

# ASH Briefing for the All Party Parliamentary Group on Smoking and Health

## TOBACCO FRONT GROUPS & THIRD PARTY LOBBYING TACTICS

*"I believe that secret corporate lobbying, like the expenses scandal, goes to the heart of why people are so fed up with politics. It arouses people's worst fears and suspicions about how our political system works."*

Prime Minister David Cameron, MP, speaking in February 2010

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### Introduction

This document has been prepared by ASH for the All Party Parliamentary Group on Smoking and Health and sets out a summary of information in the public domain at the current time about front groups and third party advocates with links to the tobacco industry and their role in the recent UK legislative process.

Over many years the tobacco industry has waged campaigns to mislead politicians and the public about the harm from smoking and has a well deserved reputation for deception and dishonest dealing.<sup>1 2 3</sup> Recognising the extent to which tobacco industry has mis-used its power to exert influence in policy making, the WHO Framework Convention on Tobacco Control, to which the UK is a party, states:

*"In setting and implementing their public health policies with respect to tobacco control, Parties shall act to protect these policies from commercial and other vested interests of the tobacco industry in accordance with national law."* (Article 5.3)

The UK Government has committed to live up to its obligations under the WHO FCTC. The Responsibility Deal, through which the UK Government seeks to engage businesses in public health policy excludes the tobacco industry and the tobacco industry was explicitly excluded from the development of the Coalition Government's Tobacco Control plan for England.<sup>4</sup> Politicians and the public are rightly suspicious of these companies' motives and are wary of accepting, at face value, the statistics and claimed "facts" presented to them by tobacco companies.

To overcome these obstacles, Big Tobacco is increasingly resorting to the use of front groups and third party advocates to peddle its interests and influence policy outcomes. The use of such groups to influence public health policies is an explicit tobacco industry strategy revealed in internal company documents released by court order.<sup>5</sup>

This negative history is just one of many reasons why the public does not trust tobacco companies. In a recent survey, 74% of the respondents (and 50% of smokers) said they support the protection of Government health policy from the influence of the tobacco industry and its representatives, whilst only 5% believe that tobacco companies can be trusted to tell the truth.<sup>6</sup> Recognising this overwhelming level of mistrust, tobacco companies have increasingly tried to thwart the implementation of tobacco regulation for public health purposes by using front groups and third parties to lobby on their behalf.

## The damage caused by front groups

Action by governments to reduce the harm caused by tobacco has refocused Big Tobacco's efforts on the use of front groups to limit or undermine tobacco control measures. For example, measures including the ban on the display of tobacco at the point of sale, stronger warning labels, and smokefree legislation have spawned a plethora of tobacco-funded groups, claiming to represent the interests of small shopkeepers or pub landlords, but in effect seeking to use these professions to push Big Tobacco's misinformation. They have been joined by an array of tobacco-supported business associations, helping to present tobacco company interests as economic necessities. The involvement of these groups detracts from the effectiveness of the policy process and places the public's health at risk. As the Prime Minister has noted, it arouses "*people's worst fears and suspicions about how our political system works*".<sup>7</sup>

## 'Retail Groups' and Big Tobacco

In March 2011, the government launched its Tobacco Control Plan, which committed to implementing the legislation from the Health Act 2009 to ban the display of tobacco products at the point of sale.

During the passage of the Health Bill through Parliament, the point of sale ban proposal had met with firm resistance from groups claiming to represent retailers. Postcards from the 'Save Our Shop' campaign were sent to every MP in an attempt to dissuade them from voting for the Bill. The postcards were from a group called **Responsible Retailers**. Responsible Retailers is a campaigning arm of the **Tobacco Retailers Alliance**, which is fully funded by the **Tobacco Manufacturers Association**, an industrial body whose membership is limited to British American Tobacco (BAT), Japan Tobacco International (JTI) and Imperial Tobacco.

