British advertising trade journal *Marketing* noted: "It is curious that the only two categories of advertising that the [advertising] industry suggests do not increase consumption are also those threatened by legislation" — tobacco and alcohol (17).

Tobacco — not a limited market

It is inconceivable that any industry would avoid trying to expand its market. By definition, advertising seeks to maximize sales. In the few cases where the market is limited, the function of advertising is to try to maintain or increase brand share. However, most products have no market ceiling, and advertising is undertaken to maintain and improve the market share, and to expand the market. This is the case with the tobacco industry; many people, especially children, do not smoke and might be persuaded to take it up.

Although the industry publicly denies that its advertising promotes smoking, workers in the advertising industry express contrary views. An Australian agency executive, extending the observations of David Abbott, a leading British advertiser, has said:

> As an argument (that tobacco advertising is only aimed at brand switching and not at attracting new consumers) it is so preposterous it is insulting . . . To claim that cigarette advertising does not encourage smoking flies in the face of all advertising knowledge and experience . . . We have the ironic situation of the Advertising Federation of Australia, on the one hand, saying that advertising in general helps expand markets, and thereby reduces the cost of products; and on the other hand claiming that cigarette advertising keeps the market in a miraculously static state (18).

David Abbott has said:

> I think it's incontrovertible, though people will argue against it, that advertising things encourages people to use them. The advertising industry believes that in every other product. I don't see why the rules are different for cigarettes (19).

And Emerson Foote, former chairman of one of the world's leading advertising agencies said about the same issue:

> This is the public position of the tobacco industry but I don't think anyone really believes this. I am not even convinced that competition among brands is the most important purpose of such advertising. I suspect that creating a positive climate of social acceptability for smoking, which encourages new smokers to join the market, is of greater importance to the industry (20).

Tobacco monopolies that advertise

A Rothmans executive has acknowledged that brand share is irrelevant in a monopoly situation.

> One common factor in virtually all the countries with no cigarette advertising . . . is that cigarettes are manufactured and marketed by a Government-owned and run monopoly, so the need to advertise simply does not exist (21).

Any advertising, therefore, must exist solely to try and increase total sales. The governments of Austria, Japan, South Korea, Thailand and Turkey have tobacco marketing monopolies, but not advertising bans.

Industry Claim No. 3: Tobacco Advertising is Aimed only at Adult Smokers and Not at Children

The Royal College of Physicians of London has stated: "Learning to smoke usually occurs in childhood or in adolescence. The matter is largely settled by the age of 20; if a person is still a nonsmoker at this age he is unlikely to take it up" (22).

Children are not only the future of the tobacco market but are a source of revenue to the industry even when they are still at school. In Britain, where it is illegal to sell cigarettes to children under 16, nearly 9 out of 10 regular under-aged smokers buy their cigarettes in shops (23). Health authorities estimated that in 1982 illegal cigarette sales to children aged 11–16 years amounted to some £60 million (over US $100 million at 1988 exchange rates) (24).

Many young smokers maintain the habit throughout their lives and so, from a marketing perspective, constitute the highest priority market segment. We must assume that the tobacco industry, like all other industries, is interested in expansion. The failure of a generation of young people to start smoking would devastate the industry within ten years.

Tobacco advertisements appear in media that, with the exception of age-restricted cinema screenings, are accessible to children. Children can see a billboard, read a newspaper or magazine, watch a television and listen to a radio in just the way that adult smokers do. Yet the Advertising Standards Authority's voluntary code for cigarette advertising states in its first clause that "cigarette advertising shall be directed only to adult smokers and intended to effect a change of brand".

If the tobacco industry claims that advertisements only influence smokers to change brands, how can these persuasive processes have no influence on children who do not yet smoke, but who are likely to do so soon? As a sceptical advertising industry worker wrote about using sporting celebrities in tobacco promotions:

> . . . the cigarette industry . . . would have us believe that cigarette advertising operates in a totally different way from every other category. That is, zeroes in on smokers and no-one else. So that when a 12-year-old boy watches the Marlboro Open, some magic barrier prevents registration of the Marlboro name, but lets it through to the smoker (18).

A document subpoenaed by the US Federal Trade Commission (25) provides a rare glimpse into the advice the industry seeks and gets from its research agencies about the approach it should take with children.

> Thus, an attempt to reach young smokers, starters, should be based . . . on the following major parameters:
>
> — Present the cigarette as one of a few initiations into the adult world.
>
> — Present the cigarette as part of the illicit pleasure category of products and activities.
>
> — In your ads create a situation taken from the day-to-day life of the young smoker but in an elegant manner have this situation touch on the basic symbols of the growing-up, maturity process.
>
> — To the best of your ability, (considering some legal restraints) relate the cigarette to "pot", wine, beer, sex etc.
>
> — DON'T communicate health or health-related points.

The industry makes great play of studies which ask children to say whether they think they are influenced by advertisements. Children, like adults, report that they are not, and that friends and parents influence them to smoke. Such studies are methodologically unsound: there is a world of difference in believing that one is not influenced by advertising, and whether in fact one is influenced. Similar results are found for all sorts of products: people seldom admit to, or are aware of, the influence of advertising. Bergler, in a book much favoured by the advertising industry, states that any self-report about the influence of advertising on smoking or brand choice is "quite worthless" (26).

However, some research has provided legitimate and important information about children and tobacco advertising. Studies conducted in Australia, the United States and the United Kingdom show that children who smoke are more aware of cigarette advertising, are more in favour of cigarette ads and have "favourite" ads compared with nonsmokers of the same age (27–29). Evidence also indicates that adolescent smokers are more likely to select cigarette brands that are heavily promoted through advertising and sports sponsorship (27,30).

(For an extended discussion of children's responses to cigarette advertising, see the second paper in this booklet, "Children and cigarette advertising".)

Industry Claim No. 4: Cigarette advertising Provides Smokers with "Information" which Persuades them to Convert to "Safer" Filtered and Low-tar Cigarettes — Advertising Bans are Therefore Inimical to both Freedom of Information and to Public Health

Few categories of advertising can provide consumers with so little information as cigarette advertising. What information is provided by the Marlboro cowboy, or the rugged Camel man with his camp fires and canoes? The argument over information on tar content can easily be met by the suggestion that all cigarette sellers be required to display a tar table, a simple solution that the tobacco industry has nowhere implemented. In Finland, where tobacco advertising is banned, dramatic reductions in tar content have been achieved through government directives to the industry.

However, Waterson (31), in a booklet on advertising and smoking produced by the British Advertising Association and distributed widely by the tobacco industry, argues that "it is obvious . . . that an advertising ban slows down the rate of conversion of smokers from plain to filtered cigarettes" and "from high-tar to low-tar products". He

has two tables comparing nations with and without advertising bans to support his claim. He shows five countries with advertising bans where more than 30% of smokers smoke non-filter cigarettes, and nine that do allow advertising, where less than 10% smoke non-filter brands. He apparently selected these because there was high filtered cigarette consumption, which contrasted for polemical purposes, with an equally selective group without advertising. He could have constructed a table for the same year showing countries which allowed advertising but also had high non-filter consumption: for example Mexico (more than 80%); India (more than 61%); Pakistan (more than 57%); and the Netherlands (more than 28%) (32). This would have produced a totally different result.

3

The Evidence of Cigarette Advertising's Influence

So far the case against tobacco advertising has been stated in common sense terms: tobacco advertising and promotion, as the words suggest, advertise and promote cigarettes. One cannot promote cigarettes without implicitly promoting smoking, so the industry's argument that its advertising is only solely concerned with brand promotion is specious.

As early as the 1940s, researchers were forthright about the effects of tobacco advertising. Borden, professor of advertising at Harvard, concluded that advertising was an important factor in determining both the size and speed of consumption . . . "without advertising cigarette use would probably have grown; with advertising, the increase has been amazing" (33).

Econometric studies

Attempts have been made to assess the relationship between cigarette consumption and aggregate advertising expenditures through econometric studies. Several such studies have been published (33–36) but their interpretation is fraught with difficulty. Some find no statistically significant effect of advertising expenditure on consumption while others find a positive and statistically significant association.

Difficulties of interpretation arise because such studies are prey to a number of technical problems. For example, how can controls be devised to account for changes in the environment in which cigarettes are sold or for changes in advertising itself? Also, much advertising is

considered to have an investment value — i.e. it establishes a degree of identification and approval of a product that, although diminishing, will exist for a time in the absence of renewed advertising. Studies which have tried to take account of this function of advertising have found a statistically significant relationship between aggregate consumption and advertising over an extended period (34,36).

The Advertising Ban in Norway

In 1970, the Norwegian Parliament decided to introduce a smoking control programme that included health education in schools, warnings on cigarette packets and a ban on all tobacco advertising and promotion. The Norwegian Tobacco Act came into force in July 1975. Official figures from the Norwegian customs and excise show that cigarette sales declined markedly at the time of the 1970 announcement and also after the Act came into force (see Fig. 1).

The Norwegian programme and legislation is considered an outstanding model by international smoking control agencies and its correspondence with the declines in smoking has often been cited as evidence that advertising bans affect tobacco consumption, a relationship which the tobacco and advertising industries have often disputed. Neither side disputes that cigarette smoking decreased, but while health groups said that it was caused by the ban on advertising, the industry argued that the falls began before the advertising ban. However, it is indisputable that the introduction of the ban in 1975 was associated with a further decline in smoking. Norwegian children who had been smoking more before the ban smoked fewer cigarettes after its introduction (see Fig. 2).

The announcement in 1970 of a major programme on smoking and health generated considerable interest throughout Norway. As the broken line in Fig. 1 indicates, if the trend in per capita consumption prior to 1970 had continued, consumption would have been 33% higher than actually occurred in 1986/1987 had the trend in consumption before 1970 continued. The unprecedented downturn may well be

explained by a synergism between the measures introduced after 1970 and the heightened community awareness. Alternatively, single measures such as the advertising ban may have been the key factor. For reasons described below, it is impossible to assess the impact of specific variables without sacrificing methodological rigour.

Impossibility of Isolating the Precise Effect of Advertising

The tobacco industry always insists that those who advocate a ban on advertising must come up with hard evidence that it influences consumption, yet they know that the exact influence of tobacco advertising cannot be assessed. As a current Rothmans' executive has stated:

> This (claim that cigarette advertising reinforces the act of cigarette smoking and hence increases total consumption to a level beyond what it might have been in the absence of advertising) is particularly difficult to refute as the only true test would be to study the consumption trend in a number of different markets under conditions of full cigarette advertising and no cigarette advertising, but over the same period as to achieve identical economical and social pressures. This is clearly impossible (37).

Tobacco advertising is only one factor influencing the decision to smoke; others include social, religious, parental, sibling and peer smoking behaviour and attitudes, price and disposable income, age limit proscriptions, education and social class. To isolate the effect of one factor would mean holding the others constant. These factors are different from country to country, continually changing.

Yet, in the public debate, the industry often characterizes as comparable quite diverse countries on the basis that they have no tobacco advertising, thereby obscuring often crucial differences in social climates and government positions on smoking. By the industry's argument, a socialist country with no advertising of any sort and increasing numbers of smokers is evidence that banning advertising will

not slow a country's smoking rate. They do not refer to any other factors such as the price of tobacco, the extent of health education or measures to restrict smoking in public. But the rise in consumption in such countries could be much steeper if advertising were added to those factors already forcing up consumption.

Effect of partial bans

The industry also argues that partial advertising bans have not worked. But in countries where tobacco advertising is banned from radio and television, such as Australia, the United Kingdom and the United States, massive amounts of advertising expenditure have been transferred into other media such as print, outdoor events and sponsorship. Partial bans can be expected to have only partial effects.

Sporting and Cultural Sponsorship

So-called indirect or incidental tobacco advertising is most common in countries where direct tobacco advertising is banned from radio and television. During the 1981/1982 Australian cricket season, the sponsor, Benson and Hedges, received what was described as a "stupefying 40 000 exposures" on one television channel alone "ranging from quick flashes to long languid camera pans of their distinctive, strategically-placed 300 metres of ground level hoarding" (38). In Britain in 1986, more than 352 hours of tobacco-sponsored events were screened on television (39).

Advertising through sporting and cultural sponsorship has three main advantages for the tobacco industry. First, such advertising is not usually classified as advertising, and therefore can circumvent advertising bans to the extent that more tobacco advertising is seen on television than would otherwise occur. Second, sponsorship tends to build a constituency of thankful and financially dependent recipients who can often be relied on to support the industry.

Finally, and perhaps most obviously, sponsorship associates sporting prowess and cultural excellence with cigarettes in ways that self-regulated codes of conduct forbid. For example, the British Code of Advertising Practice's voluntary code on tobacco states that "advertisements should not imply that smoking is associated with success in sport. They should not depict people participating in any active sporting pursuit or obviously about to do so or just having done so, or spectators at any organised sporting occasion".

Such associations tend to insulate the industry against criticism whereby "adversaries must implicitly criticize these values in order to raise objections to the ad message" (40). Criticizing a sporting hero for taking tobacco money will be seen by many as "unsporting". Like any other sponsor, tobacco companies can give money anonymously; that they choose not to do so, must be seen in terms of their desire to associate their product with popular and prestigious events.

The tobacco industry know well the value of such exposure. The chairman, president and chief executive officer of R.J. Reynolds Tobacco Co. told the *Tobacco Reporter* about its sponsorship of horse racing "we made it clear from the day we announced our sponsorship of the Grand National Division that we were in the business of selling cigarettes, not the racing business" (41). Rod Marsh, the Australian test cricketer, has said that the value Benson and Hedges received from their cricket sponsorship "was absolutely bloody ridiculous. They were laughing all the way to the bank" (42). Companies like McDonalds, who sponsor cricket in Australia, make no bones about their desire to attract children to their product. Why should we believe tobacco's sponsorship of sport has any other motives?

4

Conclusion

The bottom line in all argument about alleged freedoms, the role of the state, and tobacco advertising is the appalling, unnecessary and totally avoidable health consequences of smoking. Those who believe that the epidemic of premature smokers' deaths matters less than the corporate health of the tobacco industry will doubtless be long remembered in the history of public health. Others have different priorities, and have equally direct arguments to oppose tobacco advertising. They need say no more than the obvious truth that tobacco promotions seek to, and inevitably often suceed in, promoting smoking, which kills one million people worldwide each year. If arguments remain to delay legislation banning tobacco advertising, they will have nothing to do with public health.

5

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For their critical comments and suggestions the author would like to acknowledge: Mike Daube, Charles Fletcher, Bobbie Jacobson, David Simpson and Patti White.

PART TWO
CHILDREN AND CIGARETTE ADVERTISING

1

The influence of advertising

There is no single, simple explanation why many children take up the smoking habit. However, it is clear that children are more likely to smoke if they are encouraged to do so by the examples and pro-smoking or permissive attitudes of parents, siblings and peers (Ashton and Stepney, 1982). It seems reasonable to assume that children will also be more likely to smoke if they are encouraged to do so by wider social or cultural pressures outside the immediate circle of family and friends. Advertising is part of this wider social influence.

Advertisments for cigarettes and other tobacco products might reasonably be expected to:

— Encourage non-smokers to smoke.

— Discourage smokers from giving up.

— Encourage smokers to smoke more.

— Discourage smokers from cutting consumption.

— Encourage smokers to change or maintain preferences for particular kinds of tobacco products (for example, preferences for manufactured cigarettes as opposed to hand-rolled cigarettes).

— Encourage smokers to change or maintain brand preferences.

Spokesmen for the tobacco, advertising and media industries have not openly considered these possibilities in this analytic, point-by-point manner. Instead, they have simply claimed that advertising has one effect — it merely encourages existing smokers to change or maintain brand preferences (Waterson, 1984). This is tantamount to saying that cigarette and tobacco advertisements do not promote or reinforce smoking *per se*. It is analogous to claiming that attractive advertisements for skiing holidays in specific hotels or resorts do not promote or

reinforce skiing *per se*. This view has of course been questioned by critics from within the advertising and media industries as well as by other commentators (Kleinman, 1977; Fynn, 1981; Taylor, 1984).

The concept of 'market maturity'

Spokesmen for the tobacco and advertising industries claim that advertising can only increase consumption in markets which have not reached 'maturity'. In 'mature' markets — by which they mean static markets, or markets which have reached a ceiling — advertising can only redistribute brand shares. They also maintain that the market for tobacco is mature (Waterson, 1984).

It is difficult to conceive of the tobacco market as having a ceiling. Even if we all smoked, our consumption of tobacco could be increased. However, the major fault in this argument is the implication that we should think of only one market for tobacco products. In fact, it is much more useful and realistic to think of a number of markets varying in degrees of maturity. Markets can vary from country to country, and between different age groups within any one country. In particular, from the point of view of those interested in the effects of advertising on the young, it is much more useful to think of a spectrum of markets ranging from 'immature' or dynamic markets of teenagers who are experimenting with cigarettes to relatively more mature or static markets of older adults.

Thus the argument that tobacco advertising affects only brand choice goes against widely held advertising concepts. While advertising may have a greater effect on brand choice than on total consumption in mature or static markets of adult smokers, in which the proportions of smokers are relatively constant, it would be expected to have a much greater effect on consumption in dynamic or non-static markets of teenagers who are experimenting with cigarettes.

The teenage market is a very important one for the long-term future of the tobacco industry. The majority of smokers acquire the habit during childhood or adolescence (Royal College, 1978). As Chapman

(1985) suggests, 'the failure of a generation of young people to start smoking would devastate the industry within 10 years'.

However, despite the inherent implausibility of the notion that tobacco advertising does not promote and reinforce smoking *per se*, it seems that this controversy cannot be resolved on theoretical considerations alone. The relationship between advertising and smoking has also been considered an empirical issue.

Econometric studies

Econometric studies have dominated the empirical literature in this debate (Cox, 1984; Godfrey 1986). These have attempted to specify variables (such as level of disposable income, price of cigarettes, advertising expenditure, measures of antismoking publicity) that can effectively account for changes or differences in aggregate measures of cigarette or tobacco consumption (such as per capita expenditure on cigarettes or per capita weight of tobacco sales).

The major problems in this kind of research are concerned with the specification and measurement of variables. Inaccurate measurements or omission of relevant variables can lead to misleading or conflicting conclusions (Godfrey, 1986).

In particular, it is extremely difficult for independent researchers to obtain accurate measures of advertising and other promotional expenditure. For example, research by McGuinness and Cowling (1975, 1980), who found a statistically significant association between advertising and total demand for cigarettes, has been criticized for not considering poster advertising and other promotional activities (Johnston, 1980). In fact, the cigarette companies refused to release this information without obtaining from the researchers the right to veto any empirical results obtained (McGuinness and Cowling, 1980). Furthermore, data used in the Metra econometric studies funded by the tobacco industry (Metra Consulting Group, 1979) have not been made available to other researchers (Godfrey, 1986). For this reason, findings given publicity by

the tobacco industry cannot be subjected to validity checks by independent researchers.

A particular problem from the point of view of researchers interested in the effects of advertising on children is the emphasis on aggregate consumption (for example, per capita expenditure on cigarettes or per capita weight of tobacco sales). If exposure to cigarette advertising has a greater effect on the young then this would be obscured in analyses which use volume or per capita consumption of cigarettes or tobacco as dependent variables.

Thus it is not surprising that econometric studies have produced equivocal findings: some have shown small statistically significant associations between advertising and total demand for cigarettes and others have not (Cox, 1984; Godfrey, 1986).

However, even if we assume that these studies indicate that associations between advertising and cigarette consumption are small and sometimes not significant, this does not mean that a ban on tobacco advertising would have little influence on the demand for tobacco products. As Cox has pointed out, econometric studies merely indicate that minor short-term fluctuations in existing high levels of tobacco advertising appear to have little influence on total demand. 'This finding, however, provides no evidence at all on which to judge the effectiveness of a comprehensive ban on tobacco promotion' (Cox, 1984).

The effects of advertising bans

There are considerable problems involved in the evaluation of partial and complete tobacco advertising bans (Cox, 1984; Godfrey, 1986). Comparisons between countries with different legislative controls on tobacco promotion are difficult to interpret because of the difficulty of holding constant other important influences on smoking such as price,

disposable income and less tangible factors such as antismoking education and cultural attitudes towards smoking.

Comparisons within the same country before and after a ban must also be interpreted with caution (Cox, 1984; Godfrey, 1986). Countries such as Australia, the United Kingdom and the United States which have bans on radio and television cigarette advertising have experienced massive shifts of expenditure into other permitted forms of tobacco promotion, such as posters and sponsorship. In some countries — Italy, for example — bans have been widely violated. In some cases there have been cross-border effects — radio, television and magazine communications from countries which permit tobacco advertising.

Partial or complete advertising bans are rarely introduced in isolation of other measures designed to discourage smoking. The tobacco industry invariably retaliates to the threat and imposition of advertising bans. Thus the effects of advertising bans cannot be assessed without taking account of other influences on tobacco consumption.

Again, a particular problem from the point of view of those interested in the effects of advertising on the young is the emphasis on aggregate consumption in most evaluation studies. If tobacco advertising has a greater effect on the young then this will be obscured in evaluations of bans which use aggregate measures of cigarette consumption.

An evaluation of an advertising ban which comes nearest to dealing with these problems has been conducted in Norway (Norwegian National Council, n.d.). This work is particularly interesting because it provides information on under-age smoking trends. However, even here we must be cautious because the ban was only one of a number of measures enacted by the Norwegian Government to discourage smoking. For this reason, the consumption figures before and after the ban must be interpreted with caution.

Figure 1 shows that the upward trend in per capita cigarette and smoking tobacco consumption began to falter before the ban was imposed in 1975. For this reason spokesmen for the advertising and tobacco industries claimed that the decrease after the ban was merely a continuation of an existing trend:

> In the period prior to this [the 1975 advertising ban] there were clear indications that the overall market was showing signs of reaching maturity.
>
> (Waterson, 1984)

This kind of explanation, of course, does not explain the accelerated *decrease* in consumption after the ban. A more plausible explanation of the falter in consumption before the ban is the heightened community awareness and antismoking publicity that occurred when the ban was proposed and discussed. It is also likely that price increases after the act had some influence. Price increases form an important part of concerted attempts to discourage smoking (Pekurinen and Valtonen, 1987).

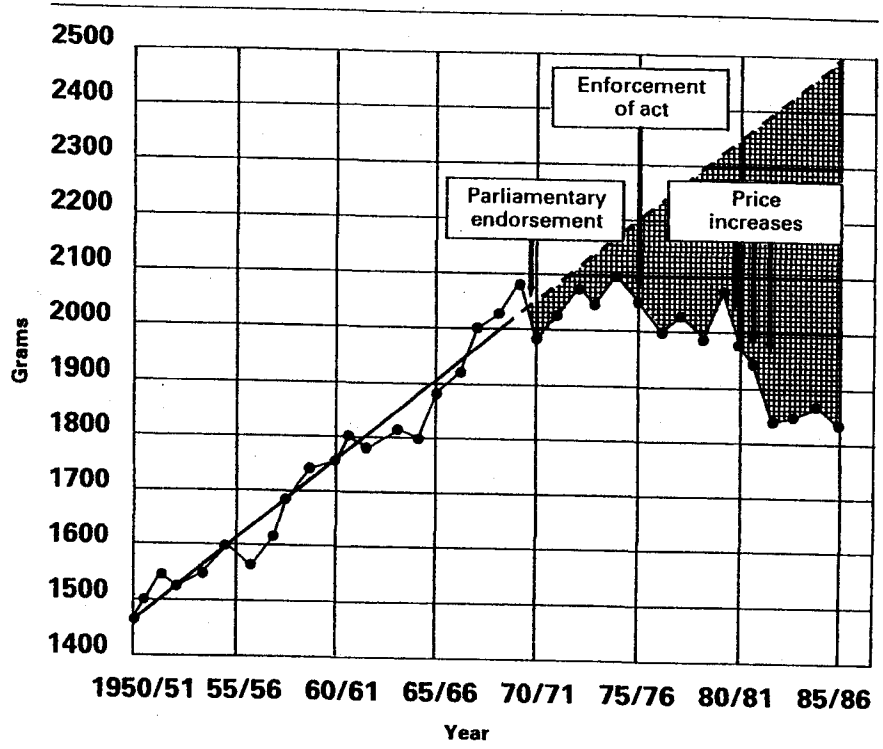
As mentioned above, the Norwegian evaluation is of particular interest to those interested in the effects of advertising on the young. Separate studies were conducted with children at 13, 14 and 15 years. Figure 2 shows that the fall in per capita consumption shown in Figure 1 holds true for the proportions of daily smokers in all three age groups and for boys and girls separately. Thus although precise attribution of effects is not possible, the Norwegian experience offers considerable encouragement to other countries who may be considering advertising bans.

Finally, it must be made clear that the Norwegian National Council on Smoking and Health are well aware of the dangers of simplistic interpretations of the decrease in smoking among boys and girls since the ban. It is fitting to end this chapter with the Council's measured summary:

> Why is it that young people — and in particular girls — smoke less now than a few years ago? The surveys provide no basis for extracting one single factor as an explanation. The positive trend of development is probably a result of an interaction between several factors. In the 1970s, the general information activities and education on smoking and health in the schools increased. The advertising pressure, which undoubtedly appealed to young people, was removed and after the 1975-survey special attention was paid to smoking habits among girls. Parents were mobilized to a greater extent, because of the marked importance of parental attitude and behaviour observed in the survey. In general attitudes towards smoking, and smoking behaviour, have

Figure 1

Per capita consumption (aged 15+) of cigarettes and smoking tobacco, Norway



Source: Directorate of Customs and Excise

Figure 1: Per capita consumption (aged 15+) of cigarettes and smoking tobacco in Norway. *Source: Directorate of Customs and Excise.*

Figure 2

Per cent daily smokers, school students, Norway, 1957–85

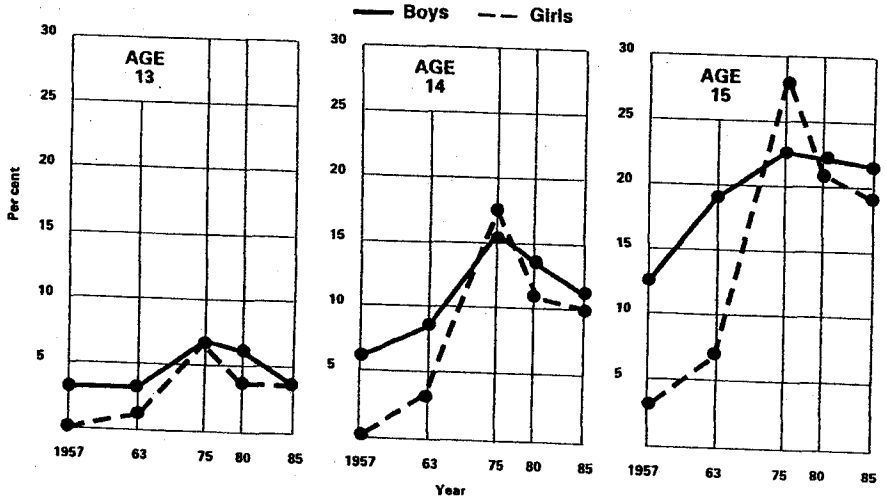


Figure 2: Per cent of daily smokers among school students in Norway, 1957-85.

changed over the last years, both among young people and among adults. Smoking is no longer considered as the normal social behaviour and a sign of maturity.

(Norwegian National Council, n.d.)

2

Children and cigarette advertising

Children's perceptions of cigarette advertising

If children are influenced by tobacco advertising then it should be possible to demonstrate that they are very much aware of such advertising. It should also be possible to demonstrate that there are important differences between under-age smokers and non-smokers of the same age with regard to their perceptions of cigarette advertising. For example, if advertising has a rewarding or reinforcing effect on smoking, one would expect under-age smokers to pay more attention to cigarette advertising and show a greater appreciation of such advertising. The remainder of this paper is concerned with cigarette advertising from the child's point of view.

Children's awareness of cigarette advertising

There is a growing body of evidence from research in Australia, the United Kingdom and the United States which indicates that children are much more aware of cigarette advertising and brand imagery than most adults realize. (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1985; Aitken *et al.*, 1987; Goldstein *et al.*, 1987). Important seminal research in Australia by Chapman and Fitzgerald (1982) showed that large numbers of adolescents were able to identify edited cigarette advertisements and brand slogans. Recent studies conducted in Scotland indicate that the majority of children between 6 and 11 years are able to recognize cigarette advertisements from highly prominent, long-running campaigns, and many can identify cigarette brands in cryptic advertisements which do not show brand names (Aitken, *et al.*, 1985; Aitken *et al.*, 1987).

Under-age smokers are particularly adept at identifying cigarette brand imagery (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1987; Goldstein *et al.*, 1987). In the study conducted in Australia, under-age smokers were nearly twice as good as non-smokers at identifying edited cigarette advertisements and brand slogans. (Chapman and Fitzgerald, 1982). Under-age smokers are also better at recalling cigarette brand names than non-smokers of the same age (Ledwith, 1984; Charlton, 1986). Thus there is now good evidence that cigarette advertising is getting through to children, and to under-age smokers in particular.

Children's descriptions of cigarette brand imagery

There have been few published accounts of the child's view of cigarette brand imagery. For this reason, this chapter leans heavily on recent research conducted in Scotland by members of Strathclyde University's Advertising Research Unit (Aitken *et al.*, 1985). Groups of children aged between 10 and 16 years were encouraged to talk about the imagery in glossy coloured advertisements, including cigarette advertisements, by asking them to describe the kind of person who would like each advertisement. After allowing time for spontaneous comments, they were asked to specify the hypothetical person's sex, age, occupation, leisure activities, clothing and music preferences. In order to obtain measures of agreement, votes by show of hands were taken at each stage in the construction of these 'brand personalities'.

Two of the advertisements shown, Kim and More, were aimed at females (Bostock *et al.*, 1982). The Kim advertisement showed a pack of Kim cigarettes; representations, in silhouette form, of cocktails in the bright and gay Kim colours; and a slogan: 'Kim! Much more to your taste'. The More advertisement showed two packs of More cigarettes, one red and one green; a long brown-coloured cigarette; two bottles of wine and a corkscrew; and a slogan: 'More. The long, slim cigarette'.

According to the United Kingdom *Financial Times*, the Kim campaign was designed to stress 'the distinctive colouring and style of

the pack — which some women now regard as an accessory — that it was designed for women and that it was an elegant long smoke' (McEwan, 1983). The industry journal *Tobacco* (1986) has suggested that Alexis Colby — played by actress Joan Collins in the Dynasty soap serial — typifies the More brand personality. Thus in presenting these advertisements we were interested in the age at which children could detect the symbolic appeal to females rather than males.

The children's responses showed a consistent pattern of age differences. Whereas the 10 year olds' descriptions were very much tied to what was specifically depicted in the advertisements, some of the 12 year olds' and most of the 14 and 16 year olds' descriptions of the people who would like these advertisements went way beyond what was specifically shown.

The 10 year olds said that the kind of person who would like the Kim advertisement would have no distinguishing features except that he or she would smoke and drink. Their responses to the More advertisement were similar, except that smoking was mentioned less often. Thus the 10 year olds' descriptions did not go beyond the explicit design features of the advertisements — both showed symbols for smoking and drinking.

Some of the 12 year olds' and most of the 14 and 16 year olds' descriptions went far beyond the explicit design features shown in these advertisements. Many of their comments were very similar to comments recorded from individual interviews with young adult Scots (Clarke, 1985) and referred to advertising messages which differentiate one brand from another.

Kim tended to be seen as female, an office worker, in her twenties. She wears colourful up-to-date, trendy clothes, likes modern pop or disco music and enjoys casual sports, such as tennis or jogging. Kim's social life was seen as centred around dances and discos.

More tended to be seen as a sophisticated person, possibly a pretentious person, more likely to be female than male. In her thirties or forties, she is well-off, wears expensive clothes and tends to prefer classical music. She was seen as enjoying a sophisticated social life '... going out for meals at night'; 'cocktails, bridge and all that'.

The 14 and 16 year olds' initial spontaneous comments often referred to important features of these 'brand personalities'. Some of their comments were critical and cynical; and some referred to the association of smoking and drinking in both advertisements:

Kim

— More for females because it's called Kim and because of the colours and that

— A young lady

— Fags again! Women's fags this time

— Smokers . . . someone who likes fancy things

— Colourful like all cigarette ads — trying to associate their products with glamour . . . cocktail glasses

— Young female, lively

— Glamourizing cigarettes . . . cocktails and all that fanciness

More

— Somebody who thinks he's flashy, but he's not got enough money to be flashy

— Wine bar freaks and a' that

— Stottin' about the house . . . doesn't like to get her hands dirty

— A long slim lady

— Sophisticated people

— Associating drink again!

— Wording itself is for females — long, slim

— A Sloane Ranger

The Kim imagery, with its emphasis on youthful activities, appears to be particularly attractive to young people. A small-scale study in West Germany, found that adolescents' perceptions of an advertisement for Kim cigarettes were quite highly correlated with their conceptions of an ideal style of advertising (Beike and Heiland, 1971;

Bergler, 1981). For them, an ideal style of advertising would emphasize the following characteristics:

— young, youthful,

— free, independent,

— racy, stylish,

— seductive, sexy,

— full of atmosphere.

(Bergler, 1981)

This contrasted with adults' conceptions, which emphasized the following characteristics:

— ambitious, successful,

— calm, relaxed,

— vital, dynamic.

(Bergler, 1981)

The symbolism shown in the Kim and More advertisements is quite muted — certainly it is much less blatant than the symbolism in many advertisements discussed by commentators and critics (Day, 1978; Williamson, 1978; Chapman and Egger, 1983). Therefore, in order to explore the perceptions of more colourful imagery which is no longer allowed in specific United Kingdom media, the children were also shown a Marlboro cigarette advertisement taken from a British Airways *High Life* magazine. It showed a cowboy on horseback with the colourful Marlboro imagery familiar to most people reading this account.

The majority of the 10 year olds said that this advertisment would be liked equally by males and females. Again, their comments tended to be tied to what was explicitly shown in the advertisement:

— Cowboys to get more people to buy them — do what the cowboys do

— It's trying to get you to buy cigarettes

— Good background, scenery; good feel, got character to it. Shouldn't advertise cigarettes

— I like the horses and the scenery, but I don't like the advertising for cigarettes

The majority of the 12 to 16 year olds said the advertisement would appeal more to males than females. Their comments tended to be more playful and cynical in contrast to the 10 year olds who tended to be more 'moralistic'. Again, the 14 to 16 year olds tended to go far beyond what was explicitly shown in the advertisement and made much of the associations between male smoking and toughness, fresh air and freedom:

— Tough and big because you smoke like a cowboy

— Try to create an image ... enjoy yourself in the fresh air like enjoying a cigarette

— It must be cool to smoke . . . like a cowboy . . . relaxed. Absolutely groovy. Relaxed . . . nothing gets you going, nothing bothers you

— It's tellin' ye that if you smoke them you're gonnae be a macho he-man

— A big-strong-guy-on-a-horse appeal to boys

— A certain sort of man smokes a certain sort of cigarette. If that looks good then smoke them

— You'll have a relaxed time if you smoke this cigarette

— Macho man!

— Hard men smoke this cigarette

— Not hard, but tough . . . like John Wayne

Chapman and Egger (1983) have described the attractive characteristics of the Marlboro cowboy advertisements in these words:

> Marlboro advertising is perhaps the most blatantly escapist of all cigarette advertising. It offers translation of the harried, rushed and crowded urban man to the open spaces, freshness, elemental toughness and simplicity of Marlboro country.

> The Marlboro man himself is a man of few words . . . he displays neither wit nor sophistication but is rather the 'strong, silent type' with quiet confidence and inner resources.

The 14 to 16 year olds' spontaneous comments indicate that they too perceived the attractive qualities in a similar fashion. This demonstrates the powerful, almost immediate appeal of this kind of imagery.

It is true that many of the 14 to 16 year olds' comments were cynical and tongue-in-cheek. However, this does not mean that children of this age are immune to such appeals. Many young adults — including smokers — make derogatory comments about the imagery shown in cigarette advertisements (The Research Business, 1985). Thus the fact that several 14 and 16 year olds made scathing remarks about the imagery is consistent with our suggestion that young people of this age tend to perceive cigarette advertisements much in the same way that young adults do (Aitken *et al.*, 1985)

A survey of children's perceptions of cigarette brand imagery

It is of course possible that young children can detect more in the imagery used in cigarette advertisements than they are able to express easily in words. For this reason, in a subsequent survey we used a technique which requires little in the way of verbal ability (Aitken *et al.*, 1987). Children between 6 and 17 years were shown a set of nine photographs of cigarette advertisements on a display card. The interviewer read out descriptions of different kinds of people and the children were asked which of the advertisements each hypothetical person would most like.

Some of the descriptions were based on children's responses to advertisements shown to them during the previous group discussions (Aitken *et al.*, 1985). Two descriptions summarized important features of the Kim and More 'brand personalities' described above:

A girl in her late teens or early twenties. She works in an office and wears trendy up-to-date clothes. She likes discos and modern pop music. So she's young and lively.

A posh lady. She is well-off, wears expensive clothes and likes going to the theatre and things.

As predicted, higher proportions of children of 12 and above chose Kim in response to the first description and More in response to the second description rather than any other advertisement. Of more interest, however, was the finding that higher proportions of 10 and 11 year olds chose these advertisements than would be expected on a purely chance basis. Thus although children of this age do not generally talk about Kim and More brand imagery in the way that older children and young adults do, many of them do appear to have a rudimentary awareness of the 'brand personalities' shown in these advertisements.

It is important to note that the group discussions described in the previous section indicated that 10 years olds do not generally show, in their spontaneous speech or answers to open-ended questions, the kind of sophisticated perceptions of advertisements that many older children are capable of (Aitken *et al.*, 1985). Thus the rudimentary awareness of brand personalities shown by the 10 and 11 year olds in the survey suggests that unconscious processes are probably at work. This indicates that the development of an adult-like perception of the imagery in cigarette advertisements over the years 10 to 14 consists of a growing ability to verbalize and critically examine associations which are initially largely unconscious. If this is the case, then 10 year olds, who are not generally consciously and critically aware of 'brand personalities' in cigarette advertisements, may be particularly vulnerable.

3

Cigarette sponsorship and sport

Cigarette brand sponsorship of sports

Although, in the previous chapter, children below the age of 10 years did not match the Kim and More advertisements to their respective 'brand personalities' to any significant extent, significant numbers of children of six years and above did match descriptions of people which referred to sports to advertisements for cigarette brands which sponsor these sports (Aitken *et al.* 1986a; Aitken *et al.*, 1987). For example, the children were asked which advertisement the following person would most like:

— Someone who likes excitement and fast racing cars.

Higher proportions of children in each age group — from 6 to 17 years — chose John Player Special or Marlboro in response to this description. Although both of these brands sponsored racing cars there was no reference to this in the advertisements shown on the display card. This suggests that associations between cigarette brand names (or their visual cues) and exciting sponsored sports can be elicited or triggered by simple advertisements.

Although significant numbers of children below the age of 10 chose John Player Special or Marlboro in response to the description which referred to racing cars, few of them were able to name these brands as being connected with motor racing (Aitken *et al.*, 1986a). Thus it seems that associations between brand names (or their visual cues) and sponsored sports are often unconscious, or not readily retrieved to consciousness. Furthermore, as few children below the age of ten years understand the purpose of cigarette brand sponsorship, it seems that such associations can be elicited in children who do not have a critical awareness and understanding of the purpose of commercial sponsorship. It is for these reasons that we have suggested that cigarette

brand sponsorship of sports has an insidious quality (Aitken *et al.*, 1986a).

Additional findings in the Scottish study (Aitken *et al.*, 1986a), together with findings from Ledwith's studies (1984) conducted in England, indicate that the majority of United Kingdom children of 12 years and above are able to name cigarette brands and sponsored sports. They tend to be most aware of brand names and sports frequently shown on television. In recent studies, conducted in the United Kingdom, these were John Player Special and motor-car racing, Embassy and snooker, Benson and Hedges and snooker, Marlboro and motor-car racing (Ledwith, 1984; Aitken *et al.*, 1986a).

This indicates that many children learn about connections between cigarette brand names (or their visual cues) and sports by watching television. This is probably one of the reasons why children and adults often claim to have seen cigarette advertisements on television (DHSS, 1983; Marsh and Matheson, 1983). Thus, as Ledwith (1984) has pointed out, television sports sponsorship by cigarette manufacturers acts as cigarette advertising and therefore circumvents the United Kingdom law banning cigarette advertising on television.

Tobacco companies are of course well aware of the power of television advertising. A director of the advertising agency, Saatchi and Saatchi, has given a revealing example of the business acumen and cynicism of tobacco companies in this respect:

> A BBC technicians' strike caused the blacking of the Rugby League John Player Cup Final. It was duly postponed. No television coverage, no match, said John Player.
>
> (Fynn,1981)

Brand-stretching cigarette promotion devices

Tobacco companies can avoid many of the restrictions on cigarette advertising by 'brand-stretching' — that is, by attaching cigarette brand names and their distinctive visual cues to non-tobacco goods and

services. For example, the distinctive Kim logo and colours were worn by the tennis player Martina Navratilova for two seasons at Wimbledon and were seen on television by a world-wide audience of millions (Taylor, 1984). British American Tobacco (BAT) said that Kim sportswear was being promoted, not Kim cigarettes. This denial was not very convincing given that a 1979 BAT memorandum stated:

> Opportunities should be explored by all companies so as to find non-tobacco products and other services which can be used to communicate the brand or house name, together with their essential visual identifiers. This is likely to be a long-term and costly operation, but the principle is nevertheless to ensure that cigarette lines can be effectively publicized when all direct forms of communication are denied. . .
>
> (Taylor, 1984)

In the Scottish study described above, some of the children mentioned tennis and other casual sports when describing the kind of person who would like the Kim advertisement, although there was nothing referring to sport in the advertisement shown to them. However, their perceptions of 'brand- stretching' were examined more systematically by showing them a colourful advertisement for JPS Grand Prix Holidays (Aitken *et al.*, 1985).

About half of this advertisement showed a John Player Special motor-racing car featuring the brand name, logo and colours of the cigarette pack. There were also some smaller pictures: two of attractive young people in bathing costumes, and one of a plush hotel. The wording gave details of holidays in places associated with motor-racing (for example, Monaco, Monza). Thus it was rich in the kind of imagery that has not been allowed in cigarette advertisements in specific United Kingdom media for the past 12 years. The advertisement did not mention 'cigarettes' and did not show a Government Health Warning.

The JPS Grand Prix Holidays advertisement was the first cigarette-related advertisement shown to the children and they were not aware that the researchers were primarily interested in their views on cigarette advertising. Despite this, and despite the fact that the advertisement did not mention cigarettes, 22% of the 6 to 10 year olds and 91% of the 12 to 16 year olds said it advertised cigarettes or holidays and cigarettes. This indicates that many Scottish children can recognize the 'essential

visual identifiers' of John Player Special cigarettes at a glance. The strategy outlined in the BAT memorandum clearly works well with children.

Perhaps more important, none of the children of 10 years and below mentioned the duplicity involved in this kind of advertising. The children of 12 years and above made much of this point:

— What's John Player got to do with cigarettes?

— Garbage . . . it's a con

— It's a con way of advertising cigarettes

— John Player Special sponsor this because they want publicity

— Kinda sneaky

— It advertises cigarettes on the motor

— Using holiday pictures to say that cigarettes are relaxing

— Holidays sponsored by cigarettes

— Killing two birds with one stone. Advertising two things in the one advert.

The apparent naivety of the 10 year olds, in that they did not mention the duplicity involved in this advertisment, should not necessarily be taken at face value. Children often 'know' more than they can express in words. Research in Australia indicates that when 10 and 11 year olds are asked to give simple 'true', 'false' or 'don't know' responses to simple statements about the purposes of cigarette advertising and sponsorship their responses indicate that they too tend to have a cynical view of the activities of cigarette manufacturers (Fisher and Magnus, 1981). Nevertheless, the findings in the Scottish study indicate that this apparent cynicism does not become salient until the early secondary school years. Other findings discussed elsewhere indicate that there is a lag between awareness and salience in the development of children's perceptions of the persuasive intent of conventional cigarette advertisements. Although awareness of the persuasive intent of conventional cigarette advertisements may be present at about 7 or 8 years, it is not particularly salient until the late primary and early secondary school years (Aitken *et al.*, 1986b).

Reinforcing effects of cigarette advertising

The research described above indicates that children are much more receptive to cigarette advertising and other promotional devices than adults realize. Furthermore, there is a growing body of evidence indicating that advertising reinforces smoking among the young.

As mentioned previously, research in Australia, the United Kingdom and the United States has shown that young smokers are more adept than non-smokers at identifying cigarette brand imagery (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1987; Goldstein *et al.*, 1987). This suggests that under-age smokers tend to take more notice of cigarette advertisements than do non-smokers of the same age.

Studies conducted in Australia and the United Kingdom also indicate that under-age smokers tend to have more positive attitudes towards cigarette advertising than do non-smokers of the same age (O'Connell *et al.*, 1981; Alexander *et al.*, 1983; Aitken *et al.*, 1986b). For example, in the Scottish survey described above, 35% of smokers and 66% of non-smokers of secondary school age favoured a ban on cigarette advertising (Aitken *et al.*, 1986b). Under-age smokers also tend to rate cigarette advertisements more highly on attractive qualities (for example, 'exciting', 'eye catching') than do non-smokers of the same age (Potts, *et al.*, 1986). In addition, under-age smokers are more likely than non-smokers of the same age to have favourite cigarette advertisements (Charlton, 1986).

Taken together, these studies indicate that under-age smokers:

— tend to pay more attention to cigarette advertisements

— tend to be more appreciative of the idea of cigarette advertising

— tend to be more appreciative of specific examples of cigarette advertising, compared with non-smokers of the same age.

This means that under-age smokers are getting some kind of reward or pleasure out of cigarette advertising. In other words, cigarette advertising is reinforcing under-age smoking.

