

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

TOBACCO FRONT GROUPS & THIRD PARTY LOBBYING TACTICS January 2014

"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 2010¹

"The evidence in this case clearly establishes that Defendants have not ceased engaging in unlawful activity"... "It is about an industry ... that survives, and profits, from selling a highly addictive product which causes diseases that lead to a staggering number of deaths per year, an immeasurable amount of human suffering and economic loss, and a profound burden on our national health care system. Defendants have known many of these facts for at least 50 years or more. Despite that knowledge, they have consistently, repeatedly and with enormous skill and sophistication, denied these facts to the public, the Government, and to the public health community."

Judge Gladys Kessler's judgement on the tobacco industry, 2006²

Summary

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. Some of the key points from the briefing are as follows:

- The tobacco industry has a long history of using front groups to influence the policy process and undermine tobacco control.
- Front groups ostensibly represent their own agenda while in fact serve the interests of the tobacco industry. They are often supported by the industry financially yet these links are not commonly disclosed. In addition, such groups frequently have ex-tobacco executives in their employ.
- Despite provisions within Article 5.3 of the Framework Convention on Tobacco Control (FCTC), discouraging contact between the tobacco industry and policymakers, numerous MPs continue to accept industry funded hospitality at events such as the Chelsea flower show.
- Front groups are commonly created by the industry itself through a process known as "astroturfing" – this describes the genesis of a group or movement that is created by the industry but superficially gives the impression of being a grassroots initiative.

- Numerous retail groups, trade bodies, think tanks and organisations representing big business have direct links with the tobacco industry, evidenced here, and so are described as front groups or third party advocates.
- The 2013 edition of this briefing includes examples of the tobacco industry's attempts to influence local tobacco policy. Since April 2013, Local Authorities in England have had responsibility for leading on local public health, including tobacco control. The industry has sought to influence local policy on Smokefree places, illicit tobacco and tobacco harm reduction, using its full range of third party lobbying techniques including front groups, bogus research and payments to councils and partnerships under the guise of “corporate social responsibility”.

Introduction

Over many years the tobacco industry has waged campaigns to mislead politicians and the public about the harm from smoking and it has a well-deserved reputation for deception and dishonest dealing.^{3 4 5} Recognising the extent to which the tobacco industry has misused 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.⁶ 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. Indeed, a survey of over 12,000 adults found that only 4% agreed that tobacco companies behave ethically and only 6% believe that the tobacco industry can be trusted to tell the truth.⁷

Big Tobacco is increasingly resorting to the use of front groups and third party advocates to further 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.⁸

This history is just one reason why the public does not trust tobacco companies. In a recent survey, 74% of the respondents (and 51% of smokers) said they support the protection of Government health policy from the influence of the tobacco industry and its representatives, whilst only 6% believe that tobacco companies can be trusted to tell the truth.⁷

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*".⁹

Tobacco industry and local government

Tobacco industry attempts to influence national government are well documented. Less well known are attempts to influence local health policy and to influence national policy via local opinion. In fact, these efforts go back many years and have included a major British tobacco company's sponsorship of a city academy and industry branded smoking shelters on council property – part of this company's "*Smoking Allowed*" campaign.¹⁰ Such attempts are often described by the industry as enterprises of "*Corporate Social Responsibility*" and are attempts to associate their brand with positive values.

Other examples include collaboration with Keep Britain Tidy and DEFRA in the founding of the "*Love where you live*" litter campaign.¹¹ (NB it should be noted that both DEFRA and Keep Britain Tidy have now withdrawn from any links with the tobacco industry). Other attempts to influence policy have been more direct; ASH has received documents confirming that in the summer of 2013, representatives of the BAT subsidiary "*Nicoventures*" approached councils across England to discuss local plans to implement NICE Public Health Guidance on tobacco harm reduction.