Claims of worried shopkeepers were also put forward by the **National Federation of Retail Newsagents** (NFRN), described by its former President Colin Ruck, as "*a puppet for the tobacco industry*"<sup>8</sup>, an opinion amply justified by the NFRN's relationship outlined below. Amongst the winners at the 2011 NFRN Awards was Ian Watkins of Imperial Tobacco, who won the "Fellowship of the Year".<sup>9</sup> The awards themselves were sponsored by BAT and Imperial Tobacco. BAT has since admitted that it funded the NFRN campaign, whilst PR firm **Hume Brophy** has also acknowledged involvement.<sup>10</sup> The NFRN campaign was championed by Conservative Party MP Mike Weatherly. Another group that made a submission to the government's tobacco control consultation in 2008, the **Rural Shops Alliance**, lists Imperial Tobacco and BAT as two of its principal sources of funding.<sup>11</sup> The **Association of Convenience Stores** (ACS), which also made a submission, counts BAT, Imperial Tobacco, JTI and Philip Morris Int. as members of its 'Premier Club',<sup>12</sup> while PMI refers to ACS as a "key stakeholder" in post card and letter writing campaigns to health ministers Andrew Lansley and Anne Milton.<sup>13</sup>

Amongst the evidence cited by the ACS in its submission to the consultation was a survey conducted by the trade journal **Independent Retail News**, which had previously conducted roundtable discussions in conjunction with Imperial Tobacco.<sup>14</sup> Throughout the POS display campaign ACS echoed PMI's key messages claiming that there would be a severe impact on small retailers, that there was a "lack of evidence" and that illicit trade would be aggravated by a display ban.

Leaked industry documents outline tobacco manufacturers' "**Project Clarity Grass Roots Campaign**" to "create a post-election political environment that allows Government decision-makers to mitigate, through regulation or legislation, the effects of the POSD ban."<sup>13</sup>

Documents from Philip Morris International (PMI) assert how "Retailers are essential to campaign success, so must be parties to the law suit, and must take the lead in communications effort".<sup>13</sup> The report goes on to spell out in some detail a to-do list for the campaign to be delivered in the name of the NFRN including a target list of prospective parliamentary candidates and toolkit for influencing them. PMI added to the "grass roots" feel of the project when they secured the support of the **Leicester Asian Business Association (LABA)**. PMI identified **LABA** as a "key account to finalise deliverables and messaging" along side national groups such as the CBI and British Retail Consortium. The campaign included establishing meetings between individuals and their MPs, with PMI consultant teams providing coverage.

None of these groups disclosed their association with tobacco companies in their submissions.

### **Tobacco Industry Trade Bodies**

One of the groups involved in the recent consultation on banning cigarette vending machines is the **National Association of Cigarette Machine Operators (NACMO)**. Whilst the group purports to represent small business operators, JTI, Imperial and BAT are all members and each contribute around £5,000 a year.<sup>15</sup> The **European Smoking Tobacco Association (ESTA)** is a Europe-wide pro-tobacco lobby, of which BAT is a prominent member, and has allegedly spent €300,000-350,000 on EU lobbying in 2007.<sup>16</sup> The **European Smokeless Tobacco Council (ESTOC)** aims for the deregulation of smokeless tobacco. Amongst its board members is Kristof Dorms, of PMI and Ulf Bauer of British American Tobacco. Also prominent is the **Confederation of European Community Cigarette Manufacturers (CECCM)**, "the primary source of tobacco expertise in the EU", which was founded by BAT and spent up to €350,000 on lobbying in 2007.<sup>17</sup>

### **Trade Unions**

The **Tobacco Workers Alliance (TWA)** was set up with industry backing to represent employees working in tobacco manufacturing who were members of the Amicus, Transport & General and GMB trades unions. The TWA played a key role in the consultation regarding the ban on tobacco advertising, claiming that the workers it represented would supposedly be badly affected by the ban. The TWA was, according to the TMA's notes, "originally set up to oppose...the proposal to ban tobacco advertising and sponsorship".<sup>18</sup> The Amicus and Transport & General trade unions combined to form Unite in 2007. Having taken its lead from the TWA, the trade union Unite has continued to take a pro-tobacco stance and actively lobbies Labour MPs, most recently in opposition to the introduction of plain packaging of tobacco products.