Part of the reward-value that smokers derive from advertisements probably comes in the form of perceived support from society, in the

sense that advertisements for cigarettes indicate society's support for smoking. However, it is also likely that under-age smokers are more directly reinforced by cigarette advertisements. We have suggested that young smokers use attractive features in cigarette advertisements in order to reduce some of the conflict between the positive and negative aspects of smoking (Aitken *et al.*, 1986a). For example, it is likely that young smokers attempt to reduce the dissonance between knowledge that smoking is harmful and the symbolic appeal of smoking by seeking out or paying attention to attractive features in cigarette advertisements. That this kind of activity is occurring is suggested by the research described above which indicates that under-age smokers take more notice of cigarette advertisements than do non-smokers of the same age. (Chapman and Fitzgerald, 1982: Aitken *et al.*, 1987; Goldstein *et al.*, 1987).

There is considerable evidence that smoking has a symbolic appeal for many young people. Several studies have shown associations between under-age smoking and precocious, rebellious behaviour (Bynner, 1969; Aitken, 1978; Ashton and Stepney, 1982). Young smokers also tend to be perceived as being tougher or more rowdily extrovert (Bynner, 1969; Aitken, 1978; Ashton and Stepney, 1982). Given this, it does seem reasonable to suggest that under- age smokers enhance the symbolic appeal of smoking by paying attention to the imagery used in cigarette advertisements.

In brief, it is likely that under-age smokers attempt to reward themselves by paying attention to cigarette advertisements. Advertising theorists and practitioners have often drawn attention to the importance of this kind of reinforcement. Barrie Day, one of the best known names in international advertising, described the important characteristics of good advertisements in these words:

> I BELIEVE that all advertising must in some way *reassure* . . . I BELIEVE an ad should be a small *reward*.
>
> (Day, 1978)

The suggestion that under-age smokers make use of advertisements in this way is also consistent with Lannon and Cooper's view of advertising as expressed in an influential article in the *International Journal of Advertising*:

> Advertising is capable of entering language, daydreams and intuition because of its independent existence. It does not simply *do* things to people in the sense of treating consumers as objects to manipulate, nor does it merely do things to products, like creating USPs, brand personalities. Rather, *people* do things to advertising, interact with it, and produce surprising outcomes.
>
> (Lannon and Cooper, 1983)

Predisposing effects of cigarette advertising

Thus there is good evidence that cigarette advertising is reinforcing under-age smoking. This of course does not necessarily mean that cigarette advertising plays a part in persuading children to start smoking. Cause and effect relationships are always difficult to disentangle. For example, attitudes towards cigarette advertising may become more positive *after* children begin smoking. Indeed, research in Australia has shown that changes in attitudes do tend to occur after children begin smoking (Alexander *et al.*, 1983).

However, there are good reasons for suggesting that cigarette advertising has predisposing, as well as reinforcing, effects. In the survey conducted in Scotland, primary school children who said they would smoke when they were older tended to have more positive attitudes towards cigarette advertising than children who did not intend to smoke when they were older (Aitken *et al.*, 1986b). This suggests that perceptions of cigarette advertising play a part as precursors in the transition from non-smoker to smoker.

In a recent survey of children in England, non-smokers who named a favourite cigarette advertisement tended to show greater support for supposed positive values of smoking (for example, 'looking tough', 'looking grown-up') than did non-smokers who did not name a favourite cigarette advertisement (Charlton, 1986). As Charlton suggested, the non-smokers who named a favourite cigarette advertisement could be the next recruits to smoking in that they seem to be providing themselves with 'evidence' for the supposed values of smoking.

Finally, research conducted in Australia suggests that attitudes towards cigarette advertising are important predictors of *future* changes in children's smoking behaviour (Alexander *et al.*, 1983). Children who approved of cigarette advertising were twice as likely to become smokers during a follow-up year than were children who disapproved; smokers who approved were less likely to give up than were smokers who disapproved of cigarette advertising. The 'approval of cigarette advertising' effect was independent of a number of other important influences on under-age smoking (for example, smoking by parents, siblings and peers). As the authors of this important study suggest, their findings indicate that cigarette advertising may have predisposing as well as reinforcing effects on children's smoking behaviour.

Children's cigarette brand preferences

Although the tobacco industry claims that cigarette advertising does not promote or reinforce smoking *per se*, the industry does not deny that advertising influences brand preferences among adults (Waterson, 1984). Logically, there seems to be no *a priori* reason why advertising should not be an important factor in determining brand preferences among under-age smokers. As we have seen above, there is now considerable evidence that cigarette advertising is getting through to children, and to under-age smokers in particular.

In fact, there is good reason to believe that the various promotional devices which help determine adult cigarette brand preferences have an even greater influence on the brand preferences of under-age smokers. Chapman and Fitzgerald (1982) found that under-age smokers in Sydney, Australia, showed an enhanced or heightened preference for the most popular brand smoked by adults, Winfield: 48% of the under-age smokers compared with 29% of adult smokers said they usually smoked Winfield. Research in the United States and United Kingdom has provided similar findings (McNeill *et al.*, 1985; Goldstein *et al.*, 1987 and Aitken *et al.*, forthcoming). For example, in the survey conducted in Scotland, 76% of the under-age smokers compared with 44% of the adult smokers gave Kensitas Club as their most preferred

brand (Aitken *et al.*, forthcoming).

All of these heightened preferences among under-age smokers were for heavily advertised brands. In the Scottish study, the most preferred brand, Kensitas Club, was heavily advertised in the Glasgow area in which the survey was conducted (Aitken *et al.*, forthcoming). During the year preceding the survey, £387 000 was spent on advertising Kensitas cigarettes in the Scottish press; and the vast majority of this advertising appeared in the popular Glasgow tabloids. For comparison: £216 000 and £238 000 was spent advertising the second and third adult preferences, Embassy and Benson and Hedges, in the Scottish tabloids over the same period.

Goldstein and his colleagues have recently suggested that the heightened preference shown by under-age smokers for heavily advertised brands has implications for smoking education programmes for children:

> The developers of these programs should analyse cigarette brand preference in their targeted populations. If this analysis indicates that the majority of students smoke one brand, then a potentially effective health promotion technique could be to focus on the inconsistencies of tobacco health risks and the Madison Avenue image associated with that particular brand. One such intervention has used the film 'Death in the West' to demythologize the 'Marlboro Man'. Similarly, counteradvertising and brand image spoofing have been used by the health promotion group Doctors Ought to Care.
>
> (Goldstein *et al.*, 1987)

Finally, the heightened preference by under-age smokers for heavily advertised brands suggests that children are highly sensitive to cigarette brand advertising. This provides further support for the arguments and research findings summarized above indicating that cigarette advertising promotes and reinforces smoking among the young.

Thus claims by the tobacco industry that cigarette advertising does not promote or reinforce smoking among the young do not accord with findings from recent research into children's perceptions of cigarette advertising. Moreover, this evidence is now independent of researcher, country of research and research methodology used.

4

The tobacco industry's response

Recently, perhaps in response to the pioneering research on children's awareness of cigarette advertising conducted in Australia, the industry has commissioned research with children. One such study, initiated and funded by the tobacco industry, was published by the International Advertising Association in 1986 (Boddewyn, 1986). There were four main features of interest in this study concerned with the influence of cigarette advertising.

The first part of the study compared proportions of under-age smokers in 'five countries where the control of cigarette advertising ranges from a ban (Norway) to rather limited restrictions (Hong Kong and Spain), with Australia and the United Kingdom standing in between'. As noted in a previous section, comparisons of smoking rates between countries with different legislative controls on tobacco promotion are fraught with problems because of the difficulty of holding constant other important influences on smoking such as price, income, peer influences and cultural attitudes towards smoking. At the very least such comparisons should use appropriate statistical procedures (such as multiple regression analysis) which allow one to make cautious judgements about which variables are *independently* associated with under-age smoking. This investigation made no attempt to do this.

The problems involved in comparing smoking rates were compounded by another flaw in the design of the study. The United Kingdom figures were taken from studies conducted by the Office for Population Censuses and Surveys (OPCS) and were obtained from stratified random samples of children questioned by means of group-administered anonymous self-completion questionnaires in schools. The figures for the other countries were obtained from quota samples of children questioned by means of face-to-face interviews in their homes. Thus the differences between the United Kingdom prevalence figures and those for the other countries were confounded by differences in

sampling and questioning procedures.

The second feature concerned with advertising involved an examination in four countries of the reasons children gave for first trying a cigarette. When questioned about this they were shown a set of ten possible answers on a prompt card. Because very few pointed to the option referring to advertising ('I'd seen advertising for cigarettes') it was then concluded that cigarette advertising does not promote smoking. The dubious assumption behind this questioning procedure is that children can identify the important underlying determining factors involved in the initiation of a half-remembered previous event. Thus it was not surprising to find that the majority of the children pointed to the option which said 'I wanted to see what it was like'.

Had they wished, the authors of this report could have used findings from this particular question to 'demonstrate' that peer and parental influences are unimportant. Only 10% of the children pointed to the option referring to peer pressures ('Because all my friends smoked'). In Australia, only 4% of the children pointed to options referring to parental influences: 'Parents made me' — 3%; 'Because parents smoke' — 1%. (For some unexplained reason the options referring to parental influences were presented only to the Australian children.) They did not use this line of reasoning when emphasizing the importance of peer and parental influences elsewhere in the report. Had they done so, the dubious nature of the rationale behind this questioning procedure would have been made even more apparent.

The children in four of the countries were also questioned about their awareness of cigarette brands. However, no details were given of the questioning procedures used in this part of the study. Furthermore, no information was given about possible differences between under-age smokers and non-smokers. This would have been of interest because, as we have seen, several studies have shown that under-age smokers tend to be much more aware of cigarette brands, cigarette advertising and brand imagery (Chapman and Fitzgerald, 1982; Ledwith, 1984; Charlton, 1986; Aitken *et al.*, 1987; Goldstein *et al.*, 1987).

The fourth part of the study concerned with the influences of advertising consisted of a brief literature review. This pointed, quite reasonably, to the importance of certain social factors:

> Overall, the findings of these studies indicate that children and young people are most likely to smoke when their father, mother, siblings or best friend(s) smoke, and when parents are permissive towards children's smoking.

However, only three studies of children's perceptions of cigarette advertising were mentioned. There was no mention of the seminal Australian research which demonstrated that under-age smokers are more appreciative of cigarette advertising than are non-smokers (O'Connell *et al.*, 1981; Alexander *et al.*, 1983). Although Chapman and Fitzgerald's study (1982) was mentioned, their findings were not. As mentioned above, this research stimulated a number of studies in the United Kingdom and the United States which showed that under-age smokers are more adept than non-smokers at identifying cigarette brand imagery (Aitken *et al.*, 1987; Goldstein *et al.*, 1987) and that under-age smokers tend to show heightened preferences for cigarette brands most preferred by adults (McNeill *et al.*, 1985; Goldstein *et al.*, 1987; Aitken *et al.*, forthcoming). None of these important issues was explored in the literature review section of this tobacco industry sponsored report.

More recently the Advertising Association has announced in a news release the preliminary results of an investigation into the effects of advertising on children of 7 to 14 years (Advertising Association, 1988). Although this study was mentioned in a 1987 submission to a United Kingdom Ministerial Group which said that all references in the submission were available from the Advertising Association (1987), and publication was promised in Spring 1988, I have been unable to obtain a copy of the report to date (May 1988). However, the news release states unambiguously:

> Advertising recall appears low in the list of predictors, although recall levels of named brands are higher for smokers. Those who recognized all three cigarette advertisements shown (a better predictor of exposure) were not significantly more likely to smoke than the general sample.
>
> (Advertising Association, 1988)

It will be interesting to see if the report when published mentions the research described here which has shown that under-age smokers are indeed more adept than non-smokers at recognizing and identifying

cigarette advertisements (Chapman and Fitzgerald, 1982; Aitken *et al.*, 1987; Goldstein *et al.*, 1987). It will also be interesting to see if this latest study publicized by the Advertising Association used any of the measures of advertising recognition and identification and measures of advertising appreciation devised by previous independent researchers (O'Connell *et al.*, 1981; Chapman and Fitzgerald, 1982, Alexander *et al.*, 1983; Aitken *et al.*, 1985; Aitken *et al.*, 1986b; Charlton, 1986; Potts *et al.*, 1986; Aitken *et al.*, 1987 and Goldstein *et al.*, 1987).

5

Conclusions

The tobacco industry's claim that tobacco advertising affects only brand choice goes against widely held advertising concepts. While advertising may have a greater effect on brand choice than on total consumption in static markets of adult smokers, it would be expected to have a much greater effect on consumption in dynamic markets of teenagers who are experimenting with cigarettes.

Econometric studies of the effects of advertising and studies of the effects of advertising bans are fraught with technical problems and have produced equivocal findings. An important problem, from the point of view of those interested in the effects of advertising on the young, is the emphasis on total demand. If exposure to cigarette advertising has a greater effect on the young then this would be obscured in analyses which use aggregate measures of tobacco or cigarette consumption.

Recent research has shown that children are much more receptive to cigarette advertising than adults realize. Many can identify cryptic or edited cigarette advertisements which do not show brand names; and many can identify cigarette brand imagery in 'brand-stretching' advertisements for other products. Moreover, associations between cigarette brand names (or their visual cues) and exciting cigarette-sponsored sports can be elicited by simple advertisements.

Under-age smokers tend to show enhanced or heightened preferences for cigarette brands most preferred by adult smokers. This indicates that the various promotional devices which help determine adult brand preferences have a greater effect on under-age smokers.

Furthermore, under-age smokers:

— appear to pay more attention to cigarette advertisements

— tend to be more appreciative of the idea of cigarette advertising

— tend to be more appreciative of specific examples of cigarette advertising, compared with non-smokers of the same age.

These findings indicate that cigarette advertising is important in promoting and reinforcing smoking among the young.

Acknowledgement

The continuing programme of research into children's perception of cigarette advertising conducted by Strathclyde University's Advertising Research Unit, is supported by the Cancer Research Campaign.

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CHILDREN AND SMOKING

Children's advertisement-awareness related to their views on smoking

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IN a Cancer Research Campaign-funded survey of 849 children aged nine and ten years, and 1132 children aged 12 and 13 years in Cumbria and Tyne and Wear in November 1984, 67 per cent of the younger group and 84 per cent of the older group could name at least one cigarette brand. Seventeen per cent of the younger and 23 per cent of the older group named a favourite cigarette advertisement, although one per cent and two per cent respectively named cigar or tobacco advertisements on television, or anti-smoking posters. Those children who named a favourite advertisement showed significantly greater support for supposed positive values of smoking such as looking tough, looking grown-up, calming nerves, giving confidence and controlling weight. This difference in opinion applied equally to smokers and 'never-smokers' in both age groups.

Comparatively few children – 20 per cent of smokers of the younger group and 12 per cent of the older group – smoked the brand they named as their favourite advertisement. Three-quarters of the sample expressed no brand loyalty, but of those who did, taste of the cigarette was the main reason they gave for choosing it, although some made the choice because they considered that cigarette to be less harmful.

It is suggested that children are receiving the positive messages from cigarette advertisements even as young as the impressionable age of nine years when they are most likely to try their first cigarette, although the advertisements are supposedly not intended for them. They may see these messages as generic to smoking and the positive impressions they gain from them could be one of the important influences in their decision to smoke.

IN a recent publication,[1] the Tobacco Advisory Council, in making its case for tobacco advertising, emphasis the point that none of it is planned to appeal to children, in accordance with the rules of the Advertising Standards Authority.[2] But whatever the intention of the manufacturers, are advertisements complying fully with the intention of the rules? Just what *does* appeal to children? Are they perhaps as appreciative as many adults of any aesthetically pleasing design, and as receptive of hidden messages? This study looks at children's knowledge of, and preference for cigarette advertisements and relates them to their smoking habits and opinions of smoking.

Sample and methods

The sample consisted of two cohorts of children, the younger one of 427 boys and 422 girls, aged nine and ten years in the Junior 3 year of a random sample of 36 primary schools, and the older one 620 boys and 512 girls aged 12 and 13 years in Secondary 2 year of a random sample of 12 secondary schools.[3] All the schools were in the north of England, in Cumbria and Tyne and Wear. Response from the classes involved was 100 per cent because every child present on the day of the survey took part.

The survey took place during the last week of November 1984, by means of short self-administered anonymous questionnaires completed by intact classes supervised by the class teacher. This method of administration has been shown to give the highest, and therefore presumably the most accurate, incidence of reported smoking among adolescents.[4]

The questions considered in this paper were widely separated in the questionnaire to minimise the chance that consideration of one would affect the answers to the others.

Before any questions on cigarette brands, the respondents were asked for their opinions on "some of the things that people have said about smoking." This question included positive and negative views. Later, on a different page, questions on brands were asked, including one question on naming brands, one on favourite cigarette advertisements in posters and magazines, and one on which brands they chose if they were smokers and why the chose it.

The question on smoking habits included six categories as follows:

- Those who had never tried a cigarette
- The triers who had had at least one puff of a cigarette at some time
- Ex-smokers
- Occasional smokers who smoked less than one cigarette per week
- Lighter regular smokers, who smoked between one and six cigarettes per week
- Heavier regular smokers smoking more than six cigarettes per week

The usual definition of a regular child smoker is one who smokes at least one cigarette per week. 'Ever smoking' includes all categories except those who have never even tried a cigarette. The one per cent (29) of respondents who failed to indicate their smoking habits were omitted from the analysis.

Results

Smoking habits

Table 1 shows the self-reported smoking habits of the two age-groups. Nearly a third more of the children in the older group had tried smoking than had done so in

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the younger group. There was also evidence of appreciable establishment of regular smoking in the older group. These findings corroborate those of an earlier, large-scale survey in this area in late November 1982, where the peak age for experimenting with smoking was found to be between nine and 11 years of age, with the persistent triers becoming regular smokers by the time they reached the second year of the secondary schools, at the age of 12 or 13 years.

Familiarity with cigarette brands

The respondents were asked the question, 'Can you name two makes (brands) of cigarettes?' As **Table 2** shows, half the younger group and three-quarters of the older group could name two brands, and only a third and a sixth of the two groups respectively did not name any brand.

There was, as might be expected, a significant difference in the ability of never-smokers and ever-smokers to name at least one brand, but it was much less significant in the junior school children ($x^2=9.1$; df=1; p=< 0.001), than it was in the secondary school group ($x^2=95.9$; df=1; np=< 0.0001).

The four brands most frequently named were all frequently advertised ones, most of which also figured prominently in sports sponsorship on television as well as on posters and in magazines. They were John Player Special, Benson and Hedges, Regal King Size, and Embassy for the nine- and ten-year-olds in that order for the boys, but with the position of Benson and Hedges and Regal King Size reversed for the girls. Regal King Size is an Embassy brand, much advertised in the north of England and especially well known to the children in the north east.

The same four brands retained the top positions with the older group, but Benson and Hedges was now the most frequently mentioned by both boys and girls, with John Player Special, Embassy and Regal King Size following for the boys and Regal King Size, Embassy and John Player Special, in that order, following for the girls.

Favourite cigarette advertisements

Far fewer children named a favourite advertisement than named a brand they knew. In spite of the fact that the question was worded 'Which cigarette advertisement on posters or in magazines do you like best?' one per cent of the children named cigar or tobacco advertisements on television and two per cent named anti-smoking posters such as 'Superman' or 'Pacesetters don't smoke' **(Table 3)**. In the junior school group, 23 per cent of the boys and nine per cent of the girls named a favourite cigarette advertisement, and in the secondary school group, 24 per cent of the boys and 13 per cent of the girls named one. The most popular with the boys in both groups was John Player Special, with Benson and Hedges second most popular. For the girls in both groups, John Player Special and Silk Cut tied for top place, followed by Regal King Size. Quite a number of children described which advertisement they meant, for example "the one with the racing cars", "a touch of blue does it", "beyond the King Size", "One step ahead" and so on.

Again, the difference between never-smokers and ever-smokers, who named a favourite advertisement was highly significant for both junior children ($x^2=29.3$; df=1; p=< 0.001) and secondary children ($x^2=42.5$; df=1; p=< 0.0001).

Table 1
Reported smoking habits

	Junior 3 (9/10-yr-olds) Boys %	(n)	Girls %	(n)	Secondary 2 (12/13-yr-olds) Boys %	(n)	Girls %	(n)
Never smoked	78	(333)	85	(358)	51	(319)	50	(258)
Tried once	14	(60)	12	(49)	22	(138)	24	(124)
Not now	3	(13)	2	(8)	14	(89)	14	(72)
< 1 per week	1	(3)	0	(2)	4	(27)	3	(16)
1-6 per week	1	(2)	0	(0)	3	(16)	4	(22)
< 6 per week	1	(5)	0	(0)	4	(25)	3	(13)
No information	3	(11)	1	(5)	1	(6)	1	(7)
Base for %	100	(472)	100	(422)	100	(620)	100	(512)

Table 2
Naming cigarette brands

	Junior 3 (9/10-year-olds) Never Smoked Boys %	Never Smoked Girls %	Tried Smoking Boys %	Tried Smoking Girls %	Current Smokers Boys %	Current Smokers Girls %	Secondary 2 (12/13-year-olds) Never Smoked Boys %	Never Smoked Girls %	Tried Smoking Boys %	Tried Smoking Girls %	Current Smokers Boys %	Current Smokers Girls %
Name 2 Brands	53	47	64	70	70	100	67	59	86	84	99	100
Named 1 Brand	19	12	11	9	20	0	10	13	5	8	1	0
Named No Brands	28	41	25	21	10	0	22	28	9	8	0	0
Base for %	333	358	73	57	10	2	319	258	227	196	68	51

Table 3
Naming favourite cigarette advertisement

Favourite	Junior 3 (9/10-year-olds) Never Smoked Boys %	Never Smoked Girls %	Tried Smoking Boys %	Tried Smoking Girls %	Current Smokers Boys %	Current Smokers Girls %	Secondary 2 (12/13-year-olds) Never Smoked Boys %	Never Smoked Girls %	Tried Smoking Boys %	Tried Smoking Girls %	Current Smokers Boys %	Current Smokers Girls %
Cigarettes	18	7	42	23	30	50	17	8	27	16	50	33
Cigars or Tobacco	1	0	0	0	0	0	0	1	2	1	1	0
Antismoking	1	0	1	2	0	0	2	3	4	3	1	0
No favourite	80	93	56	75	70	50	81	89	66	81	47	67
Base for %	333	358	73	57	10	2	319	258	227	196	68	51

What are they smoking?

In spite of the fact that those children who currently smoked or had at some time in the past tried a cigarette were much more likely than those who had never smoked to have a favourite cigarette advertisement, very few of them actually smoked that brand of cigarettes. Of the younger group who said they smoked a specific brand of cigarettes, only 20 per cent named the advertisement for that brand as their favourite. In the older group only 12 per cent smoked their 'favourite advertisement' brand. Regal King Size was the brand smoked by the most children (11 per cent of the junior 3 boys, and 7 per cent of the junior girls; 9 per cent of secondary boys and 13 per cent of the secondary girls). Some of the children (8 per cent) said they smoked any kind, and the majority (66 per cent) did not specify any brand loyalty.

Why do they choose particular brands?

Most of those children who expressed brand loyalty, said that they chose that particular brand because they liked its taste (21 per cent). Sometimes they specified some particular feature of taste which

appealed to them, for example, menthol flavour, strength or mildness. Value for money was seen as important by some (six per cent), and so was ease of availability from parents of friends (eight per cent). But perhaps the most alarming reason why some of the children smoked particular brands was that they thought they were less harmful than others (four per cent). Most of the 'brand-loyal' smokers, however, gave no reason for their expressed brand loyalty.

Opinions on smoking in relation to having or not having a favourite cigarette advertisement.

The respondents were asked if they agreed or disagreed with a number of statements which were made about smoking. These included 'smoking gives you confidence', 'smoking calms your nerves', 'smoking looks tough', 'smoking makes you feel grown up', and 'smoking keeps your weight down'. As in a previous study,[5] more of the smokers than the non-smokers agreed with these supposed 'positive' features of smoking.

However, within each of the groups, never-smokers and ever-smokers, those with with a favourite cigarette advertisement were significantly more likely than those without to be in agreement with these five statements **(Table 4)**.

Overall for these five 'positive' features, agreement was as follows: In the junior cohort, 12 per cent of the never-smokers without a favourite advertisement, and 21 per cent of those with one were in agreement. In the secondary cohort, 13 per cent of the never-smokers without a favourite advertisement and 20 per cent of those with a favourite were in agreement.

As **Table 4** shows, for almost all of the individual 'attributes', the children with a favourite advertisment were almost twice as likely as the others to envisage that smoking provides positive benefits.

There was reluctance among the secondary cohort to agree that smoking makes people of their age feel grown up, possibly largely because they consider themselves to *be* grown-up already.

A most marked difference between the advertisement-conscious and the others was in the matter of weight control, especially in the primary school girls.

The primary school girls showed a reversal of the trend with regard to smoking looking tough. Girls who had a favourite advertisement generally favoured one of the more sophisticated, entertaining or humorous ones and thus rejected the images of toughness.

There was a link between the favourite advertisement chosen and the respondents' agreement with certain positive features which are sometimes given as reasons for smoking. For example, 48 per cent of the 12 and 13-year-old boys whose favourite advertisement was for John Player Special agreed that smoking calms the nerves, as against 27 per cent of those who named other brands as their favourites, and 22 per cent of those who did not name a favourite. The girls in this age group who were most likely to agree that smoking looks tough and grown-up were those whose favourite advertisement was an anti-smoking one; 71 per cent who thought it looked tough and 43 per cent who thought it looked grown up agreed as against 23 per cent and nine per cent of those who named other advertisements; and 16 per cent and seven per cent of those who did not name a favourite. It seems possible that these children interpret the tough image of non-smokers created in anti-smoking publicity as being a replacement for the toughness of smoking.

Table 4
Opinions on smoking related to having a favourite cigarette advertisement

AGREE	Junior 3 (9-10 yr-olds) Never smoked NFA Boys %	Girls %	FA Boys %	Girls %	Ever smoked NFA Boys %	Girls %	FA Boys %	Girls %	Secondary 2 (12-13 yr-olds) Never smoked NFA Boys %	Girls %	FA Boys %	Girls %	Ever smoked NFA Boys %	Girls %	FA Boys %	Girls %
Calms nerves	14	16	21	32	23	18	34	20	22	19	32	28	43	25	51	42
Looks tough	12	14	24	6	19	25	29	53	15	17	20	34	28	30	35	31
Feels grown up	15	23	29	32	30	32	40	73	16	17	18	17	35	28	36	45
Gives confidence	6	4	9	20	23	9	37	13	5	3	10	3	13	9	35	29
Keeps weight down	4	6	9	32	23	16	31	20	9	8	22	17	16	16	17	24
Base for %	267	333	66	25	47	44	35	15	259	229	60	29	182	192	113	55

FA = Has favourite advertisement
NFA = No favourite advertisement

The younger cohort named a wider range of favourites than the older ones did, the older ones concentrating on the most advertised brands. However, the girls naming Regal King Size as their favourite were the most likely to agree that smoking feels grown up, keeps the weight down and gives confidence, whereas the Benson and Hedges group of boys was most likely (42 per cent) to agree with these statements and 12 per cent of those who named none.

One suprising feature was the claim by one per cent of the junior cohort and three per cent of the secondary school – including some smokers – to have an anti-smoking poster as their favourite *cigarette* advertisement. Even more surprising is the positive image of smoking held by many of the children – smokers and non-smokers alike – who chose Superman or Pacesetters as their favourite. Particularly favoured among these children, especially the older girls, was the idea that smoking looks tough, grown-up, and calms the nerves.

Discussion

There are many influences on children to start smoking,[5] one of which could be advertising of cigarettes. The tobacco industry claims that its advertising is not to promote smoking as such, but to promote brand-switching, and that it is not aimed at children. It appears from these findings that whatever the intentions, the effects are different. This study shows that many children, even as young as nine years, are attracted by certain cigarette advertisements and enjoy looking at them. This interest is not surprising in that many cigarette advertisements are attractive or entertaining pictures to look at, and often contain some element of real interest to children, such as racing cars, horses, surrealist or space-age images, snooker games or glossy silk. Once their attention is caught by a particular poster or magazine page, the subliminal message is also likely to be received by the children as to the possible positive value of smoking.

This was borne out by the fact that, even among the *non-smokers*, those who demonstrated advertisement-awareness by naming a favourite were more supportive of supposed advantages of smoking. These could be the next recruits to smoking, who are already providing themselves with 'evidence' of its value and reinforcement for their possible future decision. Glossy advertisements and attractive posters do give impressions even to very young children[7].

Children are by no means unaware of advertising. For example, Fisher and Magnus[8] showed that ten and 11-year-olds identified the most advertised brand of cigarettes as being those most popular with adults, and it was indicated that their own cigarette brand preference was determined by advertising. Another study of Sydney schoolchildren[9] age 11 to 14 years showed that four of the available 130 brands accounted for the cigarettes smoked by 78.7 per cent of the smokers among them. These smokers were nearly twice as likely to identify edited cigarette advertisements as the non-smokers were. That they also, even when at primary school, can form images of the type of person who would smoke each brand of cigarette simply by looking at the advertisement, has also been recently shown.[7]

In the present study the older cohort, with their longer experience and greater reading ability, were more likely than younger ones to name one of the most widely advertised brands.

Children who concentrated sufficiently on, or were sufficiently attracted by, cigarette adertisements to *choose* a *favourite* one, whether or not they were smokers, showed increased support for the impressions of smoking created in those advertisements.

The fact that there was a similar difference between the advertisement-conscious children both among the smokers and the *never-smokers*, suggests that there is not simply an increased awareness of advertising in children who are already smoking, but that it could also be an important factor to those who are considering taking up smoking. Several studies, including one by Monismith *et al*[10] has indicated that adolescents consider promotional advertisements can be very effective in showing smoking as pleasant or enjoyable and reinforcing the desire to smoke in young people of their age, although perhaps not exerting a direct influence on their adoption of smoking. Another study[11] indicated that disapproval of cigarette advertising was one of the factors which distinguished those children who remained non-smokers from those who take up the habit.

As Chapman[12] has pointed out, there are numerous problems in evaluating the effect of advertising. These include the lack of control populations who are unexposed to advertising; the difficulty of isolating the effects of the advertisements from other factors; the decision as to whether the advertisments generate the smoking levels or *vice versa*; and the problems generated by respondents having to admit themselves to be influenced by advertisements.

However, the current study circumvents at least the last of these problems in that the respondents did not have to make any claim as to whether or not they felt that advertising influenced them. Quite apart from this, the findings are clear enough to indicate that at least some of the opinions on smoking are generated by interest in cigarette advertising and, as such, would suggest that some advertisements *are* attractive to children although not aimed directly at them. They may see advertisements for specific brands and interpret their messages as generic ones for smoking. Further evidence for this is that some of them identify cigar and tobacco advertisements on television as cigarette advertisements.

The Tobacco Advisory Council's claim that "None of us want children to smoke",[1] is clearly at odds with some of the effects of current cigarette advertising.

Acknowledgements

The author's most grateful thanks are due to the Cancer Research Campaign for financing the research: to Mr R. L. Davison, Executive Director, and the staff of the former Manchester Regional Committee for Cancer Education for their practical help; to Mr David Simpson, Director of ASH, for his help and advice; to Mr R. Swindell and Mrs V. Blair of the University Hospital of South Manchester for their help with the computing; and to all the headteachers, staff and pupils in the schools involved.

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THE LANCET

Boys' smoking and cigarette-brand-sponsored motor racing

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Reprinted from THE LANCET **Saturday 15 November 1997**
Vol. 350 No. 9089 Page 1474

Boys' smoking and cigarette-brand-sponsored motor racing

SIR—We are surprised and disappointed at the UK government's U-turn on banning tobacco sponsorship of Formula-one motor racing. Addressing the issue of tobacco advertising is to be applauded as a positive step to reduce smoking among children and young people. The Smee Report[1] made it clear that cigarette advertising is associated with tobacco consumption. Such advertising on posters and in magazines and other media has been widely acknowledged, even by the tobacco industry,[2] as one of the factors that affect children's uptake of smoking, but the effect of indirect advertising such as sports sponsorship should not be ignored.

We investigated whether there is evidence that motor racing is associated with increased risk of smoking in children, whether regular smoking increases in association with watching motor racing, and whether watching motor racing has a significant effect when other known influences are taken into account.

A cohort study funded by the Cancer Research Campaign was conducted in 22 secondary schools in urban, suburban, and rural areas in the north and south of England. Self-completed questionnaires were administered to whole classes under the supervision of teachers, a method which elicits the highest self-reporting of smoking in adolescents.[3] Two questions were asked: "which sports do you most like to watch on television? Please write the names here or write 'none' or 'don't know'". The second was the smoking categories devised by Bewley[4] and widely used: never smoked, tried smoking once, used to smoke, smoke sometimes but not as much as one a week (occasional smokers), or smoked 1–6 or more cigarettes weekly (regular smokers). We report here boys only: 1461 aged 12–13 years in 1994 and 1268 aged 13–14 years in 1995. The 1063 boys who responded to both questionnaires were included in this analysis.

In 1994 and 1995, 128 (12·0%) and 143 (13·5%) boys, respectively, named motor racing as their favourite television sport. These boys were significantly more likely than the others to name Marlboro (odds ratio 1·91 [95% CI 1·25–2·92]) and Camel (1·92 [1·01–3·63]) in 1994. These two brands are commonly seen in the context of motor racing on television. Of the boys who were not regular smokers and named motor racing as a favourite television sport in 1994, 12·8% versus 7·0% who did not like racing became regular smokers (1·96 [1·09–3·51]). The greatest risk in the progression to regular smoking was for occasional smokers, but exsmokers and triers also became regular smokers (table). Motor racing remained a significant independent variable in logistic regression after parental and personal smoking, but ahead of best friend's smoking (table).

There are about 626 400 boys aged 12–13 years in the UK,[5] so on the basis of our findings 72 764 (12·0%) non-smokers might be expected to watch motor racing from choice. Of these boys, 9314 (12·8%) would take up smoking compared with only 7·0% of other boys aged 12–13 years. Any ban on tobacco advertising must include all sponsored sport.

Predictors	Unadjusted OR (95% CI)	Adjusted OR (95% CI)
Parental (father; mother) smoking habit		
Smoker; smoker (n=88)	3·78 (2·01–7·12)	2·72 (1·36–5·45)
Smoker; non-smoker (n=137)	2·25 (1·22–4·17)	2·16 (1·11–4·21)
Non-smoker; smoker (n=65)	1·12 (0·39–3·23)	0·91 (0·29–2·82)
Don't know/have, etc (n=54)	1·74 (0·65–4·61)	1·40 (0·49–3·99)
Non-smoker; non-smoker (n=685)	Reference	Reference
Best friend's smoking habit		
Smoker (n=68)	3·49 (1·83–6·66)	1·40 (0·65–3·00)
Didn't know (n=137)	0·83 (0·39–1·79)	0·51 (0·22–1·18)
Non-smoker (n=824)	Reference	Reference
Own smoking habit		
Occasional (n=30)	25·53 (10·64–61·23)	21·91 (8·33–57·65)
Exsmoker (n=80)	12·76 (6·35–25·67)	12·32 (5·95–25·49)
Tried smoking (n=251)	5·20 (2·81–9·61)	4·91 (2·61–9·23)
Never smoked (n=668)	Reference	Reference
Motor racing		
Named (n=125)	1·96 (1·09–3·51)	2·25 (1·17–4·33)
Not named (n=904)	Reference	Reference

Odds ratios (OR) for regular smoking in 1995 based on predictors from 1994

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Printed in UK
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ORIGINAL ARTICLES

Does advertising promote smokeless tobacco use among adolescent boys? Evidence from California

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Abstract

Objectives **– To assess trends in smokeless tobacco use and to identify risk factors that distinguish youths who use or who are at risk of using smokeless tobacco.**

Design **– Population based telephone surveys conducted in 1990, 1992, and 1993.**

Subjects **– Adolescent boys in California aged 12 to 17 years and men between the ages of 18 and 24. Sample sizes were 3912 in 1990, 883 in 1992, and 2814 in 1993.**

Main outcome measures **– Current use and susceptibility to use smokeless tobacco.**

Methods **– The predictor variables that were examined included exposure to other users of smokeless tobacco, exposure to advertisements, rebelliousness, peer norms, school performance, depression, cigarette smoking, involvement in competitive or organised sports, attending religious services, and peer use of alcohol and drugs. Age and race adjusted logistic regression analyses was used to identify important predictors of outcome measures of the 1993 data.**

Results **– Whereas 15% of adolescent males had experimented with smokeless tobacco, current use appeared stable at around 6% for males aged 16 to 24 years. Smokeless tobacco use in teenage boys was associated with having best friends who were users (odds ratio = 13.2, $p < 0.001$). This effect was compounded when family members were also users (odds ratio = 34.4, $p < 0.001$). Recall of smokeless tobacco advertisements was also strongly associated with use (odds ratio = 7.5, $p < 0.001$) and susceptibility to use smokeless tobacco (odds ratio = 1.6, $p < 0.001$). Cigarette smokers were at greater risk of being users (odds ratio = 3.3, $p < 0.001$).**

Conclusions **– Despite the large scale California Tobacco Control Program, adolescent use and susceptibility to use smokeless tobacco remained unchanged from 1990 to 1993. Exposure to other smokeless tobacco users was the largest predictor of both current use and susceptibility to use smokeless tobacco. However, peer approval and exposure to tobacco advertising were also both significant predictors for use and susceptibility. Extending the ban of tobacco marketing practices to all mass media may be necessary if smokeless tobacco use is to be reduced.**

(*Tobacco Control* 1995; 4 (Suppl 1): S57–S63)
Keywords: advertising; smokeless tobacco; adolescent boys

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Introduction

The use of smokeless tobacco has been shown to pose health risks such as oral cancer, periodontal disease, leukoplakia, and altered cardiovascular function.[1] In 1986, a report of the Advisory Committee to the Surgeon General concluded that smokeless tobacco use represents a significant health risk, is not a safe substitute for cigarette smoking, can cause oral cancers, and can lead to nicotine addiction and dependence.[2] In addition, the American Cancer Society estimated 31 000 cases of oral cancer in the US in 1989 and identified smokeless tobacco as a major risk factor.[3] Given these health consequences, information identifying adolescents at high risk of using smokeless tobacco is critical for formulating intervention and prevention programmes.

In 1988, $68.2 million was spent on smokeless tobacco advertising and promotion in the USA and revenues were approximately $900 million.[4] Advertising and promotion expenditures, revenues, and smokeless tobacco sales increased each year from 1988 to 1991. By 1991 advertising and promotion expenditures had increased to $104 million and revenues had increased to $1.2 billion.[4] We hypothesize that part of the increase in smokeless tobacco use during the 1970s to the mid-1980s might be attributed to smokeless tobacco advertising and marketing. Additional factors that might have contributed to the increase include the growing market of young males, the teaming of smokeless tobacco with sports and entertainment personalities, and the increased accessibility of smokeless tobacco products.[5–8]

The tobacco industry has long claimed that their advertising targets adults only.[9] They also argue that they use tobacco advertising only to maintain market share and to influence brand selection among adult tobacco users. Evidence showing the targeting of cigarette advertisements towards children and adolescents and its effect on smoking continues to mount.[10–15] If advertising encourages smoking uptake, we would expect it similarly to influence the uptake of smokeless tobacco.

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Among the more frequently invoked theories in health promotion and behaviour change are the Theory of Reasoned Action,[16] the Health Belief Model,[17] Operant Theory,[18] and Social Learning Theory.[19] Social learning theory dominates the field of smoking initiation research and is at the basis of most current interventions. The theory posits that the individual's susceptibility to perform a particular behaviour is based on expectations of the costs and benefits of performance. However, cognitions related to this expectation are subject to a variety of personal and environmental influences including exposure to other users, peer norms, and the impact of tobacco advertising in promoting smokeless tobacco use.[20] Smokeless tobacco advertising can influence an adolescent's expectations of the advantages of using smokeless tobacco. Like other products, smokeless tobacco is advertised as possessing certain utilities that may come to affect the individual's assessment of the costs and benefits of its use.

Many of these personal and social influences have been found to be predictive of both cigarette and smokeless tobacco use.[21] Previous studies have found significant associations between peer or family use and adolescent adoption of smokeless tobacco.[22-26] Personal influences including emotional stability, rebelliousness, and achievement at school also influence the expectations of the costs and benefits of using smokeless tobacco. Adolescence is a time of frequent conflict with parents and other authority figures. The tendency towards rebellious behaviour often compensates adolescents by reinforcing their position within peer groups. Smokeless tobacco use may be viewed by some teenagers as moderately deviant behaviour through which to improve their status in the peer group.[20] In some studies, participation in recreational or team sports has also been found to be related to smokeless tobacco use.[27] Adolescent boys strive to project machismo and emulate heroes, including athletes. Consequently, the use of smokeless tobacco by athletes and their participation in advertising is believed to promote use of smokeless tobacco by youths.[28]

In this study, we use the California Tobacco Surveys to identify the size of the smokeless tobacco problem in California. Further, we investigate major predictors of use and susceptibility to use smokeless tobacco.

Methods

SAMPLING AND DESIGN OF THE CALIFORNIA TOBACCO SURVEYS

The California Tobacco Surveys, undertaken to evaluate the California Tobacco Control Program, were conducted by Westat Inc in 1990, 1992, and 1993. These surveys used a random digit dialled methodology developed by Waksberg[29] to contact an adult to obtain the household composition and the smoking status of each adult member. A stratified random sample of adults and all 12 to 17 year old adolescents were scheduled for an in-depth telephone interview. In this article, we report data from the adolescent surveys in 1990 (n = 7767, response rate = 76.3%), 1992 (n = 1789, response rate = 77.8%), and 1993 (n = 5531, response rate = 80.3%). In addition, we report smokeless tobacco usage rates for 18 to 24 year old men surveyed in 1990 (total sample (n) = 24296, response rate = 75.3%) and 1992 (n = 8224, response rate = 71.3%). The 1993 adult survey did not include questions on smokeless tobacco. Detailed methods for these surveys are published elsewhere.[30,31] Because fewer than 0.3% of girls surveyed used smokeless tobacco and use among women was just as rare, this analysis is restricted to adolescent boys and men. The majority of the analysis is based on 2814 adolescent boys from the 1993 Youth Attitudes and Practices Survey.

DESCRIPTION OF VARIABLES AND QUESTIONS

Current use and susceptibility to use smokeless tobacco

Respondents who reported use of smokeless tobacco in the past month were classified as current users, "On how many of the last 30 days did you use chewing tobacco or snuff?" This measure of current usage may introduce a recall bias, particularly among young adolescents because it requires the adolescent to recall behaviour over a 30 day period. Another concern is that this measure may misclassify adolescents in the uptake phase, which is characterised by infrequent usage. The process of starting to use an addictive substance is usually prefaced by a period during which the person is predisposed to use.[31,32] We have argued that such a predisposition or susceptibility can be identified by the absence of a determined decision not to be a user in the future.[20] Adolescents were classified as susceptible to use smokeless tobacco as follows:

(1) All recent users (last 30 days)
(2) Responses of "definitely yes," "probably yes," or "probably not" to either of the following two questions: (a) Do you think you will ever use chewing tobacco or snuff? (b) Do you think you will use chewing tobacco or snuff in the next year?

Current use of cigarettes

Adolescents were asked, "Think about the last 30 days. On how many of these days did you smoke?" Respondents who smoked a cigarette in any of the past 30 days were classified as a current cigarette smoker.

Exposure to other users of smokeless tobacco

Adolescents were classified as being exposed to family members who use smokeless tobacco from their responses to the following questions: "Do any of your parents, stepparents or guardians now use chewing tobacco or snuff?" and "Do you have any older brothers or sisters who use chewing tobacco or snuff?" Exposure to best friends who use smokeless tobacco was assessed through these two questions: "Of your best friends who are male, how many of them use chewing tobacco

or snuff?" and "Of your best friends who are female, how many of them use chewing tobacco or snuff?" This exposure variable was categorised into four levels: none, family only, best friends only, or both family and best friends.

Exposure to smokeless tobacco advertisements
Based on an analogous study on cigarette use,[14] exposure to advertising was assessed by asking the adolescents, "What brand of chewing tobacco or snuff is the most advertised?" Youths were classified as being exposed to advertising if they were able to identify a specific brand of smokeless tobacco from the advertisement.

Rebelliousness
The rebelliousness items included liking for doing risky or dangerous things, being in physical fights, arguing with the family, seeking revenge, telling lies or getting in trouble to help friends, and getting nagged by family members. The reliability index of this scale was 0.66 (Cronbach's alpha).

Participation in team sports
Participation in team sports was determined from the question: "In the past year have you participated in any kind of competitive and organised physical activity, such as team sports?"

Depression
A six item scale previously validated by Kandel was used to assess depression.[33] Each question was introduced with the phrase, "During the past 12 months, how often have you...": "Felt too tired to do things?," "Had trouble going to sleep or staying asleep?," "Felt unhappy, sad, or depressed?," "Felt hopeless about the future?," "Felt nervous or tense?," "and "Worried too much about things?" For each item the adolescent indicated whether the symptom occurred "Often," "Sometimes," "Rarely," or "Never." The internal consistency of the scale for this sample was 0.70, as measured by the α statistic. Following Kandel, the 18% of respondents who scored 1 standard deviation above the population mean were classified as depressed.[33]

Peer use of drugs or alcohol
Exposure to peer usage of drugs or alcohol was assessed by the questions, "How many people do you know, who are about your age smoke marijuana?" and "How many people do you know, who are about your age use drugs such as cocaine or crack?" Response categories included "None," "A few," "Some," and "Most." Any response other than "None" categorised the individual as exposed to peers who used that class of drugs.

Peer norms
The social network (peer) norm was assessed from an approve/disapprove response to the question, "How do you think your best friends would feel about you using chewing tobacco or snuff regularly?"

STATISTICAL ANALYSIS
All analyses were weighted to reflect the California population and to account for the design of the California Tobacco Surveys. We used a jackknife procedure to derive 95% confidence intervals in which 51 subsamples of the full file were taken and population estimates computed using the same procedures as for the full file.[34] Variance estimates were calculated from the deviations observed between these estimates and those obtained from the full file.