Despite recent successes in exposing and ending or preventing such partnerships, the tobacco industry has continued to make advances. For example, in 2013 Derry-Londonderry was awarded the status of UK City of Culture for 2013, sponsored by Japan Tobacco International. JTI described their sponsorship of the event as part of their "*approach to corporate philanthropy*".¹² However, guidelines within the WHO FCTC Article 5.3 specifically advise that: "*Parties should not endorse, support, form partnerships with or participate in activities of the tobacco industry described as socially responsible.*"

The Tobacco Manufacturers Association has also been active in engagement with local authorities – in particular around illicit tobacco and in preventing under age sales through so called 'responsible retailer' work. The TMA has circulated briefing materials to councils on these issues claiming to have worked with Tobacco Free Futures in the North West of England in an apparent attempt to boost their credibility with other councils and as an engagement device to access wider regional networks of local government officers. In reality Tobacco Free Futures reject all such partnerships.

A major area of activity has been to influence policy on tobacco smuggling through local campaigning. It should be remembered that the industry's own legitimately manufactured products forms an important part of the illicit market and competing in the illicit market is a long established tobacco industry practice. Former BAT Chairman Kenneth Clark said in 2000: "*Where any government is unwilling to act or their efforts are unsuccessful, we act, completely within the law, on the basis that our brands will be available alongside those of our competitors in the smuggled as well as the legitimate market*".¹³ Tobacco industry campaigns on illicit tobacco have tended to focus on their competitors in the illicit market such as counterfeit products and smuggled "*cheap white*" brands.¹⁴ They have achieved this

through funding conferences for local government officers, providing sniffer dogs and scanners to councils, conducting joint visits to retailers with local trading standards officers, and planting stories in local papers with exaggerated accounts of the local problem with illicit tobacco.

'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*"¹⁵, 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".¹⁶ 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.¹⁷ 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.¹⁸ 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',¹⁹ while PMI refers to ACS as a "key stakeholder" in post card and letter writing campaigns to the then health ministers Andrew Lansley and Anne Milton.²⁰

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.²¹ Throughout the Point of Sale 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.*"²⁰

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.*"²⁰ 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*"

alongside 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 consultation on banning cigarette vending machines was 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.²² 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 2007.²³ 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 2007.²⁴

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 TWA's notes, *“originally set up to oppose the New Labour Government's proposal to ban tobacco advertising and sponsorship”*.²⁵ 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 standardised 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 2007-09.²⁶ 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”*.²⁷

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, claiming a lack of research evidence to support the government's proposals.²⁰ 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.²⁸ In 2010, BBG made a submission opposing standardised packaging for tobacco products to the European Commission.²⁹ More recently the BBG joined forces again with the Anti-Counterfeiting Group to respond to the Australian government's laws on standardised packaging.³⁰

The Anti-Counterfeiting Group and BBG are both members of the **Alliance for Intellectual Property**, which sponsors the All Party Parliamentary Group on Intellectual Property.³¹

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 on the European Union's Tobacco Products Directive. BAT is also a member of BASCAP's parent organisation, the **International Chamber of Commerce** (ICC).³²

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.²⁴

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.³³

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 refuses to say where its funding

comes from but has been a long-standing recipient of tobacco industry funding. British American Tobacco, Philip Morris and Japan Tobacco International have all funded the IEA – in BAT's case since 1963. British American Tobacco has admitted that it gave the institute £20,000 in 2012 and that it was planning to increase its contribution in 2013 and 2014.³⁴ The IEA was variously described by BAT as “*a good ally*” and “*exactly the kind of organisation that we should be supporting*”.³⁵ ³⁶ 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.³⁷ The Institute of Economic Affairs hosted an event to promote a book on tobacco standardised 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.⁸

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*”.³⁸ The ASI has also coordinated the Confederation of European Community Cigarette Manufacturers' (CECCM, see above) response to European tobacco control initiatives.³⁹

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.⁸

London Economics, an economics and public policy consultancy, has published a report funded by Philip Morris International opposing standardised packaging of cigarettes in 2012.⁴⁰ In November 2013, the same firm published a new report in which it tried to dismiss claims that of falls in smoking prevalence and increases in the noticeability of health warnings had arisen from the implementation of standardised packaging in Australia.⁴¹

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 secondhand smoke and, explicitly, for seeking to discredit the US Environmental Protection Agency.⁴² However, in 2010 Burson-Marsteller ceased working with the tobacco industry.⁴³