### **Business Groups, Big Business and Big Tobacco**

Tobacco companies do not limit their influence to the use of retail front groups. They also play a key role in many international business organisations, allowing them to seek to present their interests as the interests of the wider business community. The **Trans-Atlantic Business Dialogue**, which counts BAT amongst its member organisations, also made a

submission to the government's 2008 tobacco control consultation. The group's European branch is headed by Jeffries Briginshaw, an employee of British American Tobacco for fourteen years, and its Head of Political and Regulatory Affairs until 2007. The former Chairman of BAT, Martin Broughton, was also the President of the **Confederation of British Industry** (CBI) from 2007-09.<sup>19</sup> The CBI opposed the ban on smoking in public places. For example, in written evidence to the House of Lords Select committee on Economic Affairs the CBI argued that, as voluntary smoking bans were already in place in many areas, *"business saw the legislation as further evidence of unnecessary intervention by government"*.<sup>20</sup>

Internal PMI documents reveal that the company thought it unlikely that the **British Retail Consortium** and the **Confederation of British Industry** would make their own representations to the government's consultation on the future of tobacco control but could be relied on to refer to partners such as the ACS. Nick Bish, CEO of the **Association of Licensed Multiple Retailers** and Ian Twinn, former Deputy Chairman of the Conservative Party and Chief Executive of the advertisers association **ISBA**, were provided with PMI messages and documents which show that PMI expected these to be used, claiming a lack of research evidence to support the government's proposals.<sup>21</sup> The **Federation of Small Businesses** and **Scottish Grocers Federation** were to be expected to deliver manufacturers' assertions about the impact on small businesses.

The **British Brands Group**, a membership organisation dedicated to promoting British brands, was founded in 1994 by BAT, Rothmans and leading food and beverage companies. The BBG made a joint response to the government's consultation on the future of tobacco control with the **Anti-Counterfeiting Group**, which counts Imperial Tobacco, Gallaher and Philip Morris amongst its members.<sup>22</sup> In 2010, BBG made a submission opposing plain packaging for tobacco products to the European Commission.<sup>23</sup> More recently the BBG joined forces again with the Anti-Counterfeiting Group to respond to the Australian government's laws on plain packaging.<sup>24</sup>

The Anti-Counterfeiting Group and BBG are both members of the **Alliance against IP Theft**, which sponsors the All Party Parliamentary Group on Intellectual Property.<sup>25</sup>

Other groups utilised by tobacco companies in both the UK and EU include the **International Trademark Association**, whose Vice President is Toe Su Aung of British American Tobacco, and **Union ales Fabricants** (Unifab), a French group concerned with intellectual property, on whose advisory committee both BAT and PMI sit.

As well as these groups, there is also **Business Action to Stop Counterfeiting and Piracy** (BASCAP) and the **European Communities Trademark Association** (ECTA). The CEOs of BAT, JTI and PMI are all members of the 'Global Leadership Group' of BASCAP. BASCAP has previously lobbied the European Union on Directive 2001/37/EC concerning the manufacture, presentation and sale of tobacco products. BAT is also a member of BASCAP's parent organisation, the **International Chamber of Commerce** (ICC).<sup>26</sup>

ECTA made a submission to the 2008 Department of Health consultation. Its legal advisor, **David Latham**, has also worked as an advisor to British American Tobacco.

Until 2010, British American Tobacco was also a member of the **European Roundtable of Industrialists**, a group of chief executives and chairmen that aims to influence policy at a European level. Also operating at European level is the **Tobacco Industry Platform (TIP)**, active on lobbying about the REACH regulation, which is concerned with improving

protection from dangerous chemicals. TIP counts among its members BAT, Imperial, JTI, PMI, and several umbrella groups, such as ESTA, outlined above.<sup>27</sup>

### Think Tanks and Consultancies

Nominally independent think-tanks have also been regarded as important allies for tobacco industry strategy. One of the best-known is **the Cato Institute**, a Washington-based libertarian group that has received sponsorship from both Altria and RJ Reynolds. The Cato Institute was founded by **Charles R Koch**, billionaire CEO of Koch Industries, the energy giant and associate of the US Tea Party movement. The **Institute of Economic Affairs** is a right-wing think tank, whose former President, Ralph Harris, was Chairman and President of industry-funded lobby group FOREST (see below). The IEA has been a long-standing recipient of tobacco industry funding and was variously described by BAT as “a good ally” and “*exactly the kind of organisation that we should be supporting*”.<sup>28 29</sup> Anthony Fisher, founder of the IEA, also helped set up a libertarian think tank in Canada, the **Fraser Institute**, which has received funding from several tobacco companies.<sup>30</sup> The Institute of Economic Affairs recently hosted an event to promote a book on tobacco plain packaging by tobacco industry consultants Patrick Basham and John Luik, respectively Director and Senior Fellow of the **Democracy Institute**. Basham was the founding director of the Social Affairs Centre at the Fraser Institute and scholar with the Cato Institute while Luik has written extensively questioning the health effects of secondhand smoke and is a regular guest at tobacco industry events.<sup>5</sup>