For the overall multivariate analyses, separate logistic regression models were used for each outcome measure, current use, and susceptibility to use smokeless tobacco. Following standard procedure, any independent variable where the univariate test had a p value < 0.25 was included in the multivariate logistic regression model.[35]

Results

SUSCEPTIBILITY AND CURRENT USE OF SMOKELESS TOBACCO
Similar proportions of adolescents reported having ever experimented with smokeless tobacco across the three years of the study (1990 = 15.2% (confidence interval (CI) 1.5)%) 1992 = 12.3 (CI 2.5)%; 1993 = 13.8 (CI 1.5)%.

Using smokeless tobacco was age dependent. The percentage of current users increased with age, with the 16 to 17 year olds having the highest rates, 6.6% (table 1). The percentage of 12 to 13 year olds who used smokeless tobacco, less than 1%, was minimal compared to the older age groups. The uptake of smokeless tobacco may be complete by age 17, as the proportion of users among the 16 to 17 year age group is equivalent to the proportion among the 18 to 24 year age group (fig 1).

Smokeless tobacco use also differed by race and ethnicity. Table 1 shows that white adolescent boys were the primary users of smokeless tobacco and that African-American boys had the lowest rates of current use, 4.5% and 0.2% respectively. Hispanic boys had the second highest use rates, followed by the Asian/Other group.

The demographic pattern of susceptibility to smoking broadly followed the pattern of current use, although at a much higher level. The single exception to this was age. Although the youngest adolescents (12 to 13 years) had the lowest usage rates, they appeared just as likely to be susceptible to starting to use smokeless tobacco – approximately 17% (table 1).

Table 1 Exposure to smokeless tobacco advertisement, current use, and susceptibility to use smokeless tobacco for adolescent boys in California, 1993

Demographic variables ($n = 2814$)	*Current use of smokeless tobacco (%)*	*Susceptibility to use smokeless tobacco (%)*	*Exposure to smokeless tobacco advertising (%)*
Age group (years)			
12–13	0.3 (0.1–0.5)	16.8 (13.7–19.9)	21.0 (17.4–24.6)
14–15	2.6 (1.0–4.2)	17.3 (14.8–19.8)	34.3 (30.3–38.3)
16–17	6.6 (4.1–9.1)	18.8 (14.6–23.0)	43.8 (38.8–48.8)
Race/ethnicity			
White	4.5 (3.1–5.9)	20.7 (17.9–23.5)	43.4 (39.8–47.0)
African-American	0.2 (0.0–0.6)	8.4 (2.3–14.5)	13.5 (7.9–19.1)
Hispanic	2.4 (0.4–4.4)	17.6 (13.3–21.9)	26.2 (21.7–30.7)
Asian/other	1.0 (0.3–1.7)	11.6 (6.7–16.5)	21.0 (14.4–27.6)
School performance			
Much better than average	1.1 (0.5–1.7)	16.5 (11.6–21.4)	26.5 (22.9–30.1)
Better than average	3.9 (1.8–6.0)	18.3 (14.4–22.2)	36.1 (31.1–41.1)
Average and below	3.2 (1.8–4.6)	17.5 (15.0–20.0)	32.1 (29.0–35.2)
Overall	3.1 (2.1–4.1)	17.6 (15.6–19.6)	32.6 (30.2–35.0)

(Percentages with 95% confidence intervals)

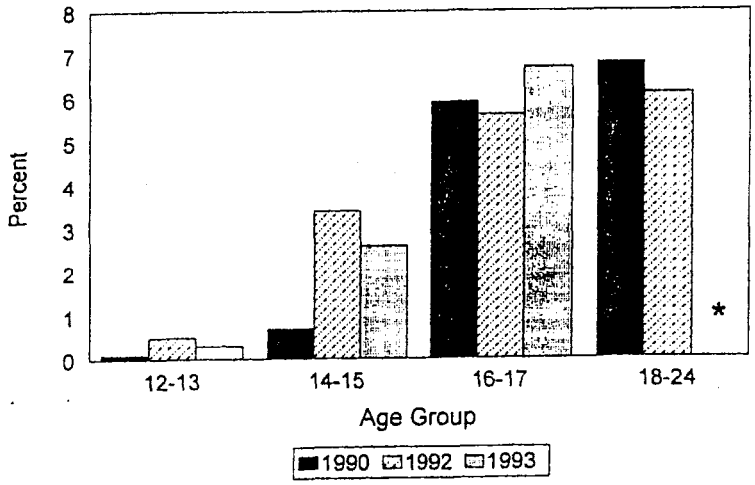

Figure 1 Smokeless tobacco use in males in the last 30 days by age.
**Data not available for 18 to 24 year olds for 1993.*
(*Source*: California Tobacco Surveys, *1990, 1992, 1993*)

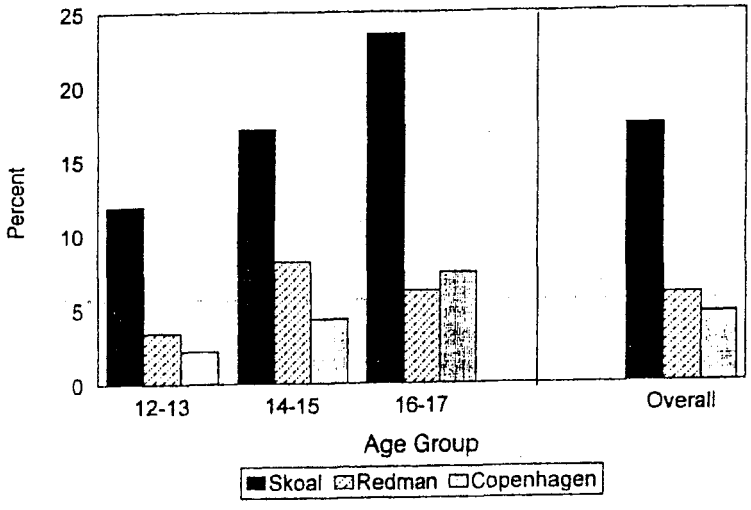

Figure 2 Most advertised smokeless tobacco brands nominated by adolescent boys.
(*Source*: California Tobacco Survey, *1993*)

EXPOSURE TO SMOKELESS TOBACCO ADVERTISING AND SMOKELESS TOBACCO USE CONTINUUM

Table 1 also presents the demographic data for exposure to smokeless tobacco advertising. Overall, approximately 33% of the adolescent boys were able to identify a specific brand in an advertisement for a smokeless tobacco product. The reported exposure was twice as high in the oldest compared to the youngest adolescents (44% *v* 21%). Race/ethnicity and educational differences in recall of a specific advertisement followed the same pattern as susceptibility to use, although the rates were slightly higher for advertising exposure.

Skoal was the most popular brand of smokeless tobacco advertising named by adolescents, and recall increased with age: from 12% for 12 to 13 year olds to almost one quarter of 16 to 17 year olds (fig 2). Redman was the next most identified brand of advertising and nomination peaked in 14 to 15 year olds (average 5.9%), followed by Copenhagen. Over half of current users nominated Skoal as the most advertised brand, followed by Copenhagen (15%) and Redman (3.3%).

Figure 3 shows the proportion of adolescent boys exposed to smokeless tobacco advertising by categories of use. Among current users of smokeless tobacco, over 90% were able to nominate a smokeless tobacco advertisement. Adolescents who had experimented with smokeless tobacco had higher levels of exposure compared to those who had never experimented. Within each category of experimentation, boys who were susceptible to use had higher levels of exposure to smokeless tobacco advertising compared to boys who were not susceptible, approximately 13%.

RELATIVE IMPORTANCE OF EXPOSURE TO USERS AND ADVERTISING

Figure 4 presents the impact of advertising and exposure to users on susceptibility to use smokeless tobacco. Exposure to advertising increased the probability of an adolescent being susceptible at each level of exposure to users. This effect appeared stronger at the higher levels of exposure such as when peers

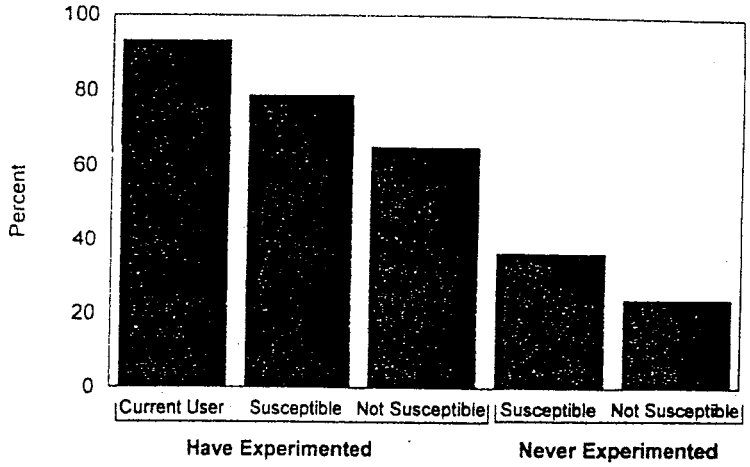

Figure 3 The effect of smokeless tobacco use on recall of smokeless tobacco advertising.
(*Source*: California Tobacco Survey, *1993*)

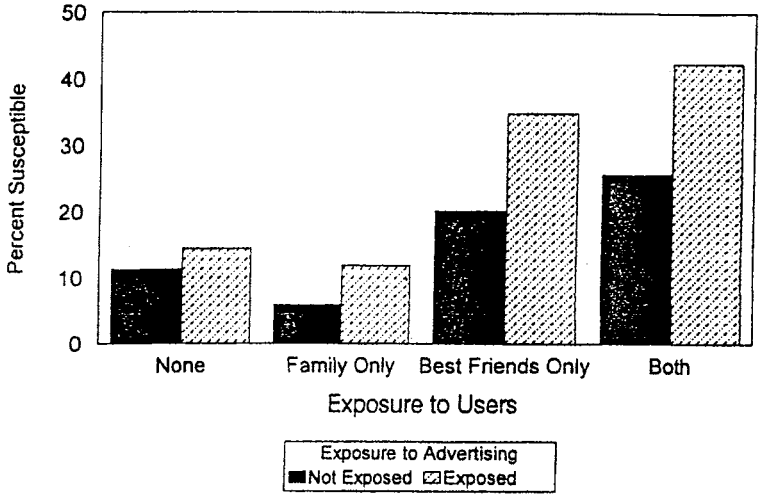

Figure 4 Impact of exposure to other users of smokeless tobacco and smokeless tobacco advertising on susceptibility.
(*Source*: California Tobacco Survey, *1993*)

Table 2 Predictors of smokeless tobacco use and susceptibility among adolescent boys in California, 1993

Predictors	*Current use of smokeless tobacco Adj OR (95% CI) (n = 2814)*	*Susceptibility to use smokeless tobacco Adj OR (95% CI) (n = 2814)*
Exposure to other users of smokeless tobacco		
None	1.0	1.0
Family only	3.2 (0.3–58.2)	0.5 (0.2–1.1)
Best friends only	13.2 (3.4–50.8)	2.2 (1.7–2.8)
Both family and best friends	34.4 (7.8–150.7)	3.1 (1.8–5.2)
Exposure to smokeless tobacco advertisements		
Not exposed	1.0	1.0
Exposed	7.5 (3.1–18.1)	1.6 (1.2–2.0)
Peer norms about using smokeless tobacco		
Best friends disapprove	1.0	1.0
Best friends approve	5.2 (3.0–9.0)	1.9 (1.5–2.4)
Cigarette smoking		
No	1.0	1.0
Yes	3.3 (1.9–5.7)	1.3 (1.0–1.8)
Participation in team sports		
No	1.0	1.0
Yes	1.2 (0.6–2.2)	1.7 (1.3–2.2)

Adjusted odds ratios (Adj OR) and 95% confidence intervals.
(Adjusted for age, race, and the variables in the table)

were already users (73% increase in probability) and when both family and peers were users (65% increase in probability).

Table 2 presents the results from the multivariate analyses for current use and susceptibility to use smokeless tobacco. Exposure to smokeless tobacco users was strongly related to both current usage and to susceptibility to use. The existence of a smokeless tobacco user in the family but not in the peer network did not predict either current use or susceptibility to use smokeless tobacco. Having a best friend who was a user increased the chances of an adolescent being a user 13-fold and doubled the likelihood of an adolescent being susceptible to using smokeless tobacco. Exposure to family and best friend users further increased these odds ratios (OR): OR = 34.4 for current use and 3.1 for susceptibility (table 2).

The next most important predictor of current use was exposure to smokeless tobacco advertising, which had a sevenfold effect on current use and increased the proportion who were susceptible by 60%. Other predictors included peer norms and cigarette smoking. Adolescents who had best friends who approved their use of smokeless tobacco were more than five times as likely to be a current user as adolescents with best friends who disapproved using smokeless tobacco. This effect was similar for susceptibility, although the magnitude of the effect was smaller, OR = 1.9. Cigarette smoking was also significant in predicting current use of smokeless tobacco. Boys who smoked cigarettes were over three times as likely to be a current user of smokeless tobacco as youths who did not smoke. Finally, boys who participated in team sports were 70% more likely to be susceptible to the use of smokeless tobacco then non-participants, although this effect was not significant for current use of smokeless tobacco.

Discussion

Our results indicate that experimentation and current use of smokeless tobacco among adolescent males in California have not changed significantly between 1990 and 1993, despite the large scale Tobacco Control Program. Smokeless tobacco use was highest among white boys, followed by Hispanic boys. Much lower levels were observed in Asians and smokeless tobacco use was almost non-existent in African-Americans.

Usage rates were highest among adolescents who described themselves as better than average students although not in the top student group. This pattern differs from cigarette consumption patterns which have shown a marked educational gradient for a number of years.[36]

This study once again emphasises the importance of exposure to peer users as a predictor of susceptibility to use and actual use. Peer users may provide a convenient access to the product for experimentation purposes. Further, these best friends may proselytise the benefits associated with usage

in an attempt to normalise a potentially deviant behaviour. As in a number of studies, we find evidence linking advertising and promotion of the product with illicit use by minors.[14,37–39] However, because of the cross-sectional nature of the data, any conclusions related to the directionality of the relationship between the risk factors and use of smokeless tobacco should be viewed with caution. The effect of advertising on the likelihood of an adolescent being susceptible to start using smokeless tobacco appears independent of the effect of peer or family usage increasing the probability in the higher usage categories. As with studies of cigarette use, the more a brand is perceived by adolescents as most advertised, the greater the market share of that brand. Although this association is commonly found, in itself it does not provide evidence suggesting a causal link. Time-trend data showing a close temporal match between the start of a targeted advertising campaign and smoking uptake in minors of that population subgroup strengthen the case that advertising and promotion encourages uptake.[40] Further evidence can be seen in the relationship between advertising and susceptibility among never-users. Among never-users, 22 (CI 3.9)% of the adolescents who were exposed to smokeless tobacco advertising were susceptible whereas only 13 (CI 2.1)% of those who were not exposed to smokeless tobacco advertising were susceptible to use smokeless tobacco.

Since adolescence has been characterised as a period in which youths begin to favour the norms of their peers over the norms of their parents,[41,42] it is not surprising that we found peer norms be an important predictor of current use of smokeless tobacco. These unspoken norms may be conceptualised as one of the benefits or costs of using smokeless tobacco by the adolescent boy.[20]

In previous studies, involvement with baseball as a team sport has been associated with higher usage rates for smokeless tobacco. Because the survey question did not differentiate the type of team sport that adolescents practised, any baseball specific effect might have been diluted. This may explain why this study identified an effect of participation in team sports on susceptibility to use smokeless tobacco but not on current use. That this study identified any effect emphasises the promoting power of athletes either as conspicuous users or as advertising agents for this tobacco product.

The anti-tobacco interventions of the Tobacco Control Program include school programmes and media campaigns aimed at adolescents, in addition to other programmes involving local lead agencies, medical care programmes, and the competitive grants programme. Since the anti-tobacco interventions were not specifically targeted for adolescent boys and their use of smokeless tobacco, the campaign may not have had a major impact on preventing smokeless tobacco use. Furthermore, the tobacco industry's own advertising campaign directed toward youth, in addition to the other social influences, may have counterbalanced the effect of the California Tobacco Control Program on these adolescent boys.

Adolescents do not have an understanding of how the long term consequences of smokeless tobacco will affect them. Primary prevention programmes should target elementary school age children before they develop a regular pattern of use. These prevention efforts should stress the negative effects associated with smokeless tobacco use and emphasise the maintenance of present health and physical competence.[43] Interventions for older children might best be implemented with peers in school, and with athletic and youth groups.

Advertising and promotion of smokeless tobacco products must be considered in any prevention programme, especially because the tobacco industry attributes much of the increase in smokeless tobacco consumption to marketing and advertising strategies.[44] Tobacco companies that advertise smokeless tobacco products use specific themes, such as portraying smokeless tobacco as an acceptable alternative to cigarette smoking and that it is easy to use.[45] Other messages that are stressed include that it is convenient in places where you can't light up, and that a pinch is all it takes. Some advertisements provide explicit instructions (written or through the use of athletes) on how to use smokeless tobacco and also suggest that it could be used without parents' awareness.[5,8] Tobacco related prevention programmes geared toward adolescents should address these youth oriented advertisement themes to prevent adolescents from trying smokeless tobacco.

Supported by Contract 93-6810 from the University of California, San Francisco, Institute for Health and Aging.

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Coalition québécoise pour le contrôle du tabac

819 rue Roy Est, Montréal (Québec) H2L 1E4; téléphone : (514) 598-5533; télécopieur : (514) 598-5283

POSITION

OBJECTIVES
⇨PROTECT PEOPLE FROM TOBACCO SMOKE
⇨PREVENT TOBACCO USE BY YOUTHS
⇨CONTROL TOBACCO PRODUCTION AND MARKETING
⇨SUPPORT SMOKERS WHO WANT TO QUIT
⇨INSTITUTE MEASURES SUPPORTING THE LEGISLATION

MESURES

1) require all work environments to protect their personnel, clients, suppliers and visitors from second-hand smoke
2) prohibit smoking in public areas (schools, day-care centers, hospitals, youth centers, ministries, state owned firms, municipal buildings, services, stores and restaurants) and in work environments while allowing independently ventilated smoking areas
3) prohibit the sale of all tobacco products to any person under the age of 18 (using ID checks)
4) better control retailer sales
5) prohibit sales in educational facilities through vending machines, in quantities of fewer than 20 cigarettes, by self-serve displays, in pharmacies
6) prohibit all types of tobacco promotions, including sponsorship
7) recognize, in the appropriate legal framework, the hazardous and addictive nature of tobacco and nicotine
8) control tobacco manufacturing by regulating certain components (ex : nicotine)
9) include therapeutic aids which help smokers quit in the list of medications covered by the Quebec prescription-drug insurance plan ; allow smokers to deduct, for income tax purposes, expenses related to quitting programs
10) establish progressive implementation adapted to specific areas
11) introduce a system of inspection and enforcement to ensure adequate compliance (government body, inspections, appropriate sanctions, permit system to cover the cost of the system)
12) allot an appropriate share of tobacco-related government revenue to compensate cultural and sporting events affected by a ban on tobacco sponsorship, to finance education campaigns, prevention programs and tobacco related research, and to cover a part of the health care costs attributable to tobacco

ORGANIZATIONS WHO HAVE ENDORSED THE POSITION OF THE COALITION

(712 on October 29th, 1998)

Medical Associations and Institutions

1. Association canadienne de santé mentale - section Saguenay
2. Association d'oto-rhino laryngologie et chirurgie cervico faciale du Québec
3. Association des allergologues et immunologues du Québec
4. Association des cardiologues du Québec
5. Association des chirurgiens cardio-vasculaires et thoraciques du Québec
6. Association des chirurgiens dentistes du Québec
7. Association des chirurgiens généraux du Québec
8. Association des dentistes en santé communautaire du Québec
9. Association des intervenants en formation personnelle et sociale
10. Association des internistes rhumatologues et gériatres du Québec
11. Association des médecins de langue française du Canada
12. Association des médecins microbiologistes infectiologues du Québec
13. Association des médecins omnipraticiens de l'Ouest du Québec
14. Association des médecins omnipraticiens de Québec
15. Association des médecins ophtalmologistes du Québec
16. Association des médecins spécialistes en santé communautaire du Québec
17. Association des obstétriciens et gynécologues du Québec
18. Association des pathologistes du Québec
19. Association des pédiatres du Québec
20. Association des pneumologues de la province de Québec
21. Association des spécialistes en chirurgie buccale et maxillo-faciale du Québec
22. Association du cancer de l'Est du Québec
23. Association médicale du Québec
24. Association pour la santé publique du Québec
25. Collège des médecins de famille du Canada - section Québec
26. Collège des médecins du Québec
27. Conseil des médecins, dentistes et pharmaciens du Centre hospitalier Jonquière
28. Coopérative des techniciens ambulanciers de l'Outaouais
29. Institut de cardiologie de Montréal
30. Institut de recherche clinique en nutrition
31. Institut Nazareth et Louis-Braille
32. Institut thoracique de Montréal
33. Médecins associés de Sainte-Croix enr. (Les)
34. Ordre professionnel des inhalothérapeutes du Québec
35. Ordre régional des infirmières et infirmiers - Chaudière-Appalaches
36. Ordre régional des infirmières et infirmiers de Québec
37. Ordre régional des infirmières et infirmiers de la Montérégie
38. Organisation de la promotion de la santé
39. Société dentaire de Québec
40. Société de pneumologie de Québec - Hôpital du Saint-Sacrement
41. Table de concertation des hygiénistes dentaires en santé dentaire publique

Public Health Network

1. Centre de santé publique de Québec
2. Conférence des Régies régionales de la santé et des services sociaux du Québec
3. Conseil des directeurs de santé publique
4. Direction de la santé publique Abitibi-Témiscamingue
5. Direction de la santé publique de la Côte-Nord
6. Direction de la santé publique Chaudière-Appalaches
7. Direction de la santé publique du Bas-Saint-Laurent
8. Direction de la santé publique du conseil Crie-de-la-Baie-James
9. Direction de la santé publique de l'Estrie
10. Direction de la santé publique Gaspésie-Îles-de-la Madeleine
11. Direction de la santé publique de Lanaudière
12. Direction de la santé publique des Laurentides
13. Direction de la santé publique de Laval
14. Direction de la santé publique Mauricie-Bois-Francs
15. Direction de la santé publique de la Montérégie
16. Direction de la santé publique de Montréal-Centre
17. Direction de la santé publique du Nord-du-Québec
18. Direction de la santé publique du Nunavik
19. Direction de la santé publique de l'Outaouais

20. Direction de la santé publique de Québec
21. Direction de la santé publique du Saguenay-Lac-St- Jean
22. Régie régionale de la santé et des services sociaux Abitibi-Témiscamingue
23. Régie régionale de la santé et des services sociaux de la Côte-Nord
24. Régie régionale de la santé et des services sociaux de Laval
25. Réseau de la santé et des services sociaux des Aurores Boréales

Hospitals, Clinics and Medical Centres

1. Centre communautaire Pro-Santé (Baie-Saint-Paul)
2. Centre d'accueil Renaissance
3. Centre d'accueil Saint-Louis inc.
4. Centre de dermatologie du Québec-Métro
5. Centre de pneumologie de l'Hôpital Laval
6. Centre de réadaptation en déficience intellectuelle
7. Centre de réadaptation en toxicomanie 02
8. Centre de réadaptation L'Estran
9. Centre de santé Arthur-Caux
10. Centre de santé de la Basse-Côte-Nord - Conseil d'administration
11. Centre de santé de la Vallée-de-l'Or (Val-d'Or)
12. Centre de santé de Témiscaming
13. Centre de santé Sainte-Famille (Ville-Marie)
14. Centre d'hébergement Champlain Chateauguay
15. Centre d'intervention La Délivrance (Longueuil)
16. Centre hospitalier Anna-Laberge
17. Centre hospitalier Chauveau (Loretteville)
18. Centre hospitalier de Gatineau
19. Centre hospitalier de l'Archipel (Îles-de-la-Madeleine)
20. Centre hospitalier de l'Assomption
21. Centre hospitalier de l'Université de Montréal
22. Centre hospitalier de l'Université de Montréal - Service de pneumologie
23. Centre hospitalier de la région de l'Amiante
24. Centre hospitalier de Lachine
25. Centre hospitalier de Trois-Pistoles
26. Centre hospitalier de Val d'Or
27. Centre hospitalier du comté de Huntingdon
28. Centre hospitalier Gatineau Mémorial
29. Centre hospitalier St-Joseph de La Malbaie
30. Centre hospitalier Lac-Mégantic
31. Centre hospitalier Mgr. Ross de Gaspé
32. Centre hospitalier régional de Baie-Comeau
33. Centre hospitalier régional de l'Outaouais
34. Centre hospitalier régional de Lanaudière
35. Centre hospitalier régional de Sept-Îles
36. Centre hospitalier régional de Trois-Rivières
37. Centre médical de Cap-Rouge
38. Centre médical Fafard (Baie-Saint-Paul)
39. Centre médical Sainte-Foy
40. Centre Rouville
41. Centre Victor-Cloutier (Saint-George de Beauce)
42. CHSLD et CH de Matane
43. CHSLD et CH Le Jeannois (Chicoutimi)
44. Clinique de médecine de Famille (Québec)
45. Clinique de médecine familiale de Comporté
46. Clinique de médecine industrielle Robert Lizotte inc.
47. Clinique médicale Boischâtel
48. Clinique médicale de Charny
49. Clinique médicale de Saint-Raphaël
50. Clinique médicale Duberger
51. Clinique médicale Évangéline
52. Clinique médicale Notre-Dame-des-Laurentides
53. Clinique médicale Saint-Appolinaire
54. Clinique médicale Saint-Étienne
55. Clinique médicale Sainte-Claire
56. Clinique Santé plus
57. CHSLD de Beauce
58. CHSLD de la MRC d'Arthabaska
59. CHSLD du Centre Mauricie (Grand' Mère)
60. CHSLD Florence Groulx inc
61. CHSLD Notre-Dame-de-Lourdes (Dollard-des-Ormeaux)
62. CHSLD Regroupement Kamouraska
63. CLSC Alfred-DesRochers (Magog)
64. CLSC Arthur-Buies
65. CLSC Beauce-Centre
66. CLSC Châteauguay
67. CLSC de Charlevoix
68. CLSC de Hull
69. CLSC de l'Aquilon (Baie-Comeau)
70. CLSC de l'Estuaire
71. CLSC de la Haute-Yamaska (Granby)
72. CLSC de l'Hématite (Fermont)
73. CLSC de la Guadeloupe
74. CLSC de la Jacques-Cartier (Val-Bélair)
75. CLSC de la Jonquière
76. CLSC de la Vallée (Causapscal)
77. CLSC de la Vallée de la Gatineau
78. CLSC de Matane
79. CLSC de Port-Cartier
80. CLSC de Rosemont (Montréal)
81. CLSC de Sept-Îles
82. CLSC des Appalaches
83. CLSC des Aurores Boréales
84. CLSC des Berges
85. CLSC des Chenaux (Ste-Geneviève-de-Batiscan)
86. CLSC des Draveurs (Gatineau)
87. CLSC des Frontières et CHSLD du Témiscouata (Pohénégamook)
88. CLSC des Îles
89. CLSC des Maskoutains (Saint-Hyacinthe)
90. CLSC des Prés-Bleus
91. CLSC des Trois-Vallées (Saint-Jovite)
92. CLSC Desjardins (Lévis)
93. CLSC Domaine des Forestiers
94. CLSC du Centre-de-la-Mauricie (Shawinigan)
95. CLSC du Fjord
96. CLSC du Havre (Sorel)
97. CLSC du Richelieu
98. CLSC Frontenac
99. CLSC Gaston Lessard (Sherbrooke)
100. CLSC Huntingdon
101. CLSC Haute-Ville (Québec
102. CLSC Jardin du Québec (Saint-Rémi)
103. CLSC la Presqu'île (Vaudreuil-Dorion)
104. CLSC le Méandre (Le Gardeur)
105. CLSC le Moulin
106. CLSC le Norois (Alma)
107. CLSC le Partage-des-Eaux (Rouyn-Noranda)
108. CLSC les Aboiteaux
109. CLSC les Forges
110. CLSC Longueuil-Est
111. CLSC Longueuil-Ouest
112. CLSC Maria-Thibault (Lac-Mégantic)
113. CLSC Nicolet-Yamaska
114. CLSC Portneuf
115. CLSC René-Cassin
116. CLSC Rivières et Marées (Rivière-du-Loup)
117. CLSC SOC
118. CLSC Sainte-Foy / Sillery
119. CLSC Suzor-Coté (Victoriaville)
120. CLSC Témiscouata
121. CLSC Thérèse-de-Blainville
122. CLSC Vallée-de-la-Lièvre (Buckingham)
123. CLSC et CHSLD Baie des Chaleurs (Paspébiac)
124. CLSC et CHSLD Champagnat de la Vallée des Forts
125. CLSC et CHSLD de Gatineau
126. CLSC et CHSLD de la MRC de Bellechasse
127. CLSC et CHSLD de la MRC de Coaticook
128. CLSC et CHSLD de la MRC de L'Érable
129. CLSC et CHSLD de la MRC de L'Islet
130. CLSC et CHSLD de la MRC de Lotbinière
131. CLSC et CHSLD de la MRC de la Nouvelle-Beauce
132. CLSC et CHSLD de la MRC de Montmagny
133. CLSC et CHSLD de la Petite-Nation (St-André-Avelin)
134. CLSC et CHSLD des Basques

135.CLSC et CHSLD Grande-Rivière (Aylmer)
136.CLSC et CHSLD les Eskers (Amos)
137.CLSC et CHSLD et CH Maria-Chapdelaine
138.Comité de santé de L'Île-Verte
139.Commission médicale de la Montérégie
140.Complexe de santé et CLSC Paul-Gilbert
141.Complexe hospitalier de la Sagamie
142.Conférence des CLSC région 02 - Saguenay-Lac-Saint-Jean
143.Fédération des CLSC du Québec
144.Fonds de dotation de Centre hospitalier Jonquière
145.Hôpital Charles LeMoyne
146.Hôpital des Monts (Saint-Anne-des-Monts)
147.Hôpital Douglas (Verdun)
148.Hôpital de Mont-Joli inc.
149.Hôpital du Haut-Richelieu
150.Hôpital général de Québec
151.Hôpital général du Lakeshore
152.Hôpital général juif de Montréal
153.Hôpital Jeffrey_Hale (Québec)
154.Hôpital Laval
155.Hopital Notre-Dame-de-Fatima
156.Hôpital St-Joseph de la Providence
157.Hôpital Saint-Lambert
158.Hôpital Shriners pour enfants
159.Hôtel Dieu d'Alma
160.Hôtel Dieu de Lévis
161.Hôtel Dieu de Montmagny
162.Hôtel Dieu de Sorel
163.Hôtel Dieu du Sacré-Cœur de Jésus
164.Institut de réadaptation en déficience physique de Québec
165.Regroupement des CHSLD Christ-Roi
166.Réseau de santé Richelieu-Yamaska
167.Réseau de santé du Témiscouata Centre hospitalier Notre-Dame-du-Lac
168.Regroupement des CLSC de la Montérégie
169.Unité de médecine familiale - Pavillon du centre hospitalier de l'Université Laval
170.Villa Mon domaine inc.
171.Virage (réadaptation: alcoolisme, toxicomanies)

Foundations and Anti-tobacco Organizations

1. Association Cardiami de Jonquière inc.
2. Association des églises adventistes du 7ième jour du Québec
3. Association des non-fumeurs de l'Abitibi-Témiscamingue
4. Association des non-fumeurs du sud-ouest
5. Association pour les droits des non-fumeurs, bureau du Québec
6. Association pulmonaire du Québec
7. Association pulmonaire du Québec - Chapitre de Québec/Chaudière-Appalaches
8. Asthmédia inc
9. Centre vivre mieux sans fumer
10. Clinique d'aide aux fumeurs de l'Hôpital Laval
11. Club Bon cœur des cardiaques de Charlevoix-Est
12. Club Bon cœur des cardiaques de Charlevoix inc.
13. Coalition Chaudière-Appalaches/Québec pour la santé et contre le tabagisme
14. Comité « Cœur actif » (Pohénégamook)
15. Comité « Cœur Action » (Pakington)
16. Comité « Cœur en forme » (Saint-Marc-du-Lac-Long)
17. Comité « Force du cœur » (Pohénégamook)
18. Comité « Les grands coeurs » (Pohenegamook)
19. Conseil québécois sur le tabac et la santé
20. Fondation des maladies du cœur du Québec - Montréal
21. Fondation des maladies du cœur du Québec, région Estrie
22. Fondation des maladies du cœur du Québec - Chapitre de Québec/Chaudière-Appalaches
23. Fondation des toxicomanes du Québec inc.
24. Fondation québécoise des maladies du cœur du Québec - Chapitre du Saguenay-Lac-Saint-Jean
25. Fondation québécoise du cancer
26. Fondation québecoise du cancer - Chapitre de Québec/ Chaudière-Appalaches
27. Info-Air région Sorel-Tracy
28. Info-Tabac
29. Informed Mothers for the Protection of our Air and Children from Tobacco
30. McGill Anti-Smoking Society
31. Projet « Action cœur-vie » de Charlevoix
32. Projet "Frais de L'Air" (La Malbaie)
33. Société canadienne du cancer - Abitibi-Témiscamingue
34. Société canadienne du cancer - Bas Saint-laurent, Gaspésie
35. Société canadienne du cancer - Chapitre de Québec/Chaudière-Appalaches
36. Société canadienne du cancer - Division Québec
37. Société canadienne du cancer - Saguenay Lac Saint-Jean, Côte Nord
38. Société canadienne du cancer - Sherbrooke

Education and Youth Groups

1. 8ième Groupe scout de Roberval
2. 43ième Groupe scout de Saint-Thomas / Saint-Edmond
3. 58ième Groupe scout de Sainte-Jeanne-d'Arc
4. 60ième Groupe scout d'Albanel
5. Agence de garde Au soleil des p'tits bouts d'choux (Matane)
6. Agence de garde l'Aurore boréale (Rimouski)
7. Agence de services de garde Milou enr. (Rivière-du-Loup)
8. Alternative Jeunesse du sud-ouest inc. (Valleyfield)
9. Association de étudiants du département d'éducation physique de l'Université Laval
10. Association des éducateurs et éducatrices physiques enseignants de l'Outaouais
11. Association des étudiants de la faculté des sciences de premier cycle à l'université de McGill
12. Association féminine d'éducation et d'action sociale
13. Association générale des étudiants du collège de l'Outaouais
14. Association Régionale du Sport Collégial de l'île de Montréal
15. Association régionale du sport étudiant des Cantons de l'Est
16. Association régionale du sport étudiant de Québec et coalition jeunesse tabac « La gang allumée »
17. Association régionale du sport étudiant de l'Abitibi-Témiscamingue
18. Association régionale du sport étudiant de la Côte-Nord
19. Association régionale du sport étudiant de Laval
20. Association régionale du sport étudiant de l'Outaouais
21. Association régionale du sport étudiant de Québec
22. Association régionale du sport étudiant du Saguenay-Lac-Saint-Jean
23. Association régionale du sport étudiant Laurentides - Lanaudière
24. Baie-Comeau High School - Home and School Association
25. Carrefour F.M. Portneuf
26. CEGEP de La Pocatière
27. CEGEP de Rimouski
28. CEGEP Montmorency - Association générale des étudiants
29. Centre jeunesse Bas-Saint-Laurent (Rimouski)
30. Centre jeunesse L'Escale (Cap-Rouge)
31. Centres jeunesse de l'Outaouais
32. Centres jeunesse Chaudière-Appalaches (Lévis)
33. Collège Charles-Lemoyne (Ville Sainte-Catherine)
34. Collège de Limoilou
35. Collège Jean de la Mennais (La Prairie)
36. Collège Mont Sacré-Coeur
37. Collège Saint-Charles Garnier
38. Comité central des parents de la CECM
39. Comité de parents - Commission scolaire de l'Asbesterie
40. Comité de parents - Commission scolaire de la Jonquière
41. Comité de parents - Commission scolaire de la Pocatière
42. Comité de parents - Commission scolaire de Sept-Îles
43. Comité de parents - Commission scolaire de Tadoussac
44. Comité de parents - Commission scolaire de Victoriaville
45. Comité de parents - Commission scolaire des Basques (Saint-Éloi)
46. Comité de parents - Commission scolaire du Gouffre (Baie-Saint-Paul)
47. Comité de parents - Commission scolaire la Sapinière
48. Comité de parents - Commission scolaire Malartic
49. Comité de parents - Commission scolaire Morilac (Windsor)
50. Comité de parents - Commission scolaire protestante de Greater Seven Islands

51. Comité de parents - Commission scolaire Taillon
52. Comité de parents - Commission scolaire Val-Mauricie
53. Comité de parents - Commission scolaire Vallée de la Matapédia
54. Commission scolaire Côte du Sud (Montmagny)
55. Commission scolaire de Coaticook
56. Commission scolaire de la Côte du Sud
57. Commission scolaire de La Chaudière-Etchemin
58. Commission scolaire de La Jonquière
59. Commission scolaire de la Tourelle (Sainte-Anne des Monts)
60. Commission scolaire de Malartic
61. Commission scolaire de La Mitis (Mont-Joli)
62. Commission scolaire de Normandin
63. Commission scolaire de Port-Cartier
64. Commission scolaire de Portneuf
65. Commission scolaire de Quevillon
66. Commission scolaire de Rivière-du-Loup
67. Commission scolaire de Saint-Hyacinthe
68. Commission scolaire des Basques (Trois-Pistoles)
69. Commission scolaire des Draveurs (Gatineau)
70. Commission scolaire des Falaises (Gaspé)
71. Commission scolaire des Frontières (Pohénégamook)
72. Commission scolaires des Moissons (Beauharnois)
73. Commission scolaire des Montagnes (Dégelis)
74. Commission scolaire des Navigateurs
75. Commission scolaire des Patriotes (Saint-Eustache)
76. Commission scolaire Eastern Townships
77. Commission scolaire Fermont
78. Commission scolaire Jean-Chapais (Kamouraska)
79. Commission scolaire Jean-Rivard (Plessisville)
80. Commission scolaire Lakeshore, Lakeshore Schoolboard (Beaconsfield)
81. Commission scolaire Louis-Hémon
82. Commission scolaire Morilac (Windsor)
83. Commission scolaire Rouyn-Noranda
84. Commission scolaire René-Lévesque
85. Commission scolaire Saint-Jean-sur-Richelieu
86. Commission scolaire Seigneurie
87. Commission scolaire Vallée-de-la-Matapédia
88. Commission scolaire Valin
89. Conseil d'orientation de l'École secondaire Albert-Carrier
90. Conseil d'orientation Saint-Christophe
91. Conseil régional des loisirs de l'Outaouais inc.
92. Corporation de l'école secondaire St-Joseph (Saint-Hyacinthe)
93. Corporation de l'Entre-Jeunes (centre pour jeunes, Rivière-du-Loup)
94. École Alberte-Melançon (Saint-Paul de l'Île aux noix)
95. École Amitié-Groupe d'élèves de 5e et 6e année
96. École au Quatre Vents - Comité d'école (Beauport)
97. École centrale de Saint-Anicet - Comité d'école
98. École d'Argenteuil (Laval-des-Rapides)
99. École de Richelieu - Comité d'école
100. École des découvertes - Comité d'école (Fermont)
101. École Félix-Leclerc (Longueuil)
102. École Gaétan-Boucher (Saint-Hubert)
103. École Harold Sheppard (Tracy)
104. École l'Arc en Ciel
105. École Marcelle Mallet (Lévis)
106. École Notre-Dame du Paradis - Comité d'école (Marbleton)
107. École Primaire Harwood Home + School Association
108. École québécoise de naturopathie
109. École Roc Amadour (Québec)
110. Écoles Dansereeau & St-Martin (Conseil d'établissement)
111. École Saint-Blaise - Comité d'école
112. École Saint-Jean-Baptiste (Roxton-Falls)
113. École Sainte-Thérèse de l'Enfant Jésus Comité d'orientation de (Roxton-Falls)
114. École secondaire de Donnacona
115. École secondaire les Sentiers
116. École secondaire Jean-Jacques Rousseau - Comité d'école (Boisbriand)
117. École Vinet-Souligny (Saint-Constant)
118. Elizabeth Ballantyne Home and School Association
119. Enfant d'or (Lac-des-Aigles)
120. Faculté de médecine de l'Université Laval
121. Faculté de médecine de l'Université de Montréal
122. Faculté de médecine de l'Université McGill
123. Faculté de Pharmacie de l'Université Laval
124. Fédération des comités de parents de la province de Québec
125. Fédération des comités de parents de la province de Québec - 02 (Saguenay-Lac-Saint-Jean)
126. Fédération des éducateurs et éducatrices physiques enseignants du Québec (FEEPEQ)
127. Fédération des éducateurs et éducatricees civiques kinésiologues
128. Fédération québécoise du sport étudiant
129. Forest Hill School Home and School Association
130. Garderie du Bas-du-Fleuve inc. (Rimouski)
131. Garderie "Les petits soleils magiques"
132. Hudson High School - School Committee (Lakeshore School Board)
133. LaSalle Youth Centre
134. Macdonald High Home and School Association
135. Maison des jeunes F.R.A.D. d'Amos inc.
136. Maison des jeunes de Desbiens L'Illusion
137. Maison des jeunes de Saint-Jovite
138. Maison des jeunes du Bas-Saguenay
139. Maison des jeunes Quartier jeunesse 1995 inc. (St-Pascal)
140. Mesures de rechange jeunesse inc.(Baie-Comeau)
141. Ministère de l'Éducation - direction régionale Bas-Saint-Laurent, Gaspésie, Îles-de-la-Madeleine
142. PATRO de Fort-Coulonge/Mansfield
143. Prévention dépannage jeunesse (Charny)
144. Scouts du Montréal Métropolitain
145. Seigniory Elementary School
146. Séminaire Saint-François
147. Service de Garde L'Enfant joue (St-Moïse)
148. Syndics d'écoles pour la municipalité de Baie-Comeau (Les)
149. Thorndale Home and School Association
150. Travaux communautaires jeunesse (Montmagny)
151. Université du Québec à Chicoutimi

Municipalities

1. Canton d'Inverness
2. Canton Grand-Calumet
3. Canton de Newport
4. Corporation municipale de Béarn
5. Corporation municipale de Beaulac
6. Corporation municipale de Charette
7. Corporation municipale de la paroisse de la Trinité-des-Monts
8. Corporation municipale de la paroisse de Saint-Fidèle-de-Mont-Murray
9. Corporation municipale de la paroisse de Saint-Narcisse
10. Corporation municipale de la paroisse de Saint-Valérien-de-Milton
11. Corporation municipale de la paroisse de Sainte-Apolline-de-Patton
12. Corporation municipale de Lytton
13. Corporation municipale de Paspébiac-Ouest
14. Corporation municipale de Rivière-Pentecôte
15. Corporation municipale de Saint-François de Sales
16. Corporation municipale de Saint-Jean-Baptiste-de-l'Isle-Verte
17. Corporation municipale de Saint-Joseph-de-Lepage
18. Corporation municipale de Saint-Louis-de-Gonzague
19. Corporation municipale de Saint-Michel-du-Squatec
20. Corporation municipale de Saint-Patrice-de-Rivière-du-Loup
21. Corporation municipale de Saint-Pacôme
22. Corporation municipale de Saint-René
23. Corporation municipale de Saint-Stanislas-de-Kostka
24. Corporation municipale de Sainte-Françoise
25. Corporation municipale de Sawyerville
26. Corporation municipale du canton de Trécesson
27. Corporation municipale du canton Shenley
28. Corporation municipale du Lac-à-la-Tortue
29. Corporation municipale du village Saint-Siméon (Port-au-Persil)
30. Corporation municipale Lac-à-la-Croix
31. Corporation municipale Notre-Dame-des-Sept-Douleurs
32. Corporation municipale Saint-Eusèbe
33. Corporation municipale Saint-Norbert
34. Corporation municipale Saint-Norbert-de-Mont-Brun
35. Municipalité d'Albertville
36. Municipalité d'Ange-Gardien
37. Municipalité d'Ascot
38. Municipalité d'Authier-Nord
39. Municipalité d'East Hereford
40. Municipalité de Bellecombe