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*”.⁴⁴ The most prominent of these is **FOREST** (‘Freedom Organisation for the Right to Enjoy Smoking Tobacco’), which was established in 1979 with tobacco industry funding⁴⁵ and which continues to receive over 90% of its funding from tobacco companies.⁴⁶ ⁴⁷ Even Simon Clark, the Director of FOREST acknowledges that “in all probability, FOREST was set up with funding from the tobacco manufacturers”.⁴⁸

In 2009 Simon Clark, told the Scottish Parliament that the organisation received “approximately £250,000 a year” from tobacco manufacturers.⁴⁹ 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 and campaigns in association with JTI against standardised packaging.⁵⁰ In 2011, **Privacy International** released a FOREST-funded report on the ‘persecution’ of smokers.⁵¹ In 2013 it was revealed that the Hands Off Our Packs campaign, run by FOREST to oppose standardised packaging, had received funding from BAT.⁵² 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**.⁵³ 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.⁵⁴

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.*”⁵⁵

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.⁵⁶

Political Links

Tobacco companies have several links within the current government. The most prominent of these is the long serving cabinet minister **Kenneth Clarke** who was formerly Deputy Chairman and a Director of British American Tobacco.^{57 58}

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.^{59 60}

⁶¹ **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. Alun Cairns, Jim Dowd, Philip Hammond, Angela Watkinson and Mark Spencer again attended the flower show in 2012, with Conservative MP **Laurence Robertson** similarly accepting hospitality from JTI that year. Philip Hammond and Angela Watkinson would yet again be guests of JTI at the event in 2013.

Previous guests of JTI at the Chelsea flower show have included **Cheryl Gillan**, ex-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”.⁶² 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)⁶³. 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 2007.⁶⁴

The smokinggate.com activist website, which works to expose activities by PMI, 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]*”.^{20 65} 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.⁶⁶

Organisations and their links with the tobacco industry

WHO THEY ARE	WHAT THEY DO	WHO IS INVOLVED
Adam Smith Institute	Libertarian think tank. Made submission to 2012 Department of Health consultation on standard packs	Receives tobacco industry funding. ⁶⁷ Has worked with CECCM. ³⁹
Alcan Packaging	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.
Alliance for Intellectual Property	A coalition of trade and enforcement organisations	Members include the Anti-Counterfeiting Group and the British Brands Group ⁶⁸
American Chamber of Commerce to the European Union	Represents American business interests in the EU	BAT and Philip Morris are members ⁶⁹
Amcor Tobacco Packaging	Global supplier of packaging solutions based in Australia. Made submission to 2012 consultation on standardised packaging.	Client of the tobacco industry with “strong international relationships with major customers” ⁷⁰
American-European Community Association	Provides a forum for discussion of key global business, economic and political affairs	Philip Morris, BAT and Imperial are all members ⁷¹
The Anti-Counterfeiting Group	Made a submission to the 2008 Department of Health consultation (with British Brands Group). Also made a submission to the 2012 consultation on standard packs	Imperial Tobacco, Gallaher and Philip Morris International (PMI) are full members ²⁸
APCO	Public affairs agency with long history of service to tobacco industry. Provides public affairs support, nominally to retailers.	Engaged by PMI ⁷²
Apram (Association of Trade Marks and Designs Rights Practitioners)	International trade-marks and intellectual property organisation. Made submission to 2012 Department of Health consultation on standardised packaging. ⁷³ Stated in submission that they are “fiercely independent of the tobacco lobby and industry”.	Jointly issued public statement opposing proposals for standard packs with European Communities Trademark Association (for more information on the ECTA see below) ⁷⁴