The **Adam Smith Institute** (ASI), which describes itself as “*the UK’s leading libertarian think tank*”, was set up with the help of Anthony Fisher of the IEA. In February 2012 Christopher Snowden, author of an ASI report told the BBC Today Programme that ASI received “less than 3% of their turnover from the tobacco industry”. According to an internal PMI memo, The Institute would conduct training for journalists on free market principles that would be “*ideologically consistent with [Philip Morris’] issues and interests*”.<sup>31</sup> The ASI has also coordinated the Confederation of European Community Cigarette Manufacturers’ (CECCM, see above) response to European tobacco control initiatives.<sup>32</sup>

In Europe, BAT and the European Smoking Tobacco Association are both members of the Brussels think tank, the **European Policy Centre** whilst the **European Policy Forum** was involved in British American Tobacco’s attempts to influence regulatory reforms in Europe.

London Economics, an economics and public policy consultancy, has published a report funded by Philip Morris International opposing the plain packaging of cigarettes.<sup>33</sup>

### Public Relations Companies

Tobacco companies also work through PR firms such as **Burson-Marsteller**, which helped them set up the National Smokers Alliance, the US counterpart to FOREST. Burson-Marsteller was also instrumental in spreading what was widely regarded as misinformation over the health effects of second hand smoke and, explicitly, for seeking to discredit the US Environmental Protection Agency.<sup>34</sup> However, in 2010 Burson-Marsteller ceased working with the tobacco industry.<sup>35</sup> British American Tobacco’s public relations in the UK are handled by **Weber Shandwick**, which also counts the Japanese Whaling Association and the Chinese Government as clients.

## Astroturfing

'Astroturf' refers to "apparently grassroots-based citizen groups or coalitions that are primarily conceived, created and/or funded by corporations, industry trade associations, and political interests or public relations firms".<sup>36</sup> The most prominent of these is **FOREST** ('Freedom Organisation for the Right to Enjoy Smoking Tobacco'), which was established in 1979 with tobacco industry funding<sup>37</sup> and which continues to receive over 90% of its funding from tobacco companies.<sup>38 39</sup> Even Simon Clark, the Director of FOREST acknowledges that "in all probability, FOREST was set up with funding from the tobacco manufacturers".<sup>40</sup> In 2009 Simon Clark, told the Scottish Parliament that the organisation received "approximately £250,000 a year" from tobacco manufacturers.<sup>41</sup> FOREST made a submission to the 2008 tobacco control consultation, as did its offshoot, **The Free Society**. Both are headed by Simon Clark, who has also established the group **Save Our Pubs and Clubs**, which campaigns for 'reform' of the smoking legislation and has run competitions in association with JTI. In 2011, **Privacy International** released a FOREST-funded report on the 'persecution' of smokers.<sup>42</sup> Big Tobacco also funds groups to influence public opinion online. Amongst these is **Liberal Vision** which acknowledges itself as "*in strict legal terms...a wholly-owned subsidiary*" of **Progressive Vision**.<sup>43</sup> Progressive Vision ran a summit with the TMA on illicit tobacco smuggling in January 2011. The opening address was given by **Mark Garnier, MP**. **Chris Snowdon's** blog, **Velvet Glove Iron Fist** has removed its claim not to receive tobacco industry funding. Snowdon was part of an "impressive line up" of invited speakers at the industry's Global Tobacco Networking Forum in Bangalore in 2010. He was billed as an adjunct scholar of the tobacco industry funded Cato Institute, writing on public health issues for the website **Spiked**. Other invited speakers included **Patrick Basham, John Luik, Mark Littlewood, Simon Clark** of Forest, **Katherine Graham** of the Tobacco Retailers Alliance and **Christopher Ogden** of the Tobacco Manufacturers Association.<sup>44</sup>