41. Municipalité de Béthanie
42. Municipalité de Blue-Sea
43. Municipalité de Boileau
44. Municipalité de Bois-Franc
45. Municipalité de Calixa-Lavallée
46. Municipalité de Cantley
47. Municipalité de Canton-Tremblay
48. Municipalité de Cayamant
49. Municipalité de Champlain
50. Municipalité de Chazel
51. Municipalité de Courcelles
52. Municipalité de Delisle
53. Municipalité de Des Ruisseaux
54. Municipalité de Destor
55. Municipalité de Ferland-et-Boileau
56. Municipalité de Fontainbleau
57. Municipalité de Fort-Coulonge
58. Municipalité de Gallichan
59. Municipalité de Gallix
60. Municipalité de Grand-Remous
61. Municipalité de Honfleur
62. Municipalité de l'Anse-Saint-Jean
63. Municipalité de l'Étang-du-Nord (Îles-de-la-Madeleine)
64. Municipalité de l'Île-aux-Coudres
65. Municipalité de La Doré
66. Municipalité de La Macaza
67. Municipalité de la paroisse de Saint-Ange-Gardien
68. Municipalité de la paroisse de Saint-Antonin
69. Municipalité de la paroisse de Saint-Arsène
70. Municipalité de la paroisse de Saint-Césaire
71. Municipalité de la paroisse de Saint-Élie
72. Municipalité de la paroisse de Saint-Hubert
73. Municipalité de la paroisse de Saint-Jovite
74. Municipalité de la paroisse de Saint-Marcellin
75. Municipalité de la paroisse de Saint-Paul d'Abbotsford
76. Municipalité de la paroisse de Sainte-Anne-de-la-Pocatière
77. Municipalité de la paroisse de Sainte-Anne-de-Sabrevois
78. Municipalité de la paroisse de Sainte-Barbe
79. Municipalité de la Paroisse de Tingwick
80. Municipalité de la Paroisse des Saints-Martyrs-Canadiens
81. Municipalité de La-Visitation-de-Yamaska
82. Municipalité de Lac-au-Saumon
83. Municipalité de Lac-des-Aigles
84. Municipalité de Lac-du-Cerf
85. Municipalité de Lac Sainte-Marie
86. Municipalité de Lambton
87. Municipalité de Larouche
88. Municipalité de Lotbinière
89. Municipalité de Marsoui
90. Municipalité de Mille-Isles
91. Municipalité de Mont-Saint-Grégoire
92. Municipalité de Montpellier
93. Municipalité de Natashquan
94. Municipalité de Newport
95. Municipalité de Notre-Dame-de-Bon-Secours
96. Municipalité de Notre-Dame-de-la-Merci
97. Municipalité de Notre-Dame-de-Pierreville
98. Municipalité de Notre-Dame-des Pins
99. Municipalité de Notre-Dame-du-Nord
100. Municipalité de Notre-Dame-du-Sacré-Cœur d'Issoudun
101. Municipalité de Noyan
102. Municipalité de Péribonka
103. Municipalité de Petit-Matane
104. Municipalité de Petit-Rivière-Saint-François
105. Municipalité de Plaisance
106. Municipalité de Pointe-à-la-Croix
107. Municipalité de Port-Daniel
108. Municipalité de Poularies (Abitibi-Ouest)
109. Municipalité de Rainville
110. Municipalité de Rimouski-Est
111. Municipalité de Rivière-à-Claude
112. Municipalité de Rivière-au-Tonnerre
113. Municipalité de Rivière-Beaudette
114. Municipalité de Rivière-Ouelle
115. Municipalité de Roquemaure
116. Municipalité de Sacré-Coeur
117. Municipalité de Saint-Albert-de-Warwick
118. Municipalité de Saint-Anaclet-de-Lessard
119. Municipalité de Saint-André (Comté de Kamouraska)
120. Municipalité de Saint-Bernard
121. Municipalité de Saint-Bernard-de-Michaudville
122. Municipalité de Saint-Bruno
123. Municipalité de Saint-Bruno-de-Guigues
124. Municipalité de Saint-Bruno-de-Kamouraska
125. Municipalité de Saint-Charles-de-Mandeville
126. Municipalité de Saint-Charles-Garnier
127. Municipalité de Saint-Cléophas
128. Municipalité de Saint-Cyprien
129. Municipalité de Saint-Damien
130. Municipalité de Saint-Damien-de-Buckland
131. Municipalité de Saint-Épiphane
132. Municipalité de Saint-Étienne de Lauzon
133. Municipalité de Saint-Fabien-de-Panet
134. Municipalité de Saint-Gabriel
135. Municipalité de Saint-Georges-de-Clarenceville
136. Municipalité de Saint-Georges-de-Windsor
137. Municipalité de Saint-Gérard-des-Laurentides
138. Municipalité de Saint-Herménégilde
139. Municipalité de Saint-Hilaire-de-Dorset
140. Municipalité de Saint-Jacques-de-Leeds
141. Municipalité de Saint-Jean-Baptiste
142. Municipalité de Saint-Jean-de-Dieu
143. Municipalité de Saint-Joachim-de-Courval
144. Municipalité de Saint-Joseph-de-Kamouraska
145. Municipalité de Saint-Joseph-de-la-Rive
146. Municipalité de Saint-Jude
147. Municipalité de Saint-Léon-de-Standon
148. Municipalité de Saint-Léon-le-Grand
149. Municipalité de Saint-Léonard-d'Aston
150. Municipalité de Saint-Léonard-de-Portneuf
151. Municipalité de Saint-Liboire
152. Municipalité de Saint-Louis-de-Blandford
153. Municipalité de Saint-Louis du Ha! Ha!
154. Municipalité de Saint-Luc-de-Matane
155. Municipalité de Saint-Malachie
156. Municipalité de Saint-Marcel
157. Municipalité de Saint-Mathieu
158. Municipalité de Saint-Mathieu-de-Beloeil
159. Municipalité de Saint-Mathieu de Rioux
160. Municipalité de Saint-Narcisse de Rimouski
161. Municipalité de Saint-Omer
162. Municipalité de Saint-Pascal
163. Municipalité de Saint-Philémon
164. Municipalité de Saint-Philippe-de-Néri
165. Municipalité de Saint-Pierre-de-l'ile-D'Orleans
166. Municipalité de Saint-Prime
167. Municipalité de Saint-Romain
168. Municipalité de Saint-Siméon Village
169. Municipalité de Saint-Simon-de-Rimouski
170. Municipalité de Saint-Simon-les-Mines
171. Municipalité de Saint-Sylvestre
172. Municipalité de Saint-Tharcisius
173. Municipalité de Saint-Valérien
174. Municipalité de Saint-Vianney
175. Municipalité de Saint-Zénon-du-Lac-Humqui
176. Municipalité de Sainte-Agnès
177. Municipalité de Sainte-Anne-de-Portneuf
178. Municipalité de Sainte-Anne-des-Monts
179. Municipalité de Sainte-Christine
180. Municipalité de Sainte-Flavie
181. Municipalité de Sainte-Florence
182. Municipalité de Sainte-Germaine-de-l'Anse-aux-Gascons
183. Municipalité de Sainte-Luce
184. Municipalité de Sainte-Marguerite-Marie
185. Municipalité de Sainte-Paule
186. Municipalité de Sainte-Rita
187. Municipalité de Sainte-Thérèse de Gaspé
188. Municipalité de Sainte-Thècle

189.Municipalité de Val-des-Monts
190.Municipalité de Val-Senneville
191.Municipalité des Boules
192.Municipalité des Coteaux
193.Municipalité des Hauteurs
194.Municipalité d'Ivry-sur-le-Lac
195.Municipalité d'Omerville
196.Municipalité du canton Arundel
197.Municipalité du canton Clermont
198.Municipalité du canton Cloridorme
199.Municipalité du canton d'Orford
200.Municipalité du village de Calumet
201.Municipalité du village de Howick
202.Municipalité du village de L'Île-verte
203.Municipalité du village de Lacolle
204.Municipalité du village de Melbourne
205.Municipalité du village de Saint-Ulrich
206.Municipalité du village de Taschereau
207.Municipalité de Tring-Jonction
208.Municipalité Lac Edouard
209.Municipalité Notre-Dame-du-Mont-Carmel
210.Municipalité Régionale de Comté de la Matapédia
211.Municipalité Régionale de Comté de Rivière-du-Loup
212.Municipalité Régionale de Comté des Basques
213.Municipalité Régionale de Comté du Domaine-du-Roy
214.Paroisse de Saint-Athanase
215.Paroisse de Saint-Georges-Cacouna
216.Paroisse de Saint-Roch-de-L'Achigan
217.Paroisse de Sainte-Julienne
218.Municipalité d'Ange-Gardien
219.Village de Philipsburg
220.Village de Pointe-Lebel
221.Village de Price
222.Ville de Baie-Comeau
223.Ville de Beaconsfield
224.Ville de Beauharnois
225.Ville de Beloeil
226.Ville de Bromptonville
227.Ville de Causapscal
228.Ville de Chambly
229.Ville de Charlesbourg
230.Ville de Charny
231.Ville de Château-Richer
232.Ville de Coaticook
233.Ville de Dégelis
234.Ville de Desbiens
235.Ville de Deux-Montagnes
236.Ville de Forestville
237.Ville de Gaspé
238.Ville de Grande-Rivière
239.Ville de Granby
240.Ville de Greenfield Park
241.Ville de Joliette
242.Ville de L'Islet
243.Ville de la Pocatière
244.Ville de La Tuque
245.Ville de Lac-Mégantic
246.Ville de Lac-Saint-Charles
247.Ville de Lennoxville
248.Ville de Malartic
249.Ville de Matagami
250.Ville de Matane
251.Ville de Mont-Tremblant
252.Ville de Pohénégamook
253.Ville de Pointe-au-Père
254.Ville de Pont-Rouge
255.Ville de Richelieu
256.Ville de Rimouski
257.Ville de Roberval
258.Ville de Saint-Basile-le-Grand
259.Ville de Saint-Félicien
260.Ville de Saint-Hubert
261.Ville de Saint-Joseph-De-Sorel
262.Ville de Saint-Nicolas
263.Ville de Saint-Pascal
264.Ville de Sillery
265.Ville de Sorel
266.Ville de Témiscaming
267.Ville de Thetford-Mines
268.Ville de Val Bélair
269.Ville de Valcourt
270.Ville de Vanier
271.Ville de Verdun
272.Ville de Sherbrooke
273.Ville du Lac-Sergent

Other Organizations

1. Association québécoise de défense des personnes retraitées et préretraitées - Section Haut-Richelieu (Saint-Jean-sur-Richelieu)
2. Centre d'information et de recherche en consommation de Charlevoix-Ouest (la Malbaie)
3. Cercles des fermières du Québec (Les)
4. Conseil régional de concertation et développement de la région de Québec
5. Conseil régional de l'environnement de la Côte-Nord
6. Fédération des caisses populaires Desjardins de Richelieu-Yamaska
7. Kino-Québec
8. Michel Vézina et Associés
9. Musée du Québec
10. Organisme de soutien aux familles québécoises (Saint-Bruno)
11. Service de pastorale sociale du Diocèse de Sherbrooke
12. Spécialité hydraulique Côte-Nord inc.
13. Union québécoise pour la conservation de la nature (UQCN)

Tobacco Control 1995; 4: 253–257

Tobacco promotions in the hands of youth

Remy R Coeytaux, David G Altman, John Slade

Abstract

Objective **– To examine the extent to which minors in the United States are exposed to and participate in tobacco promotion campaigns.**

Design **– 1047 minors (12–17 years old) and 290 young adults (18–24 years old) were interviewed in July and August 1993 as part of a national, random digit dial telephone survey designed to investigate the participation by young people in tobacco promotion campaigns.**

Results **– 366 minors surveyed had participated in tobacco promotion campaigns (35%). Among this group, 111 (10.6% of total respondents) reported having owned at least one tobacco promotional item. The mean number of items owned by these 111 respondents was 3.2. By applying these figures to the US population in this age group, an estimated 7.4 million minors have participated in tobacco promotion campaigns, and 2.2 million of these have collectively owned an estimated seven million tobacco promotional items.**

Conclusions **– Despite claims by the tobacco industry that promotional items are intended solely for smokers at least 21 years of age, millions of young people, both smokers and non-smokers, possess and use such items. This popular form of advertising lacks warning labels and familiarises minors with tobacco products.**

(*Tobacco Control* 1995; 4: 253–257)

Keywords: tobacco; advertising and promotion; youth; minors

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Introduction

The practice of enticing consumers to purchase a particular brand of tobacco by offering promotional items dates back to the late nineteenth century, when collectible cards were included in cigarette packs.[1] Today, this marketing strategy has grown to include a wide array of items bearing the logo of the particular tobacco product being promoted.

In this report we use the term "promotion campaign" to refer to the practice of offering promotional items such as clothing or equipment, either concurrent with the purchase of tobacco products, or in exchange for proofs of purchase or coupons obtained through the purchase of tobacco products. Tobacco promotional items range from relatively small items such as lighters, caps, T shirts, or coffee mugs given at the time of purchase of tobacco products to expensive leather jackets or backpacking gear obtainable (along with less extravagant items) through coupon redemption or direct purchase. Examples of such tobacco promotions include Camel Cash coupons, which are colourful imitations of US currency attached to cigarette packs, and Marlboro Miles obtainable with the purchase of Marlboro cigarettes, which can be collected and redeemed for promotional items. Many of these items are appealing to young people, and the practice of distributing them for the promotion of tobacco products has been implicated in the recent rise in sales to minors of certain brands of cigarettes.[2,3]

Tobacco manufacturers are increasingly relying on promotional items to entice US consumers to purchase their tobacco products. Domestic cigarette advertising and promotional expenditures have increased from \$3.99 billion in 1990 to \$5.23 billion in 1992, to \$6.03 billion in 1993.[4,5] Spending on the distribution of specialty items, which consist primarily of tobacco promotional items, has increased from \$307 million to \$400 million to \$756 million in that same time period,[4,5] while expenditures for coupons and retail value-added promotions, which include non-cigarette items such as key chains or lighters given away at the time of purchase of cigarettes, more than doubled between 1990 and 1993, from \$1.2 billion to \$2.6 billion.[4,5]

The magnitude of these expenditures, as well as the dramatic increases in recent years, raises concerns about the extent to which young people are being exposed to and influenced by tobacco promotions. Tobacco manufacturers have attempted to counter criticism that promotional items reach young people by instituting a policy whereby mail orders for tobacco promotional items must be accompanied by the customer's signature attesting to the fact that he or she is a smoker 21 years of age or older. Age and smoking status are not verified in any way, however, and promotional items and samples of tobacco products have been delivered regardless of true age or smoking behaviour.

We conducted a national, random digit dial telephone survey of residents of the United States between the ages of 12 and 24 years to examine the extent to which young people are exposed to and participate in tobacco promotion campaigns. Our data provide estimates for the number of youth who have acquired

tobacco promotional items as well as how minors have obtained these items.

Methods

DESIGN AND PROCEDURE

Data in this study were collected from telephone interviews of a random sample of eligible households in the United States. A questionnaire was developed and administered by telephone by interviewers at Freeman, Sullivan and Company, a social science research firm in San Francisco, California. Twenty three interviewers were trained to administer the study questionnaire in English; two were trained to administer it in Spanish. Survey responses were entered directly into a computer, using a computer assisted telephone interview (CATI) system. On average, the questionnaire took approximately 12 minutes to administer.

Informed consent was sought from each respondent as well as from their parents or guardians when the respondent was under the age of 18. The interviewer would first explain the study to the parent of an eligible minor and seek informed consent. If the parent declined consent, the accrual attempt was considered to be a refusal and no further calls were made to that household. If the parent provided informed consent, the interviewer would ask to speak to the selected respondent and would call back if the respondent was unavailable at that time. Respondents were told that they were selected randomly, their responses were confidential and anonymous, they would not be called again for this study, and they would not receive remuneration for their participation. To limit response bias, parents were asked to allow the child to respond to the questions in private. Parents who refused to provide such privacy were counted as refusals in response rate calculations.

SAMPLE AND SUBJECT ACCRUAL

The study sample consists of 1047 residents of the United States between the ages of 12 and 17 years inclusive, and 290 US residents between the ages of 18 and 24 years. Respondents were selected randomly to partake in a telephone survey of participation in tobacco promotion campaigns. A list of telephone numbers was generated by and purchased from Survey Sampling Inc in Fairfield, Connecticut. All area codes in the United States were eligible for the sampling frame, and prefixes thought to be non-residential were excluded. Persons answering the telephone confirmed household eligibility criteria and the number of eligible persons. One eligible subject per household was selected randomly by computer to be interviewed. The interviewer would call back at another time if the eligible respondent was not available. All respondents were given a toll-free number to call if they preferred being interviewed at another time or place. This option was provided to facilitate minors' privacy.

During the first stage of the study, all English or Spanish speaking subjects between the ages of 12 and 24 years inclusive were eligible. Once a predetermined sample size of 290 respondents between the ages of 18 and 24 was obtained, only minors between the ages of 12 and 17 were recruited. Subject accrual and telephone interviews were conducted in July and August, 1993. The sole exclusion criterion was inability to speak English or Spanish.

RESPONSE RATES

A total of 30147 calls was made. Of these, 2155 (7.1%) reached households that were known to include at least one eligible respondent, and 3938 calls (13.1%) reached persons who hung up the telephone before household eligibility could be determined. Of the 2155 eligible households contacted, 1337 (62.0%) resulted in a completed interview. Of these, 1047 were between the ages of 12 and 17 years. The remaining 290 interviews were conducted with young adults, aged 18-24 years. Eight hundred and eighteen of the households known to include an eligible respondent (32.0%) declined to participate. Of these, 331 refusals came from parents and 487 directly from the respondents.

DATA ANALYSIS

Data analyses were performed using the Statistical Package for the Social Sciences (SPSS) software. Student's t tests were used for analysing continuous data, and χ^2 tests were used for categorical data.

Results

Completed interviews were obtained for 1047 minors between the ages of 12 and 17 years, inclusive, and 290 young adults aged 18 to 24 years. The sample of minors was comprised of 50% males and 78% Caucasians. With respect to tobacco use, 41% had used cigarettes or smokeless tobacco in their lifetime, 17% reported using tobacco in the previous month, and 46% lived in a household in which there was at least one tobacco user. Among the young adult respondents, 40% were male, 77% were white, 73% had used tobacco, 39% had used tobacco in the past month, and 38% lived in a household in which there was at least one tobacco user.

Respondents who reported either having owned a tobacco promotional item, or having collected coupons such as Camel Cash or Marlboro Miles, or having possessed a catalogue distributed by a tobacco manufacturer that depicted promotional items obtainable through coupon redemption, were considered to have participated in tobacco promotion campaigns. According to this definition, 366 (35.0%) of minors surveyed had participated in such campaigns. Extrapolated to the total population of 21 million US residents between the ages of 12–17 years,[6] this corresponds to an estimated 7.4 million American adolescents. Of these participants in tobacco promotion campaigns, 111 (10.6% of all minors surveyed)

reported having owned at least one tobacco promotional item, corresponding to 2.2 million minors in the USA. The mean number of items owned by respondents who reported having owned a promotional item was 3.2. Thus an estimated 7.1 million tobacco promotional items have been in the hands of young people of between 12 and 17 years of age.

Exposure to tobacco promotions was even higher than participation rates: 83.5% of all minors surveyed were aware of at least one tobacco promotions campaign and 682 (65.1%) had at least one friend or relative whom they knew to have owned a promotional item for tobacco products. Of these, 467 (44.6% of minors surveyed) had a friend or relative under the age of 18 who owned a tobacco promotional item.

Participation in tobacco promotion campaigns was greater among the young adult respondents. Of the 290 respondents between the ages of 18 and 24 years, 147 (50.7%) participated in tobacco promotion campaigns as defined above, and 87 (30.0%) owned a promotional item. Of note, however, is the finding that awareness of tobacco promotions was the same among minors and young adults: 874 minors (83.5%) and 243 young adults (83.8%) surveyed had heard of at least one tobacco promotion campaign.

Of the 173 minors who reported having used tobacco in the past month, 42 (24.3%) also owned at least one promotional item. This represents a more than threefold greater proportion than the 7.9% of respondents who were not active tobacco users who owned tobacco promotional items ($p \ll 0.001$). Of the 111 respondents who reported ever having owned a tobacco promotional item, however, 42 (37.8%) were active tobacco users and 69 (62.2%) were not active users. This corresponds to an estimated 1.4 million young people under 18 years of age who obtained tobacco promotional items who were not current smokers, in addition to an estimated 800000 youth who smoke. These figures do not include children under the age of 12 and young adults between the ages of 18 and 20 years.

Owners of tobacco promotional items were identified as those respondents who answered "yes" to the following question: "Some tobacco companies provide promotional items to the public that you can buy or receive for free. Have you ever bought or received for free any product that promotes a tobacco brand or was distributed by a tobacco company?" The 111 minors who answered this question in the affirmative (10.6%) were then asked the question, "How did you receive these promotional items?" The results are as follows: 54.1% obtained an item from a friend or relative; 12.6% by coupon redemption; 11.7% by unsolicited mail; 9.9% by buying the item directly; 7.2% with a cigarette purchase; 5.4% at an event or on the street; and 15.3% by other means or "don't know" (multiple responses were accepted, so the sum of the percentages is greater than 100%). Thus at least 12.6% of the 7.1 million tobacco promotional items (corresponding to approximately 890000 items) estimated to have been owned by minors were obtained by the minors themselves redeeming coupons. An additional 7.2% of minors surveyed obtained at least one of their items with the purchase of a tobacco product, representing an additional 510000 items.

These estimates, however, do not account for the 54.1% of respondents who had been given a promotional item by a friend or relative that had originally come from a retailer or manufacturer. By assuming that these items were obtained according to the same distribution of responses reported above, and by calculating an adjusted distribution by eliminating the "friend or relative" category and weighting the remaining means accordingly, we estimate that at least 20.3% of the promotional items in the hands of minors were originally obtained through coupon redemption, with an additional 11.6% of items obtained directly through the purchase of a tobacco product. This represents an estimated 1.4 million items obtained through coupon redemption, and 820000 obtained with the purchase of a tobacco product. These estimates may still underestimate the importance of promotional items obtained in conjunction with the purchase of tobacco products because they do not take into account the 15.3% of "other" or "don't know" responses.

Two sources of promotional items reported above, coupon redemption and receipt of unsolicited items by mail, involve direct mailings to youth. In addition, 17 minors surveyed (1.6%) reported having received a free sample of tobacco in the mail, and 47 (4.5%) responded "yes" to the question, "Some brands of cigarettes, snuff or chewing tobacco send out mail such as a survey, coupons, free gifts, merchandise offers, catalogs or free tobacco products. Have you ever received such mail addressed to you personally?" Eighty respondents (7.6%) had received some form of direct mailing from a tobacco company. This corresponds to an estimated 1.6 million minors nationwide who have received mail from a tobacco manufacturer and whose names presumably remain on company mailing lists.

Discussion

Promotional items distributed by tobacco companies are reaching American youth, irrespective of age or tobacco use status. An estimated 7.4 million young people have either owned a promotional item, had a tobacco promotions catalogue in their possession, or collected coupons such as Camel Cash or Marlboro Miles. Approximately 2.2 million of these, 62% of whom denied having used tobacco in the past month, have collectively acquired an estimated 7.1 million tobacco promotional items.

Eleven percent of the young people in this study reported having owned promotional items. This compares with a 30% ownership

among the same age group reported by a national survey conducted by the Gallup International Institute.[7] The different findings from the two surveys may be related to differences in consent procedures (the Gallup Institute survey did not obtain parental consent), the wording of survey questions, or sample selection procedures. The high rates of youth participation in tobacco promotion campaigns reported in these two studies are consistent with our own regular interaction with young people in educational sessions. When tobacco promotional items are displayed to them during these sessions, many young people express a strong interest in obtaining those items.

Widespread youth exposure to, ownership of, and use of tobacco promotional items by young people raises numerous concerns. First, there may be a causal relationship between ownership or pursuit of promotional items and tobacco consumption. This may occur directly by encouraging children and adolescents to purchase tobacco products in order to acquire coupons that can be exchanged for desirable promotional items. Moreover, adolescents and preadolescents may be encouraged to consume tobacco in an environment in which items promoting tobacco products are common. By simply browsing through promotional catalogues or observing their friends use promotional items, young people become familiar with brand names, marketing themes, and tobacco products. This familiarity may help to create an atmosphere in which tobacco use is considered the norm rather than the exception.

In our survey, one half of the promotional items obtained by minors had been given to them by a friend or relative. While tobacco manufacturers may deny responsibility for transfers of tobacco or promotional products from adults to minors, many of the items nevertheless end up in the hands of minors. Moreover, the minors have obtained the items from credible and respected sources. This is likely to enhance and further reinforce the selling message conveyed by the item.

Another consequence of youth participation in tobacco promotions is that it enables manufacturers to compile extensive mailing lists of underage consumers. According to this survey, an estimated 1.6 million minors nationwide received promotional mail from a tobacco company. Philip Morris has reported having a mailing list of 26 million customers,[8] many of whom are undoubtedly minors. Despite a stated intention to the contrary, tobacco companies have no practical way of avoiding mailing to young people when they use these lists.

Advertising through promotions enables manufactures to circumvent regulations requiring the display of health warnings. The Comprehensive Smokeless Tobacco Health Education Act of 1986 requires spit tobacco promotional items of a certain size to display a warning. Spit tobacco manufacturers have skirted these regulations, however, for example by distributing smaller items,[9] although a warning may appear on the packaging. The Federal Trade Commission (FTC) has not raised objections to these practices, nor has the FTC treated promotional items for cigarettes (as opposed to smokeless tobacco) as advertising. Thus the tobacco promotional items seen and owned by young people do not display the health warnings required of other forms of tobacco advertising.

Results from this survey indicate that young people themselves have owned more than seven million tobacco promotional items. In addition, many times this number of promotional items bearing the logo of a tobacco product but not health warnings are owned by adults and presumably seen by young people. This is evident by the finding that well over half of the survey respondents reported having a friend or relative who owned a tobacco promotional item. Promotional catalogues themselves are devoid of prominent warnings: a 1993 Camel Cash catalogue,[10] for instance, displayed two inconspicuous warnings in its 16 page brochure. Such paucity of warning labels in brochures that are widely available is particularly meaningful in the light of the fact that spending on promotions now far exceeds spending by tobacco companies on newspaper and magazine advertisements,[6] which are required by law to display health warnings.

Finally, the estimated 1.4 million nonsmoking youth who own tobacco promotions plus the millions of minors who browse through promotions catalogues or collect promotion coupons may represent a large pool of young people who may be at increased risk for tobacco use and subsequent nicotine addiction. A recent survey of youth in Massachusetts[11] showed a dose-response relation between the degree of participation in tobacco promotion campaigns and the amount of tobacco use. This relationship is perhaps the single most important issue regarding the ownership of tobacco promotional items by young people. Millions of minors are participating in tobacco promotion campaigns, and the vast majority of new tobacco users are under the age of 18. It is not a coincidence that tobacco companies are increasing their already substantial investment in promotional items that appeal to youth. In sum, tobacco promotional items are not only reaching the American youth in large numbers; they are also almost certainly encouraging children and adolescents to use tobacco and become addicted to nicotine.

RECOMMENDATIONS

Given the widespread participation by young people in tobacco promotion campaigns, as documented in this report, we recommend the following actions: (1) the promotion of tobacco products through the distribution of specialty items bearing brand logos or symbols associated with tobacco brands should be banned; (2) if tobacco promotion campaigns are not banned, manufacturers should be required to display health warnings on all items regardless of the item's size or shape; (3) the practice of sending promotional mail and free samples of tobacco products by mail

should be stopped; (4) federal agencies such as the FTC and the Food and Drug Administration have authorities that should be brought to bear on this problem; and (5) individuals and community groups should take action to decrease the involvement by local merchants in tobacco promotion campaigns.

This investigation was supported by grant No 18107 from the Robert Wood Johnson Foundation and by the Stanford University Medical Scholarship

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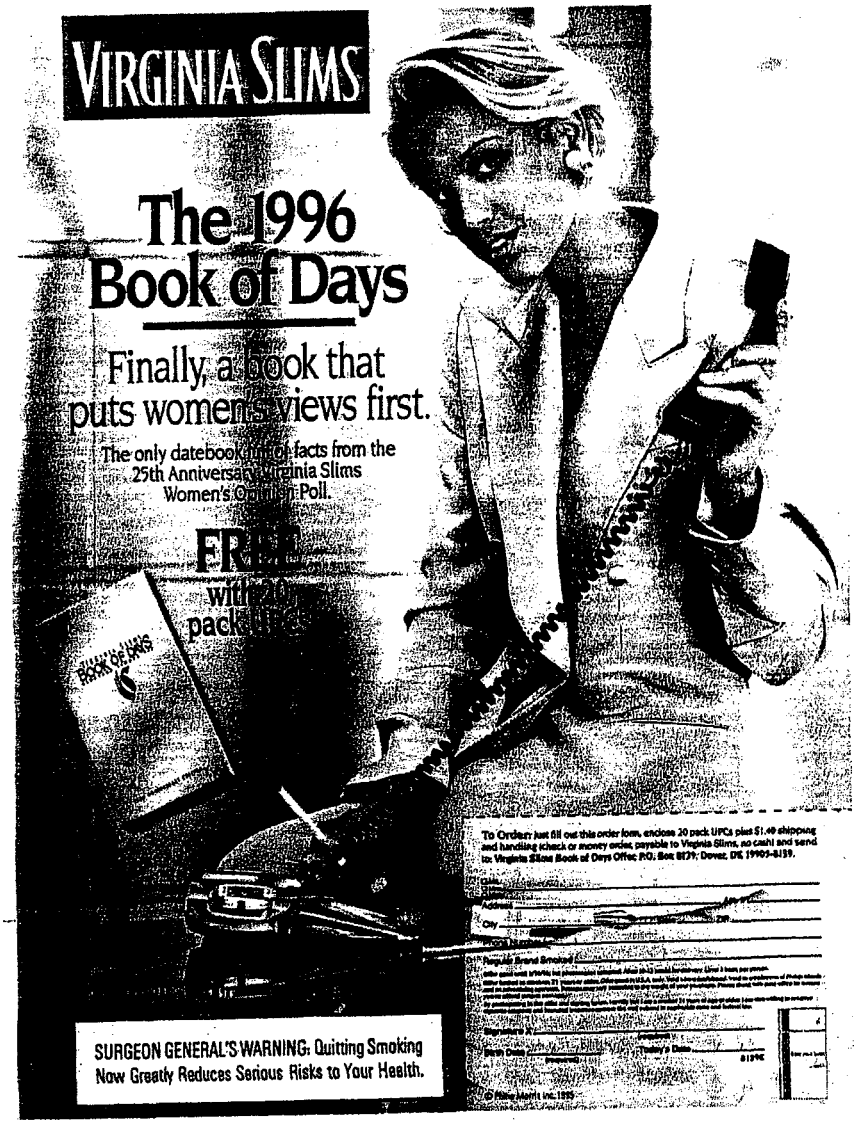
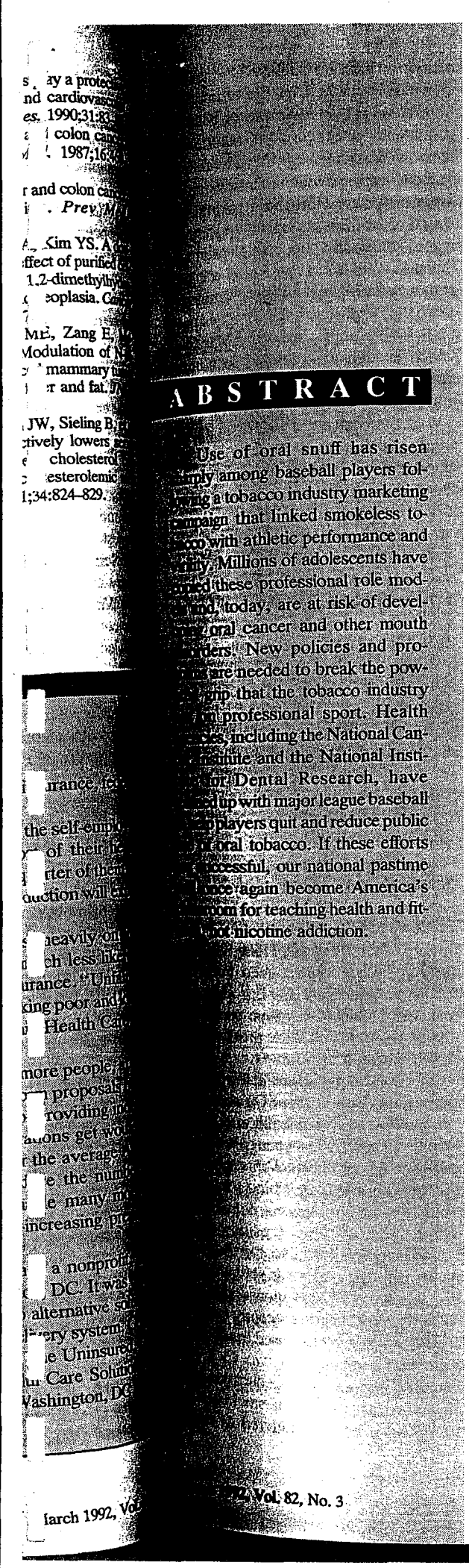


Advertisement for the Virginia Slims 1996 Book of Days, a datebook "full of facts from the 25th Anniversary Virginia Slims Women's opinion poll", free in exchange for 20 pack UPCs.



Commentary

Snuffing Tobacco Out of Sport

Gregory N. Connolly, DMD, MPD, C. Tracy Orleans, PhD, Alan Blum, MD

In this issue of the Journal, Siegel and colleagues report on the use of oral smokeless tobacco (i.e., Snuff or chewing tobacco) by professional baseball players. The authors found that use may not seriously increase risks for cardiovascular disease, at least not in the short run and not among physically fit professional athletes, many of whom chew only while in uniform. Other smaller studies suggest that the use of smokeless tobacco carries a risk of developing acute cardiovascular effects.[1-8] The authors wisely call for more research among older, more sedentary dippers and chewers.

Of major concern is the finding that 45% of the nation's premiere professional athletes (and role models) use smokeless tobacco, most of them the moist snuff products highest in nicotine and potent cancer causing chemicals called nitrosamines.[9] This is unprecedented in the history of baseball and the nation.

Until recently, chewing tobacco, not snuff, was the choice on the baseball diamond. This custom started a century ago when players chewed tobacco to keep their mouths moist in the dusty parks.[10] Pitcher Nolan Ryan estimates that when he joined the major leagues 20 years ago perhaps a third of the players smoked cigarettes, a few on each team still chewed tobacco, but none dipped snuff.[11] During the 1980s smoking among the players dramatically declined, as did the use of chewing tobacco, but the dipping of moist snuff gradually increased. "The switch came with free samples of dip coming into the clubhouse," Ryan says.[11]

Of major concern is the fact that the greatest cancer risks and most severe oral pathology (oral leukoplakia and gum recession) occur among snuff dippers rather than tobacco chewers.[9] Cancer risks also rise when snuff dipping is combined with alcohol use—a pattern not uncommon in this cohort. No player should consider himself immune from the long-term cancer risks. Babe Ruth smoked cigars, chewed tobacco, and consumed alcohol during most of his illustrious career. He died tragically at the age of 52 of throat cancer, which is commonly cased by tobacco.[10] Moreover, previous studies indicate that players who dip snuff report greater self-perceived addiction, more regular use, less seasonal use, more frequent cravings, and greater difficulty quitting than players who chew tobacco.[10-12]

This shift to the potentially most addictive and harmful smokeless tobacco SPT products that has taken place in the clubhouse mirrors the shift that has occurred in the US population, particularly among adolescent boys. Between 1980 and 1989, US consumption of chewing tobacco did decline by 12%, from 72.3 million lb to 63.5 million lb.[13] However, at the same time, consumption of moist snuff increased by 57%, from 26.7 million lb to 41.9 million lb. Almost three quarters of a billion tins of snuff are sold annually. Between 1970 and 1985, the use of the moist snuff increased by 30% among all Americans, but eightfold in the 17- to 19-year-old group.[9] Such an increase did not occur by accident, but rather as the result of a carefully crafted marketing strategy by to-

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Editor's Note. See related article by Siegel et al. on page 417 of this issue.

bacco companies, which uses extensive point-of-purchase displays, wide distribution of free samples, and sponsorship of touring sports and cultural events. Ninety percent of this increase in sales is accounted for by two brands manufactured by the United States Tobacco Company (UST), SKOAL and Copenhagen.[13]

In countless neighborhood grocery stores, gas stations, and truck stops across the country, these products are displayed at check-out counters alongside the candy and cough drops. There is even a shredded chewing gum called Big League Chew that prepares very young mouths for the future chewing of tobacco. The introduction in 1983 of SKOAL Bandits,[15] an easy-to-use tea bag of snuff, with the slogan "Take a pouch instead of a puff" has made it extremely convenient for teenagers to take up the habit. The "Bandit" is a low-nicotine teaching tool that allows novices to slowly develop tolerance to the toxic effects of the alkaloid. As one industry brochure says: "Like your first beer, SKOAL Bandits can be a taste that takes time to acquire and get the most out of."[16] Once a "taste" is acquired new dippers gradually move to the more potent and addictive brands of snuff, such as SKOAL and Copenhagen.

The campaign has been successful. Of the estimated 10 million American users of smokeless tobacco, 3 million are under the age of 21 years, many of them still playing Little League baseball. The 1990 Youth Risk Behavior Survey found that 24% of all White male high school students currently use smokeless tobacco.[17] A 1989 National Collegiate Athletic Association (NCAA) survey of college athletes found a 40% increase (from 20% to 28%) in the use of smokeless tobacco from 1985 to 1989.[18] Among NCAA baseball players, an alarming 57% use SPT.

Meanwhile, since there is no ubiquitous counteradvertising campaign to discourage the use of these products and no substantive cessation program, players will continue to dip in record numbers, some of them doubtlessly influenced by the slogan that implies they are using a safe alternative to cigarettes. And because these athletes are viewed on television by millions of aspiring teenaged players and children, they will continue to serve as unpaid models for tobacco companies.

Notwithstanding the broadcast ban on advertisements for smokeless tobacco, it has been estimated that the manufacturers of these products receive extensive free advertising by virtue of the many close-up shots of baseball players using smokeless tobacco.[19] Indeed, sports sponsorship by tobacco companies has become an easy way to circumvent the TV advertisement ban.[20] Throughout 1991 the following sports sponsored in part by either SKOAL or Copenhagen were seen on national television in the United States: professional rodeo, hunting, Indy car racing (including the Indianapolis 500), monster truck racing, drag racing, sprint car racing, and stock car racing.[21] A cadre of famous athletes, including former football players Walt Garrison, Earl Campbell, Nick Buoniconti, Joe Klecko, Terry Bradshaw, and Lawrence Taylor, have been employed to promote SKOAL in advertisements and personal appearances.[22] For the past 15 years, a highlight of the social season in Dallas has been the Walt Garrison All-Star Rodeo, sponsored by UST, to benefit the national Multiple Sclerosis Society. UST also campaigns against drug abuse among children and supports the Alcohol and Drug Abuse Council. Yet, at the same time, UST manufacturers Zig Zag cigarette papers,[23] which are commonly used for rolling marijuana cigarettes.

Sport has become a filed of dreams and dollars for tobacco manufacturers. Tobacco billboards litter the landscapes of our national pastime and sully sport magazines that exist ostensibly to promote child health and fitness. Free samples of low nicotine snuff are given to young fans, and the athletic event is turned into one big tobacco classroom where the thrill of competition makes learning nicotine addiction fun. It's called niche marketing and it's done with spitball stealth and accuracy.

Efforts at the federal level to counteract the use and promotion of oral tobacco have been inadequate and ineffectual. In 1985 Congress voted to restore the federal excise tax on moist snuff and chewing tobacco—at a whopping penny per pack![14] The following year Congress passed the Comprehensive Smokeless Tobacco Health Education Act, which mandated warning labels on packs and print advertisements and which allegedly should have banned televised advertising for oral tobacco. According to the Federal Trade Commission (FTC),[24] in 1988 43% of the advertising expenditures for oral tobacco was devoted to free sampling and event sponsorship, which are not addressed by the federal law.

Since then, UST and Pinkerton Tobacco Company, the other major manufacturer of snuff, have stepped up their sponsorship of sports and cultural events, many of which are televised. Amon activities sponsored by Pinkerto Man brand are softball, tractor pu country music concerts.[21] Pinkerton recently purchased by the Swedi bacco Company, which in Swede hibited by law from sponsoring events and advertising in sport zines.[25] Swedish Tobacco also cla Swedish snuff is not cancerous be contains low levels of nitrosamine. 1990, the Swedish subsidiary rolled o first brand of snuff called Red Ma which is high in nicotine, to c against UST's Copenhagen. Tests o new brand found nitrosamine level 5 to 25 times greater than those f snuff sold in Sweden and the hig any snuff sold in the United States. those levels the brand would likely sold in Sweden.

Actions by state governments h been stronger than those at the fed level but have accomplished littl number of states that tax oral t products increased from 19 in 1983 to 1989.[26] Maine taxes these products at of wholesale price and Washing 65%, thus setting excellent examp other states. Much needed now are b on free sampling, such as have be acted in California and some cities

Many nations are well ahead of United States in preventing the sprea this carcinogen. In 1987, the Study on Smokeless Tobacco of the Health Organization recommended countries with no history of smokeless bacco use ban it before UST and S Tobacco could gain a foothold. By New Zealand, Australia, Hong Kong, land, and Belgium had banned mois and chewing tobacco. The Europea nomic Community has given preli approval to a ban on these products in thirteen member nations.[14]

However, there are a few h signs in this country, too. On several casions Secretary of Health and Hum Services Louis Sullivan has called public to boycott sports events spo by tobacco company "blood money Shareholders' resolutions detailin marketing of SKOAL Bandits to people have been introduced at the a meeting of UST. A Florida softball lea has rejected a $25 000 sponsorship by Red Man. California recently rais cigarette excise tax and used funds for education campaign. In two Californ counties, Inyo and Mono, education paigns against the use of smokele bacco have been conducted at rod

events heavily sponsored by UST. The health activist group DOC (Doctors Ought to Care) has tried fighting the use of smokeless tobacco by sponsoring a Dead Man Chew softball league in Omaha and an anti-smokeless tobacco monster truck in Seattle. In the past few years, the American Cancer Society, the American Academy of Otolaryngology, the American Dental Association, the American Academy of Pediatrics, the American Public Health Association, and the American Medical Association have begun to tackle the oral tobacco pandemic.

Professional baseball has responded with a new program to help players quit and reduce their public use of smokeless tobacco. (Remarks by L. W. Sullivan to Major League Baseball Team Physicians, December 3, 1990, as recorded by . . .) Major League Baseball (MLB) in collaboration with the National Cancer Institute and the Professional Baseball Athletic Trainers Association developed a cessation guide, which was distributed in the spring of 1991 to all major and minor league players.[11] The guide contains a strong health message and the advice of respected players who have tried and succeeded in quitting the use of smokeless tobacco. It will be distributed to the nation's 40 000 college and junior college players in 1992. The National Institute of Dental Research funded a major study of the use and health effects among players from which the Siegel study came.

The Los Angeles Dodgers have banned all players from carrying snuff or chewing tobacco while in uniform, and the Oakland Athletics recently banned tobacco advertising in their program.[25] In 1991, MLB Commissioner Fay Vincent banned the use of smokeless tobacco in the Single A Rookie League, which affected about one third of minor league players. The NCAA did the same for the 1991 College World Series.[27,28]

The public health community has a special obligation to prevent the spittoon from replacing the ashtray in the high school locker room. Thus far, we have failed to see through the passage of tough legislation and to enlist allies in the community at large and in the business world to replace the insidious tobacco advertising dollars with new advertising for healthy products. The health of today's athletes must be protected and their influences as role models must be reclaimed from tobacco industry exploitation.

New policies, programs, and funding are needed to break the powerful grip that the tobacco industry has on sport. Athletes should become positive role models for young people and should participate in public education campaigns. At a minimum they should not use tobacco publicly. Taxes should be raised on all forms of tobacco, and a portion of the increase should be dedicated to the sponsorship of sporting events. Free sampling, the sponsorship of sporting events, and advertising in sport magazines should be prohibited. Corporate sponsors should campaign against the use of tobacco by children with the same zeal they display in fighting the use of illicit drugs. Manufacturers of healthy products from toothpaste to sugarless bubble gum should team up and directly market their products as healthy alternatives to tobacco.

Sport is the vehicle by which we pass many of our treasured national values on to the nation's young people. Each year millions of youngsters play sports and through that experience are taught about the importance of competition, fairness, good sportsmanship, team work, and good physical health. Tobacco companies also recognize the powerful influence sport has on shaping youthful behavior. They have exploited sport to pass the nation's tobacco epidemic on to each new generation, recruiting young people to replace those who have quit or died from tobacco use. The harmful effects of tobacco are camouflaged against the backdrop and thrill of athletic victory. All of this must end. □

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T. BETTINA CORNWELL

The Use of Sponsorship-Linked Marketing by Tobacco Firms: International Public Policy Issues

Worldwide, the marketing and promotion practices of tobacco firms are coming under scrutiny. Although tobacco advertising in traditional media such as television has been banned in most countries for many years, the use of nontraditional media such as sponsorship has only recently come into question. This paper analyzes how sponsorship-linked marketing programs function like advertising in promoting tobacco products. The various marketing tactics utilized by international tobacco firms are discussed as are policy recommendations for governments, businesses, households, and communities that seek to reduce tobacco promotion in their environments.

Countries around the world have enacted legislation attempting to restrict tobacco consumption via restriction of tobacco advertising and promotion. The number and types of restrictions vary by country, but most countries prohibit tobacco advertising in the traditional media such as broadcast and print. On the other hand, tobacco companies attempting to maintain or expand their international consumer markets seek to continue communications via available media routes. The clash of these two initiatives has resulted in some creative and some questionable marketing behavior on the part of tobacco companies and other interested parties. This paper examines the use of nontraditional communication programs such as event and sports sponsorship by tobacco firms in their international marketing programs and makes policy recommendations for governments, businesses, communities, and households wishing to reduce the viability of these communication routes.

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I would like to thank International MBA students Juan Sacoto and Melissa Martin-Salinas for their research assistance. I would also like to thank the Center for International Business Education and Research at the University of Memphis for financial support.

The Journal of Consumer Affairs, Vol. 31, No. 2, 1997
0022-0078/0002-238 1.50/0
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SCOPE OF THE INTERNATIONAL TOBACCO PROBLEM

The World Health Organization estimates that three million people die from tobacco-related diseases annually. They also argue that future deaths (given the continuation of current smoking patterns worldwide) will reach ten million annually by the year 2025 (Roemer 1993). "Legislation has been enacted in 91 countries and territories in response to the tobacco pandemic that is already the main cause of avoidable disease and premature death in developed countries and will become the leading cause of preventable death in the world as a whole in the 21st century" (Roemer 1993, 1). Even the sweeping legislation passed in these countries since Roemer published her first study in 1982 has not slowed the worldwide expansion of tobacco consumption. Connolly (1992) chronicled the market expansion of transnational tobacco companies and showed the targeted opening of Latin America in the 1960s, the newly developed countries of Asia in the 1980s, Eastern Europe in the early 1990s, and most recently China and other closed markets. Similarly, Schwartz (1991) examined the systematic movement of U.S. tobacco companies from developed domestic markets to developing international markets in their search for continued profitability. The works of Connolly and Schwartz show that as developed country markets decline (due to promotion restrictions and health information) tobacco companies move into developing country markets.