API Group	Global supplier of foils, films and laminates. Made submission to 2012 Department of Health Consultation on standardised packaging	Tobacco client for more than 40 years ⁷⁵
Association of Convenience Stores	Made a submission to the 2008 Department of Health tobacco control consultation. Also made submission to 2012 consultation on standard packs. ⁷⁶ Declared links.	Imperial, BAT and JTI are all “Premier Club” members. ¹⁹
Association of Licensed Multiple Retailers	Campaigns on behalf of pubs and other licensed retailers	Lobbied by PMI to oppose Government’s tobacco control proposals ⁷⁷
Benkert UK Ltd	Manufacturers of tipping papers for cigarettes. Made submission to 2012 Department of Health consultation on standardised packaging	Manufacturer for the tobacco industry.
Business Action to Stop Counterfeiting and Piracy (BASCAP)	Lobbied EU on tobacco advertising directive (2001/37/EC). Made submission to 2012 Department of Health consultation on standard packs. ⁷⁸ Declared links.	BAT, JTI And Imperial are all members. Set up by the ICC. ⁷⁹
British Brands Group	Made a submission to the 2008 Department of Health consultation on tobacco control. Also made a submission to consultation on standardised packaging in 2012. ⁸⁰ Submission includes the admission that the group is “cross-sectoral and members include tobacco companies.”	Established in 1994 by BAT, PMI and Rothmans, amongst others ²⁴
British Chamber of Commerce in Belgium	Provides a platform for its members to raise their profile in Belgium	BAT and JTI are members ⁸¹
British Retail Consortium	Trade association for the UK retail industry. Made submission to 2012 Department of Health consultation on standard packs.	One of the stakeholders identified in PMI’s “Project Clarity” ⁷⁷

Cato Institute	Considered by Philip Morris to be one of its “national allies”	Received funding from Altria (parent of Philip Morris) and RJ Reynolds ⁸²
Centre for Economics and Business Research	An economics think tank. Made submission to 2012 consultation on standardised packaging.	Has produced reports on the display ban and standardised packaging at the behest of the TRA and PMI. ⁸³
Chesapeake Ltd	Tobacco packaging manufacturer. Made submission to 2012 consultation on standardised packaging	Was at one time a client of BAT. ⁸⁴ Part of group of major packaging manufacturers – along with Weidenhammer, API and others – that formed to lobby against standard packs. ⁸⁵
Clipper Logistics Group Ltd	Logistics company. Made submission to 2012 consultation on standardised packaging	Client of BAT, Imperial and JTI ⁸⁶
Coley Porter Bell	Brand design agency. Made submission to 2012 Department of Health consultation on standard packs.	Part of Ogilvy Group, a communications and PR group that has worked for the industry since the 1950's. ⁸⁷
Common Sense Alliance	A group that lobbies against “excessive regulation”. Their main activities have been to campaign against standard packs and the Tobacco Products Directive (TPD).	The group lists BAT as a supporter on its web page. ⁸⁸ Additionally, the web design agency Flaming Frog is also a supporter. ⁸⁸ Flaming Frog designed the TRA's webpage while one of their partners previously worked for BAT. ^{89 90}
Confederation of British Industry	The UK's premier business lobbying organisation. Made submission to Department of Health consultation on standardised packaging	Imperial Tobacco includes the CBI among organisations with which it engages. ⁹¹
Confederation of European Community Cigarette Manufacturers	Spent €300,000-€350,000 lobbying the EU in 2007	Represents BAT, JTI and 13 other manufacturing organisations. Founded by BAT. ²⁴

Confederation of Netherlands Industry and Employers (VNO-NCW)	Represents Dutch business interests. Member of businessseurope, a Brussels lobby group which has lobbied against EU public health legislation. Submitted to 2012 Department of Health consultation on standard packs	Director General claimed in an interview that “we are one of the few tobacco industry friends”. Links with the industry in opposing the TPD and standard packaging. Edith Schippers (Dutch Health Minister that reversed smoking ban in pubs once she came to power) previously worked for VO-NCW on health and social issues. ⁹²
CSR Solutions	CSR consultancy. Responded to 2012 Department of Health consultation on standard packs	Works with Imperial on CSR initiatives (litter icons). Co-founder, Charles Hamshaw-Thomas, is ex-Imperial. One Non-Executive director, Roger Batty, was previously National Accounts Director at Imperial. ⁹³
Czech Association for Branded Products	A Czech group with the goal of protecting and promoting the interests of manufacturers of branded products. Made submission to 2012 Department of Health consultation on standard packs	BAT, JTI, PMI and Imperial are members. ⁹⁴ The General Manager of JTI in Czechoslovakia is a director. ⁹⁵
David Jones Design Ltd	Design agency. Made submission to 2012 Department of Health consultation on standardised packaging	Client of JTI. ⁹⁶ Previously designed vehicle livery for B&H Jordan F1. ⁹⁷
Davidoff	Swiss luxury tobacco goods brand. Submitted to 2012 consultation on standardised packaging.	The Davidoff cigarette brand is owned by Imperial Tobacco ⁹⁸
Deloitte	Provides financial and consultancy services	BAT commissioned Deloitte to produce a report on standardised packaging ⁹⁹
Democracy Institute	Think tank based in Washington DC and London.	Founded by Patrick Basham. Basham was an adjunct scholar with the Cato Institute. ¹⁰⁰
Dragon Rouge	Design agency. Submitted to 2012 consultation on standardised packaging	JTI is a client ¹⁰¹