**FORCES**, an acronym for 'Fight Ordinances and Restrictions to Control and Eliminate Smoking' claims to be independent of any commercial body but is "*aligned with those who fight the antismoking movement*". Through its criticism and opposition to tobacco control campaigns FORCES is aligned to the tobacco industry. Previously secret documents released in court demonstrate that under the leadership of **Gian Turci**, FORCES sought the support of Philip Morris and Rothmans Ltd. In Turci's own words he received "wonderful hospitality" and hoped that that his visit would "*mark the beginning of a good and mutually beneficial co-operation between FORCES and other smokers' rights groups, and the industry.*"<sup>45</sup>

The UK-based **Freedom2choose** lobby group, which was set up originally to oppose the smokefree legislation, says it is a grass-roots organisation that is independent of the tobacco industry. However, some people associated with it have links with Big Tobacco. Freedom2choose is allied to The International Coalition Against Prohibition. One of the founders of **TICAP** was Gian Turci. According to TICAP Turci was a member of the Executive Committee of Freedom2choose.<sup>46</sup>

## Political Links

Tobacco companies have several links within the current government. The most prominent of these is **Kenneth Clarke**, Secretary of State for Justice, who was formerly Deputy Chairman and a Director of British American Tobacco.<sup>47 48</sup>

Tobacco companies also offer generous hospitality to elected representatives. Former **Transport Secretary Philip Hammond** was amongst the MPs treated to more than £1,000 worth of hospitality at the Chelsea flower show by Japan Tobacco International (JTI). Under Hammond's tenure, the Department of Transport reviewed legislation regarding smoking on ships and ruled against extending the smokefree legislation to shipping. The following Conservative MPs were also at the 2011 Chelsea flower show as guests of Japan Tobacco International: **Alun Cairns, Therese Coffey, Michael Ellis, Mark Garnier, James Gray, Karl McCartney, Stephen Metcalfe, Richard Ottaway, Chris Pincher, Mark Spencer and Angela Watkinson.** **Jim Dowd** of the Labour Party was also present as a guest of JTI.<sup>49 50</sup>  
<sup>51</sup> **Brian Binley**, who was a guest of JTI at the Chelsea Flower Show and Glyndebourne, went on to table an Early Day Motion attacking the smoking ban.

Previous guests of JTI at the Chelsea flower show have included **Cheryl Gillan**, Secretary of State for Wales and **David Lidington**, Minister for Europe.

**Solicitor General Edward Garnier**, who backed a legal challenge against the ban on the display of tobacco in shops, was also at the Chelsea flower show and has previously been the recipient of hospitality from Imperial Tobacco and the Tobacco Manufacturers Association. He was also a member of the **House of Commons Pipe and Cigar Smokers Club**, previously described in the view of another MP as "a front for the Tobacco Manufacturers Association".<sup>52</sup> Conservative MP **Jonathan Djanogly** also has financial interests in the tobacco industry with shares in Imperial Tobacco, as do a number of members of the House of Lords, including Baroness Byford (BAT), Lord Gavron (Imperial), Lord Glendonbrook (BAT, Imperial and PMI), Lord Millett (BAT and Imperial), Lord Palmer (BAT), Lord Sheppard of Didgemore (Imperial) and Lord Wasserman (PMI)<sup>53</sup>. When he was an MP, the current **London Mayor, Boris Johnson**, received between £5,000 and £10,000 from an organisation listed in the Register of Members' Interests as the Association of Tobacco (presumed to be the Tobacco Manufacturers' Association) for speaking engagements in 2007.<sup>54</sup>

The smokingate.com activist website, which works to expose activities by PMI, recently revealed documents in which **Gardant Communications** acted as an intermediary between Conservative Health Spokesman Earl Howe and PMI. Gardant channelled PMI legal advice to Earl Howe and claimed that Howe "*did express interest and has undertaken to visit [PMI headquarters] in Neuchatel [Switzerland]*".<sup>55 56</sup> However, since becoming a Health Minister, Earl Howe has stated that no Government Minister has had any dealings either directly or indirectly with the tobacco industry.<sup>57</sup>