COMPLEXITY OF THE PROBLEM

Attempts on the part of individual countries to control the expansion of tobacco consumption is a multifaceted endeavor. Although bans or restrictions on advertising and promotion perhaps receive the most attention and research, they are only part of the effort. Health warnings and health education can play a role in reducing tobacco consumption as can legislation for smoke-free places and programs directed toward specific target groups such as women and children. Other facets of the problem which are receiving some attention include pricing policies, taxation, tobacco subsidies, and the relative economic importance of the tobacco industry to particular nations.

Of particular importance to the ability of a country to control tobacco within its borders is the international market behavior of countries which are net exporters of tobacco. These countries are

often politically active in opening (or keeping open) export markets. Political pressure by the United States to open Asian markets over the past ten years has been particularly strong. For example, in 1986, Senator J. Helms of North Carolina wrote to the Japanese prime minister complaining that American cigarettes claimed less than two percent of the Japanese market (Mackay 1992). In his letter, Helms suggested that the Japanese should facilitate the opening of a 20 percent share of their market to U.S. cigarettes within 18 months. It has also been noted that in Helms' letter no other U.S. export product was mentioned (Mackay 1992) and that within a few months Japan removed its tariff on all foreign cigarettes. Likewise, the developed countries of Europe with the most to gain from tobacco sales have been those most likely to oppose tobacco advertising bans. Britain, Germany, Denmark, Greece, and the Netherlands have blocked bans on advertising which would include a ban on sponsorship of sporting events and teams in the European Community (Summers 1995).

It is not only the pressure applied by country governments that opens and keeps markets open, it is also the actions of the transnational tobacco companies. As a more recent example, Philip Morris Co. developed an advertising campaign to persuade European countries not to adopt laws limiting smoking in public places (Calian 1996). The campaign cites research showing that eating sweets and drinking chlorinated water each pose more of a health risk than second-hand smoke in public places.

Another layer of complexity is added by the fact that many of the targets of international tobacco companies are countries that are still unable to control basic health problems such as infectious diseases and therefore can ill afford to expose their populations to the hazards of smoking. In addition, developing countries oftentimes face hard currency shortages that tobacco importation only exacerbates. These countries are also the most vulnerable to tobacco companies' promotions because they are less aware of the hazards of tobacco use. For example, in a 1990 survey conducted in the Philippines, 57 percent of respondents were unaware that cigarettes cause cancer (Levin 1994).

Unfortunately, many developing countries are reluctant to pass any legislation that would reduce tobacco sales because the associated tax revenues that support the social infrastructure would also be reduced (Huebner 1980; Orgill 1995). Likewise, developed countries such as the United States have been disinclined to regulate the export of hazardous or domestically restricted products because export controls might restrict U.S. industry and threaten U.S. jobs (Albers and Gelb 1991).

THE CONTINUING DEBATES

There have been several rather extensive debates in the literature concerning the influence of advertising on tobacco consumption. The essence of these debates finds tobacco supporters disclaiming the role of advertising in increasing consumption (Boddewyn 1986a, 1986b, 1989, 1994; Lambin 1976; Stewart 1992, 1993a, 1993b). The other side of the debate sees restrictions on advertising as valuable in the reduction of tobacco consumption (Chetwynd, Brodie, and Harrison 1989; Laugesen and Meads 1991; Leeflang and Reuijl 1985). Both sides marshal data to show the influence of advertising on tobacco consumption or the lack of such influence.

There are at least three reasons why the arguments for advertising leading to increased tobacco consumption are convincing: (1) face validity of the argument, (2) self-incriminating evidence coming from the tobacco industry, and (3) recent meta-analytic findings. First and perhaps most compelling is the argument of advertising executives regarding the obviousness of the tobacco industry's aims: "Advertising encourages people to use things, if this holds true for every other product category, then why not for tobacco?" (Roemer 1993, 25). Advertising professionals, when interviewed, admit that contrary to the tobacco industry's stated target of adult brand-switchers, tobacco advertising does encourage young people to initiate smoking (Crowley and Pokrywczynski 1991). Second, when confidential documents of tobacco companies have been subpoenaed, the documents have usually been self-incriminating for the tobacco companies. For example, a U.S. Federal Trade Commision staff report uncovered advice that the tobacco industry received from its advertising research agency with regard to the approach it should take when targeting children.

> Thus, an attempt to reach young smokers, starters, should be based . . . on the following major parameters:
>
> - Present the cigarette as one of a few initiations into the adult world.
> - Present the cigarette as part of the illicit pleasure category of products and activities.
> - In your ads create a situation taken from the day-to-day life of the young smoker but in an elegant manner have the situation touch on the basic symbols of the growing-up, maturity process.

- To the best of your ability (considering some legal restraints) relate the cigarette to 'pot,' wine, beer, sex, etc.
- Don't communicate health or health-related points. (Myers *et al.* 1981, Sec. V)

The most convincing findings to date that show advertising's role in tobacco consumption are those compiled by Andrews and Franke (1991). Their meta-analysis of econometric data showed that there exists a meaningful positive elasticity of demand with respect to advertising and income and a negative elasticity of demand with respect to price. Their analysis of 48 time-series studies showed that advertising does have an influence on the primary demand for cigarettes and that its regulation can be effective in reducing that demand. Most importantly, the research of Andrews and Franke shows that the positive impact of advertising on sales declines as cigarette markets become mature. They conclude that "potential smokers in countries with low income bases or little experience with consumer advertising may be much more responsive to growing prosperity or sophisticated marketing techniques than are potential smokers in the United States and the United Kingdom today" (1991, 96).

Therefore, based on the above reasoning, this paper assumes that advertising and promotion by the tobacco industry encourage consumption of the products advertised and promoted. Given the need of countries to restrict tobacco consumption and given the multifarious pressures both for and against continued tobacco expansion in world markets, governments, businesses, and households need to better understand the influence of tobacco sponsorships. The following section examines the ability of sponsorship-linked marketing programs to circumvent existing laws that limit the direct and indirect promotion of tobacco products.

LOOPHOLES IN LEGISLATION

One dictionary definition of the word "loophole" is that it is an opportunity for escaping or evading something, especially a law. This definition fits well with the duality of the behavior present in the promotion of tobacco. What is an "evasion of the law" from the country's perspective is a "promotion opportunity" from the tobacco firms' perspective. Therefore, loopholes in the following discussion are instances where, although the letter of the law is not violated in the promotion of tobacco products, the intent of the law is.

Sponsorship involves two main activities: (1) an exchange between a sponsor and a sponsee whereby the sponsor provides a fee to the sponsee and in return obtains the right to associate itself with the sponsee's activity or event and (2) the marketing of this association by the sponsor. The marketing importance of this association between the sponsor and the sponsee is emphasized by Cornwell who defined "sponsorship-linked marketing as the orchestration and implementation of marketing activities for the purpose of building and communicating an association to a sponsorship" (1995, 15). Sponsorship has become central to the promotional efforts of most tobacco companies in the United States because they allow tobacco name brand exposure in broadcast media from which they are banned. Similarly, around the world, sponsorships of events and activities are used to reach broadcast audiences even when local laws specifically prohibit tobacco companies access to broadcast media.

Sponsorship Loophole

Of all the loopholes in the various national legislative initiatives, sponsorship looms the largest. There are several reasons why allowing sponsorships by tobacco companies (especially sponsorship of sports) undermine attempts to curb tobacco consumption: (1) sponsorships function like advertising, (2) sports sponsorships reach the youth market very effectively, (3) sponsorships associate smoking with healthy, popular activities and images, and (4) the international nature of sponsored events may allow exemption from national sponsorship bans.

Sponsorships function like advertising

Most of the literature on advertising agrees that the major function of advertising is to generate awareness and liking for a product or service. Likewise most practitioners and researchers seeking to measure the effectiveness of advertising use recognition and recall of the advertisement or some measure of the consumers' change in awareness. The same is true for sponsorship, it seeks to generate awareness and liking and measures success by means of recognition, recall, and awareness criteria. Several studies have been conducted in the United States that examine the effectiveness of sponsorship as a promotion tool in different venues. Cuneen and Hannan (1993) surveyed 451

spectators at a U.S. golf tournament and found that respondents correctly recognized the participating sponsors. Turco (1995) surveyed 392 spectators at a horse racing event and found positive effects of sponsorshp in terms of recall, consumption, and corporate image. In an assessment of the impact of sponsorship on consumers' attitudes and awareness, Sandler and Shani (1992) conducted a mail survey of 1,500 running enthusiasts and found positive effects of sponsorship on awareness levels of company brands.

Internationally, the same kinds of results are found. In India, Rajaretnam (1994) conducted a longitudinal survey of a tire manufacturer that utilized only sponsorship in the promotion of products. Results of the 14,700-person survey showed that sponsorship had influenced awareness, brand preference, and corporate image for the tire manufacturer over the four-year period of the study. In Australia, Pope and Voges (1994) surveyed 180 Brisbane residents regarding messages at a rugby game and found that sponsorship, like advertising, has a cumulative effect on awareness. Although these studies differ in their approach to the study of sponsorship, they do agree that sponsorship can function like advertising.

In a study specifically of tobacco sponsorship, Ledwith (1984) surveyed 880 children in Great Britain and showed that recognition levels of cigarette brands varied according to which brands had recently sponsored televised sporting events. After conducting two separate surveys, Ledwith concluded that TV sports sponsorship acts as cigarette advertising to children and therefore circumvents the law banning TV advertising in the United Kingdom. A more recent study conducted in New Zealand assessed whether young males' attitudes toward smoking had changed after viewing an advertisement promoting a cigarette sponsorship (Hoek, Gendall, and Stockdale 1993). These results support the work of Ledwith (1984) suggesting that sponsorship communications serve more to increase awareness among nonsmokers than to change the awareness of smokers regarding alternative brands.

Sports sponsorships reach the youth market

Research conducted by Aitken, Leathar, and Squair (1986) examined children's awareness of cigarette brand sponsorship in the United Kingdom and found that the majority of the 726 children interviewed have some understanding of the meaning of sponsorship

by the late primary/early secondary school years. More than half of secondary school children were able to name cigarette brands and sponsored sports such as the combination of John Player Special and motor racing. Recent research by Pollay *et al.* (1996) added a disturbing potency to the above findings regarding sponsorship. In a study of market shares among youths and adults for the period 1979-1993, Pollay and his co-authors found that brand choices among teenagers are significantly related to cigarette advertising and the relationship between brand choices and brand advertising is significantly stronger among teenagers than among adults.

The implications that sponsorship functions like advertising, especially among the young, draw into question any research findings of a relationship between tobacco advertising and consumption that does not explicitly consider the influence of sponsorship. The problem is summed up in this short paragraph by Raphael as quoted in Crompton:

> In the United Kingdom where cigarette advertising has been banned on television for more than a quarter of a century, 64 percent of children aged between nine and fifteen claim to have seen cigarette advertising on television. The reason is that there is an average of one hour's television coverage each day of sports directly associated with a major tobacco brand. (1993, 153)

Sponsorships associate smoking with healthy images

The quintessential example of associating smoking with a healthy activity is the teaming of Virginia Slims brand cigarettes with women's tennis. The infusion of money brought about by tobacco sponsorship of women's tennis has been credited with bringing women's tennis to new prominence (Stotlar 1992), but some would question: At what cost? Ryssel and Stamminger (1988) studied how the image of tennis stars sponsored by Adidas was transferred to Adidas products in Germany. Their survey of 505 consumers who had watched a televised tennis event showed that the personality of athletes is important in determining the success of the sponsor's campaign in that the psychological credibility of the sponsor is essential to a successful brand transfer. Although no research to date has examined these types of effects in the case of tobacco sponsorships, developed nations seeking to restrict promotion of tobacco have come to recognize the powerful images created through the tobacco sponsorship of sport and have begun to take voluntary action to

restrict tobacco sponsorships. For example, Hindson in a survey of U.S. Olympic Committee's member organizations found "the most frequently cited reason for not accepting tobacco sponsorship was that tobacco products were incompatible with the health aspects of sport" (1990, 129).

In developing countries, tobacco companies oftentimes associate their products with positive images in the community. Connolly (1992) argued that tobacco companies ingratiate themselves with developing countries by sponsoring social and cultural projects. He cited the construction of schools and the provision of scholarships in Zaire, Malaysia, and India; the support of environmental projects in Costa Rica, Uganda, and Indonesia; and the sponsorship of cultural projects in Venezuela, Nicaragua, and Zimbabwe as examples.

International events may be exempt from national sponsorship bans

One of the most powerful case examples of an international media exemption for a sponsored activity is that of yachting events in New Zealand. The New Zealand Smoke-free Enviroments Act of 1990 prohibited all direct and indirect advertising of tobacco products with the exception of foreign publications and retailers' displays. This legislation prohibited sponsorship and merchandising with language that left few, if any, loopholes for tobacco marketers. "Unfortunately, six months after the passage of the Act, the New Zealand Parliament amended it to exempt from the ban the sponsorship of multinational events, defined as those in which at least three countries participate, one of which is New Zealand" (Roemer 1993, 36). The problem is that major sporting events have become so dependent on the sponsorship fees coming from tobacco companies that they themselves become advocates for the tobacco companies. Stotlar found that "television, sponsors and event owners have become a triumvirate in sport. The event owner depends on the sponsor for an operating budget, yet the sponsor is willing to provide the needed assets only if television coverage can be guaranteed" (1992, 16). Recognizing this developing dependence of sport on tobacco sponsorships, Australian states have experimented with imposing a tax on tobacco, the proceeds of which are then used to "buy out" existing sports sponsorships (Roemer 1993). In contrast, developing countries are depending more and more on tobacco companies to sponsor youths' scholastic sports and cultural events. For example, in Kenya

and other African countries, tobacco companies sponsor grade school sports (Wamwara 1996).

Countries intent on restricting tobacco promotion and stopping circumvention of advertising bans have become more aggressive by banning both direct advertising and the "indirect advertising" allowed by sponsorship-linked marketing programs. However, in many instances these attempts to limit the promotion of tobacco have been thwarted by other loopholes that are oftentimes used in conjunction with sponsorship. A discussion of these loopholes follows.

Name-Game Loophole

Several countries (e.g., Bolivia, Canada, Finland, France, Iceland, Ireland, New Zealand, Norway, and Portugal) have recognized the need to ban not only direct advertising, but also the very effective indirect advertising that is the major reason for tobacco companies heavy investments in sponsorship. The typical legislation prohibits not only direct advertising of any kind, but also limits the sponsor to the use of their corporate name (rather than brand name). This is often required to be in uniform lettering with no tobacco brand names or related advertising imagery. Roemer reported on the success of the Canadian legislation as follows:

> Tobacco companies have taken advantage of this provision (allowing limited sponsorship of corporate name) by creating shell corporations, named after major tobacco brand families. As a result, Canadians now watch the Player's Ltd. Tennis Tournament and the Benson and Hedges Inc. Fireworks Festival. (1993, 35)

Merchandising and Retailing Loophole

A variation on the name-game loophole, outlined above, is the merchandising and retailing loophole. Instead of developing a shell company, the tobacco company offers a non-tobacco product or establishes a non-tobacco retail operation in order to promote cigarette brand names. A supposedly total ban of advertising in Sweden in 1994 left the merchandising loophole open by allowing tobacco companies to market other products under the same brand names as their cigarettes (Koranteng and Crumley 1994). The dominant marketer, The Swedish Tobacco Co., responded by advertising and promoting sunglasses and cigarette lighters under the same name as its leading Blend brand tobacco.

One merchandising loophole that is being closed in many developed countries is the practice where a tobacco company sets up a retail outlet for a non-tobacco product, names that establishment after a popular cigarette brand, and then promotes the brand name heavily. Examples include "Camel Boots" footwear in Hungary and "Marlboro Classics" clothing for men in Europe. In developing countries, this loophole appears to remain wide open. For example, in Malaysia, the route around a direct TV advertising ban found R.J. Reynolds promoting "Salem Power Stations," a youth-oriented music store, and "Salem Holidays," a travel agency. Levin (1994) reported on the situation as follows:

> There also have been lavish TV ads for 'Salem Holidays.' Attractive young couples stroll through alpine scenery as music plays and a narrator intones: 'Salem High Country—a world of refreshment!' But there is no information on destinations, travel dates, or prices, and a travel agency's name appears only in the fine print. When a documentary film crew from Yorkshire Television of England sent a representative to book a Salem Holiday, the travel agent told him: 'No, no, no, we only advertise the name.' (1994, 1A)

International Media Loophole

After U.S. pressure on Thailand in 1986 and 1989 resulted in a GATT panel ruling that Thailand had the right to protect human life as a priority over liberalization of trade, Thailand enacted strong legislation in 1992 (Roemer 1993). The tobacco legislation enacted by Thailand is some of the strongest in the developing world; however, even it exempts international magazines and live international telecasts. These exemptions provide a motivation for tobacco companies to seek international sponsorships that will reach these markets and to advertise heavily in international newspapers and magazines which have a high pass-along rate in developing countries. Although the wording of the law is somewhat different, South Korea has a similar exemption for print media and broadcasts in foreign language (U.S. Government Documents, GA 1.13:GGD-93-38, 1993).

The typical proceedings leading to an international exemption for a tobacco sponsorship are illustrated in a recent Canadian debate. The Canadian Bill, C-71, which prohibits tobacco sponsorship of race cars, drivers, and equipment as of October 1998, is argued to place a "financial burden on 370 sporting and cultural events across Canada" (Dawson 1997, 16). In particular, the Molson [Breweries] Indy races in Toronto and Vancouver are seen as threatened by the

new legislation. Molstar Sport and Entertainment executives, promoters of the Molson Indy races, hope to receive an exemption from the law based on the Championship Auto Racing Teams' status as an international series (Zeisberger 1997). If they receive an international exemption clause it would allow tobacco sponsorships to continue in Canada.

The value of this loophole to tobacco companies has been recognized by many developed countries and various actions have been taken. For example, France, which bans indirect advertising, fined the Williams-Renault car racing team for allowing images of the Camel logo to reach French consumers from broadcasted events in Japan and Australia (Crompton 1993). Unfortunately, because developing countries depend more on international sources for programming, they are more likely to exempt international media from their tobacco advertising bans.

Promotional Creativity Run Awry

In actively exploiting loopholes in restrictive tobacco legislation, some tobacco concerns have gone too far. For example, in defiance of a Norwegian tobacco advertising ban, the Enlightened Tobacco Company of the United Kingdom launched their Death brand cigarette with a newspaper and TV campaign ("Death Cigarettes Vows to Advertise on Norwegian TV" 1995). The campaign, which might be mistaken as a public service sponsorship, uses lung cancer as its unique selling point. In marketing Death brand cigarettes, digitized pictures of lungs destroyed by tobacco products are displayed. Although the ads have been declared illegal by Norway's state tobacco supervisory council, they will not take action against the campaign so as to limit public attention to the brand.

POLICY RECOMMENDATIONS

Governments

The World Health Organization recommends, for all countries, that legislation (not voluntary agreement) restricting tobacco advertising is essential and that total bans (not partial bans) are required, and furthermore, total bans should include both advertising and sponsorship (Roemer 1993). However, governments in developed

and developing countries may need to adopt different policies depending on the circumstances in the country. For example, the United States and United Kingdom have the greatest potential and the greatest responsibility for appropriate policy change of all countries. The United States and United Kingdom are home to the major transnational tobacco companies (Connolly 1992) and therefore have the greatest influence in world markets. Developed countries such as the United States have arguably permitted a double standard (Johnson 1991) where an extensively regulated product with known health risks associated with consumption is allowed unrestricted export to developing nations where the dangers of smoking are less well understood.

It is essential that developed countries place a total ban on advertising and sponsorships that reach international markets where they would receive exemptions from individual country's national law. A total ban should include direct and indirect forms of advertising and leave no opportunities for evasion of the intent of the law. In the short term, more developed countries with greater resources should implement sponsorship-substitution programs aimed at buying out tobacco sponsors, while developing countries should guard against any "ingratiating" sponsorships where tobacco companies seek favor with local governments.

Business

Many properties (events and activities seeking sponsorship) restrict sponsorship from tobacco companies. In 1995, *IEG Sponsorship Report,* an industry newsletter, surveyed 1,617 properties and found that 21 percent of properties had restrictive sales policies and 93 percent of properties with restrictions banned tobacco sponsors specifically. Likewise, in a recent survey of companies that have sports sponsorships in their communications programs, several companies reported specific sponsorship restriction policies related to association with tobacco companies (Cornwell 1997). From a business person's perspective, the development of sponsorship guidelines that specifically prohibit a firm's co-sponsorship of events with tobacco companies would not only serve to limit any negative images for their own company but also discourage sponsorship use by tobacco companies. In addition, major event packagers could discourage or prohibit merchandising and sampling activities by tobacco companies during sponsored events.

Communities and Households

Although individual consumer strategies to reduce worldwide tobacco promotion might seem farfetched, there are several important policies households could adopt in an effort to reduce the viability of international communication routes for tobacco firms. In countries where freedom of speech is protected, actions could begin with boycotts of international events when tobacco companies are sponsors and/or boycotts of those media that carry tobacco advertising. This may require that an entire event is boycotted when only one tobacco sponsorship is included. Naturally, these efforts would be most effective if individuals were also to communicate to the event organizer/property and/or media the reason for the boycott. A somewhat more extreme approach might be a public protest against the tobacco firm's promotion practice. This method was effective in Hong Kong when the public learned that R.J. Reynolds' popular rock concert series required not money but five empty Winston cigarette packages as the entrance fee (Roemer 1993). As a result of public protest the series was canceled.

A second grassroots strategy would be to communicate with lawmakers and the media concerning these sponsorships. One very effective way for an individual to communicate with a larger audience is to write a letter to the editor of their local newspaper. For example, a health educator in Florida wrote to the *St. Petersburg Times* regarding the inappropriateness of Virginia Slim's sponsorship of women's sports (Davis 1997). This same letter writer also works with a group of teens dedicated to creating a tobacco-free generation. They call themselves SCAT (Student Coalition Against Tobacco). This leads to a third route for households and communities to influence tobacco communication: coalition building.

Community based efforts to reduce the presence of tobacco "cues" have already proven effective. For example, in the United States, the Los Angeles Public Health Foundation, working through its tobacco control project, L.A. Link, has sponsored "The Tobacco-Free Grand Prix." The focus of the project is to encourage the well-established Long Beach Grand Prix to phase out its tobacco sponsorships and replace them with smoke-free sponsors. L.A. Link has the participation of local community groups including the Long Beach Fire Department, the Long Beach Health Department, and a group called Kids Motor Sports Education (Etem 1997). The State

Department of California funds L.A. Link through a state tax on tobacco that began in 1990.

Lastly, communities and household can now engage in international discussions regarding tobacco promotion via the Internet. As an example, the *selbstgegründete* (self-organized) worldwide web homepage for the German nonsmoking initiative (Nichtraucher-Initiative Deutschland) shares information concerning laws related to tobacco and smoking (http://ip-service.com/NID). The Internet provides an international communication medium where ideas successful in one country can be shared with another.

CONCLUSION

The active exploitation of the advertising loopholes examined here make a mockery of individual countries' attempts to discourage tobacco consumption by their citizens. Despite the fact that World Trade Organization rulings have given priority to human health over liberalization of trade, tobacco exporting countries and companies still seek to use trade-related reasons to open markets. Once these markets are open, sponsorships and other promotional techniques designed to circumvent advertising restrictions are utilized to the fullest extent possible. While the discussion in this paper focuses on obacco sponsorships as a promotional tool, it is recognized that dvertising and promotion are only one part of the puzzle, however, he policy recommendations provided here, if implemented would educe the channels of communication for tobacco firms which could n turn reduce worldwide consumption of tobacco.

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TAMARA F. MANGLEBURG, DHRUV GREWAL, AND TERRY BRISTOL

Socialization, Gender, and Adolescent's Self-Reports of Their Generalized Use of Product Labels

This study examines how various aspects of the consumer socialization process affect male and female teenagers' tendencies to use product labels in general. In contrast to the traditional information-processing perspective used in many studies of gender differences and studies of labeling, this research focuses more on sociological explanations for gender differences in teens' tendencies to read product labels. Specifically, because males and females are likely to receive differential consumer socialization, differences are expected in the genders' use of product labels. Male and female teenagers may be differentially taught about the importance and use of product labels through differences in exposure to marketplace-related communication from parents, peers, and mass media. Exposure to marketplace-related communication, in turn, is likely to have positive effects on teens' tendencies to use product labels in general. With the exception of exposure to mass media, results based on data from a sample of high school students generally supported this mediational model.

Consumer socialization is the process "by which young people acquire skills, knowledge, and attitudes relevant to their functioning as consumers in the marketplace" (Ward 1974, 1). Through socialization, adolescents may learn a variety of consumer skills. For example, research has shown that socialization processes affect adolescents' ability to filter puffery in advertising, their level of product knowledge, and their tendencies to seek information prior to making a purchase decision (Moschis 1978). One consumer skill likely to be particularly important, but which has not been previously studied, is

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We thank the Florida Atlantic University Foundation for a faculty research grant to Tamara Mangleburg which partially supported this research and Josh Wiener for helpful comments on earlier drafts of this manuscript. Dhruv Grewal would like to acknowledge a University of Miami summer research grant.

The Journal of Consumer Affairs, Vol. 31, No. 2, 1997
0022-0078/0002-255 1.50/0
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Cigarette Packaging and Event Marketing Increases the Attractiveness of Smoking: A Study of Youth

Working Papers

Cigarette Packaging and Event Marketing Increases the Attractiveness of Smoking: A Study of Youth

Working Papers Series No. 28

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OCTOBER 1997

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Suggested Citation: Josie R. d'Avernas, David Northrup, Mary K. Foster, Dee Burton, Roberta Ferrence, John Pollard, Irving Rootman and Brian R. Flay. Cigarette packaging and event marketing increases the attractiveness of smoking: A study of youth. Ontario Tobacco Research Unit, Working Paper Series #28, Toronto, 1997.

INTRODUCTION

Most smokers begin experimenting with cigarettes during adolescence,[1] and many go on to become addicted to tobacco.[2 3 4] The magnitude of the role played by tobacco marketing in promoting this experimentation is not well-established, though it is well-accepted that it plays a role.[5 6 7] Opinions aside, the *data* are remarkably consistent in two key areas of inquiry: awareness of tobacco promotion and advertising among children and adolescents is high,[8 9 10] and major marketing thrusts to specific target groups correspond to increases in smoking initiation in those target groups.[11]

Since tobacco products cannot be easily differentiated based on differences in taste, smell or appearance, promotion is key in encouraging purchase.[12] Promotion increases awareness of the product and associates it with images, activities, and events that are appealing and desirable. At the time of this study, there were notable contrasts between the United States and Canada in the way tobacco products were promoted. In the United States, marketing and promotion was sophisticated and broad, including direct advertising on billboards and in magazines, sponsorship of sporting and cultural events, sale or give-away of promotional merchandise, point-of-purchase displays, and packaging. In Canada, promotion was more subtle and circumscribed as a result of restrictions on direct advertising, occurring primarily through the sponsorship of sporting and cultural events and point-of-purchase displays. Through the formation of "shell" companies bearing names very similar to tobacco brands (e.g., du Maurier Ltd., Player's Ltd., Matinée Fashion Foundation Ltd.), tobacco companies advertise events they sponsor, using names, colours, logos and font styles that are similar to those on cigarette packaging.[a] This study examines the extent to which this has resulted in event advertising that is mistaken for cigarette advertising by youth.

This study also examines the role of packaging in promotion and image creation. In product categories where consumers have little or no previous experience -- in this case, adolescent

[a] Since the time of this study, significant changes have occurred in the regulatory framework for tobacco advertising and promotion, in both the U.S. and Canada.

nonsmokers contemplating starting -- brand image is an important trigger for purchase. Brand image is created in advertising, in other promotional activities, in an individual's role models and the brand they smoke, and in the way the brand is packaged.[13 14]

To the extent that package design creates and reinforces brand images, then downplaying these images via ***plain packaging*** may reduce smoking. Plain packaging would eliminate the use of unique logos, fonts or colours on the package. The tobacco industry has acknowledged that as advertising restrictions increase, the package itself will become increasingly significant as "the creator and bearer of the image."[15] In a New Zealand qualitative study of 550 13 year old students, Beede and Lawson[16] found that plain packages were considered "dull and boring" by this age group, and reduced curiosity about smoking. This paper replicates and extends this work in the Canadian and American contexts. It addresses the following research questions:

1. To what extent do youth recognize sponsored event advertising as advertising for tobacco products? To what extent to they recognize it as advertising for an event or activity?

2. Do plain cigarette packages project less positive imagery than regular packages?

3. Do plain packages increase attention to, believability of, and recall of health warning information compared to regular packages?

4. What effect will plain cigarette packaging will have on youth smoking, according to youth?

METHODS

This study used both quantitative and qualitative methods. To the extent that the results and conclusions drawn from one method support the results and conclusions from the other, overall confidence in the conclusions is greatly enhanced.[17 18 19]

FOCUS GROUP DISCUSSIONS

A total of 339 people participated in 52 focus group discussions. Forty group discussions were conducted in various locations in Ontario and 12 were held in Chicago.

Ontario

Forty focus groups were held, with a total of 269 youth participating. Four groups were held in each of five medium-sized cities, and 20 groups were held in a large metropolitan area. Groups included a cultural mix that was roughly representative of the cities the groups were held in. Youth who participated ranged in age from 12 to 17. Groups were held separately for males and females, and for smokers and nonsmokers contemplating smoking. Group size ranged from 6 to 12. Potential candidates were identified through existing directories maintained by a focus group recruiting firm. Questions about smoking status were asked in the context of several other questions in order to mask the true purpose of the study. Those indicating they did not smoke and never intended to smoke were disqualified, as were those who had participated in any other focus groups in the last six months or any focus groups, ever, on the topic of smoking.

Youth who qualified for the study were invited to participate in a focus group session "to market test new packaging for a popular consumer product." To avoid bias in responses given by participants, they were not told of the sponsor or the purposes of the research until the end of the focus group. A short discussion on the effects of smoking was conducted at the end of the session

and educational materials were distributed to ensure that the group discussion in no way encouraged participants to look more favourably on smoking. Participants received payment for their participation. All focus groups were 1.5 to 2 hours long.

Focus group discussions investigated brand imagery, attributes of smokers of plain-packaged and regular-packaged cigarettes, recall of health warning information on plain and regular packages, perceived impact of plain packaging on smoking behaviour of youth, and youth awareness of the sponsorship of events by tobacco companies. Plain and regular packages were used for display purposes throughout the discussion. Plain packages were beige with black printing in a standard font. Only the brand names, health warning label, tar and nicotine levels and UPC code appeared on these packages. Du Maurier and Player's brands were used for the study, as these are the most popular brands among Canadian youth. A detailed description of procedures and results of the focus groups is available.[20]

Chicago

Twelve focus groups were held, with a total of 70 adolescents participating. The Chicago focus groups were similar in composition to those conducted in Ontario in terms of age, sex and group size, but differed in terms of smoking status and ethnic mix. All participants in Chicago were smokers, reporting smoking "on a regular basis", or "on a fairly regular basis." Four groups were composed of African-Americans, four of Caucasians, and four were mixed, with about 50% Hispanics. The recruiting firm used in-person recruitment at convenience stores, fast-food restaurants and other teen hangouts, using questions similar to those used in Ontario to mask the smoking criterion. Participants received payment for their participation. All focus groups were 1 to 1.5 hours long.

Half of the group sessions consisted of focused group discussion; half consisted of quantitative assessments (paper-and-pencil ratings). Discussion and ratings centred on comparisons of three types of cigarette packages: regular (real), plain (beige with black lettering and no brand imagery) and novel (full colour and attractive, but distinctly different in design from the real

package). Camel, Marlboro and Newport brands were used, as these are the most popular brands among U.S. adolescents. A de-briefing with information on cessation strategies concluded the session, to ensure that the discussion was not interpreted as encouraging or condoning smoking behavior.

CLASSROOM SURVEY

A significant threat to generalizability of findings from focus group research stems from the fact that participants are self-selected and therefore not necessarily representative of the general population. Qualitative analyses are also subject to interpretive bias and require verification with quantitative data. To supplement the qualitative study 2132 students from 71 Ontario classrooms and 10 Chicago classrooms were surveyed.

Ontario

A random sample of Ontario students in grades seven and nine was surveyed. The population of students was stratified according to geographical location (Metropolitan Toronto, Northern Ontario, Western Ontario and Eastern Ontario) and a stratified, clustered sample using home rooms as sampling units was drawn. Within each of the two grade strata, students were proportionally allocated among the four regional strata. Results from the Ontario component of 1,559 youth are generalizable to the Ontario population of Grade 7 and 9 students. Results are accurate to within 2.5 percentage points, 19 times out of 20.

Each student completed an interviewer-guided questionnaire in a classroom setting. The questionnaire included items about the students' background, their attitudes about and use of tobacco, their awareness of tobacco sponsorship, their attitudes about plain and regular cigarette packages, and their view of the believability of current health warnings on cigarette packages.

Parental information and consent forms were obtained for all participants. Data collection occurred between November, 1994 and January, 1995. In Ontario, 43% of the sample was in Grade

7 and 57% in Grade 9. Eight percent of Grade 7s and 28% of Grade 9s reported smoking at least one cigarette in the last month. One percent of Grade 7s and 19% of Grade 9s reported smoking daily. A detailed report of procedures and results of this survey is available.[21]

Chicago

The Chicago school-based study consisted of a stratified random sample of all Chicago public schools, drawn within school type (high school/elementary and regular/specialized). A total of 577 students in 10 Chicago schools participated. All students were in the 7th, 8th, 10th or 11th grade. Assessments took place in a classroom setting. Questionnaires with computerized scan sheets were administered anonymously. Responses centred on comparisons of three types of cigarette packages: regular (real), plain (beige with black lettering and no brand imagery) and novel (full colour and attractive, but distinctly different in design from the real package).

Of the 577 students, 60% described themselves as aged 14 or under and 40% as aged 15 and over; 71% described themselves as black, 10% as white, 9% as Hispanic, 5% Asian and 6% Other. With respect to smoking status, 23% reported that they had smoked cigarettes within the past year. Of these, 46% smoked only a few times a month or less; 16% a few times a week, 19% a few times most days, 14% about a half a pack a day, and 6% a pack or more a day.

RESULTS

1. **To what extent do youth recognize sponsored event advertising as advertising for tobacco products? To what extent to they recognize it as advertising for an event or activity?**

Ontario

During the time period of this study, direct advertising of tobacco products was prohibited

in Canada under the *Tobacco Products Control Act*[b]. During the time of the ban, a primary means of marketing tobacco products was through sponsorship of sporting and cultural events, with event advertising making the link to tobacco products through the use of names, logos, colours and fonts similar to those found on cigarette packages. An "event advertising poster" procedure was conducted in both the classroom survey and focus groups. Students in the classroom survey were shown three posters, one at a time and in random order, depicting events sponsored by beer companies and tobacco companies. The posters were the du Maurier Jazz Festival, Player's Ltd. Racing, and Labatt's Blue Jays Baseball. In all posters, the words were modified to make them unreadable so students would use the imagery, colours and fonts to identify the meaning of the poster rather than the words. Students were shown the poster and asked to write down "what you think this poster is about." The interviewer told students there were no right or wrong answers, and that they should write down as many ideas as they could think of. This experiment was done very early in the survey so that responses to other questions would not contaminate the results.

Focus group participants saw the same posters, wrote down their impressions of what each poster was about, then discussed those impressions.

Most students (about 85%) offered a literal description of the poster, as expected. However, other responses were also offered (Tables 1 and 2). These included responses that identify the product (e.g., "it's about smoking"), responses that identify the brand name (e.g., "it's the Player's racing car"), responses that associate a lifestyle with the ad (e.g., "people who smoke do fun and dangerous things like race cars"), and responses that identify the event or activity (e.g. "It's about the Jazz Festival").

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b In September of 1995, the Supreme Court of Canada struck down key sections of that legislation, leading to a lifting of the ban that had been in place since 1989. It was replaced in 1997 by the *Tobacco Act.*

TABLE 1: Ontario Student Recognition of Product, Brand, Lifestyle Connection and Event Associated with Player's Ltd. Racing Poster

Proportion of students who:	Overall	Smoking Status			Grade		Sex	
		Non	Light	Daily	7	9	M	F
	%	%	%	%	%	%	%	%
Mentioned cigarettes	53	50	67	61*	48	56*	45	60*
Mentioned brand name	51	46	69	68*	38	60*	38	63*
Made lifestyle connection	20	19	21	27	16	23*	19	21
Mentioned event advertised	<1	<1	<1	<1	<1	<1	<1	<1
n	1559	1,243	220	96	637	922	753	801

*indicates significant difference between groups ($p < .001$)
Ontario school sample, n = 1559

TABLE 2: Ontario Student Recognition of Product, Brand, Lifestyle Connection and Event Associated with du Maurier Jazz Festival Poster

Proportion of students who:	Overall	Smoking Status			Grade		Sex	
		Non	Light	Daily	7	9	M	F
	%	%	%	%	%	%	%	%
Mentioned cigarettes	12	11	17	16*	8	15*	12	13
Mentioned brand name	16	13	25	28*	6	23*	12	20*
Made lifestyle connection	4	4	5	7	3	5	4	4
Mentioned event advertised	<1	<1	<1	<1	<1	<1	<1	<1
n	1559	1,243	220	96	637	922	753	801

*indicates significant difference between groups ($p < .001$)
Ontario school sample, n = 1559

Less than one percent of young people mentioned the event being advertised by these posters. A significant proportion, however, interpreted the posters as advertisements for cigarettes. Fifty-three percent said the Player's Ltd. Racing ad was about cigarettes and 12% said the du Maurier Jazz Festival ad was about cigarettes. The brand name was mentioned equally as frequently. In fact, it was common for students to mention the brand name and cigarettes in the same line (e.g., Player's cigarettes, du Maurier cigarettes).

For both the Player's Ltd. Racing and the du Maurier Jazz Festival posters, smokers were more likely than nonsmokers to link the poster to cigarettes and to mention the brand name. Grade nine students were more likely than Grade seven students to link the posters to cigarettes and to mention the brand name.

2. Do plain cigarette packages project less positive imagery than regular packages?

Ontario

In the Ontario school survey, posters depicting regular and plain-packaged cigarettes were displayed beside each other. Half the classes (randomly determined) saw Player's cigarettes on the poster, and half saw du Maurier. Students were requested to respond to a series of statements by choosing either the regular or the plain package as the package best described by the statement.

Sixty-four percent said they liked regular packages better than plain packages; 86% found the plain package more boring; and 78% found it uglier (Table 3). Smokers were significantly more likely to report liking the regular package better than were nonsmokers (70% versus 60%).

TABLE 3: Ontario Student Responses to Statements About Regular and Plain Cigarette Packages

Question	Regular Package %	Plain Package %	No Difference %
Which do you like better?	64	8	28*
Which is more boring?	5	86	9*
Which is uglier?	8	78	14*
Which has cigarettes that cool kids would smoke?	64	5	31*
Which would you more like to be seen with?	50	5	45*

*indicates significant difference between groups ($p<.001$)
Ontario school sample, n = 1559

Students were also asked which package has cigarettes that taste better, which package has cigarettes that would keep them from gaining weight, and which package has cigarettes that would be more likely to make them sick. For these items, the majority indicated there was no difference. Therefore, students understood that the product was the same but were nevertheless susceptible to the more positive imagery projected by the regular packages.

Chicago

In Chicago focus groups, each of nine packages (real, plain and novel versions of Camel, Marlboro and Newport) was passed around the group in sequence. Youth examined each package and rated it using four-point bipolar attributes. Real cigarette packages were rated by both younger

and older Chicago youth smokers participating in the focus groups as more attractive, exciting, modern, for young people, expensive looking, colorful, and cool than plain packages (Table 4). They were also reported to be more likely to turn young people on to smoking. The novel packages were closer in appeal to the real packages than to the plain packages, suggesting that an appealing package design, whether recognized and associated with imagery from other sources or not, portrays a more positive imagery than does a plain package.

TABLE 4: Chicago Youth, Average Ratings of Various Package Types by Age

Descriptor	12-13 year olds			16-17 year olds		
	Real	Novel	Plain	Real	Novel	Plain
ugly-attractive	2.9	2.6	1.5	2.8	2.4	1.4
boring-exciting	2.8	2.5	1.5	2.6	2.4	1.3
old fashioned-modern	3.0	2.6	1.5	2.7	2.5	1.5
cheap-expensive looking	3.0	2.6	1.6	2.9	2.3	1.5
for old-for young people	3.0	2.6	1.7	2.7	2.4	1.7
dull-colorful	2.8	2.7	1.4	2.7	2.7	1.3
nerdy-cool	3.0	2.5	1.6	2.6	2.3	1.6
turn people onto-turn people off smoking	3.0	2.6	1.8	2.8	2.4	1.6

Chicago focus group sample, n = 70

Data from the Chicago school study, including both smokers and nonsmokers support these findings. Table 5 shows the choices of students who viewed slides of three different types of packages. Here students simply circled a letter to tell which package looked best. Again, a majority of students consistently selected the real package as the one that looked best (58% to 80%). As in the focus group assessments, the plain packages were least likely to be chosen, with the novel packages falling in the middle.

TABLE 5: Percent of Chicago Students Selecting Various Package Types by Age and Brand

Brand	<15 year olds			15+ year olds		
	Real %	Novel %	Plain %	Real %	Novel %	Plain %
Marlboro	61.0	31.0	6.8	57.8	24.8	16.5
Newport	63.8	30.2	4.9	73.0	16.8	9.9
Camel	80.2	14.3	4.9	72.0	17.2	10.4

Chicago school sample, n = 573

3. Do plain packages increase attention to, believability of, and recall of health warning information compared to regular packages?

Ontario

A "warning recall" experiment was part of the classroom survey. Classes were randomly presented with a poster with one of six pictures on it: du Maurier regular package, du Maurier plain package (white), du Maurier plain package (beige), Player's regular package, Player's plain package (white) and Player's plain package (beige). All packages displayed the warning "Smoking can kill you." This warning was chosen because focus group results showed that it was judged as most effective by youth in stopping young people from smoking. After showing the poster for about one minute, it was removed and students were asked to record everything they could remember about the cigarette package they just saw. Students' comments were coded into six categories: colour of package described, health warning recited, brand name mentioned (Player's or du Maurier), cigarette type mentioned (e.g., filter-tipped), pack size mentioned (e.g., 20 cigarettes), and information from side panel mentioned (tar, nicotine and carbon monoxide levels). Following this, students looked at pictures of plain and regular-packaged cigarettes side by side and were asked to indicate "which

makes the health warning look more serious" and "which makes the health warning easier to see."

When packages were shown and then withdrawn, the feature most often recalled by students was the health warning (83%), followed by brand name (77%). It was also the element most often mentioned first (40%) followed by colour (25%).

There was no difference in recall of the health warning between plain and regular packages for nonsmokers and light smokers. However, significantly more daily smokers mentioned the health warning on the plain package (82%) than on the regular package (62%) ($p<.001$). Although recall of the warning was not much affected by plain packaging, perceived seriousness and visibility of the warning was. Fifty-three percent of students said plain packages made the health warning look more serious compared to 19% who felt that way about regular packages ($p<.001$). Fifty-one percent said plain packages made the health warning easier to see, but only 29% said this about regular packages ($p<.001$).

Chicago

A similar "warning recall" experiment was conducted in Chicago focus groups. Each of nine packages (real, plain and novel versions of Camel, Marlboro and Newport) was passed around the group in sequence and removed from view. For each package, participants were asked to write down the first thing they remember about the package, then to write down everything else they remember.

Warning recall results from the Chicago sample contrast sharply with the Ontario results. None of the 12-13 year olds and only 2% of the 16-17 year old Chicago participants listed the health warning as the first thing they recalled about the packages that had been shown and removed from view. Only 3% of younger adolescents and 8% of older adolescents mentioned the warning label as any part of their extended recall. When one examines the prominence of the Canadian warnings (top portion of each face of the package) in comparison to the American warnings (small type on side of package), this result is not surprising. Recall did not vary by package type.

4. What effect will plain cigarette packaging will have on youth smoking, according to youth?

Ontario

In the school survey, posters depicting regular and plain-packaged cigarettes were displayed beside each other. Half the classes (randomly determined) saw Player's cigarettes on the poster, and half saw du Maurier. Students were asked to compare regular and plain packages according to which they thought would make people their age start smoking, which people their age would be willing to pay more for, and which would turn people off from smoking. Most students felt that regular packages were more likely to encourage smoking than plain packages (62% versus 6%), and that young people would pay more for them (60% versus 4%). Almost half felt that plain packs would turn them off smoking, compared to regular packs (43% versus 5%). The remainder felt there was no difference (Table 6). Non-smokers were more likely than smokers to report that cigarettes in plain packages would turn people their age off smoking.

TABLE 6: Ontario Student Responses to Statements About Regular and Plain Cigarette Packages

Question	Regular Package %	Plain Package %	No Difference %
Which would make people your age start smoking?	62	6	32*
Which would people your age be willing to pay more for?	60	4	36*
Which would turn people like you off smoking?	5	43	52*

* indicates significant difference between groups ($p<.001$)
Ontario school sample, n = 1559

In both the Ontario classroom survey and the Ontario focus groups, students were asked what they thought would happen if all cigarettes were sold in plain packages: whether students who smoke would smoke more, less or the same, and whether students who don't smoke would be more likely, less likely or equally likely to start smoking. One quarter (25%) of students thought plain packaging would make smokers smoke less, and one third (35%) thought plain packaging would make it less likely that nonsmokers would start. Most of the remainder (71% and 62%) thought it would make no difference. Smokers were more likely than nonsmokers to say plain packaging would make no difference to the amount young smokers smoke (85% versus 67%) or to the likelihood of nonsmokers starting (77% versus 58%).