Economiesuisse	Swiss business federation. Made submission to 2012 Department of Health consultation on standard packs	Member of <i>businessseurope</i> . ¹⁰² PMI is a member. ¹⁰³ The vice President of Fiscal Affairs and International Trade for PMI sits on the <i>Economiesuisse</i> board ¹⁰⁴
European Cigar Manufacturers' Association	Represents European manufacturers of cigars. Made submission to 2012 Department of Health consultation on standardised packaging.	BAT, Imperial Tobacco and JTI are all members ¹⁰⁵
European Communities Trademark Association	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, was the association's legal advisor ²⁴
European Union Chamber of Commerce in Korea	Trade body focussing on business between the EU and Korea. Made submission to 2012 Department of Health consultation on standardised packaging	BAT and Philip Morris Korea are members ¹⁰⁶
European Policy Centre	Think tank used to influence Brussels on various issues	BAT is a member and has worked with the EPC since the 1980s ¹⁰⁷
European Policy Forum	Lobbies the European Union on tobacco control issues	BAT has worked with the EPF ¹⁰⁸
European Rolling Papers Association	Represents the interests of European manufacturers of rolling papers and tubes	Imperial Tobacco has an interest through its Rizla subsidiary
European Roundtable of Industrialists	Seeks to examine and influence policy-making at a European level	Paul Adams of BAT was a member until 2010 ¹⁰⁹
European Risk Forum	Formerly part of the EPC, its membership was by invitation only	BAT was a founding member ¹¹⁰
European Smoking Tobacco Association	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 ²³

European Smokeless Tobacco Council (ESTOC)	Objective is “the worldwide legalisation of Swedish snus and other smokeless tobacco products, based on a regulatory framework”. Made submission to 2012 Department of Health consultation on standardised packaging	Board of Directors are all tobacco executives ¹¹¹
European Travel Retail Council	Met with European Commission on revising Tobacco Products Directive	Imperial Tobacco is a member ¹¹²
Federation of Small Businesses	A pressure group promoting the interests of small businesses	Ex-head of external affairs appointed by PMI for senior role in corporate communication. The appointment came as PMI was initialising its fight against standard packs. ¹¹³
Finnish Tobacco Industries’ Federation	Representative organisation for Finnish tobacco companies. Made submission to Department of Health consultation on standardised packaging.	BAT and Altadis (tobacco manufacturer owned by Imperial) are members. ¹¹⁴
Focke & Co	Supplier of packaging machinery. Made submission to 2012 consultation on standardised packaging.	Supplies machinery used in packaging to the tobacco industry, including JTI. ¹¹⁵
FORCES	Campaign group “aligned with those who fight the antismoking movement”	Previous leader Gian Turci sought support from PMI & Rothmans Ltd. ⁵⁵
FOREST	Made a submission to the 2008 Department of Health consultation on tobacco control. Made submission to 2012 Department of Health consultation on standardised packaging	Established with tobacco industry funding. Tobacco industry continues to provide funding. ^{46 47 48 49 52}
Fraser Institute	Involved in influencing Canadian policy on tobacco	Sought and received funding from several tobacco companies ³⁷
Freedom to Choose (F2C)	Campaigned for a repeal of smoking ban. Made a submission to the 2008 Department of Health consultation on tobacco control. Made submission to 2012 consultation on standard packs.	A member of TICAP ¹¹⁶