## Organisations and their links with the tobacco industry

WHO THEY ARE	WHAT THEY DO	WHO IS INVOLVED
<b>Adam Smith Institute</b>	Libertarian think tank	Receives tobacco industry funding. Has worked with CECCM
<b>Alcan Packaging</b>	Supplier to tobacco industry. Made a submission to the 2008 Department of Health consultation on tobacco control	Subsidiary of Amcor, a multi-national packaging company.
<b>Alliance against IP Theft</b>	A coalition of trade and enforcement organisations	Members include the Anti-Counterfeiting Group and the British Brands Group
<b>American Chamber of Commerce to the European Union</b>	Represents American business interests in the EU	BAT and Philip Morris are members
<b>American-European Community Association</b>	Provides a forum for discussion of key global business, economic and political affairs	Philip Morris, BAT and Imperial are all members
<b>The Anti-Counterfeiting Group</b>	Made a submission to the 2008 Department of Health consultation (with British Brands Group)	Imperial Tobacco, Gallaher and Philip Morris International (PMI) are full members
<b>APCO</b>	Public affairs agency with long history of service to tobacco industry. Provides public affairs support, nominally to retailers.	Engaged by PMI
<b>Association of Convenience Stores</b>	Made a submission to the 2008 Department of Health tobacco control consultation	Imperial, BAT and JTI are all "Premier Club" members.
<b>Association of Licensed Multiple Retailers</b>	Campaigns on behalf of pubs and other licensed retailers	Lobbied by PMI to oppose Government's tobacco control proposals
<b>Business Action to Stop Counterfeiting and Piracy (BASCAP)</b>	Lobbied EU on tobacco advertising directive (2001/37/EC)	BAT, JTI And Imperial are all members
<b>British Brands Group</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Established in 1994 by BAT, PMI and Rothmans, amongst others



<b>British Chamber of Commerce in Belgium</b>	Provides a platform for its members to raise their profile in Belgium	BAT and JTI are members
<b>British Retail Consortium</b>	Trade association for the UK retail industry	One of the stakeholders identified in PMI's "Project Clarity"
<b>Cato Institute</b>	Considered by Philip Morris to be one of its "national allies"	Received funding from Altria (parent of Philip Morris) and RJ Reynolds
<b>Confederation of British Industry</b>	The UK's premier business lobbying organisation	Imperial Tobacco includes the CBI among organisations with which it engages.
<b>Confederation of European Community Cigarette Manufacturers</b>	Spent €300,000-€350,000 lobbying the EU in 2007	Represents BAT, JTI and 13 other manufacturing organisations
<b>Deloitte</b>	Provides financial and consultancy services	BAT Australia commissioned Deloitte to produce a report on plain packaging
<b>Democracy Institute</b>	Think tank based in Washington DC and London.	Founded by Patrick Basham
<b>European Cigar Manufacturers' Association</b>	Represents European manufacturers of cigars	BAT, Imperial Tobacco and JTI are all members
<b>European Communities Trademark Association</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	David Latham, who has also worked for BAT and the Plain Pack Group, is the association's legal advisor
<b>European Policy Centre</b>	Think tank used to influence Brussels on various issues	BAT is a member and has worked with the EPC since the 1980s
<b>European Policy Forum</b>	Lobbies the European Union on tobacco control issues	BAT has worked with the EPF
<b>European Rolling Papers Association</b>	Represents the interests of European manufacturers of rolling papers and tubes	Imperial Tobacco has an interest through its Rizla subsidiary
<b>European Roundtable of Industrialists</b>	Seeks to examine and influence policy-making at a European level	BAT was a member until 2010
<b>European Risk Forum</b>	Formerly part of the EPC, its membership was by invitation only	BAT was a founding member