Chicago

In the Chicago focus groups, a quasi-behavioural test was completed. Nine packages (real, plain and novel versions of Camel, Marlboro and Newport) were displayed, and students were asked to give their top three choices for "which package you would most like to take home today." They did not actually get the packages to take home with them, but were offered cash instead.

There were striking differences in package preferences. Most youth in each age group preferred the real package (88% and 73% respectively for younger and older respondents). A minority chose the novel package (13% and 21%) and very few chose the plain package (Table 7).

TABLE 7: Chicago Youth Selecting Various Package Types by Age

Package Type[1]	12-13 year olds	16-17 year olds
Real	88	73
Novel	13	21
Plain	0	6

[1] First choice from a selection of 9 choices (3 package types by 3 brands)
Chicago focus group sample, n = 65

DISCUSSION

A growing body of evidence suggests that tobacco advertising and promotion is a contributing factor to adolescent smoking uptake. [22 23 24 25 26 27 28 29] Tobacco is an undifferentiated, image product: undifferentiated, because different brands of the product are not noticeably different on the basis of the product itself; image, because it is sold for the image it projects to the user. These images are created by advertising and promotion, which takes many forms, including direct advertising, ads for tobacco company-sponsored events that use colours, fonts and logos that connect the ad to the product, and packaging. Cigarette packaging serves as the badge for these images, that transfers the image, created from advertisements, promotions and real life role models who use the product, to the user.

Even with the restrictions on direct advertising of tobacco products in Canada that were in place over the time of this study, youth perceived that tobacco ***product*** advertising was occurring, through the advertising of events sponsored by tobacco companies, notably Player's Ltd. Racing and the du Maurier Jazz Festival. This is particularly true for Player's, with colours, font and even shapes making fairly blatant connections to the cigarette package itself. That over one half of students associated the Player's Ltd. Racing ad with cigarettes, despite the fact that the poster did not have the word "Player's" on it indicates the high degree of success that Player's has had in maintaining a profile for their company and their product, despite the ban on advertising cigarettes. Given that the purpose of the advertising ban was to eliminate cigarette advertising, these results indicate the Player's, and to a lesser extent, du Maurier, have successfully circumvented the spirit of the law.

These ads, like direct advertising for tobacco, are perceived as "lifestyle" ads, portraying imagery of fun, sophistication, wealth, and independent lifestyles. When writing about the Player's advertisement, students often linked it to a flashy lifestyle, making comments about fast cars, fun and smoking. The cigarette package reinforces this imagery and serves as a badge to transfer that imagery

to the user.[13 14] This "badge" function is important to youth, and the package design can enhance or reduce this function. While youth see no difference between cigarettes in regular or plain packages in terms of the likelihood of cigarettes in each package keeping them from gaining weight, harming them as they get older, or making them sick, they are, nevertheless, susceptible to the image associated with regular packages, saying cool kids smoke cigarettes in regular packages, regular packages are more likely to make their peers begin smoking, and they prefer to be seen with regular packages. In contrast, plain packages are seen as boring and ugly, and the health warnings appears both more prominent and more serious on them. Novel, interesting packaging was more appealing to youth than plain packaging, but not as appealing as the real packaging, suggesting that the link to other promotions is important, but not the only thing influencing appeal. In other words, there seem to be two distinct negative factors about plain packages that reduce the appeal of smoking to youth: their lack of brand identification, and their lack of flair.

Youth believe that the negative (or neutral) imagery projected by plain packages will translate to fewer people their age smoking. Nonsmokers are more likely to report that plain packaging would turn people their age off smoking, consistent with the notion that packaging is more salient to nonsmokers and light smokers, and that once the habit is established, the product itself becomes more salient and the packaging becomes relatively less important.

The results of this study contribute to a growing body of evidence suggesting that restrictions on advertising and promotion - including requiring that cigarettes be sold in plain packages - will reduce the positive imagery associated with tobacco products. Of course, more than product image contributes to decisions to try cigarettes. Other key factors include rebellion, curiosity, opportunity and direct peer pressure[30]. Restrictions on advertising and promotion, including plain packaging, form one plank in a comprehensive platform of strategies to protect youth from starting to smoke.

ACKNOWLEDGEMENTS

This project was a joint initiative of the University of Toronto, University of Illinois at Chicago, and York University. It was funded by the Robert Wood Johnson Foundation and the Canadian Cancer Society.

We thank the members of the Scientific Advisory Committee who provided valued input on the design of the study, analysis strategy and interpretation of the data: Dennis Raphael from the University of Toronto, Eric Single from the Canadian Centre for Substance Abuse, Rob Donovan from the University of Western Australia. We also thank Gar Mahood from the Non-Smokers' Rights Association, Marilyn Pope from the Addiction Research Foundation, Gail Lindsay from the Canadian Cancer Society and Penny Evans from the Canadian Cancer Society for their input at strategic points in the course of the studies.

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Guest Editorial

The Effects of Tobacco Advertising: Brand Loyalty, Brand Switching, or Market Expansion?

In 1993 the tobacco industry spent $6.035 billion to advertise and promote cigarettes in the United States.[1] This figure, equivalent to $191 per second, represents a 15.4% increase over 1992 expenditures. From 1975 to 1992, cigarette advertising and promotional expenditures increased fourfold in real (inflation-adjusted) terms.[2] Cigarettes are the second most heavily advertised product in the United States, after automobiles.[3]

What are the effects of this massive spending to promote the use of these deadly, addicting products? The official position of the tobacco and advertising industries is that the sole effects of tobacco advertising are to promote brand loyalty and brand switching. The 1989 surgeon general's report on smoking and health,[4] however, identified four direct mechanisms whereby tobacco advertising and promotion may affect overall consumption: (1) by encouraging children or young adults to experiment with tobacco products and initiate regular use, (2) by increasing tobacco users' daily consumption of tobacco products (by acting as an external cue to tobacco use), (3) by reducing tobacco users' motivation to quit, and (4) by encouraging former users to resume usage. The report also described three indirect mechanisms by which advertising and promotion may affect total consumption: (1) by reducing media coverage of tobacco and health; (2) by creating support for, or muting opposition to, the industry's marketing activities among sporting, cultural, and minority organizations that receive industry largess; and (3) by fostering the notion—through the ubiquity and familiarity of tobacco advertising and promotion—that "Smoking can't really be all that dangerous; otherwise, the government would ban cigarette advertising."

Based on a review of the evidence available at the time, the 1989 surgeon general's report came to the following conclusion: "There is no scientifically rigorous study available to the public that provides a definitive answer to the basic question of whether advertising and promotion increase the level of tobacco consumption. Given the complexity of the issue, none is likely to be forthcoming in the foreseeable future. The most comprehensive review[5] of both the direct and indirect mechanisms concluded that the collective empirical, experiential, and logical evidence makes it more likely than not that advertising and promotional activities do stimulate cigarette consumption" (citation added).

Since publication of that report, evidence indicating that cigarette advertising and promotion increase total consumption, especially among youth, has accumulated steadily.[6–15] The 1994 surgeon general's report, *Preventing tobacco use among young people,* reflected this growing evidence by concluding that "cigarette advertising appears to increase young people's risk of smoking."[16]

In this issue of *AJPM,* Siegel at al.[17] have added another important piece of information to this field of research. They analyzed data from the 1986 Adult Use-of-Tobacco Survey to measure the frequency of brand switching among smokers. They found that only 9.2% of adult smokers switched brands in 1986, and only 6.7% of smokers switched from one company's brand to another company's brand. The 9.2% figure is similar to the 10% figure widely cited in scientific journals and industry trade publications. (The source of the 10% figure is elusive, as Siegel et al. noted, but likely derives from internal industry research.)

Siegel et al. estimate that the total profit derived from "company switching" in 1986 was $362 million, which, in their view, "does not justify the $2.4 billion spent on cigarette advertising and promotion in 1986." By inference, then, the heavy expenditures for cigarette advertising and promotion must be intended to accomplish other effects besides brand switching (see above).

How would the tobacco and advertising industries respond to this research? No doubt they would emphasize that advertising and promotion are intended not only to induce switching *to* the brand being advertised, but also to discourage switching *away from* that brand. Siegel et al. thus call for further research to assess the effect of advertising on maintaining brand loyalty.

But if enhancing brand loyalty were the only other effect of tobacco advertising and promotion, as the industries would have us believe, would it make sense for tobacco manufacturers to continue to spend such large amounts to hawk their products? As Tye et al. asked,[18] why wouldn't the companies cease advertising and promotion altogether and save themselves billions of dollars in "defensive" expenditures? That would provide special benefit to Philip Morris and RJR Nabisco, which control the bulk of the domestic cigarette market and spend the largest amounts on cigarette advertising.[19] Well, as the companies would be quick to point out, they cannot collude to stop advertising because that would violate antitrust laws. And because of the competitiveness of the cigarette market, no company could abandon advertising and promotion unilaterally.

But in this hypothetical point-counterpoint, there is one final question: If the companies don't find an industry-wide (market expansion) benefit to advertising and promotion, why wouldn't they support federal action to ban tobacco advertising and promotion? There is no antitrust impediment to petition Congress, the Food and Drug Administration (FDA), or any other arm of government. And precedent for such action exists; in the late 1960s the cigarette industry offered to voluntarily cease advertis-

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ing in the broadcast media (under mounting pressure from critics), but ultimately supported a congressional ban instead because of antitrust considerations.[20]

The reason for the industry's failure to support a federal ban on tobacco advertising must be that the underlying premise is wrong—that is, the companies must indeed perceive an industry-wide benefit to advertising and promotion. The benefit—the maintenance or expansion of the cigarette market—serves a vital need for an industry that is losing more than 400,000 of its consumers each year to smoking-attributable deaths.[21]

President Clinton has given the FDA approval to promulgate regulations that will restrict tobacco advertising and promotion, as well as minors' access to tobacco. The proposed restrictions on advertising and promotion would (1) ban outdoor advertising within 1,000 feet of schools and playgrounds; (2) allow only "tombstone" advertising (black-and-white text-only advertising) for all other outdoor advertising; (3) allow only tombstone advertising in publications with significant youth readership (more than two million readers or more than 15% of the readership younger than age 18); (4) prohibit the sale or giveaway of products such as caps and gym bags that carry tobacco-product brand names or logos; and (5) prohibit brand-name sponsorship of sporting and entertainment events.[22] The study by Siegel et al. provides one more piece of evidence to indicate that cigarette advertising affects overall cigarette consumption, lending further support to the FDA's proposal.

The 1994 surgeon general's report[16] cited a number of statements made by tobacco and advertising industry employees and publications through the years about the effectiveness of cigarette advertising in building and maintaining the cigarette market. These testimonials support the findings of empirical research, but also reflect the common-sense notion that advertising must have effects beyond brand loyalty and brand switching. Sir George Young, a former British health minister, put it well: "I totally reject the argument that advertising has no effect on total consumption, but simply redistributes consumption between competing brands. I remember an advertising man justifying the amount of money spent on promoting different brands of toothpastes. He assured me that it promoted general interest in dental hygiene, in addition to promoting the particular brands. I believed him, and I believe that the same is true for tobacco."[23]

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Canadian Heritage Patrimoine canadien

FEDERAL GOVERNMENT POLICY ON TOBACCO SPONSORSHIP OF NATIONAL SPORT ORGANIZATIONS

Department of Canadian Heritage
Sport Canada

(Originally issued)
March 1985

Canada

Principles

Corporate sponsorship of national sporting events and programs through national sport organizations is an important component of the funding structure of amateur sport throughout Canada. The federal government has continuously supported and encouraged national sport organizations in their effects to secure such sponsorship.

As a general principle, national sport organizations retain the responsibility for obtaining, controlling and managing sponsorships for their sport. At the same time, they accept the responsibility for protecting the integrity of their own sport and amateur sport generally, when accepting corporate sponsorships. The nature of the sponsor and the sponsor's product should be consistent with the overall objectives of amateur sport.

In acknowledging the traditional independence of national sport organizations, one must also be mindful that the responsibility for the development and funding of national amateur sport in Canada is a joint undertaking involving national sport organizations, the corporate sector and the federal government. The federal government, as a major funding partner, on behalf of the Canadian public, cannot participate in a relationship with a national sport organization and a corporate sponsor which in any way jeopardizes the image of sport or is contrary to the objectives of the federal government for fitness and amateur sport.

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With respect to the sponsorship of sport by the tobacco industry, the federal government takes the position that the sponsorship of amateur sport should not be used as a vehicle for promoting a product which is a major health risk for Canadian youth and the population in general.

The Policy

In light of the conclusive evidence identifying smoking as a major health hazard with no redeeming health aspect, the federal government has developed a policy designed to discourage, in the strongest possible terms, the sponsorship of amateur sport by the tobacco industry.

Therefore, effective immediately, all national amateur sport bodies funded in part by the federal government will be required to desist from associating in any new or renewed sponsorship arrangements with the tobacco products industry. The federal government will withhold all funds from national amateur sport organizations associating in any sponsorship, promotional or other financial support arrangements (e.g., advertising) with the tobacco products industry for events or programs predominantly involving amateur athletes.

Where a sponsorship contract currently exists between a national sport organization and a tobacco company, the contract will be allowed to continue until its existing maturity date.
The federal government will however, withhold all funds from any sport organization choosing to renew, extend or otherwise continue the contract after the existing maturity date.

.../3

Conclusion

It is not the intent of the federal government to place further restrictions on corporate sponsorship within national sport organizations. Rather, it is the intent to encourage such sponsorship for the mutual best interests of all concerned.

THE EFFECTS OF TOBACCO ADVERTISING ON CHILDREN

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ABSTRACT

Children are influenced by tobacco promotions even before they understand the purpose of advertising. Adolescence is a time of vulnerability when youths must struggle to form an identity, to become independent of their parents, and to establish themselves with their peers. Tobacco advertising exploits the vulnerabilities of youths by offering tobacco as the key to the desired self-image, as a badge of independence, and as the key to acceptance by their peers. Research demonstrates that children's attitudes and behavior regarding tobacco are influenced by advertising. In addition to promoting brand switching, tobacco advertising increases the number of youths who smoke or use spitting tobacco. The use of a cartoon character to promote Camel cigarettes will be used to illustrate these points.

INTRODUCTION

Since tobacco is a dangerous drug, tobacco advertisers should rightly bear the burden of proving that their product (advertising) does not have adverse effects on the health of children. This paper will present evidence to the contrary, that tobacco advertising does increase tobacco use among children.

If tobacco advertising causes more children to use tobacco, it would seem necessary that children be exposed to tobacco advertising, and that this exposure occur before the onset of tobacco use. One would also expect to see some effect of advertising on children's knowledge, attitudes, or behavior concerning tobacco use. One might even see a dose-response effect in that children who are most familiar with tobacco advertising would be most likely to use tobacco. Finally, there should be some plausible mechanism through which this cause and effect relationship would operate. Let us examine the scientific literature in light of these expectations.

It is well established that children are indeed exposed to tobacco advertising (Fischer 1989, DiFranza 1991). Even though tobacco companies claim that their advertising is directed exclusively against adult smokers, they are quite successful at designing and placing

Tobacco and Health, Edited by Karen Slama, Plenum Press, New York, 1995

their advertisements in ways which attract the careful attention of youngsters. Indeed, children as young as three years of age could match a picture of a cigarette with a cigarette advertisement from which all smoking cues had been removed (Fischer 1989). Hence it is clear that children are exposed to tobacco advertising, and that this exposure begins long before actual tobacco use begins.

What is particularly sinister is the fact that children receive and understand the implied messages delivered by tobacco advertisements before they are old enough to understand the purpose of advertising (Aitken 1986). In other words, they are learning from tobacco advertisements without being able to take into account the source of the message.

There is a strong correlation between actual smoking behavior and exposure to advertising. Children who are aware of, or who approve of, cigarette advertising are more likely to smoke (Aitken 1986, Alexander 1983). The tobacco industry argues that rather than awareness of advertising causing smoking the reverse is true: in an attempt to rationalize a disapproved behavior, young smokers search the advertisements for valid reasons to smoke.

This cannot be the case, since even among non-smokers, those children who approve and like cigarette advertisements are more likely to intend to smoke in the future (Aitken 1986). Also, in a prospective study, children who approved of cigarette advertising were twice as likely to begin smoking over the following year (Alexander 1983). Thus, the effects of tobacco advertising on the child's mind precede, and do not follow from, actual tobacco use.

A dose-response relationship is also evident in that the more familiar and comfortable children are with tobacco advertisements the more likely they are to smoke (Aitken 1986, Alexander 1983, Aitken 1987, Charlton 1986, Goldstein 1987, Chapman 1982).

Let us look now at the mechanism whereby tobacco advertising could cause children to use tobacco. Three major developmental tasks of adolescence are to 1) develop an identity as a man or woman, 2) establish independence from the parents, and 3) gain acceptance by peers and members of the opposite sex. Research conducted under contract with a tobacco company has identified these areas of psychological vulnerability among potential adolescent smokers (Kwechansky 1977). Advertisements are skillfully crafted to portray tobacco as the answer to the turmoils of adolescence.

According to a document prepared for the RJR MacDonald tobacco company: "Very young starter smokers chose Export A because it provides them with an instant badge of masculinity, appeals to their rebellious nature, and establishes their position amongst their peers" (RJR MacDonald 1977). "Export smokers will be perceived as... characterized by their self-confidence, strength of character and individuality which makes them popular and admired by their peers" (RJR MacDonald 1977). RJR MacDonald identifies the target group for their Tempo brand as individuals who are "extremely influenced by their peer group" (Thompson 1984).

These marketing plans are devoid of references to the taste, quality or economy of the products and are devoted entirely to promoting the "psychological benefits" to be enjoyed by adolescents who smoke particular brands (RJR MacDonald 1977).

The source of these quotes are documents obtained from the tobacco companies by the Attorney General of Canada. These documents present the results of comprehensive studies of adolescents conducted to "learn everything there was to learn about how smoking begins" (Kwechansky 1977). The tobacco companies seem to know much more about why youngsters smoke than the medical community does. While not all tobacco advertising has the purpose of encouraging youngsters to smoke, it is possible to view tobacco advertisements and identify those which appeal to youths' needs to feel macho or feminine, independent and popular.

Many children clearly understand and accept these psychological appeals. Children with favorite cigarette advertisements are twice as likely to believe there are benefits to smoking (Charlton 1986), with the perceived benefits being those portrayed in the adver-

tisements (Aitken 1987). Children who believe that smoking will make them more popular are up to 4.7 times more likely to smoke (McAlpine 1988).

We thus have a plausible mechanism by which advertising causes children to smoke. Research identifies the psychological vulnerabilities of adolescents. Advertising then portrays tobacco use as the solution for the developmental problems of adolescence. Some youths who are exposed to these messages from a very early age come to accept the notion that tobacco use will provide these "psychological benefits". When they later face the challenges of adolescence, it appears that the risks of tobacco use (which are perceived to be remote) are outweighed by the immediate psychological benefits. The addiction to nicotine remains long after any psychological benefits are gone.

Much of what has been discussed involves youths' attitudes and beliefs about tobacco. Three studies demonstrate the strong influence advertising has on the behavior of youths.

In 1988, the RJ Reynolds Tobacco Company in the United States replaced a long standing advertising theme with a new approach which utilized a cartoon character named Joe Camel. Joe Camel is the epitome of "cool". He dresses well and always has an attractive female admiring him from a distance. He leads an exciting life patterned after James Bond.

In a standard marketing study, the author demonstrated that the Joe Camel advertisements were far more familiar to children under 18 than they were to adults (DiFranza 1991). Children also found the advertisements to be more appealing than adults did. The most impressive finding however, was the effect Joe Camel had had on brand preference among smokers. While only 0.5% of teen smokers were smoking Camels prior to the cartoon advertisements, this figure jumped to 32.8% only two years into the campaign. Among adults, Camel claims only 3 to 4% of the market. Thus, the Joe Camel cartoons had caused an extreme change in the brand preference of underage smokers resulting in a situation in which the brand was far more popular among children than among adults.

The tobacco industry rightly argues that demonstrating a shift in brand preference does not prove that advertising causes an increase in the number of youths who smoke. However, such evidence does come from a study of the Regal cigarette campaign in England (HEA 1993). It would appear that the "Reg" campaign was modeled after the Joe Camel campaign. Reg is a balding middle age man who shares Joe Camel's irreverent attitude and penchant for bad jokes.

A study conducted by the Health Education Authority revealed that 91% of teenagers recognized "Reg" as compared to 49% of adults (HEA 1993). While the Joe Camel campaign was national at its inception, the "Reg" campaign was regional in nature. The Health Education Authority demonstrated that smoking among 14-15 year old boys increased only in those regions of England where "Reg" advertisements had been shown.

The most impressive evidence that the advertising and promotion of tobacco causes children to use tobacco comes from a study of the effects of the US Tobacco Company's campaign to promote the use of spitting tobacco in the United States. Although spitting tobacco use had been common during the 19th century it had fallen out of favor as a result of the invention of the cigarette rolling machine, and the concern that tuberculosis was spread by spitting. By the mid 1970's sales of spitting tobacco had been dwindling for 24 years (USDHHS 1986). While tobacco control advocates were confident in the eventual demise of this filthy habit, the US Tobacco Company (UST) had other plans. UST launched an aggressive youth oriented marketing campaign to promote the use of "smokeless" tobacco throughout the nation. The campaign eventually featured the introduction of pediatric smokeless products with a reduced dose of nicotine and candy flavorings. The reduced dose of nicotine facilitates the development of addiction by reducing the incidence of the unwanted side-effects of nicotine overdosage. A marketing slogan brags "Sooner or later its Copenhagen" which is true since as tolerance to nicotine develops the user will likely "graduate" to the use of products with greater

nicotine content, with Copenhagen being the strongest. UST advertisements include instructions on how to use the products for the first time.

The result of UST's investment has been a nationwide epidemic of spitting tobacco use among American youths (Connolly 1986). The average age for new users of UST's products is 10 years (USDHHS 1986). In Bogalusa, Louisiana the use of spitting tobacco among 9 year olds increased from 3% in 1976-1977, to 33% in 1981-1982 (Hunter 1986).

The only possible explanation for this epidemic is the marketing efforts of US Tobacco. It is clear that parental example cannot be blamed. The epidemic halted a 24 year decline in spitting tobacco sales, and suddenly spitting tobacco use had become popular among youths in regions where adults had never used these products in appreciable numbers (Connolly 1986). The cost of spitting tobacco had not changed appreciably, but UST's marketing strategy of giving away free samples and displaying their products prominently in stores made them more available to children. Peer pressure cannot be blamed for this epidemic since spitting tobacco use suddenly became common in regions where it had always been unpopular among youths.

The real world experiences with the "Reg" campaign and the national epidemic of pediatric spitting tobacco use in the United States provide clear and convincing evidence that tobacco advertising and promotions play a decisive role in causing children to use tobacco. A complete ban on all advertising and promotion of tobacco is warranted to protect children from exploitation at the hands of tobacco advertisers.

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RJR Nabisco's Cartoon Camel Promotes Camel Cigarettes to Children

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Objectives.—To determine if RJR Nabisco's cartoon-theme advertising is more effective in promoting Camel cigarettes to children or to adults. To determine if children see, remember, and are influenced by cigarette advertising.

Design.—Use of four standard marketing measures to compare the effects of Camel's Old Joe cartoon advertising on children and adults.

Subjects.—High school students, grades 9 through 12, from five regions of the United States, and adults, aged 21 years and over, from Massachusetts.

Outcome Measures.—Recognition of Camel's Old Joe cartoon character, product and brand name recall, brand preference, appeal of advertising themes.

Results.—Children were more likely to report prior exposure to the Old Joe cartoon character (97.7% vs 72.2%; $P<.0001$). Children were better able to identify the type of product being advertised (97.5% vs 67.0%; $P<.0001$) and the Camel cigarette brand name (93.6% vs 57.7%; $P<.0001$). Children also found the Camel cigarette advertisements more appealing ($P<.0001$). Camel's share of the illegal children's cigarette market segment has increased from 0.5% to 32.8%, representing sales estimated at $476 million per year.

Conclusion.—Old Joe Camel cartoon advertisements are far more successful at marketing Camel cigarettes to children than to adults. This finding is consistent with tobacco industry documents that indicate that a major function of tobacco advertising is to promote and maintain tobacco addiction among children.

(*JAMA* 1991;266:3149-3153)

WITH the number of US smokers declining by about 1 million each year, the tobacco industry's viability is critically dependent on its ability to recruit replacement smokers.[1] Since children and teenagers constitute 90% of all new smokers, their importance to the industry is obvious.[2] Many experts are convinced that the industry is actively promoting nicotine addiction among youth.[3,4]

See also pp 3145, 3154, and 3185.

Spokespersons for the tobacco industry assert that they do not advertise to people under 21 years of age, the sole purpose of their advertising being to promote brand switching and brand loyalty among adult smokers.[5-8] However, industry advertising expenditures cannot be economically justified on this basis alone.[9] This study was therefore undertaken to determine the relative impact of tobacco advertising on children and adults.

There is abundant evidence that tobacco advertising influences children's images of smoking.[10] In Britain, the proportion of children who gave "looks tough" as a reason for smoking declined after tough images were banned from cigarette advertisements.[11] Children as young as the age of 6 years can reliably recall tobacco advertisements[12] and match personality sketches with the brands using that imagery.[10] In fact, cigarette advertising establishes such imagery among children who are cognitively too immature to understand the purpose of advertising.[13] Subsequently, children who are most attuned to cigarette advertising have the most positive attitudes toward smoking, whether or not they already smoke.[11] Children who are more aware of, or who approve of, cigarette advertisements are more likely to smoke,[10,11,13-16] and those who do smoke buy the most heavily advertised brands.[14,17]

Historically, one brand that children have not bought is Camel. In seven surveys, involving 3400 smokers in the seventh through 12th grades, conducted between 1976 and 1988 in Georgia, Louisiana, and Minnesota, Camel was given as the preferred brand by less than 0.5% (Saundra MacD. Hunter, PhD, Weihang Bao, PhD, Larry S. Webber, PhD, and Gerald S. Berenson, MD, unpublished data, 1991; D.M., unpublished data, 1991).[14,18,19] In 1986, Camels were most popular with smokers over the age of 65 years, of whom 4.4% chose Camels, and least popular among those 17 to 24 years of age, of whom only 2.7% preferred Camels.[20]

In 1988, RJR Nabisco launched the "smooth character" advertising campaign, featuring Old Joe, a cartoon camel modeled after James Bond and Don Johnson of "Miami Vice."[21] Many industry analysts believe that the goal of this campaign is to reposition Camel to compete with Philip Morris' Marlboro brand for the illegal children's market segment. To determine the relative impact of Camel's Old Joe cartoon advertising on children and adults, we used four standard marketing measures.

1. Recognition. We compared the proportions of teenagers and adults aged 21 years and over who recognize Camel's Old Joe cartoon character.

2. Recall. We compared the ability of teenagers and adults to recall from a masked Old Joe advertisement the type of product being advertised and the brand name.

3. Appeal. We compared how interesting and appealing a series of Old Joe cartoon character advertisements were to teenagers and adults.

4. Brand preference. We compared brand preferences of teenaged smokers prior to the Old Joe cartoon character campaign with those 3 years into the campaign to determine if the campaign had been more effective with children or with adults, and to determine if Camel had been repositioned as a children's brand.

METHODS

Subjects

Since adolescent brand preferences may vary from one geographic location to another (Saundra MacD. Hunter,

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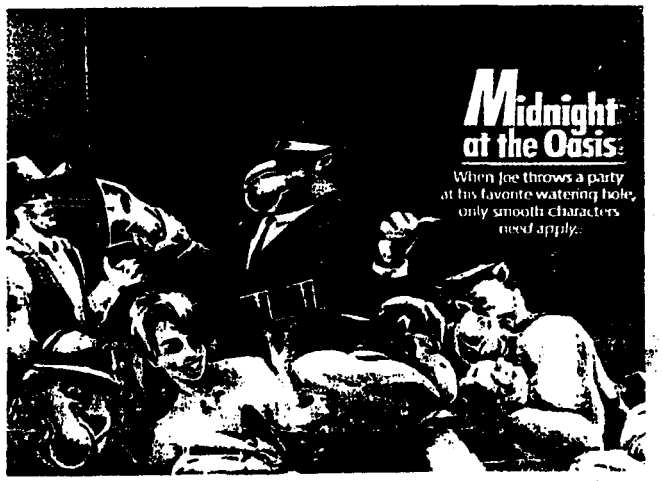
Fig 1.—Masked Old Joe Camel cartoon advertisement.

Fig 2.—A portion of an eight-page Camel advertising supplement.



PhD, Weihang Bao, PhD, Larry S. Webber, PhD, and Gerald S. Berenson, MD, unpublished data, 1991; D.M., unpublished data, 1991),[14,18,19] we selected children from Georgia, Massachusetts, Nebraska, New Mexico, and Washington, representing five regions. One school in each state was selected based on its administration's willingness to participate. Schools with a smoking prevention program focused on tobacco advertising were excluded.

A target of 60 students in each grade, 9 through 12, from each school was set. In large schools, classes were selected to obtain a sample representative of all levels of academic ability. Students were told that the study concerned advertising and were invited to participate anonymously.

Since adult brand preferences are available from national surveys, adult subjects were recruited only at the Massachusetts site. All drivers, regardless of age, who were renewing their licenses at the Registry of Motor Vehicles on the days of the study during the 1990-1991 school year were asked to participate. Since licenses must be renewed in person, this is a heterogeneous population.

Materials

Seven Camel Old Joe cartoon character advertisements were obtained from popular magazines during the 3 years prior to the study. One ad was masked to hide all clues (except Old Joe) as to the product and brand being advertised (Fig 1).

The survey instrument collected demographic information and information on past and present use of tobacco, including brand preference. Children were considered to be smokers if they had smoked one or more cigarettes during the previous week. Previously validated questions were used to determine children's intentions regarding smoking in the next month and year[22] and their attitudes toward the advertised social benefits of smoking.[23,24]

Subjects rated the ads as "cool or stupid" and "interesting or boring." Subjects were asked if they thought Old Joe was "cool" and if they would like to be friends with him. Each positive response to these four questions was scored as a one, a negative response as a zero. The "appeal score" was the arithmetic sum of the responses to these four questions, with the lowest possible score per respondent being a zero and the highest a four.

Procedure

Subjects were first shown the masked ad and asked if they had seen the Old Joe character before. They were then asked to identify the product being advertised and the brand name of the product. Subjects who could not answer these questions were required to respond "Don't know" so they would not be able to write in the correct answer when the unmasked advertisements were shown. The subjects were then shown, one at a time, the six unmasked advertisements and asked to rate how the advertisements and the Old Joe cartoon character appealed to them. Subjects then completed the remainder of the survey instrument.

Adolescent brand preference data from this study were compared with the data obtained by seven surveys completed prior to the kickoff of Camel's Old Joe cartoon character campaign early in 1988 (Saundra MacD. Hunter, PhD, Weihang Bao, PhD, Larry S. Webber, PhD, and Gerald S. Berenson, MD, unpublished data, 1991; D.M., unpublished data, 1991).[14,18,19]

Tests of significance were made using the Two-tailed Student's t Test for continuous data and the χ^2 and Fisher's Exact Test for discrete data. A P value of less than .05 was used to define statistical significance.

The study was conducted during the 1990-1991 school year.

RESULTS

A total of 1060 students and 491 subjects from the Registry of Motor Vehicles were asked to participate. Usable surveys were obtained from 1055 students (99%) and 415 license renewal applicants (84.5%). Seventy drivers were under 21 years of age, leaving 345 adults aged 21 years or older. Students ranged in age from 12 to 19 years (mean, 15.99 years) and adults from 21 to 87 years (mean, 40.47 years). Females represented 51.0% of the students and 54.8% of the adults.

Children were much more likely than adults to recognize Camel's Old Joe cartoon character (97.7% vs 72.2%; $P<.0001$) (Table). It is not plausible that the children were simply saying they had seen Old Joe when they had not, since they also demonstrated a greater familiarity with the advertisement on the two objective measures.

When shown the masked advertisement, the children were much more successful than the adults in identifying the product being advertised (97.5% vs 67.0%; $P<.0001$) and the Camel brand

Comparison of Student and Adult Responses to Camel's Old Joe Cartoon Character Advertisements

	Georgia Students	Massachusetts Students	Nebraska Students	New Mexico Students	Washington Students	Total Students*	Total Adults†
No. of subjects‡	212	224	232	210	177	1055	345
Have seen Old Joe, %	98.1	99.6	96.6	95.7	98.9	97.7§	72.2§
Know product, %	95.3	100	97.8	95.7	98.9	97.5§	67.0§
Know brand, %	92.9	97.3	91.8	90.0	96.6	93.6§	57.7§
Think ads look cool, %	62.4	54.1	57.4	61.2	55.1	58.0§	39.9§
Ads are interesting, %	83.4	73.9	77.3	62.3	69.9	73.6§	55.1§
Like Joe as friend, %	46.2	31.1	33.9	31.4	32.6	35.0§	14.4§
Think Joe is cool, %	51.0	38.6	44.1	40.9	40.0	43.0§	25.7§
Mean appeal score‖	2.4	2.0	2.1	1.9	2.0	2.1§	1.4§
Smoke Camel (%)¶	29/76 (38.2)	12/55 (21.8)	13/52 (25.0)	23/43 (53.5)	9/35 (25.7)	86/261 (33.0)§	8/92 (8.7)§

*Age range, 12 to 19 years.
†Age range, 21 to 87 years.
‡This is the total number of subjects in each category; due to incomplete questionnaires, respondents for some questions may be fewer.
§$P<.0001$.
‖See text for explanation.
¶Percentage of smokers who identify Camel as their favorite brand.

name (93.6% vs 57.7%; $P<.0001$). Even when the analysis was limited to those subjects who were familiar with the Old Joe cartoon character, children were still more likely than adults to remember the product (98.6% vs 89.6%; $P<.0001$) and the Camel brand name (95.0% vs 79.1%; $P<.0001$). This confirms that Old Joe cartoon advertisements are more effective at communicating product and brand name information to children than to adults.

Because Massachusetts adults may not be representative of adults in the other four states where children were surveyed, the above analyses were repeated comparing only Massachusetts children and adults. In all cases the differences between adults and children were significant and of even greater magnitude ($P<.0001$), excluding the possibility that the above findings were due to a lighter level of advertising exposure in the Massachusetts area.

On all four measures, the children found the Camel cartoon advertisements more appealing than did the adults. Children were more likely to think the advertisements looked "cool" (58.0% vs 39.9%; $P<.0001$) or "interesting" (73.6% vs 55.1%; $P<.0001$). More of the children thought Old Joe was "cool" (43.0% vs 25.7%; $P<.0001$) and wanted to be friends with him (35.0% vs 14.4%; $P<.0001$).

The brand preference data revealed a dramatic reversal in the market segment pattern that existed prior to Camel's Old Joe cartoon character campaign. Camel was given as the preferred brand by 32.8% of children up to the age of 18 years who smoked, 23.1% of Massachusetts adult smokers aged 19 and 20 years, and 8.7% of those 21 years of age and over. The figures for the Massachusetts adults were significantly higher than the national market share for Camel, 4.4%,[25] suggesting that Massachusetts adults may be more familiar with the Old Joe Camel campaign than adults in general. Camel cigarettes are now most popular with children and progressively less popular with older smokers.

About equal proportions of adults (28.2%) and children (29.0%) reported some current cigarette use, making it unlikely that this factor influenced any of the above findings. Although there were some statistically significant differences in the responses of children from different regions, these were not the focus of this study (Table).

When compared with nonsmokers, children who were currently smoking gave higher approval ratings to the advertisements (mean approval score of 2.8 for smokers vs 1.8 for nonsmokers; $P<.0001$). Approving attitudes toward cigarette advertisements seem to precede actual smoking. Among the nonsmoking children, those who either were ambivalent about their future smoking intentions or expressed a definite intention to smoke were more approving of the advertisements than those children who intended not to smoke (mean approval scores of 2.6 and 1.8, respectively; $P<.001$).

Children were more likely to smoke if they believed that smoking is pleasurable (relative risk [RR], 6.6; $P<.0001$) and that it makes a person more popular (RR, 2.0; $P<.0001$), and attractive (RR, 2.5; $P<.0001$), all common themes in cigarette advertising. Among nonsmoking children, those who believed that smoking would make them more attractive were eight times more likely to express an intention to smoke in the next year ($P<.001$).

COMMENT

Our data demonstrate that in just 3 years Camel's Old Joe cartoon character had an astounding influence on children's smoking behavior. The proportion of smokers under 18 years of age who choose Camels has risen from 0.5% to 32.8%. Given that children under 18 years account for 3.3% of all cigarette sales,[26] and given a national market share of 4.4% for Camel,[25] we compute that Camel's adult market share is actually 3.4%. Given a current average price of 153.3 cents per pack,[27] the illegal sale of Camel cigarettes to children under 18 years of age is estimated to have risen from $6 million per year prior to the cartoon advertisements to $476 million per year now, accounting for one quarter of all Camel sales.

From both a legal and moral perspective, it is important to determine if the tobacco industry is actively promoting nicotine addiction among youngsters. However, from a public health perspective it is irrelevant whether the effects of tobacco advertising on children are intentional. If tobacco advertising is a proximate cause of disease, it must be addressed accordingly. In the following discussion we will examine the evidence produced by this study, the marketing practices of the tobacco industry as a whole as revealed in industry documents, and the marketing practices used by RJR Nabisco, in particular, to promote Camel cigarettes. The quotations cited below are from tobacco industry personnel and from documents obtained during litigation over Canada's ban of tobacco advertising.

Our data show that children are much more familiar with Camel's Old Joe cartoon character than are adults. This may be because children have more exposure to these advertisements, or because the advertisements are inherently more appealing to youngsters. The tobacco industry has long followed a policy of preferentially placing selected advertisements where children are most likely to see them.[3,28,29] For example, print advertisements are placed in magazines

"specifically designed to reach young people."[29] Paid cigarette brand promotions appear in dozens of teen movies.[30] Camels are featured in the Walt Disney movies *Who Framed Roger Rabbit?* and *Honey I Shrunk the Kids*.

The industry targets poster advertisements for "key youth locations/meeting places in the proximity of theaters, records [sic] stores, video arcades, etc."[29] It is common to see Old Joe poster advertisements in malls, an obvious gathering spot for young teens. Billboards, T-shirts, baseball caps, posters, candy cigarettes, and the sponsorship of televised sporting events and entertainment events such as the Camel "Mud and Monster" series are all used to promote Camels. All are effective marketing techniques for reaching children.[3,28,31-34]

The fact that children are much more attracted to the themes used in the Old Joe cartoon character advertisements may also explain why they are more familiar with them. The themes used in tobacco advertising that is targeted at children are the result of extensive research on children conducted by the tobacco industry to "learn everything there was to learn about how smoking begins."[35-38] Their research identifies the major psychological vulnerabilities of children, which can then be exploited by advertising to foster and maintain nicotine addiction.

The marketing plan for "Export A" cigarettes describes their "psychological benefits": "Export smokers will be perceived as . . . characterized by their self-confidence, strength of character and individuality which makes them popular and admired by their peers."[39]

Consider a child's vulnerability to peer pressure. According to one industry study, "The goading and taunting that exists at the age of 11 or 12 to get nonsmokers to start smoking is virtually gone from the peer group circles by 16 or 17."[35,36] If peer influence is virtually gone by the age of 16 years, who is the intended target group for RJR-MacDonald's Tempo brand, described as individuals who are "[e]xtremely influenced by their peer group"?[40] (RJR-MacDonald is a wholely owned subsidiary of RJR Nabisco.) The recommended strategy for promoting this brand is the "[m]ajor usage of imagery which portrays the positive social appeal of peer group acceptance."[40] In one Camel advertisement, a cowboy (a Marlboro smoker?) is being denied admission to a party because "only smooth characters [ie, Camel smokers] need apply" (Fig 2). It appears that Camel advertisements are also targeted at individuals who are influenced by their peer group.

Children use tobacco, quite simply, because they believe the benefits outweigh the risks. To the insecure child, the benefits are the "psychological benefits" promised in tobacco advertisements: confidence, an improved image, and popularity.[22,40,41] Children who believe that smoking will make them more popular or more attractive are up to 4.7 times more likely to smoke.[23,24]

Previous research makes it clear that children derive some of their positive images of smoking from advertising.[11,13,34] Children who are aware of tobacco advertising, and those who approve of it, are also more likely to be smokers.[10,11,13-16] Children's favorable attitudes toward smoking and advertising precede actual tobacco use and correlate with the child's intention to smoke, suggesting that the images children derive from advertising encourage them to smoke.[42] Our data confirm these earlier findings. Among nonsmoking children, those who were more approving of the Old Joe advertisements were more likely either to be ambivalent about their smoking intentions or to express a definite intention to smoke. Nonsmoking children who believed that smoking would make them more popular were eight times more likely to express an intention to smoke in the future.

Since a child's intention to smoke is considered to be a good predictor of future smoking behavior,[43] it seems reasonable to conclude that a belief in the psychological benefits of smoking, derived from advertising, precedes, and contributes to, the adoption of smoking.

There are other lines of evidence indicating that tobacco advertising increases the number of children who use tobacco. In countries where advertising has been totally banned or severely restricted, the percentage of young people who smoke has decreased more rapidly than in countries where tobacco promotion has been less restricted.[44] After a 24-year decline in smokeless tobacco sales, an aggressive youth-oriented marketing campaign has been followed by what has been termed "an epidemic" of smokeless tobacco use among children, with the *average* age for new users being 10 years.[45,46]

Many of the tobacco industry documents cited above provide abundant evidence that one purpose of tobacco advertising is to addict children to tobacco. In the words of one advertising consultant, "Where I worked we were trying very hard to influence kids who were 14 to start to smoke."[47] Two marketing strategy documents for Export A also reveal that it is the youngest children they are after.[48,49] "Whose behavior are we trying to affect?: new users."[48] The goal is "[o]ptimizing product and user imagery of Export 'A' against young starter smokers."[49] The average age for starter smokers is 13 years.[50]

The industry also researches the best ways of keeping children from quitting once they are "hooked on smoking."[36] The purpose of one tobacco industry study was to assess the feasibility of marketing low-tar brands to teens as an alternative to quitting.[36] The study found that for boys, "[t]he single most commonly voiced reason for quitting among those who had done so . . . was sports."[36] The tobacco industry's sponsorship of sporting events, such as the Camel Supercross motorcycle race, should be seen in relation to its need to discourage teenage boys from quitting. Similarly, its emphasis on slimness serves as a constant reinforcement of teenage girls' fears of gaining weight as a result of quitting.

Our study provides further evidence[51] that tobacco advertising promotes and maintains nicotine addiction among children and adolescents. A total ban of tobacco advertising and promotions, as part of an effort to protect children from the dangers of tobacco,[52,53] can be based on sound scientific reasoning.

This project was supported by grants from the University of Massachusetts Medical Center, the Massachusetts chapter of the American Cancer Society, and Doctors Ought to Care.

We would like to thank the participating schools and the following for their contributions to this study: the Massachusetts Registry of Motor Vehicles, Bruce Churchill, MD, Della C. de Baca, Sharon DiFranza, Saundra MacD. Hunter, Melinda Raboin, MD, Mary Sherhart, and the Canadian Council on Smoking and Health.

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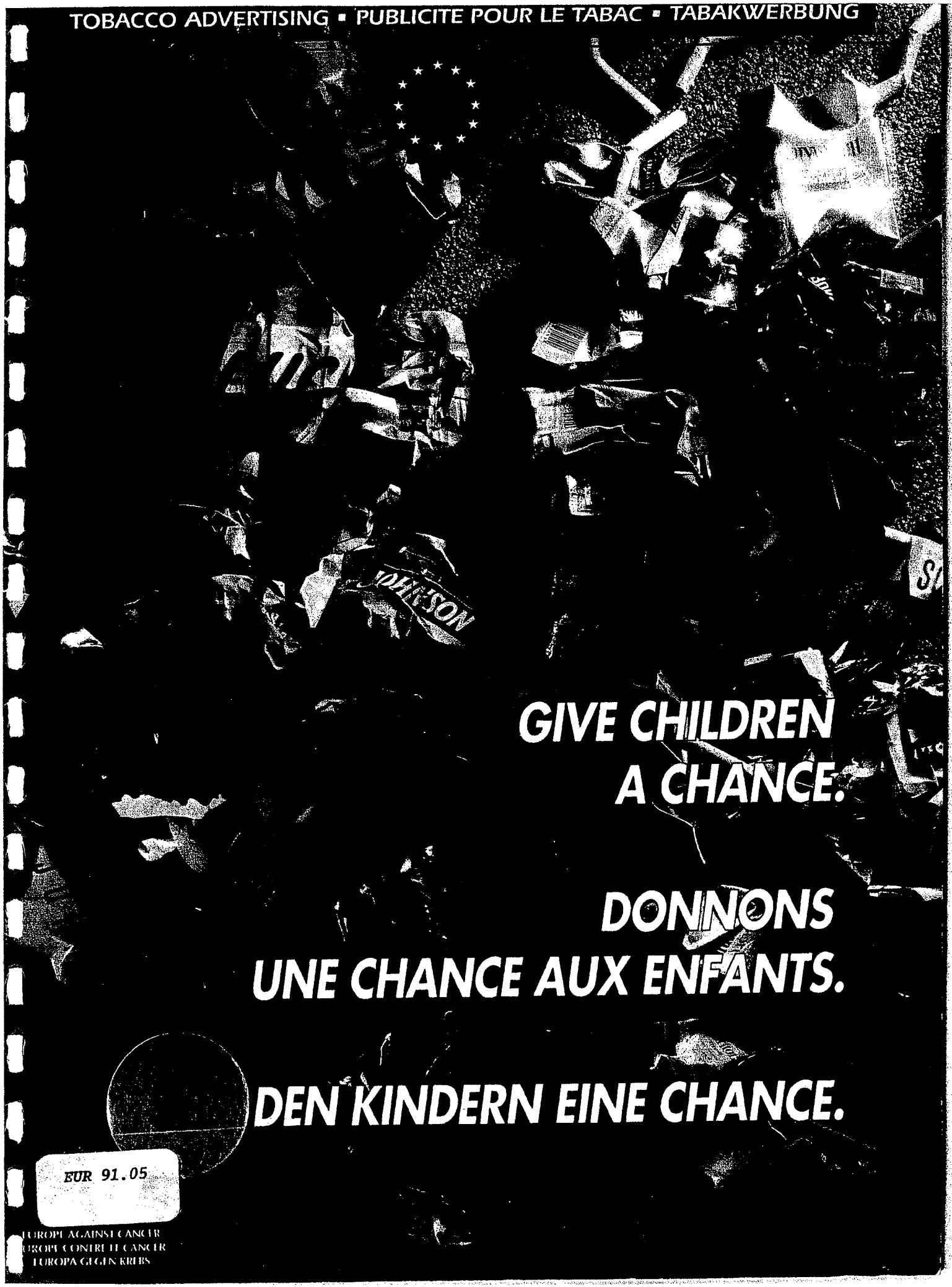
TOBACCO ADVERTISING ▪ PUBLICITE POUR LE TABAC ▪ TABAKWERBUNG



GIVE CHILDREN A CHANCE.