G.D. (Italy)	Company specialising in tobacco making and packing machines. Made submission to 2012 consultation on standard packs.	Supplies machinery to the tobacco industry.
The Global Intellectual Property Centre	Made a submission to the 2008 Department of Health consultation on tobacco control	Institution of the US Chambers of Commerce
Hoffmann Neopac AG (Switzerland)	Supplier of tins for tobacco products. Made submission to 2012 consultation on standard packs.	Supplier of tins to tobacco industry, including Philip Morris and Imperial. ¹¹⁷
Ignis Ltd	Marketing communications company. Made submission to 2012 consultation on standardised packaging.	Clients include JTI ¹¹⁸
Independent Retail News	Survey of business regarding standardised packaging used as evidence in 2008 Department of Health consultation on tobacco control	Conducted roundtable discussions in association with Imperial Tobacco over standardised packaging ²¹
Institute of Economic Affairs	Calls itself the UK's original free-market think tank. Made submission to 2012 Department of Health consultation on standardised packaging	Recipient of tobacco industry funding. ⁵² Former President Ralph Harris was also former President of FOREST. Described by BAT as "exactly the kind of organisation we should be supporting". ^{35 36}
Institute of Practitioners in Advertising	Trade body for over 270 ad-agencies. Submitted to 2012 Department of Health Consultation on standard packs. ¹¹⁹ Does not disclose any links with industry on response.	Rory is IPA President and Vice-Chair of Ogilvy Group UK. ¹²⁰ Sutherland co-founded the industry lobby group the Common Sense Alliance.
Interbrand	A branding consultancy and division of Omnicom; argues against the introduction of standardised packaging	BAT and PMI are clients ^{121 122}
International Chamber of Commerce	Parent organisation of BASCAP; business lobby group. Made submission to 2012 Department of Health consultation on standardised packaging.	British American Tobacco is a member ³²
International Trademark Association	Made a submission to the 2008 Department of Health consultation on tobacco control	The President for 2013 was Toe Su Aung, a British American Tobacco employee ¹²³

ISBA (Incorporated Society of British Advertisers)	Defends commercial right to advertise	Recipient of PMI campaign messages opposing Government's tobacco control proposals ²⁰
Keep Britain Tidy	Charity that campaigns on the issue of litter. Made submission to 2012 Department of Health consultation on standardised packaging.	Imperial is a "founding partner" of Keep Britain Tidy's Love Where You Live Campaign. ¹²⁴ In addition, Imperial used KBT as a case study of its CSR. ¹²⁵ The TMA also reports "working closely" with KBT. ¹²⁶ KBT has also formed close partnerships with local authorities and provided smoking shelters, funded by Imperial, for councils.
Leicester Asian Business Association (LABA)	A "key stakeholder" and message carrier in Project Clarity and PMI supporter in ministerial meetings.	Partner in PMI "grass roots" campaigning. ²⁰
Liberal Vision	A subsidiary of Progressive Vision (see below)	Links to the TMA through Progressive Vision ⁵³
London Economics	An economics and public policy consultancy	Published reports on tobacco standardised packaging funded by PMI ^{40 41}
Londonderry/Derry	UK City of Culture 2013	JTI entered into partnership with Londonderry/Derry council in support of their awarding of the UK City of Culture in 2013 ¹²
Markenverband	Made a submission to the 2008 Department of Health consultation on tobacco control. Also made submission to 2012 consultation on standardised packaging.	Has tobacco industry members; Manfred A Häussler, now retired, was previously an Executive Director at Markenverband and Imperial Tobacco's Sales and Marketing Director. He also worked for a time for Philip Morris International. ¹²⁷
Manifatture Sigaro Toscano	Italian manufacturer of cigars. Made submission to 2012 consultation on standardised packaging.	Company purchased by BAT in 2004. ¹²⁸
The Maxim Design Group	A brand consultancy. Made submission to 2012 consultation on standardised packaging.	Client of the tobacco industry. ¹²⁹