<b>European Smoking Tobacco Association</b>	Represents the interests of the European manufacturers, distributors and importers of many types of tobacco.	Spent €300,000-€350,000 on lobbying in the EU in 2007
<b>European Smokeless Tobacco Council</b>	Objective is “the worldwide legalisation of Swedish snus and other smokeless tobacco products, based on a regulatory framework”	BAT's Tomas Hammargran is Chair
<b>European Travel Retail Council</b>	Met with European Commission on revising Tobacco Products Directive	Imperial Tobacco is a member
<b>Federation of Small Businesses</b>	A pressure group promoting the interests of small businesses	Lobbied by PMI to oppose Government's tobacco control proposals
<b>FORCES</b>	Campaign group “aligned with those who fight the antismoking movement”	Previous leader Gian Turci sought support from PMI & Rothmans Ltd.
<b>FOREST</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Established with tobacco industry funding. Tobacco industry continues to provide over 90% of funding.
<b>Fraser Institute</b>	Involved in influencing Canadian policy on tobacco	Sought and received funding from several tobacco companies
<b>Freedom to Choose (F2C)</b>	Campaigned for a repeal of smoking ban. Made a submission to the 2008 Department of Health consultation on tobacco control	A member of TICAP
<b>The Global Intellectual Property Centre</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	BAT and Philip Morris are members
<b>Independent Retail News</b>	Survey of business regarding plain packaging used as evidence in 2008 Department of Health consultation on tobacco control	Conducted roundtable discussions in association with Imperial Tobacco over plain packaging
<b>Institute of Economic Affairs</b>	Calls itself the UK's original free-market think tank	Recipient of tobacco industry funding. Former President Ralph Harris was also former President of FOREST

<b>Interbrand</b>	A branding consultancy and division of Omnicom; argues against the introduction of plain packaging	BAT and PMI are clients
<b>International Chamber of Commerce</b>	Parent organisation of BASCAP; business lobby group	British American Tobacco is a member
<b>International Trademark Association</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Vice President is Toe Su Aung, a British American Tobacco employee
<b>ISBA (Incorporated Society of British Advertisers)</b>	Defends commercial right to advertise	Recipient of PMI campaign messages opposing Government's tobacco control proposals
<b>Leicester Asian Business Association (LABA)</b>	A "key stakeholder" and message carrier in Project Clarity and PMI supporter in ministerial meetings.	Partner in PMI "grass roots" campaigning.
<b>Liberal Vision</b>	A subsidiary of Progressive Vision (see below)	Links to the TMA
<b>London Economics</b>	An economics and public policy consultancy	Published report on tobacco plain packaging funded by PMI
<b>Markenverband</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Has tobacco industry members; Manfred A Häussler, now retired, was previously an Executive Director at Markenverband and Imperial Tobacco's Sales and Marketing Director.
<b>National Association of Cigarette Machine Operators</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	BAT, JTI and Imperial are all members, each contributing around £5,000 per year.
<b>National Federation of Retail Newsagents</b>	Campaigned against display ban	Funded by BAT, Imperial; a "puppet of the tobacco industry"
<b>Nude Brand Consulting</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Appointed for a major design deal by JTI in 2005
<b>Privacy International</b>	Its mission is to "defend the right to privacy across the world, and to fight surveillance and other intrusions into private life by governments and corporations"	Published a FOREST-funded report

<b>Progressive Vision</b>	Libertarian think tank; hosted a summit on tobacco smuggling with the Tobacco Manufacturers Association	Supporter of Save Our Pubs and Clubs campaign; associated with TMA and FOREST
<b>Responsible Retailers</b>	Ran 'Save Our Shops' campaign, which included sending postcards to every MP	Offshoot of Tobacco Retailers Alliance, which is funded by the Tobacco Manufacturers Association
<b>Rural Shops Alliance</b>	Made a submission to 2008 Department of Health consultation on tobacco control	Imperial Tobacco is one of its 'principal sources of funding'
<b>Save Our Pubs and Clubs</b>	Campaign against the smoking ban in pubs	Campaign run by Simon Clark of FOREST, which receives tobacco company funding
<b>Scottish Grocers Federation</b>	Trade association for the Scottish Convenience Store Sector	Lobbied by PMI to oppose Government's tobacco control proposals
<b>Sinclair Collis</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Wholly owned subsidiary of Imperial Tobacco
<b>Trans-Atlantic Business Dialogue</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	BAT is a member; Jeffries Briginshaw, EU Executive Director, was a BAT employee for fourteen years
<b>Transatlantic Public Affairs</b>	Provided support, nominally to retailers, on "Project Clarity"	Engaged by PMI
<b>The Free Society</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Offshoot of FOREST, run by Simon Clark (FOREST, Save Our Pubs campaign)
<b>TICAP (The International Coalition Against Prohibition)</b>	Describes itself as "Against government prohibition and junk science based policies"	Has links with FORCES & Freedom2Choose via founder Gian Turci.
<b>Tobacco Industry Platform</b>	Lobbying Group representing tobacco industry interests	Listed among Imperial Tobacco's network of organisations