DONNONS UNE CHANCE AUX ENFANTS.

DEN KINDERN EINE CHANCE.

EUR 91.05

EUROPE AGAINST CANCER
EUROPE CONTRE LE CANCER
EUROPA GEGEN KREBS

This report was prepared under the direction and general editorship of Luk Joossens and Anna Karaoglou. Caroline Naett and Angela Pollitzer have contributed to the writing of this report. Mercedes Bolzoni and Marie Fombona were responsible for the administration.

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Der Bericht wurde unter der Leitung von Luk Joossens und Anna Karaoglou erstellt, Caroline Naett und Angela Pollitzer lieferten Texbeiträge. Das Sekretariat lag bei Mercedes Bolzoni und Marie Fombona.

Publiset & associés Desktop Publishing Services Dessins de Ph. Goossens

REPORT ON TOBACCO ADVERTISING
«GIVE CHILDREN A CHANCE»

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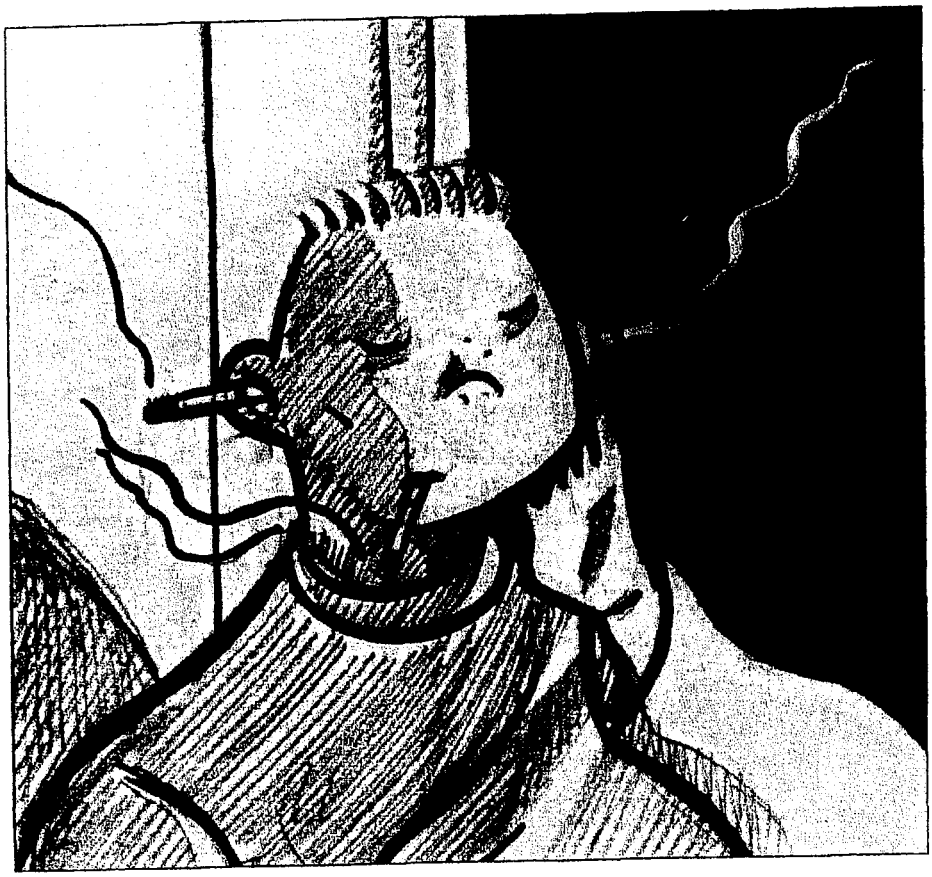
DIALOGUE OF THE DEAF



FACTS

1. More than 90% of all smokers begin to smoke as teenagers;
2. 44% of all adolescents either experiment with or regularly use tobacco products;
3. Children as young as six years have been shown to identify cigarette advertisements reliably.

From this evidence, health authorities now believe that advertising contributes to the initiation and maintenance of tobacco habits in adolescents.

THE OFFICIAL POSITION OF THE TOBACCO INDUSTRY

1. Cigarette advertisements are aimed at adults who already smoke;
2. They are designed to encourage brand switching, not the initiation of smoking.

This comes from an industry whose official position continues to be that smoking has no detrimental effect on health.

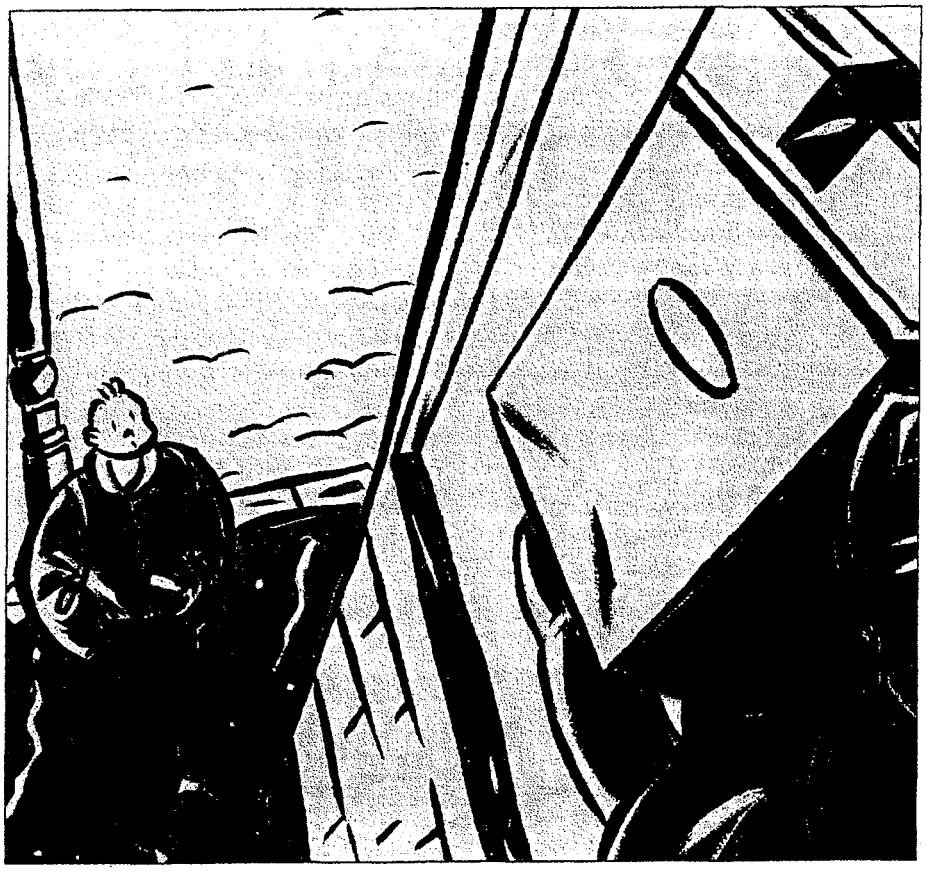
PARADOX

Advertising agencies argue on the one hand that advertising in general helps to expand the market and thereby reduces the cost of products, and on the other that cigarette advertisements miraculously keep the market in a static state. This is technically impossible but also incompatible with the realities of commercial practice.

The intention to expand the market is clearly evident from the introduction of brands aimed at young women and children. The latest example is the choice of the French monopoly Seita to introduce a new brand of cigarettes named "Chevignon" after the famous brand of clothes created for young people in 1979. These clothes are especially designed for and most attractive to children. The choice of Chevignon as a partner is a clear indication of Seita's determination to influence a young public.

The question is "if the tobacco industry cares about children and never markets to them, then why choose a brand name of clothes destined for children as a new cigarette brand?" What is the purpose of launching this new brand, if not recruitment of young starters ?

FUNCTIONS OF ADVERTISING : AN OUTLOOK



The word advertising is derived from the Latin ***advertere***, meaning to turn the mind.

A leading textbook (1) elaborates : "Advertising is salesmanship, and it is paid for by a firm, a person or a group with a particular point of view. The message attempts to inform and to persuade; it is intentionally biased, and there is no intent to present a balanced point of view."

Why do firms advertise? The obvious and most general answer is that firms advertise because it is profitable for them to do so. **Firms spend money on promotional efforts if, and only if, they believe that the benefits (long term profits) from that spending outweigh the costs** (2).

The ABC of advertising is to persuade in order to sell more. So why should advertising for tobacco products be an exception to this rule, as the tobacco industry claims?

The advertising industry believes that advertising things encourages people to use them. They believe this for every product (3).

The tobacco industry claims that cigarette advertising operates in a totally different way from every other category, that is by focusing on smokers and no-one else. This is hard to believe.

Advertising in the cigarette market

Logically, what might effective tobacco advertising do ?

It might :
- influence smokers to change brands
- influence smokers to smoke more
- influence nonsmokers to start smoking
- discourage or delay smokers from giving it up (4).

What do we already know ?

- Learning to smoke occurs in childhood or adolescence; 60% start by the age of 13; more than 90% begin before the age of 20
- Tobacco has a high brand loyalty
- Children have a higher awareness of tobacco advertising than adults
- Tobacco advertising shows positive and glamorous images, now increasingly directed towards and attractive to young children and women.

But then, the tobacco industry argues that advertising only influences smokers to change brand. It publicly denies that its advertising promotes smoking. By definition, advertising seeks to maximize sales. **In a given year only about 2% of smokers often switch brand** (5,6). Therefore, brand-switching alone could never justify the enormous amount of money spent by tobacco companies on advertising and promotion. Furthermore, international literature, research and trade journals

show that there is no product which inspires as much brand name loyalty as tobacco.

BRAND LOYALTY TO DIFFERENT PRODUCTS

	I often change brand (%)	In general, I always buy the same brand (%)
Cigarettes	**2**	**66**
Washing-up liquid	7	54
Coffee	7	52
Soap	13	48
Bras	17	48
Tights	23	48
Washing powder	15	45
Mineral Water	19	44
Shampoo	15	42
Eau de toilette	10	40
Cars (1)	13	37
Pasta	16	37
Jam	17	32
Bars of Chocolate	14	30
Vacuum Cleaners	31	29
Champagne	8	24
Batteries	33	24
Yoghurts	28	23
Mattresses	25	23
Washing Machines	19	20
Televisions	16	18
Dresses	63	4

Source : (1) Agence FCB/Other products. Kapferer and Laurent, 1983.

Capturing markets with long run returns

A look back at history shows that growing public consciousness and concern about the health consequences of smoking constituted a major threat to the economic welfare of cigarette firms. Several segments received attention : women and young starters, the reinforcement of existing smokers and those considering giving up.

The success in targeting the women's segment was particularly notable. Virginia Slims, the first cigarette targeted specifically at young females, were introduced in 1968. The advertisements depicted liberated, independent, slender and beautiful women as smokers. **In the 6 years after Virginia Slims were introduced, the proportion of teenage girls regularly smoking cigarettes nearly doubled** (7).

The other segments are concerned smokers and young starters. The dual interest in reinforcing existing smokers, and those considering giving up, and recruiting new smokers is shown in many of the industry's documents, with brand switchers of tertiary importance. Capturing a significant share of the young starters' market yields significant long- term returns, either through brand loyalty or down-switching within brand families.

Whilst the tobacco industry claims that it does not direct its advertisements at children or adolescents, there is considerable evidence that its marketing is youth-oriented (8). Smoking, particularly in the young, is encouraged by creating and maintaining the image that smoking is desirable. A good example is tobacco sponsorship of sporting events. These events often include free samples, many of which -despite industry denials- go to children.
Many of the lifestyles glamourised in cigarette advertising today, like motorcycle and automobile racing, surfing and beach parties, are those most aspired to by adolescents. In the mid-1980's, themes featuring daring and high-risk activities like automobile racing, motorcycling and wind-surfing, appeared to motivate the target audience to smoke (7).
In an extract of a document from the tobacco industry, cited in an article (2), it is stated that "Serious efforts to learn to smoke occur between ages 12 and 13 in most cases". "The adolescent seeks to display his new urge for independence with a symbol, and cigarettes are such a symbol". "However intriguing smoking is at 11, 12 or 13, by the age of 16 or 17 many regret their use of cigarettes for health reasons and because they feel unable to stop smoking when they want to".

All these facts show that :
* Cigarette advertising has greatly promoted its popularity.
* Ads are public and not distributed solely to identified target segments.
* They reinforce everyone's perceptions.
* Tobacco advertisements appear in media that are accessible to children, as well as to adult smokers.
* Advertising promotes the continued social acceptability of smoking.

Creating a positive climate of social acceptability for smoking, which encourages new smokers to join the market, is of greater importance to the industry than competition between brands (9). With a ban on advertising, fewer of tomorrow's children will be induced to become starters.

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TOBACCO ADVERTISING FROM THE CHILD'S POINT OF VIEW

An argument often used to refute an advertising ban is :

A direct connection between advertising and children taking up smoking cannot be demonstrated.

We all know that it is difficult to find a ***direct*** connection between advertising and teenagers starting smoking. Cause-and-effect relationships are always difficult to disentangle.
However, attitudes towards cigarette advertising may be important predictors of future changes in children's smoking behaviour. A study has shown that children who approved of cigarette advertising were twice as likely to become smokers during a follow-up year as children who disapproved (1). Therefore, cigarette advertising may have predisposing as well as reinforcing effects on children's smoking behaviour. Recent research confirms and extends these findings.

Indeed, *children* are more receptive to tobacco advertising than adults realise. Many can identify cryptic or edited cigarette advertisements which do not show brand names; and many can identify cigarette brand imagery in 'brand-stretching' advertisements for other products. Moreover, associations between cigarette brand names and exciting cigarette-sponsored sports can be elicited by simple advertisements.

Furthermore, *under-age smokers* (a) appear to pay more attention to cigarette advertisements, (b) tend to be more appreciative of the idea of cigarette advertising, and (c) tend to be more appreciative of specific examples of cigarette advertising, compared with non-smokers of the same age. These findings indicate that tobacco advertising is important in promoting and reinforcing smoking among the young (2-5).

Let us take a closer look at these studies, which show the stunningly high degree of receptiveness and awareness in children's reactions to tobacco advertising.

Two recent studies by Aitken et al. (2,3) show that **22% of the 6-10-year-olds and 91% of the 12-16- year-olds were able to identify that an advertisement was for cigarettes, even though it contained no smoking clues.**
Thus the awareness of the 10-and 11-year-olds suggests that unconscious processes are probably at work.

Another study by Rombouts and Fouconnier (6) reveals that tobacco advertising primarily reaches young people. **Only 18% of adolescents never noticed the advertising messages concerned, whereas 45% of adults claimed never to have seen them.**

A Dutch survey shows that young people of 10-14 years old have a high percentage of recognition of cigarette brands compared to adults (7).

BRAND RECOGNITION

The spontaneous recognition of cigarette brands and brands of self-roll tobacco by young people and adults in Holland

Recognition in %

BRAND	SPONTANEOUS YOUNG PEOPLE 10-14 YEARS	SPONTANEOUS ADULTS
DRUM	62	21
VAN NELLE	46	13
SAMSON	39	17
MARLBORO	55	19
CABALLERO	47	11
CAMEL	35	15
PALL MALL	27	9

Sources : Foundation on Smoking and Health: Dutch opinion polls on smoking habits, 1987; Dutch Research into media for youth, 1987; Adformatie 1987

For children growing up in a society where tobacco advertising is allowed, smoking is:

- ***omnipresent;***
- ***positive;***
- ***accepted;***

and because advertising may be made for it:

- ***desirable;***
- ***and legitimate*** (7).

The claims made by the tobacco industry, that cigarette advertising does not promote or reinforce smoking among the young, do not match the findings of recent research into children's perceptions of cigarette advertising. On the contrary, the consumption of tobacco products by children declines systematically following the introduction of comprehensive legislation for smoking prevention.

A report entitled "Health or Tobacco : an end to tobacco advertising and promotion", covers data from eighteen countries showing that legislation banning tobacco promotion does have the effect of reducing the numbers of young people who take up smoking (8).

Tobacco advertising is not the only factor that promotes smoking. **Positive trends result from the interaction of several factors**; factors such as the price of tobacco, the extent of health education and measures to restrict smoking in public.

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LEARNING TO SMOKE

Learning to smoke usually occurs in childhood or in adolescence. Approximately ***60% of smokers start by the age of 13 and more than 90% of smokers begin before the age of 20*** (1). If the decision about smoking can be delayed until adulthood, choosing to become a smoker is unusual (2) .

Given that ***only 10% of current smokers began as adults,*** adolescents are the group from which most new smokers are recruited.

The tobacco industry must attract more than 5000 children and teenagers to start smoking on a daily basis in order to replace smokers who quit (health conscious adults) or die prematurely from tobacco-induced diseases, thus maintaining the current size of the smoking population (1).

The failure of this generation to start smoking would devastate the industry within ten years (3). Tobacco advertisements appear in media that are accessible to children, as well as to adult smokers.

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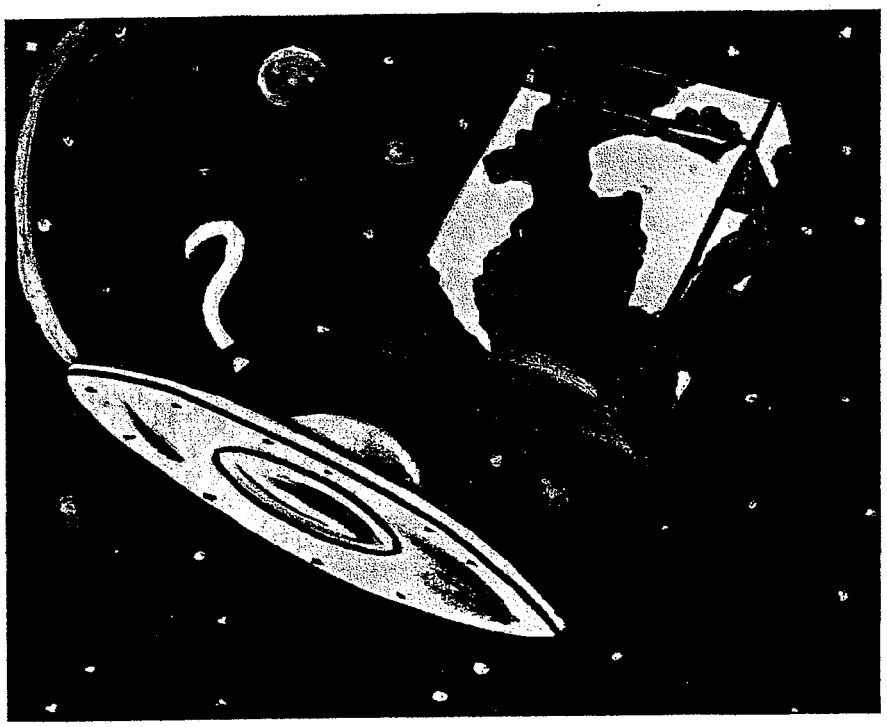
THE EFFECTIVENESS OF TOBACCO ADVERTISING BANS



According to the tobacco industry, advertising bans do not work. In countries where advertising bans are in force, consumption rises or declines as slowly as in countries where advertising is permitted. On several occasions (1), spokesmen for advertising federations or tobacco companies have quoted the U.S. Surgeon General Report of 1981 to support this view.

The way the industry quoted the report can be considered as deliberate misquotation.
The entire excerpt, including those statements taken out of context, is as follows (omitted portions in bold italic).

"There is no scientifically rigorous study available to the public that provides a definitive answer to the basic question of whether advertising and promotion increase the level of tobacco consumption. ***Given the complexity of the issue, none is likely to be forthcoming in the foreseeable future. The most comprehensive review of both the direct and indirect mechanisms (whereby advertising may affect consumption) concluded that the collective empirical, experiential, and logical evidence makes it more likely than not that advertising and promotional activities do stimulate cigarette consumption. However, that analysis also concluded that*** the extent of influence of advertising and promotion on the level of consumption is unknown and possibly unknowable". (2)

Impossibility of Isolating the Precise Effect of Advertising

Tobacco advertising is only one factor influencing the decision to smoke; others include social, religious, parental, sibling and peer smoking behaviour and attitudes, price and disposable income, age limit proscriptions, education and social class. To isolate the effect of one factor would mean holding the others constant. These factors are different from country to country, continually changing. (3)

Yet, in the public debate, the industry often characterizes quite different countries as comparable on the basis that they have no tobacco advertising, thereby obscuring crucial differences in social climate and government positions on smoking. Following the industry's argument, a socialist country with no advertising of any sort and increasing numbers of smokers is evidence that banning advertising will not slow a country's smoking rate. They do not refer to any other factors such as the price of tobacco, the extent of health education or measures to restrict smoking in public. **But the rise in consumption in such countries could be much steeper if advertising were added to those**

ITALY : TOBACCO CONSUMPTION, PRICE AND PER CAPITA INCOME 1960-1987 (5)

Year	1960	70	75	80	83	84	85	86	87
Real Tob. Price	244	191	121	100	117	114	144	116	120
Real income/cap	na	75	88	100	102	112	96	99	102
Tobacco/adult	1658	1816	2517	2262	2306	2320	2310	2227	2156

factors which are already forcing up consumption. (3)

By comparing absolute smoking figures without the underlying trends, and by isolating all other factors, one could 'prove' almost anything; for example, that price has no effect on consumption. Of the 12 EC countries, Denmark has by far the highest prices for cigarettes (in 1987 for 1000 items, 161.54 Ecus in Denmark, 106.15 Ecus in the U.K., 31.89 Ecus in Portugal and only 21.65 in Greece), but still has the highest percentage of smokers within the EC. According to the European Omnibus Survey (1987-88), 45% of adults were smokers in Denmark, 43% in Greece, 36% in the U.K. and 26% in Portugal. Such an analysis obviously does not prove that price has no effect on consumption. (4)

The Italian Example

According to documents from the European Advertising Tripartite and the Confederation of European Community Cigarette Manufacturers Limited, Italy can be regarded as a clear example that advertising bans are not effective, since the per capita cigarette consumption has risen from 1601 in 1975 to 1730 in 1987 (+8%), despite the advertising ban of 1962. The New Zealand Report "Health or Tobacco : An End to Tobacco Advertising and Promotion", which considered all kinds of tobacco (not only cigarettes) and only tobacco consumption per adult (age 15 years and over), observed a decrease from 2517 gram tobacco per adult in 1975 to 2156 gram tobacco in 1987 (-14%) instead of an increase of 8% ! (5)

Clearly, we need more background information on the situation in Italy.

• The omission of tobacco prices can be seriously misleading in the case of Italy. The halving of Italian tobacco prices relative to prices of other goods in the 1960s and 1970s can explain most of the growth in tobacco consumption in those years. (5)

• Until 1983, the Italian ban on advertising was poorly respected, because the fines were too low (between 20.000 and 200.000 lira). This situation changed in 1983 as a new law fixed the fines at between 5 and 50 million lira.

• Indirect advertising is still allowed in Italy (for instance, the advertising of Marlboro leisure wear).

• Sponsorship is authorised in Italy. All the Formula One car races are broadcast on television and are very popular. According to an interview with a Marlboro spokesman in the marketing magazine "Strategies", Marlboro is interested in car races for the following reason :

"The car racer can be considered as the cowboy of modern times; he carries the same image : adventure, virility, a thirst for danger, freedom,... With a cowboy on one side and a car on the other, Marlboro shows itself as "authentically and ancestrally modern"."(6)

The New Zealand report concludes :

"The clear message to come out of the Italian experience is that any law to eliminate tobacco advertising should :

• be strictly enforced;
• eliminate 'indirect' tobacco brandname advertising (i.e., on non-tobacco goods); when permitted, indirect advertising can become a widespread and established practice, effective in keeping brand images alive, but difficult to eliminate at a later date;
• be part of a comprehensive policy approach to lower consumption".(5)

A perfectly designed study proving that cigarette advertising does increase cigarette consumption will probably never exist, because of the complexity of this issue.

Last but not least, the burden of proof should be on the tobacco and advertising industries to show that advertising does not increase cigarette consumption. (2)

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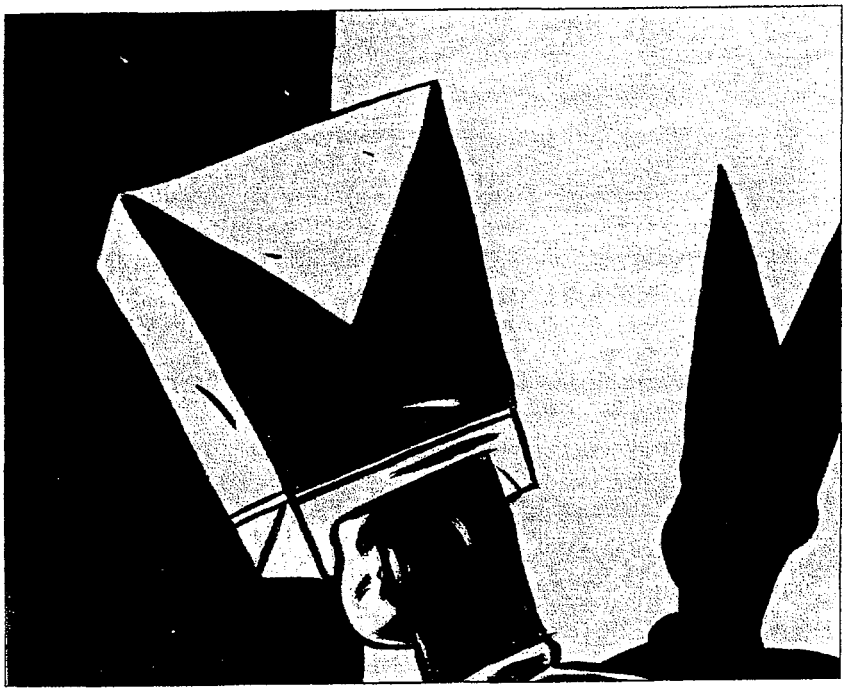
ISSUES RELATED TO INDIRECT ADVERTISING



Indirect advertising for cigarettes includes those advertisements which are advertising cigarettes in a roundabout way and those which, whilst not directly mentioning the tobacco product, refer to an emblem, symbol or other distinctive feature mainly used for tobacco products. Advertisements for Camel boots, Marlboro leisure wear, Boule d'Or matches and Barclay lighters are examples of this second category. **In the 1989 proposal for an EC directive to restrict the advertising of tobacco products, indirect advertising is prohibited. During debates on this subject at the Economic and Social Committee and the European Parliament, several questions have arisen :**

- Why ban indirect advertising?
- Wouldn't such a ban hinder desirable diversification in the tobacco industry?

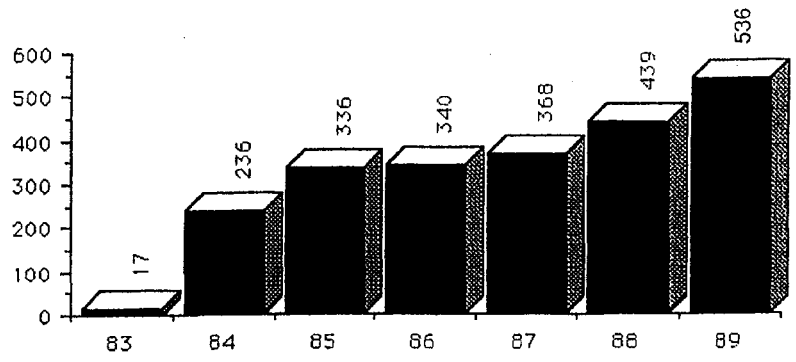
1. Why ban indirect advertising?

The tobacco industry did not create indirect advertising in order to diversify, but, rather as a response to restrictions or bans being imposed on tobacco advertising. In the EC, France was the first country where tobacco companies evolved the art of indirect advertising, in answer to the law of 1976, known as "la loi Veil", which restricted their activities. Thus a packet of cigarettes turned into a lighter or a box of matches, just as the logo and decor from cigarette advertisements became associated with clothes (Marlboro Leisure wear), travel (Peter Stuyvesant), shoes (Camel boots) etc. The French marketing magazine, "Stratégies" (see 423, 1984) describes the process as follows :
"Camel has clearly developed methods of communicating its brand, in spite of legal restrictions. This process occurred in 1982 and Reynolds addressed itself to travel and, above all, adventure, always showing a Camel packet in the background (...). Otherwise, Camel uses lighters as an alibi or Camel Adventure Tours, which achieves the perfect result of maintaining and strengthening the image of the brand".

The same process occurred in Belgium, where tobacco advertising was regulated by the Royal Decree of 20/12/1982. In 1982 indirect advertising did not exist in Belgium, but in 1983 the first advertising campaigns for matches were underway. The indirect advertising budget was 17 million Belgian francs in 1983, 236 million in 1984 and, this had reached 536 million by 1989.

The sums spent on indirect advertising compared to the total budget for advertising expenditure have risen from 3,1% in 1983
(total budget : 543 million Belgian francs) to 55 % in 1989 (total budget : 971 million Begian francs).

INDIRECT TOBACCO ADVERTISING EXPENDITURE IN BELGIUM (in mio Belgian francs)



Source : Advertising Audit Service.

In view of these data, it is clear that the regulation of advertising for tobacco products should include regulation of indirect advertising.

On the 12th of June 1990 the Court of summary jurisdiction in Liège (Belgium) judged three cases relating to indirect advertising for tobacco products, because of billboards showing matches or lighters with a cigarette brand. Regarding these three cases, the judge considered that "advertising obviously aims to promote tobacco sales. That it is said to be aimed to sell lighters or matches is of minor importance, since it is well known that this market share is minimal compared to the market share for cigarettes". The judge added that "People are not stupid. They immediately identify the tobacco brand promoted through lighters or matches".

2. Indirect advertising has nothing to do with diversification of the tobacco industry.

On the 14th of March 1990, the European Parliament voted, at first reading, for a total ban on direct and indirect advertising for tobacco.

Nevertheless, a certain number of MEP's feared that such a ban would go too far and prevent the owners of tobacco trade marks from using these to promote the sale of products which bear no relation to tobacco, but which facilitate the development of a diversification policy outside the tobacco sector.

This possible link between indirect advertising and diversification is debated more and more and needs further exploration.

As we already emphasised above, the development of indirect advertising was essentially a reaction to legislative restrictions.

It is indeed easy to prove that the intensive campaigns for Marlboro or Camel lighters and matches were not aimed at the diversification of the Philip Morris or Reynolds multinationals, but at the promotion of their cigarette brands. Matches are so inexpensive that large advertising campaigns would be meaningless and could hardly prove cost effective.

Moreover, cigarette manufacturers often use the same imagery in their advertisements for cigarettes and for lighters.

Thus, the imagery used in Time magazine (edition of June 4 1990) to advertise Camel cigarettes, is the same as the imagery in the Camel lighters advertisement published on 31st May 1990 in the Belgian review Humo.

The aim of indirect advertising is to promote the image of the brand. It is true that the most successful brands are the ones depicting a strong personality, such as Marlboro and its cowboy, Peter Stuyvesant and its travels, Camel and its adventurer.

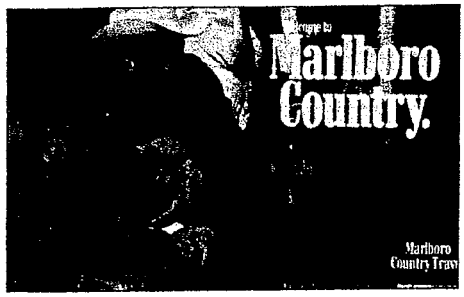
A specific case is represented by the world's most famous brand, and by the world's best-selling cigarette : Marlboro.

In China, advertising for tobacco products is banned. Nevertheless the Marlboro cowboy appears on posters in Pekin. No mention is made of cigarettes; the cowboy, the Marlboro brand and the red polygonal are sufficiently well-known for people to understand that these are advertisements for cigarettes .

Whatever the product displayed

(Marlboro Leisurewear or Marlboro travel), advertising for Marlboro always reinforces the cigarette brand.
The Chamber of accusation of the Court of Appeal of Colmar (France) in a trial on the 15th of January 1985 (confirmed in January 1990) recalled that **" there is no doubt that the emblem " Marlboro Leisure Wear ", with the representation of the name Marlboro with the red polygonal surface, on a white background, immediately brings to mind the well known cigarette packets of this brand;** and if it is trying to promote the clothes sold with this famous cigarette brand name, it also constitutes an extremely effective reminder of this cigarette brand, especially in view of the fact that direct advertising outside tobacconist's shops is currently forbidden".

It is important to note that, if one accepts that advertising for lighters is really advertising for cigarettes, one can see as well, for example, that the advertising imagery used for Marlboro Country travel in France is identical to the imagery used for Marlboro lighters in Belgium.



In conclusion, it is evident that Marlboro travel, Marlboro clothes, Marlboro lighters have nothing to do with the diversification of Philip Morris, but with the aim of maintaining the image of the cigarette.

Besides, Philip Morris bought General Foods in 1985, Kraft in 1988, and Suchard in 1990 for a total amount of 22 billion dollars. In the Philip Morris annual report (1989) it is clearly indicated that their diversification has been recently intensified, and that their income from the nutrition sector was 22933 million dollars, which is 5069 million dollars more than their income from the tobacco sector. Philip Morris' range of brands in the nutrition sector is tremendous. But the Marlboro brand is not used to sell those products. Marlboro's only target is to sell cigarettes.

In other words, the diversification process undertaken by the tobacco industry is possible and is done without having recourse to brand names of cigarettes. On the contrary, when diversifying, millions of dollars are spent by the tobacco industry for buying the right to use other brand names for the development of other activities.

THE OPINION OF EUROPEANS ON TOBACCO ADVERTISING BANS

	APPROVE
TOTAL E.C.	73%
BELGIUM	69
DENMARK	53
GERMANY	67
GREECE	79
SPAIN	69
FRANCE	75
IRELAND	78
ITALY	84
LUXEMBOURG	75
NETHERLANDS	58
PORTUGAL	77
UNITED KINGDOM	74

Source : Europeans and cancer prevention, 1987

BAN ON TOBACCO ADVERTISING : WILL THERE BE ADVERSE EFFECTS ON THE ECONOMIC SITUATION ?

A. impact on the tobacco industry

Would a ban on tobacco advertising cause reduced employment in the industry?

According to the tobacco industry, advertising does not affect global sales, so the imposition of an advertising ban would not present a difficulty for the tobacco sector.
On the other hand, consumer organisations are convinced about the impact of advertising on sales to young people, in particular, who represent only one section of the total market (1).
In other words, a fairly limited impact on global sales could be expected. Without taking other variables into account, a slight and gradual fall in sales, is predicted. However, a New Zealand study involving 18 countries has shown a correlation between advertising bans and reduced tobacco consumption among young people (2). The ***gradual*** nature of this reduction allows for a gradual reorganisation in the sphere of employment.

In Norway, the number of employees in the tobacco industry dropped by an annual mean of 2,7 % from 1965 to 1975, as against 2,6 % in the ten-year period after the ban, 1975-1985. There is no evidence that the ban has had any influence upon the general employment situation in Norway (3).

B. impact on advertising agencies

Would such a ban worsen the economic situation of the advertising agencies?

Firstly, in the European Community an estimation of the percentage spent on tobacco advertising versus total advertising expenditure, shows clearly that tobacco advertising does not represent more than 2 % of the total advertising budget (Table I);

Secondly, the total amounts spent on advertising in countries like Portugal (Fig.1) or Norway (Fig.2), which have a total ban, suggest the contrary. In Portugal, the total advertising expenditure in 1980 (two years before the introduction of the law) was 2,268 million escudos. In 1988 (adjusted figures to 1980 prices), six years after the ban, it rose to 17,289 million escudos;

Thirdly, in Norway eight years before the ban, sales of advertisements-of all kinds- increased by 3,9 per cent, as against a 5.6 per cent increase in the eight year period after the ban. This example shows that an ad ban does not worsen the economic situation (3);

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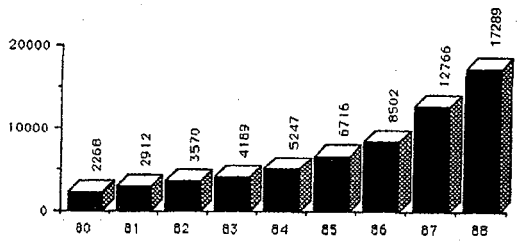
TABLE I

COMPARISON OF TOTAL ADVERTISING EXPENDITURE WITH ADVERTISING EXPENDITURE ON TOBACCO PRODUCTS IN THE EUROPEAN COMMUNITY

	TOTAL ADVERTISING EXPENDITURE	ADVERTISING EXPENDITURE TOB. PROD	DIFFERENCE TOB/TOTAL
	in mio ECU		%
	1988	1988	
FRANCE	5,872	56,5	1 %
BELGIUM/LUX	813	22,3	2,7 %
DENMARK	670	3,3	0,5 %
GREECE	253	7,0	2,8 %
IRELAND	198	3,9	2,0 %
NETHERLANDS	2,169	17,5	0,8 %
UK	10,203	92,0	0,9 %
	1987	1987	
GERMANY	7,577	205	2,7 %
SPAIN	2,905	38,8	1,3 %
			Average :1,6 %

Sources : see references (4).

FIGURE 1
TOTAL ADVERTISING EXPENDITURE IN PORTUGAL , 1980-1988
(in mio escudos)*

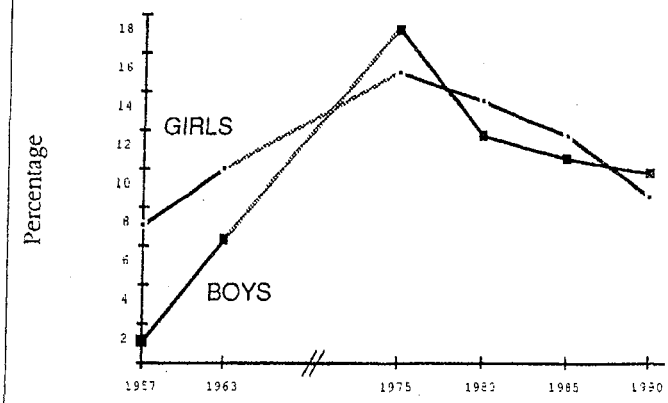


Source : Sabatina, CREDOP
(*) Adjusted figures to 1980 prices

Fourthly, if we take a look at Table II, we see that a projection made for EC countries by advertising agencies for the year 1992 shows an increase of 47,4 % in total advertising expenditure, compared with 1988. Even for Portugal (+93,6%) and Italy (+61,2%), the two Member States which already have a total ban, an increase is projected!

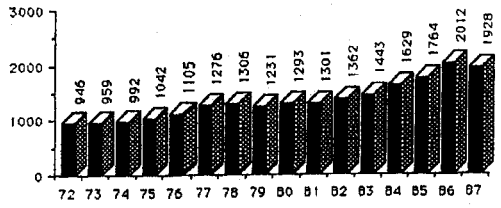
These facts and figures show clearly that since tobacco advertising represents only a small portion of the total advertising budget, and since in countries where there is a total ban, total advertising expenditure continues to increase, it is hard to believe that a total ban on advertising for tobacco products will have important adverse effects on the economic situation.

NORWAY
Percentage daily smokers, boys and girls aged 13-15 years 1957*, 1963*, 1975, 1980, 1985 and 1990



Source : Norwegian Cancer Society*
National Council on Tobacco and Health, Norway
1975 = the year of the ad ban

FIGURE 2
TOTAL ADVERTISING EXPENDITURE IN NORWAY, 1972-1987
(in mio NOK)*



Source : Norwegian Associations of advertising agencies
(*) Adjusted figures to 1979 prices

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2. Bjartveit K. Fifteen years of comprehensive legislation : results and conclusions. Paper presented at the seventh World Conference on Tobacco & Health. Perth, Western Australia, April 1990.
3. Health or tobacco: An end to tobacco advertising and promotion. Toxic substances board, New Zealand, 1989.
4. SOURCES FOR TABLE I :
   Total advertising expenditure : EAAA- Advertising investments 1988-1992;
   KRAB, De Belgische reklame in haar ekonomische kontekst, Statistische gegevens, September 1990.
   Tobacco advertising expenditure:
   France : Secodip; Belgium/Lux : Advertising Audit Service; Denmark: Gallup market Analyse; Greece: Media Services S.A.; Ireland: Market Survey; Netherlands: Bureau voor budgeten kontrol; U.K. : Media Expenditure Analysis ; Germany: Market Survey; Spain : Nielsen Repress.

TABLE II

TRENDS IN ADVERTISING EXPENDITURE
1988-1992

EUROPEAN COMMUNITY	1988	1992	'92/'88
		in mio ECU	
BELGIUM/LUX.	813	1,052	+ 29,4%
DENMARK	670	923	+ 37,8%
FRANCE	5,872	8,291	+ 41,2%
GERMANY	7,976	9,710	+ 21,7%
GREECE	253	525	+ 107,5%
IRELAND	198	233	+ 17,7%
ITALY	4,277	6,893	+ 61,2%
NETHERLANDS	2,169	2,695	+ 24,3%
PORTUGAL	204	395	+ 93,6%
SPAIN	3,794	8,361	+ 120,4%
UK	10,203	14,614	+ 43,2%
TOTAL EC	36,429	53,692	+ 47,4%
JAPAN	22,619	29,915	+ 32,2%
USA	63,107	80,158	+ 27,0%

Sources : EAAA- Advertising investments 1988-1992
KRAB, De Belgische reklame in haar ekonomische kontekst, Statistische gegevens, September 1990

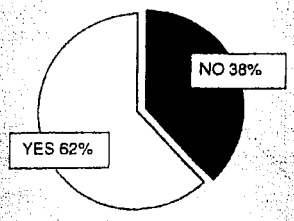
UK: ADVERTISERS SUPPORT A BAN ON TOBACCO ADVERTISING !

A recent research part of the weekly Marketing Forum survey, shows that most top advertisers now support a ban on UK tobacco advertising.

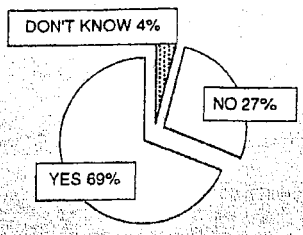
The poll was carried out among a panel of marketing directors and managers drawn from the UK's top 300 advertisers.

A clear majority of the marketing directors and managers questioned believe an outright ban is inevitable this decade.

1. Are you in favour of a total ban on tobacco advertising in the UK or not?



2. Do you think such a ban will be imposed in the UK in the next ten years or not?



Source: Marketing, 24 May 1990

ONE STEP AHEAD

Are restrictions such as health warnings on advertisements sufficient?

Health experts say that young people do not care about warnings, because they are little concerned with what is likely to happen to their health many years later and then, they think they will have all the time in the world to stop before it is too late. Therefore, health warnings on advertisements do not seem to be the best solution to the problem.

So, the next important question is: ***Even if it is true that tobacco is a legal product, is it ethical to allow it to be promoted widely when it causes so much unnecessary suffering and death and when health experts say that if introduced today, tobacco would never be made legal?***

Since a straightforward ban of the product itself is not appropriate and given the goal of reducing smoking as much as possible, the industry should be allowed to provide certain information through advertising, but then only to those the same industry says it wants to reach.
Therefore the correct answer here seems to be that tobacco consumers **but only they** should not be deprived of information on the possibility of transferring to other less harmful tobacco products.
In fact, bearing in mind the dangers of tobacco, any information, marketing, and promotion of these products should be limited only to the consumers of tobacco products. This way the advertising clearly fulfils the role which the industry claims for it.

Adults are free to choose to smoke or not", says the industry. ***Yes, but without persuasion to smoke. The acknowledgement that cigarettes are a dangerous product must be part of any reasonable argument that people still have a right to smoke.***

Indeed, such advertising must be restricted in a way which guarantees full protection for the vast majority of citizens that our society wants to remain non-smokers. The same applies to addicted smokers who try to give up smoking (29 % in the EC want to give up smoking). They also have the right not to be reminded of the availability of the product they are trying to get rid of.

"In this respect, the experience of countries who have a total ban is instructive regarding the question of advertising policy and flow of information.

The recent example of the tobacco law in France shows that health authorities may have a way of helping the tobacco industry justify its claims that tobacco advertising is only for brand loyalty and to inform smokers about "lighter" products, rather than for the recruitment of new smokers. This legislation allows advertising only at points of sale of tobacco products. Thus, in this special case *advertisers' freedom of speech will continue to exist, and consumers' freedom of choice will be more objective.*

Of course, when legislating in such an area, particular care should be taken to prevent advertising from being indirectly deviated toward other substitute means of promotion.
For the same reasons such advertising should not be visible outside points of sale. No such advertising should be allowed in general stores, even if tobacco is sold there together with other products.

If such advertising is limited to points of sale, young people would receive more consistent and beneficial messages about tobacco from adult society. Peer pressure to smoke would no longer be fuelled by advertising images.

Conceding the merits of the health issue would give the tobacco industry an ethical platform to stand on - which is something that all marketeers of dangerous products must have.