National Association of Cigarette Machine Operators	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. ²²
National Federation of Retail Newsagents	Campaigned against display ban	Funded by BAT, Imperial; a “puppet of the tobacco industry” ¹⁵
Nicoventures	Company focussed on the commercialisation of licensed NCPs, including e-cigarettes	Nicoventures is a wholly owned subsidiary of BAT and part of the BAT group. Representatives from Nicoventures have been attempting to establish a relationship with members of the public health community, including those in local authorities, through what they perceive as a shared interest in terms of tobacco harm reduction and the role NCPs can play.
Northern Ireland Independent Retail Trade Association	Representative body for Northern Irish retailers. Made a submission to 2012 Department of Health consultation on standardised packaging	CEO previously worked for Federation of Small Businesses as Head of Press and Parliamentary Affairs. ¹³⁰
Nude Brand Consulting	Made a submission to the 2008 Department of Health consultation on tobacco control	Nude Brands is a client of JTI ¹³¹
Oettinger Davidoff Group	Parent company of the Davidoff brand. Made submission to 2012 consultation on standard packaging.	Imperial Tobacco is the licensee of the Davidoff cigarette brand. ⁹⁸
Oettinger Imex AG	Part of the Oettinger Davidoff Group. Made submission to 2012 consultation on standard packaging.	Imperial Tobacco is the licensee of the Davidoff cigarette brand. ⁹⁸
Ogilvy	International advertising, marketing and public relations group	The firm has worked on advertising and PR campaigns for the tobacco industry since the 1950s. Vice Chairman of the Ogilvy Group is Rory Sutherland, a founding member of the Common Sense Alliance. BAT continues to be a client. ¹³²

Privacy International	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 ⁵¹
Progressive Vision	Libertarian think tank; hosted a summit on tobacco smuggling with the Tobacco Manufacturers Association	Associated with TMA ¹³³
Promarca	Represents the interests of companies in the consumer goods sector in Switzerland. Made submission to 2012 Department of Health consultation on standardised packaging	JTI and Philip Morris are members ¹³⁴
Property Rights Alliance (USA)	Advocacy organisation dedicated to the protection of intellectual and physical property rights. Made submission to 2012 Department of Health consultation on standardised packaging	Affiliate of Americans for Tax Reform. ¹³⁵ Americans for Tax reform has received funding from the industry, including PMI and RJ Reynolds. ¹³⁶
Responsible Retailers	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 ¹³⁷
Roland Berger	Strategy consultant	Employed by PMI. Produced report on the potential economic effects of the TPD and standardised packaging for, and at the request of, PMI. ¹³⁸
Rural Shops Alliance	Made a submission to 2008 Department of Health consultation on tobacco control. Also made submission to 2012 consultation on standardised packaging.	Imperial Tobacco is one of its ‘principal sources of funding’ ¹⁸
Save Our Pubs and Clubs	Campaign against the smoking ban in pubs	Campaign run by Simon Clark of FOREST

Scottish Grocers Federation	Trade association for the Scottish Convenience Store Sector. Made submission to 2012 Department of Health consultation on standardised packaging. ¹³⁹ Did not declare any links to industry in response.	Lobbied by PMI to oppose Government's tobacco control proposals ²⁰
Scottish Wholesale Association	Retail representative organisation. Made submission to 2012 Department of Health consultation on standardised packaging	BAT, JTI and Imperial are members. Anti-standard packs campaigns funded by BAT and Imperial. ¹⁴⁰
Schur Flexible Benelux BV	Producer of pouches for loose tobacco. Made submission to 2012 Department of Health consultation on standardised packaging	Manufacturer of laminate pouches for roll-your-own tobacco for the industry. ¹⁴¹
Sinclair Collis	Made a submission to the 2008 Department of Health consultation on tobacco control	Wholly owned subsidiary of Imperial Tobacco
Spanish Confederation of Employers and Industries (CEOE)	Representative organisation for Spanish businesses. Made submission to 2012 Department of Health consultation on standardised packaging	Member of businessseurope. Businessseurope has a long history of working to advance industry interests in opposing tobacco control, including advertising and promotion, Art 5.3 and the EU TPD. ¹⁴²
Swedish Tobacco Manufacturers Association	Represents Swedish tobacco manufacturers. Made submission to 2012 Department of Health consultation on standardised packaging	JTI is a member. ¹⁴³
Taxpayers Alliance	Right wing think tank and lobbying group. Made submission to 2012 Department of Health consultation on standardised packaging	History of defending the industry. Was one of 11 signatories to a letter criticising the then proposed display ban along with other organisations such as the Adam Smith Institute and Liberal Vision ¹⁴⁴
Transatlantic Public Affairs	Provided support, nominally to retailers, on "Project Clarity"	Engaged by PMI ²⁰