<b>Tobacco Manufacturers Association (TMA)</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Represents Gallaher, Imperial and BAT
<b>Tobacco Retailers Alliance (TRA)</b>	Made a submission to the 2008 Department of Health consultation on tobacco control	Funded by the TMA
<b>Tobacco Workers Alliance</b>	Represents employees in tobacco manufacturing	Established with tobacco industry & trade union support
<b>Union ales Fabricants (Unifab)</b>	Intellectual property organisation	BAT and PMI are members of the advisory committee.
<b>Unite</b>	UK trade union. Made a submission to the 2008 Department of Health consultation on tobacco control	Linked to the TWA
<b>UK Travel Retail Forum</b>	Made submission to the 2008 and 2009 Department of Health consultations	Member of the European Travel Retail Council (see above)

### List of PR firms with tobacco links

Note: The following have been identified as having clients or other links with tobacco companies. In some cases, e.g. Burson-Marsteller, the companies no longer retain connections with the industry. Sources: [Sourcewatch - List of PR Firms](#); Legacy Tobacco Documents Library; Who's Lobbying.

<b>FIRM</b>	<b>BASED</b>	<b>CLIENTS</b>
Albert and Geiger	EU	Worked with Lancaster, Roth-Handle Filter, VDC on EU tobacco-related directives
APCO	US	Hired by Philip Morris to form TASSC (The Advancement of Sound Science Coalition), an industry front group designed to create doubt around the evidence of the harm caused by second hand smoke
Bell Pottinger Public Affairs	Worldwide	PR firm for Imperial Tobacco – has donated over £25,000 to the Conservative Party since 2008
Berman and Co	US	PR firm for Philip Morris; created the industry front group 'Guest Choice Network' to oppose smoking bans
Burson-Marsteller	Worldwide	PR firm involved in establishment of National Smokers Alliance.
Cassidy and Associates	US	PR Firm previously involved with Philip Morris
Dave Barrows and Associates	US	PR Firm previously involved with Philip Morris
DCI Group	US	Worked with RJ Reynolds for over a decade in the 1990s
Decision Management	US	RJ Reynolds' lobbying firm in 1990s
Dittus Group	US	Aided Philip Morris in honing its approach to youth smoking
Dolphin Group	US	Provided PR for Altria (Philip Morris parent company)
Edelman	Worldwide	Tasked with co-ordinating tobacco companies' response to the issue of secondhand smoke in the late 1980s/early 1990s
EUK Consulting Ltd.	EU	London-based firm representing BAT in the UK and EU. EUK founder, John Roberts, was formerly head of UK and EU Government Relations at PMI
EQ Management	UK	UK PR firm - has worked with BAT and Imperial Tobacco
Gardant Communications	UK	Clients include PMI. Coordinators of PMI's "Project Clarity"
Hill & Knowlton	US	PR firm for tobacco companies through 1950s and 60s. Responsible for original misinformation regarding health effects of smoking
Hume Brophy	EU	Irish PR firm - assisted BAT and the NFRN in their campaign against the display ban. Hume Brophy does not list BAT as a client on its website.
The Madano Partnership	UK	PR firms whose clients include JTI
Mongoven, Biscoe & Duchin	US	US PR firm whose clients include Philip Morris and RJ Reynolds; tasked with advising Philip Morris on WHO's Framework Convention on Tobacco Control
Read-Poland Associates	US	Affiliate of Burson-Marsteller - dealt primarily with Philip Morris
Reputation Measurement	AUS	Australian firm - CEO performed consulting work for PMI
State Affairs Company	US	US firm - worked for Philip Morris and the National Smokers Alliance; now defunct
The PBN Company	US	Philip Morris is among its clients
Weber Shandwick	Worldwide	World's largest PR firm; PR for BAT in Europe as well as Kraft foods, associate company of PMI. Donated £60,000 to the Labour Party between 2005 and 2007

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