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WOULD A BAN ON TOBACCO ADVERTISING WORSEN THE ECONOMIC SITUATION OF THE ADVERTISING AGENCIES?

In the European Community an estimation of the percentage spent on tobacco advertising versus total advertising expenditure, shows clearly that tobacco advertising does not represent more than **2%** of the total advertising budget.

CAN ADVERTISING BE LEGALLY BANNED?

CAN AN ADVERTISING BAN OF TOBACCO PRODUCTS, BY PREVENTING THE TRANSFER OF INFORMATION ABOUT LESS HARMFUL TYPES AND BRANDS, BE COUNTER-PRODUCTIVE ?

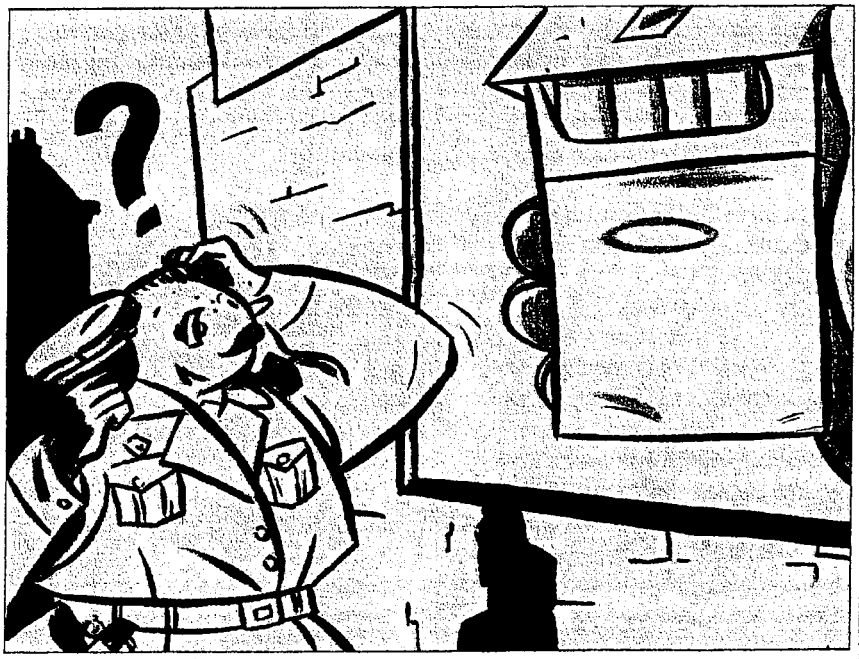
The International Advertising Association takes the view that Tobacco advertising bans tend to prevent or hamper the spread of information about new features such as filtered and lower-tar cigarettes.

Are they right ?

The Norwegian example shows that the ad ban effective since 1975, has not obstructed a shift to low tar cigarettes. Cigarettes on average in 1988 yielded 13 mg tar. Moreover, after the introduction on to the market of a low tar cigarette in 1984, the market share of this product increased from 0 to 6 percent within one year.

The average tar yield in 1988 in Sweden -where tobacco advertising is permitted- was higher than in Norway, at 15mg.

In Finland advertising was banned in February 1978. The percentage of smokers whose usual cigarette had a tar yield less than 10mg increased from 0 in 1978-79 to 46 percent in 1983-85, a spectacular increase.



On a national level

Those opposed to a total ban on tobacco advertising declaim against interference with basic freedoms, and more precisely, the freedom of speech, of trade and of trade mark rights. They argue that a total ban on tobacco advertising could therefore not be introduced into national legislation because it interferes with basic rights.

The principle of an advertising ban for certain products is already acknowledged and applied in all EC countries.

The principle of an advertising ban on certain products (weapons, pharmaceutical products, etc.) legally sold and available to the public is acknowledged and applied in all EC countries. Such bans, which depart from common law, are rare[1] and are justified in the interests of the general public and of social stability: maintaining public security (ban on advertising weapons), respecting public morality (ban on pornographic advertising), protecting public health (strict regulations on advertising pharmaceutical products), etc. It is with the goal of protecting public health that various states have already adopted a ban on tobacco advertising, and that various others are intending to do so.

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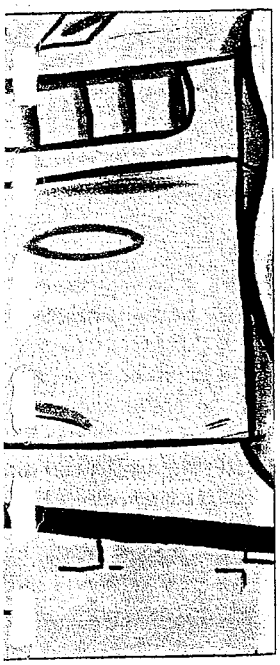

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The most restrictive bans currently in force concern advertising to the general public. Nevertheless, these bans take account of the informative role played by advertising, in allowing manufacturers and distributors to present and promote their products to professionals and customers in the sectors concerned.

A tobacco advertising ban is perfectly compatible with basic rights.

The European Court of Justice [2] recognised that basic rights shall not be absolute prerogatives. As in any legal order, there are no basic rights without limitations, the extent of which depends on the nature of the right concerned. The Belgian Supreme Court of Appeal clearly indicated in a case dated 9 December 1981, that a tobacco advertising ban is not unconstitutional [3].

**A tobacco advertising ban does not interfere with trade mark rights.*

In fact, both the International Convention of Paris and the Council Directive (89/104/EEC) regulate several conditions governing the registration and protection of trade marks and industrial property.
The main aim of the Council Directive (89/104.EEC), which is based on article 100 A, is to remove any obstacles which prevent the free circulation of such goods within the Common Market. The area of relevance is the protection given to the holder of the trade mark, by making the acquisition and continuing rights attached to the registered trade mark subject to the same conditions in every member state.
On the other hand, the Paris convention, in its revised version of the 14th July 1976, in Stockholm, specifies in article 6 quinquies, paragraph 2, 3rd alinea, that a trade mark can be refused registration or deemed not valid if it infringes public ethics or morality, and especially if it misleads the public. The purpose of the Community directive and also of the Paris convention, is to ensure the uniformity of conditions governing the protection conferred upon the holder of a trade mark. Their provisions aim at defining the conditions relating to registration and the rights vested in the trade mark. In fact, several member states have laws, concerning the public health sphere, which impose restrictions on the use of the trade mark for tobacco products in the realm of advertising. Such restrictions actually stem from the demands of public health and are, thus, exempt from the law relating to trade marks, stricto sensu.

The decision adopted by the French Constitutional Council on 8 January 1991[4] follows the same idea :
"Whereas a ban on tobacco advertising and promotion will probably affect the exercise of the property right over a tobacco or tobacco products trade mark; but, whereas these principles are based on the constitutional principle of public health protection; given that the law allows advertising in tobacconist's shops (...); it follows from the above, that the restriction introduced by Article 3 [5] to certain modalities of exercising the property right is not unconstitutional".

**A tobacco advertising ban does not interfere with freedom to trade.*

In France, the authors of the distraint to the Constitutional Council reproached the law for-among other things-failing to recognise the freedom of trade, on the basis that its exercise implies the power to apply market and competition laws to products, which means consumer information and the free circulation of products.
Here are extracts from the Constitutional Council's answer :
"Whereas the freedom of trade is neither general nor absolute; that it is possible for the legislator to introduce limits required in the general interest (...); whereas article 3 of the law does not ban either the production, or the distribution, or the sale of tobacco or tobacco products; that the possibility of informing the consumer inside tobacconist's shops is maintained; that the prohibition of other forms of advertising or promotion is based on the requirements of public health protection, which have a constitutional value; that it follows from the above, that article 3 of the law does not interfere so much with the freedom of trade, as to be unconstitutional.

**A tobacco advertising ban does not interfere with freedom of speech.*

Article 10 of the European Convention of Human Rights :
"1. Everyone has the right to freedom of expression. (...)
2. The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, (...) for the protection of health (...)".

At an EC level

According to the Treaty of Rome, the constitutional basis of the EC, the EC is not directly competent for the protection of citizens' public health, but Article 100 A provides that measures adopted for the establishment of the internal market shall be based on a high level of protection with regard to public health.

Nevertheless, EC activity, in its fields of competence, shall take into account the principle of subsidiarity which provides that the EC shall take action in the fields where the objectives "can be attained better at Community level than at the level of the individual Member States"[6]. This principle plays an important role in the distribution of competences between the EC and the member states in the environment field, a field where transnational cooperation and measures are required.
As with the environment, the problems originating from the impact and consequences of tobacco advertising go beyond the national level. The bans adopted by certain member states cannot be implemented rigorously and their efficiency is reduced because of the ineffectiveness of frontiers in this respect. A state which bans all tobacco advertising could not prevent newspapers and magazines printed or circulated in another country, which

allows tobacco advertising, from being seen or read by its own citizens. On the other hand, current differences between national legislations concerning tobacco advertising mean that consumers, and particularly young people, are confronted with pressures and purchasing conditions differing from one member state to another. EC competition rules are distorted, a product can be promoted and advertised in one member state, whilst advertising for the same product may be banned in the bordering state. These discrepancies and inequalities will worsen with the completion of the internal market, whose objective is the removal of frontiers.

The question of the need to regulate tobacco advertising on a supranational level arose during the television broadcasts of the World Football Championship organised in June 1990 in Italy. As Italy allows sport sponsorship, the TV viewers were able to see a variety of beer adverts on their screen. The French brewers, who cannot advertise for their products on the French TV channels, referred the case to court, and asked for an end to this situation of unfair competition.

The harmonisation of legislation governing tobacco advertising within the EC is the only way to mitigate discrepancies and inequalities, which affect not only European citizens' public health, but also free competition and marketing conditions.

1 Norway placed strong restrictions on alcohol advertisements in 1975; at the same time it enforced the total ban on tobacco advertising. However, since then, no other advertising ban has ever been considered, and such a ban would certainly not be adopted.

2 Internationale Handelsgesellschaft Decision of 12.11.1969 Case 29/69, Recueil 1969, 419;
Decision of 17.12. 1970 Case 11/70, Recueil 1970, 1125;
Nold, Decision of 14.5.1974 Case 4173, Recueil 1974, 491

3 "Cour de Cassation", 9 December 1981, "Journal des Tribunaux", 19 February 1983, p.133

4 On 13 December 1990, on the day when the French law on protection against tobacco and alcohol was adopted by Parliament, some members exercised their constitutional right to object to certain articles to the Constitutional Council.

5 Article 3 bans direct and indirect advertising.

6 Art. 130 R paragraph 4 of the Rome Treaty.

EFFECTIVENES OF VOLUNTAR AGREEMENTS

Introduction

"Voluntary" means "of one's own free will; not constrained or compulsory". Clearly the tobacco industry will never agree to a total ban on tobacco advertising, so voluntary agreements cannot be used to obtain a total ban. In the case of a partial ban, some governments prefer to use voluntary agreements rather than legislation, to impose certain restrictions. A clear example is found in the United Kingdom, where there is "a tendency to avoid written law where possible, leaving individuals or industries to regulate their own behaviour".(1) During the last twenty years, a whole series of voluntary agreements have been negotiated in the U.K. Voluntary agreements restricting tobacco advertising have also been made in Denmark, Germany (previously and Spain. Examples of volunt codes can be found too in c e industries, such as the pharm industry.

Advantages claimed for th voluntary code

The main advantages claime industry for these self-regulator systems, compared with legislat that they are cheaper and ea establish, implement, enforc u develop. Agreements reached b consensus are regarded by s people as more satisfactory r obligations imposed by law. Tal the example of the pharmaceuti industry, concerning the adv i and promotion of medicinal c for human use, self-regulation c

used as a useful adjunct to legislation. However, the Opinion of the CCC (the Consumer Consultative Committee, a consultative body of the EC Commission) adopted on 30th November 1989 was : "Codes can only play a complimentary role and facilitate the possible application of the legislation". (2)
The conclusion embodied in this Opinion, that voluntary codes can never replace legislation, is indeed one of the underlying principles of the Council Directive of 10th September 1984 on misleading advertising. Article 5 states that "This Directive" does not exclude the voluntary control of misleading advertising by self-regulatory bodies and recourse to such bodies by the persons or organizations referred to in Article 4 if proceedings before such bodies are *in addition to* the "court" or administrative proceedings referred to in that article".(3) (The italics are our own.)

Disadvantages of the voluntary code

Voluntary codes used without legislation have **not** proved to be effective. In relation to tobacco advertising, their main disadvantages are that they fail to cover all types of tobacco promotion, their negotiation is lengthy and secretive, it is hard to monitor the agreements and there are no real penalties for breaking them. The **U.K.** case study quoted above (1) provides examples of all these shortcomings. **Large areas of promotion are not governed by the voluntary agreements**, such as duty-free shops, international publications, "same name" products and services and, above all, sponsorhip. Although it was agreed that cigarette advertising should be removed from television, the tobacco industry achieved cheaper exposure than before, through massive sponsorhip of sport on television, managing to associate its products with health, glamour, excitement and young people's heroes. A Health Education Authority study has shown that in 1989 BBC television broadcast 364 hours of tobacco-sponsored sport. (4) Another example of loopholes in the U.K. voluntary code on tobacco advertising relates to the agreement to limit expenditure on poster advertising in general and near schools and playgrounds in particular. (5) A third example of tobacco promotion in the U.K. escaping the voluntary agreement is found in a recent study of cigarette advertising in women's magazines. (6) The voluntary agreement of 1986 aimed to protect young women from explosure to cigarette advertising by introducing new restrictions, but the results of a survey undertaken in 1989, when compared with those of a 1985 survey, show that the agreement has failed to achieve its avowed intent. "The targeting by the tobacco industry of both its product and its advertising at women has led to a steady increase in cigarette advertising expenditure in women's magazines - £9-7 million by 1988." (6) It seems that each time a voluntary agreement is reached, the tobacco industry has decided in advance how to circumvent it.

The other key problems associated with voluntary codes relate to **secrecy and the lack of a public right to be involved**. In the U.K., negotiations for voluntary agreements are limited to representatives of tobacco companies and importers meeting with representatives of the government. The British Medical Association has been refused admission, even as an observer.
Similarly, a Committee for Monitoring Agreements on Tobacco Advertising and Sponsorhip (COMATAS) consists of half industry and half government representatives, with an independent chairperson. The latter has repeatedly observed in his independent foreword to COMATAS reports that the tobacco industry complies with the letter rather than the spirit of the agreements. Many public complaints to COMATAS are found to be outside the scope of the voluntary agreement, for reasons such as the loopholes explained previously. **If the voluntary code represents agreement by consensus, then a situation can clearly be reached where the public is left out of this consensus**. No real penalties exist for violating a voluntary code, and the government's only power is to threaten legislation. But studies of the tobacco industry have shown the powerful influence it can exert on government members (8).

In **Belgium**, the first legislation on tobacco advertising goes back to 1980. Previously, in 1971, Fedetab, the federation for the tobacco manufacturing industry, had drawn up a code to regulate advertising and decided, amongst other things, that tobacco advertising should not be aimed directly at young people. Nevertheless, the themes of the advertisements (sociability, love, cowboys, popular sport, comic strip heroes and motocycles) were aimed especially at young people, so that the code became meaningless and legislation was necessary (9).

In **the Netherlands**, the tobacco industry also ignores the spirit of the voluntary code, and monitoring the agreement presents similar difficulties. In 1979, for instance, the College of Appeal of the Dutch Advertising Code Commission accepted advertising showing the top football player, Johan Cruyff, recommending low tar and nicotine cigarettes. The College stated that he had appealed to the public as a smoker, not as a top sportsman. According to the "Stichting Volksgezondheid en Roken", the Dutch Foundation on Smoking and Health, this decision was hypocritical because the image of Cruyff cannot be separated from his sports image.
On the other hand, the same College of Appeal judged in October 1986 that the Dutch Foundation on Smoking and Health was wrong to publish its view that passive smoking is harmful to health. However, four years later the District Court of the Hague ruled that the Foundation was justified in publishing this view (10). Further

problems have been experienced with voluntary tobacco advertising agreements in **Australia** (11), **Canada** (12) and **New Zealand** (13).

Conclusions

So ***voluntary agreements*** on tobacco advertising are only likely to be effective in a complimentary role, but they ***can never replace legislation***. They may be used to facilitate the application of legislation, but they cannot represent the public satisfactorily or protect them adequately from the dangers of tobacco advertising. The existence of voluntary agreements must not provide an excuse for not legislating. "The term voluntary means that the measures are agreed to by the industry-clearly no industry will voluntarily agree to measures that genuinely threaten its trading viability" (1).

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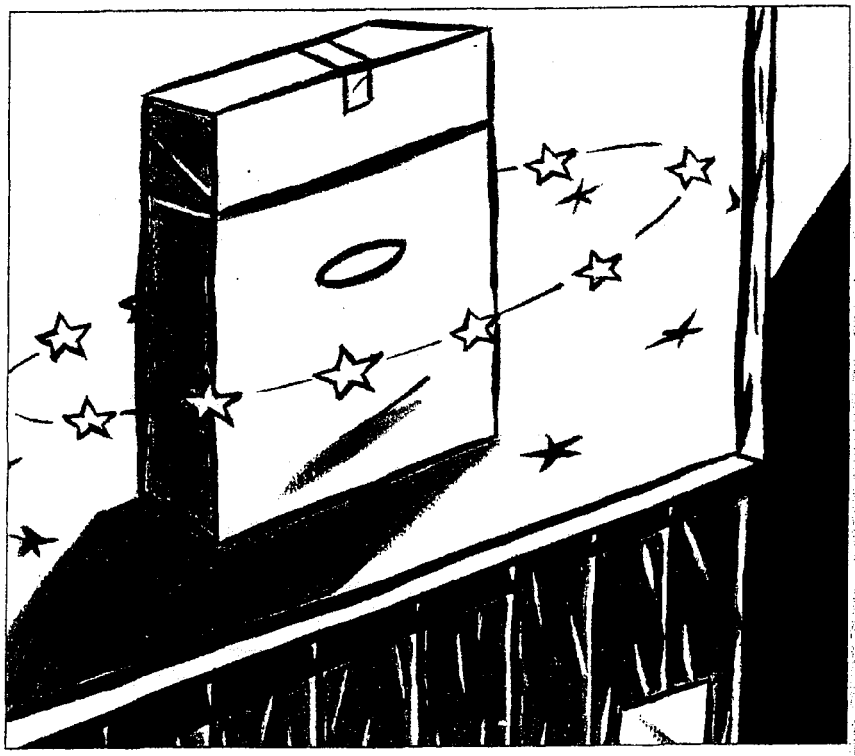
EC 12 : SOME LEGISLATIVE ASPECTS



Tobacco advertising is a formidable weapon in the hands of the tobacco industry, due to its power, to its persuasive effects and to the scale of the annual expenditure devoted to it. For this reason, every country pursuing an active tobacco prevention policy imposes limits on tobacco advertising. These limits range from the mere obligation to include health warnings in tobacco advertisements, to a total ban on all types of advertising. Considering the world as a whole, tobacco advertising is completely or partially forbidden in numerous countries[1] and is subject to regulations in an even greater number of countries. Considering the E.C. in particular, every Member State has made some provision either to ban or to control tobacco advertising.

Four categories of countries can be identified, depending on the degree of severity of their tobacco advertising controls, and the way in which these are applied (by law or by voluntary agreement).

Group 1 : a total ban

This group consists of countries which have applied a total ban on tobacco advertising.

In Italy, direct adve
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Group 2 : restrictio

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In Italy, direct advertising for tobacco products is forbidden. Sponsoring and advertisements in tobacconist's shops are permitted. (Law of 10th April 1962 prohibiting advertising propaganda for tobacco products, law N°. 52 of 22nd February 1983).

In Portugal, all advertising for tobacco products is banned. Advertising in tobacconist's shops is permitted, but sport sponsorhip is restricted (Law N°. 22/82 of 17th August 1982 on the control of tobacco consumption, decree N°. 226/83 of 27th May 1983 concerning the application of law n°. 22/82, Decree N°. 346/88 of 26th September 1988).

In France, all advertising for tobacco and tobacco products, including sponsoring, will be banned as from 1st January 1993. Advertising in tobacconist's shops will continue to be permitted (Law N°. 91-32 of 10th January 1991 in the context of the campaign against tobacco and alcohol consumption).

Group 2 : restrictions imposed by law

This group is composed of countries which impose legal restrictions on tobacco advertising, but not a total ban.

In Ireland, advertising for tobacco products is subject to strict and detailed controls. Advertising in tobacconist's shops is permitted. Sponsoring is subject to restrictions. (Tobacco Products (Control of Advertising, sponsorship and sales promotion) Act 1978 and 1986).

In Luxembourg, all advertising for tobacco products is subject to major restrictions. These measures do not apply to advertising in tobacconist's shops. Sponsoring is subject to controls and is forbidden during events involving children and young people. (Law of 24th March 1989 imposing restrictions on the advertising of tobacco and tobacco products).

In Belgium, all advertising for tobacco products is subject to major restrictions. Advertising in tobacconist's shops and sponsoring are permitted. (Royal Decree of 20th December 1982 concerning the advertising of tobacco, tobacco-based products and similar products, modified by the Royal Decree of 10th April 1990.)

In Greece, cigarette advertising is prohibited on the radio and on television. Advertising in the press and by means of bills and posters is subject to controls. Advertising in tobacconist's shops and sponsoring are permitted. (Law N° 1730 of 1987, "Hellenic Radio-Television Limited Corporation; Law N° 1592 of 1989, "Health warnings on advertisements).

Group 3 : restrictions imposed by law and by voluntary agreement.

This third group is composed of countries which restrict tobacco advertising both by law and by voluntary agreement between the government and the tobacco industry.

In Spain, all tobacco advertising through official communication channels is prohibited. Advertising in tobacconist's shops and sponsoring are permitted. (Royal Decree 709/1982 of 5th March 1982).
Voluntary restrictions are operated by the tobacco industry in Spain, of both a quantitative and a qualitative nature.

In the Netherlands, radio and television advertising for cigarettes and self-roll tobacco are banned by voluntary agreement, and advertising in the press and by means of bills and posters is subject to voluntary restrictions. It is written into the law that, if these restrictions have not proved to be effective after 5 years have passed (i.e. by 1st Janurary 1995), then advertising will be controlled by legislation. Advertising and sponsoring are permitted (Law of 10th March 1988 on the protection of non-smokers, Voluntary agreement of 9th October 1989).

In Germany, advertising for cigarettes and other tobacco products is prohibited on the radio and on television. Other advertising is subject to controls by law and by voluntary agreements. Advertising in tobacconist's shops is permitted. Sponsoring is subject to restrictions by voluntary agreements. (Law of 15 August 1974 for the Revision and Emendation of the legislation on Trade in Foodstuffs, Tobacco Products, Cosmetics and other Commodities).

In Denmark, cigarette advertising is subject to major voluntary restrictions. Advertising in tobacconist's shops and sponsoring are permitted. (Rules governing the sale of tobacco products, 21st February 1980; Voluntary agreement between the tobacco industry in Denmark and the Danish Minister of the Interior, 11th March 1986).

Group 4 : voluntary agreement

This fourth group consists of countries with voluntary agreements reached between the government and the tobacco industry of the country concerned.

In the **United Kingdom**, cigarette advertising is subject to major voluntary restrictions. Advertising in tobacconist's shops is permitted. Sponsoring is subject to voluntary restrictions. (Voluntary agreement between the tobacco industry and the British government on 1st April 1986; voluntary agreement between the Minister of Sport on behalf of Her Majesty's Government and the Tobacco Advisory Council on 19th January 1987).

1 Total ban (non-exhaustive list) :
Iceland (1972), Finland (1978), Norway (1975), Canada (1989), Jordan, Mozambique, Sudan (1983), Algeria.
While belonging to the Soviet bloc, East European countries upheld a total ban on advertising. Since the events of October 1989, the tobacco industry has launched active and conspicuous advertising campaigns in these countries.
Partial ban (non-exhaustive list) :
Singapore (1971), Sweden (1975), Thailand (1969), Taiwan (approximately 1970), Australia.

FRENCH LAW N° 91-32 OF 10TH JANUARY 1991 CONCERNING THE FIGHT AGAINST TOBACCO AND ALCOHOL USE

Article 1. As of 1st January 1992, it will be forbidden to include tobacco in the consumer price index, which is published by the government and, in particular, by the National Institute for Statistics and Economic Studies. ("L'Institut national de la Statistique et des études économiques")

Article 2. Article L, 192 of the public health code is now completed with the following alinéa :
"At this point they receive information from the school doctors about the causes, consequences, treatment methods and ways of combating tobacco and alcohol use and drug addiction".

Section I.

The provisions relating to the fight against tobacco.

Art. 3-I-As of 1st January 1993, Article 2 of law n° 76-616 of 9th July 1976 concerning the fight against tobacco now runs as follows :

"Art. 2 - All publicity and advertising for tobacco and tobacco products, both direct and indirect, is prohibited, as is the distribution of free samples.
"The above article does not apply to illuminated signs and advertisements inside tobacconist's shops, nor to publicity inside these shops, which is not visible from outside, on condition that these signs and advertisements meet the requirements laid down by joint ministerial decree.
"All sponsorship activities are forbidden when their aim or result is direct or indirect advertising or publicity for tobacco or tobacco products".

II. Until 1st January 1993, the current provisions of article 2 of law n° 76-616 of 9th July 1976 remain in force subject to the following modification : after the words : "publicity and advertising", these words are added, "direct or indirect".

Art. 4-Articles 1,3,9,12,16 and 18 of law n°76-616 of 9th July 1976 quoted above now run as follows :

"First article- 'Tobacco products' means products intended to be smoked, sniffed, chewed or sucked, in as much as they are, even partly, made of tobacco, and also those products which are designed for smoking, even if they contain no tobacco, in the meaning of the third alinéa (2°) of article 564 décies of the general "taxation code".

"Art 3 - The following is regarded as indirect advertising or publicity: all advertising or publicity for an organisation, service, activity, product or article other than tobacco, or for a tobacco product, which reminds us of tobacco or tobacco products by means of its graphics, presentation, brand imagery, advertising logo or any other distinctive feature.

"However, these provisions do not apply to publicity or advertising for a product other than tobacco, or for a tobacco product, which was launched before 1st January 1990 by a company which is legally and financially separate from any company manufacturing, importing or trading in tobacco or tobacco products. If any legal or financial links are established between these companies then this exemption is null and void.

Art. 9-I. The maximum tar yield of cigarettes is fixed by a decree from the minister responsible for health.
"II. Each packet of tobacco or each tobacco product must be labelled exactly as specified by the health minister's decree with the message "Seriously damages your health".
"III. Each cigarette packet is marked with information :
"1) about its overall composition except, if relevant, as regards filters
"2) about its average tar and nicotine content.

"A decree from the health minister specifies the ways in which this compulsory labelling is to be carried out, the analytic methods for measuring the nicotine and tar yield and for verifying the accuracy of the information given on packets.

"Every packet will also carry a health warning, printed according to the requirements of the health minister's decree.

"IV. Packets of tobacco and tobacco products produced before 31st December 1991 which do not meet the requirements laid down in paragraphs II and III above may be put on sale until 31 December 1992, concerning cigarettes, and until 31 December 1993, concerning other tobacco products, on condition that, on the one hand, their overall composition is clearly marked (except, if relevant, as regards filters) and their average tar and nicotine content are stated and, on the other hand, that they carry the message : "abuse" is dangerous"."

"Art 12 - Any infringement of the provisions of this section is punishable by a fine of between 50.000 and 500.000 French francs. For cases of forbidden publicity or advertising, the fine can be a maximum of 50% of the sum total of the cost of the illegal venture.
"For reoffenders, the tribunal can ban sale of the products involved in the illegal venture for one to five years.

"The tribunal can, when appropriate, order the abolition, removal or confiscation of the forbidden advertisements, at the offenders' expense".

"The tribunal can, depending on the circumstances, decide that legal entities are wholly or partly responsible for the payment of fines and legal expenses incurred by their directors or employees.
"The withdrawal of advertisements can be ordered either by the director of public prosecutions or automatically by the examining magistrate or by the relevant tribunal. The order thus issued is enforceable, notwithstanding the possibility of appeal. Restoration can be made by the relevant jurisdiction which is handling the case. The order ceases to have effect if there is a verdict of nonsuit or annulment.
"Orders which are subject to demands for restoration, can be considered in the original court or in the appeal court, depending on whether they were issued by an examining magistrate or by the appropriate tribunal.

"The original court or the appeal court gives a ruling within ten days of receipt of the relevant documents.

"Art.16 - Smoking is banned in places used by a number of people, in particular educational establishments, and on public transport facilities, except in areas specially set aside for smokers.

"The conditions governing the application of the above alinéa, are laid down by decree of the "Conseil d'Etat" (State Council)."

Art. 18 - Associations which have had anti-tobacco goals in their statute for a least five years prior to the event in question may exercise the rights awarded to plaintiffs claiming damages, in cases of infringement of the provisions of this law.

Art. 5 Articles 13-15 of law n°76-616 of 9th July 1976 quoted above are revoked.

Art.6-1 Until 31st December 1992, all publicity and advertisements for tobacco or tobacco products must be accompanied by a health message which meets the requirements laid down by the health minister's decree.

II. The amount of space devoted to tobacco advertising or publicity in the press per year must be one third less in 1991 and two thirds less in 1992 than the average for 1974 or 1975. For this purpose, article 8 of law n° 76-616 of 9th July 1976, quoted above, will be enforced.

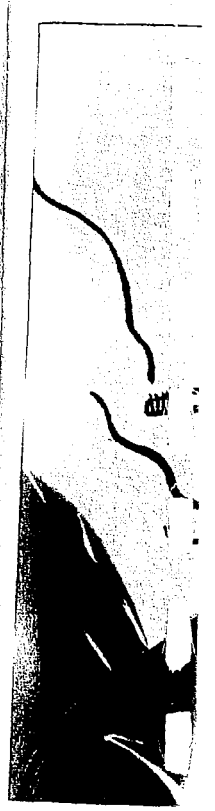
These provisions apply to contracts already in existence at the time when this law is promulgated.

Art. 7 A government decree will announce the date of an annual event entitled : "No-smoking Day".

Art. 8 Any infringement of the provisions of article 6 is punishable by a fine of between 25.000 and 250.000 French francs.
The maximum penalty which can be imposed is 50% of the total exepenses devoted to the forbidden publicity or advertising.

The tribunal can, depending on the circumstances, decide that the legal entities are wholly or partly responsible for the payment of fines and legal expenses incurred by their directors or employees.

The associations mentioned in Article 18 of law n°76-616 of 9th July 1976 quoted above can exercise the rights of the plaintiff in relation to infringements of the provisions of Article 6.



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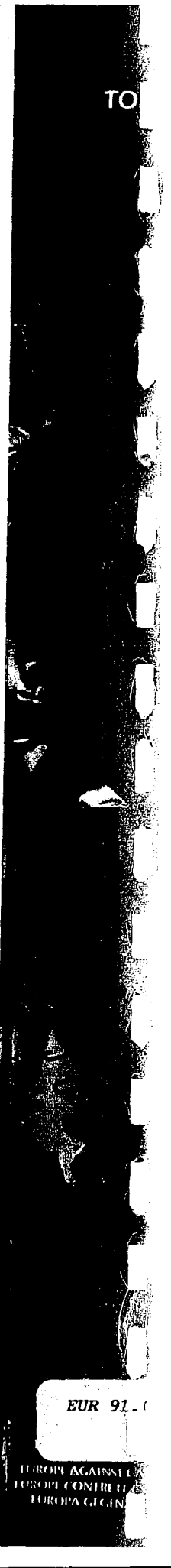

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This report was undertaken by the "European Bureau for Action on Smoking Prevention"
at the request of the European Community.
Its authors assume complete responsibility for the contents.

March 1991

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Les vues qui y sont exprimées n'engagent que leurs auteurs.

Mars 1991

Dieser Bericht wurde vom "European Bureau for Action on Smoking Prevention" auf Veranlassung der Kommission der Europäischen Gemeinschaften durchgeführt.
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März 1991

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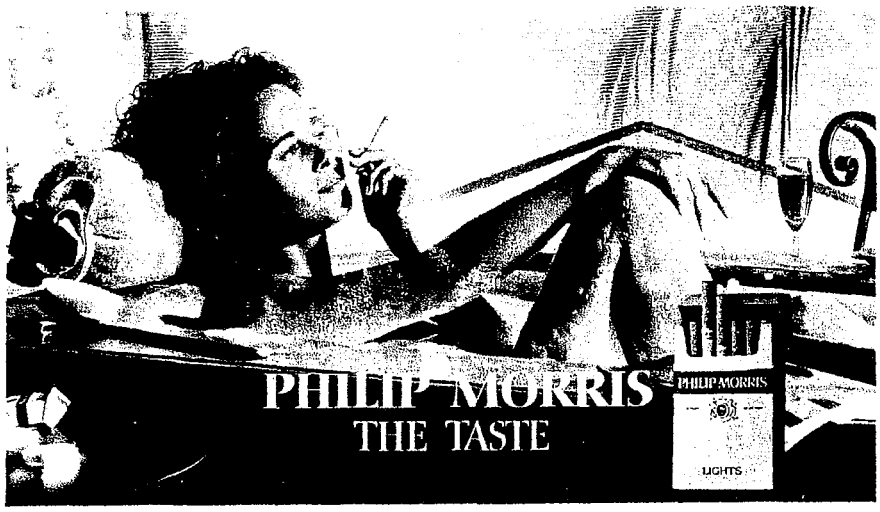

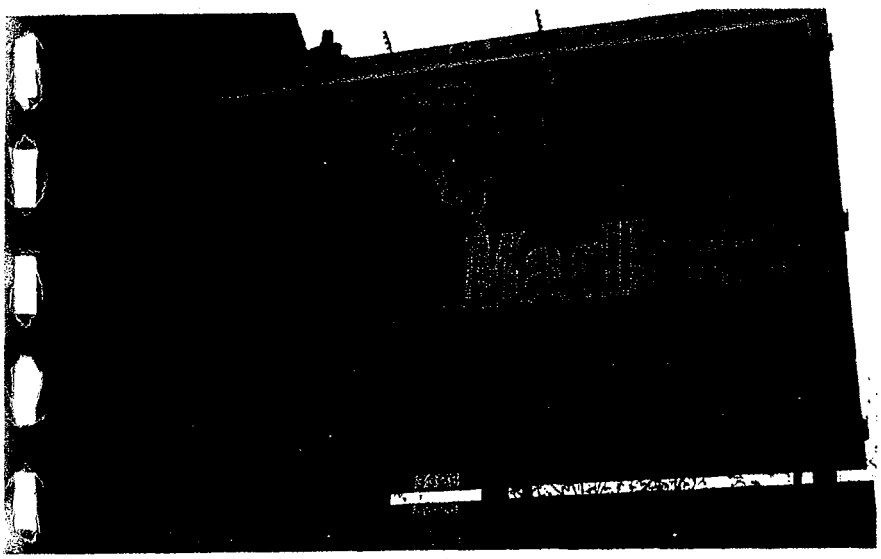

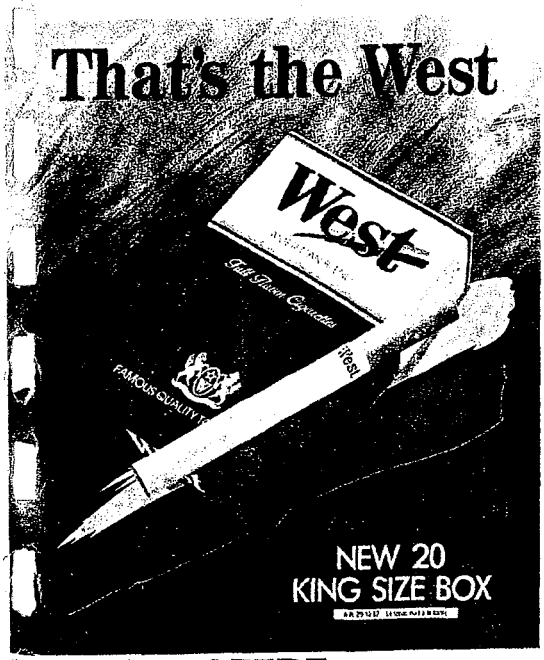

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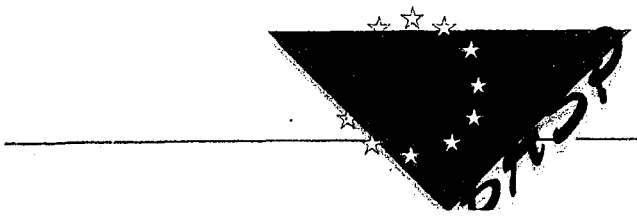

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März 1991

DIRECTIVE 98/43/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 6 July 1998

on the approximation of the laws, regulations and administrative provisions of the Member States relating to the advertising and sponsorship of tobacco products

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty establishing the European Community, and in particular Article 57(2), Article 66 and Article 100a thereof,

Having regard to the proposal from the Commission [1],

Having regard to the opinion of the Economic and Social Committee [2],

Acting in accordance with the procedure laid down in Article 189b of the Treaty [3],

(1) Whereas there are differences between the Member States' laws, regulations and administrative provisions on the advertising and sponsorship of tobacco products; whereas such advertising and sponsorship transcend the borders of the Member States and the differences in question are likely to give rise to barriers to the movement between Member States of the products which serve as the media for such advertising and sponsorship and to freedom to provide services in this area, as well as distort competition, thereby impeding the functioning of the internal market;

(2) Whereas those barriers should be eliminated and, to this end, the rules relating to the advertising and sponsoring of tobacco products should be approximated, whilst leaving Member States the possibility of introducing, under certain conditions, such requirements as they consider necessary in order to guarantee the protection of the health of individuals;

(3) Whereas, in accordance with Article 100a(3) of the Treaty, the Commission is obliged, in its proposals under paragraph 1 concerning health, safety, environmental protection and consumer protection, to take as a base a high level of protection;

(4) Whereas this Directive must therefore take due account of the health protection of individuals, in particular in relation to young people, for whom advertising plays an important role in tobacco promotion;

(5) Whereas in order to ensure the proper functioning of the internal market the Council adopted, on the basis of Article 100a, Directive 89/622/EEC [4] and Directive 90/239/EEC [5] concerning the labelling of tobacco products and the maximum tar yield of cigarettes, respectively;

(6) Whereas advertising relating to medicinal products for human use is covered by Directive 92/28/EEC [6]; whereas advertising relating to products intended for use in overcoming addiction to tobacco does not fall within the scope of this Directive;

(7) Whereas this Directive will not apply to communications intended exclusively for professionals in the tobacco trade, the presentation of tobacco products offered for sale and the indication of their prices, and, depending on sales structures, advertising directed at purchasers at tobacco sales outlets and the sale of third-country publications which do not satisfy the conditions laid down in this Directive, provided, however, that they comply with Community law and the Community's obligations at international level; whereas it is for the Member States, where necessary, to take appropriate measures in these areas;

(8) Whereas, given the interdependence between the various forms of advertising — oral, written,

[1] OJ C 129, 21.5.1992, p. 5.
[2] OJ C 313, 30.11.1992, p. 27.
[3] Opinion of the European Parliament of 11 February 1992 (OJ C 67, 16.3.1992, p. 35), confirmed under the Article 189b procedure on 3 December 1993, Council Common Position of 12 February 1998 (OJ C 91, 26.3.1998, p. 34) and Decision of the European Parliament of 13 May 1998 (OJ C 167, 1.6.1998). Council Decision of 22 June 1998.

[4] OJ L 359, 8.12.1989, p. 1. Directive as amended by Directive 92/41/EEC (OJ L 158, 11.6.1992, p. 30).
[5] OJ L 137, 30.5.1990, p. 36.
[6] OJ L 113, 30.4.1992, p. 13.

printed, on radio or television or at the cinema — and in order to prevent any risk of distorting competition or circumventing rules and regulations, this Directive must cover all forms and means of advertising apart from television advertising already covered by Council Directive 89/552/EEC of 3 October 1989 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the pursuit of television broadcasting activities [1];

(9) Whereas all forms of indirect advertising and sponsorship, and likewise free distribution, have the same effects as direct advertising, and whereas they should, without prejudice to the fundamental principle of freedom of expression, be regulated, including indirect forms of advertising which, while not mentioning the tobacco product directly, use brand names, trade marks, emblems or other distinctive features associated with tobacco products; whereas, however, Member States may defer application of these provisions to allow time for commercial practices to be adjusted and sponsorship of tobacco products to be replaced by other suitable forms of support;

(10) Whereas, without prejudice to the regulation of the advertising of tobacco products, Member States remain free to allow the continued use, under certain conditions, for the advertising of products or services other than tobacco products, of a brand name which was already in use in good faith both for such products or services and for tobacco products before this Directive entered into force;

(11) Whereas existing sponsorship of events or activities which Member States may continue to authorise for a period of eight years after the entry into force of this Directive ending not later than 1 October 2006 and which will be subject to voluntary-restraint measures and decrease of expenditure levels during the transitional period should include all means of achieving the aims of sponsorship as defined in this Directive;

(12) Whereas Member States must take adequate and effective steps to ensure control of the implementation of national measures adopted pursuant to this Directive in compliance with their national legislation,

HAVE ADOPTED THIS DIRECTIVE:

Article 1

The objective of this Directive is to approximate the laws, regulations and administrative provisions of the Member States relating to the advertising and sponsorship of tobacco products.

Article 2

For the purposes of this Directive, the following definitions shall apply:

1. 'tobacco products': all products intended to be smoked, sniffed, sucked or chewed inasmuch as they are made, even partly, of tobacco;

2. 'advertising': any form of commercial communication with the aim or the direct or indirect effect of promoting a tobacco product, including advertising which, while not specifically mentioning the tobacco product, tries to circumvent the advertising ban by using brand names, trade marks, emblems or other distinctive features of tobacco products;

3. 'sponsorship': any public or private contribution to an event or activity with the aim or the direct or indirect effect of promoting a tobacco product;

4. 'tobacco sales outlet': any place where tobacco products are offered for sale.

Article 3

1. Without prejudice to Directive 89/552/EEC, all forms of advertising and sponsorship shall be banned in the Community.

2. Paragraph 1 shall not prevent the Member States from allowing a brand name already used in good faith both for tobacco products and for other goods or services traded or offered by a given undertaking or by different undertakings prior to 30 July 1998 to be used for the advertising of those other goods or services.

However, this brand name may not be used except in a manner clearly distinct from that used for the tobacco product, without any further distinguishing mark already used for a tobacco product.

3. (a) Member States shall ensure that no tobacco product bears the brand name, trade mark,

[1] OJ L 298, 17.10.1989, p. 23. Directive as last amended by Directive 97/36/EC (OJ L 202, 30.7.1997, p. 60).

emblem or other distinctive feature of any other product or service, unless the tobacco product has already been traded under that brand name, trade mark, emblem or other distinctive feature on the date referred to in Article 6(1);

(b) the ban provided for in paragraph 1 may not be circumvented, in respect of any product or service placed or offered on the market as from the date laid down in Article 6(1), by the use of brand names, trade marks, emblems and other distinguishing features already used for a tobacco product.

To this end, the brand name, trade mark, emblem and any other distinguishing feature of the product or service must be presented in a manner clearly distinct from that used for the tobacco product.

4. Any free distribution having the purpose or the direct or indirect effect of promoting a tobacco product shall be banned.

5. This Directive shall not apply to:

— communications intended exclusively for professionals in the tobacco trade,

— the presentation of tobacco products offered for sale and the indication of their prices at tobacco sales outlets,

— advertising aimed at purchasers in establishments specialising in the sale of tobacco products and on their shop-fronts or, in the case of establishments selling a variety of articles or services, at locations reserved for the sale of tobacco products, and at sales outlets which, in Greece, are subject to a special system under which licences are granted for social reasons ('periptera'),

— the sale of publications containing advertising for tobacco products which are published and printed in third countries, where those publications are not principally intended for the Community market.

Article 4

Member States shall ensure that adequate and effective means exist of ensuring and monitoring the implementation of national measures adopted pursuant to this Directive. These means may include provisions whereby persons or organisations with a legitimate interest under national law in the withdrawal of advertising which is incompatible with this Directive may take legal proceedings against such advertising or bring such advertising to the attention of an administrative body competent to give a ruling on complaints or to institute the appropriate legal proceedings.

Article 5

This Directive shall not preclude Member States from laying down, in accordance with the Treaty, such stricter requirements concerning the advertising or sponsorship of tobacco products as they deem necessary to guarantee the health protection of individuals.

Article 6

1. Member States shall bring into force the laws, regulations, and administrative provisions necessary to comply with this Directive not later than 30 July 2001. They shall forthwith inform the Commission thereof.

When Member States adopt these measures, they shall contain a reference to this Directive or shall be accompanied by such reference on the occasion of their official publication. The methods of making such reference shall be laid down by Member States.

2. Member States shall communicate to the Commission the text of the main provisions of domestic law which they adopt in the field covered by this Directive.

3. Member States may defer the implementation of Article 3(1) for:

— one year in respect of the press,

— two years in respect of sponsorship.

In exceptional cases and for duly justified reasons, Member States may continue to authorise the existing sponsorship of events or activities organised at world level for a further period of three years ending not later than 1 October 2006, provided that:

— the sums devoted to such sponsorship decrease over the transitional period,

— voluntary-restraint measures are introduced in order to reduce the visibility of advertising at the events or activities concerned.

Article 7

The Commission shall submit to the European Parliament, the Council and the Economic and Social Committee not later than 30 July 2001, and subsequently every two years, a report on the implementation of this Directive, with particular reference to the implementation and effects of Article 3(2) and (3) and Article 6(3). Where appropriate, it shall submit proposals for the adaptation of this Directive to suit developments identified in the report. Such adaptation shall not affect the periods provided for in Article 6(3).

Article 8

This Directive shall enter into force on the day of its publication in the *Official Journal of the European Communities*.

Article 9

This Directive is addressed to the Member States.

Done at Brussels, 6 July 1998.

For the European Parliament	*For the Council*
The President	*The President*
J. M. GIL-ROBLES	R. EDLINGER