The Free Society	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) ¹⁴⁵
TICAP (The International Coalition Against Prohibition)	Describes itself as “Against government prohibition and junk science based policies”	Has links with FORCES & Freedom2Choose via founder Gian Turci. ⁵⁵
Tobacco Industry Platform	Lobbying Group representing tobacco industry interests	Listed among Imperial Tobacco’s network of organisations ³³
Tobacco Manufacturers Association (TMA)	Made a submission to the 2008 Department of Health consultation on tobacco control	Represents Gallaher, Imperial and BAT
Tobacco Manufacturers Association of Denmark	Body representing tobacco Danish tobacco manufacturers. Responded to 2012 Department of Health consultation on standardised packaging.	Member of European Smokeless Tobacco Council (ESTOC) with BAT, JTI, PMI and Imperial. ¹⁴⁶ Represents Scandinavian tobacco manufacturers.
Tobacco Retailers Alliance (TRA)	Made a submission to the 2008 Department of Health consultation on tobacco control	Funded by the TMA ¹⁴⁷
Tobacco Workers Alliance	Represents employees in tobacco manufacturing	Established with tobacco industry & trade union support ¹⁴⁸
Transatlantic Business Dialogue (TABD)	Free market think tank. Responded to 2012 Department of Health consultation on standardised packaging	Long history of tobacco links and funding. BAT and PMI are members. TABD’s EU executive director employed by BAT for more than a decade. Jeffries Briggenshaw, ex-Head of Political and Regulatory Affairs for BAT between 2004 and 2007, was previously EU director of TABD. ¹⁴⁹
Union ales Fabricants (Unifab)	Intellectual property organisation	BAT and PMI are members of the advisory committee. ¹⁵⁰
Unite	UK trade union. Made a submission to the 2008 Department of Health consultation on tobacco control	Linked to the TWA

UK Travel Retail Forum	Made submission to the 2008 and 2009 Department of Health consultations	Member of the European Travel Retail Council (see above)
US Chamber of Commerce	Business lobbying group. Made submission to 2012 Department of Health consultation on standardised packaging	Received industry donations (\$45,000 from Reynolds American). ¹⁵¹ Senior Vice President (Communications and Strategy) is ex-PMI Vice President of Public Affairs. ¹⁵²
Washington Legal Foundation	Non-profit with the stated goal to “ <i>defend and promote the principles of freedom and justice</i> ”. Made submission to 2012 Department of Health consultation on standardised packaging	Historic links with the industry, previously funded by PMI and the now-defunct tobacco institute. ¹⁵³
Zopag AG	Distributor of cigarette vending machines. Submitted response to 2012 consultation on standardised packaging	Until July 2013 was a subsidiary of the Oettinger Davidoff Group. Now owned by the Swiss Group Margo Tabac. ¹⁵⁴

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.

FIRM	BASED	CLIENTS
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
Crosby Textor Group	UK	Previous clients include BAT. Worked with BAT and PMI in Australia to fight standard packs there. ¹⁵⁵ Embarked on new contract with PMI in November 2012, during which time co-founder Lynton Crosby was under the employ of the Conservative Party as Cameron's chief electoral strategist. ¹⁵⁶
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

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- ¹Speech by David Cameron at the University of East London quoted in the Guardian Monday 8th February 2010. <http://www.theguardian.com/politics/2010/feb/08/david-cameron-secret-corporate-lobbying>
- ² US District Court for the District of Columbia Civil Action No.99-2496 (GK) USA Plaintiff v. PMI (USA) defendant et al. Final judgement 2006. <http://www.justice.gov/civil/cases/tobacco2/amended%20opinion.pdf>
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