



COMMUNICATING ABOUT NICOTINE & TOBACCO PRODUCT ADVERTISING

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DISCLOSURES

- I have served as a paid expert witness in litigation sponsored by the Public Health Advocacy Institute against RJ Reynolds. This arrangement has been reviewed and approved by the Johns Hopkins University in accordance with its conflict of interest policies.
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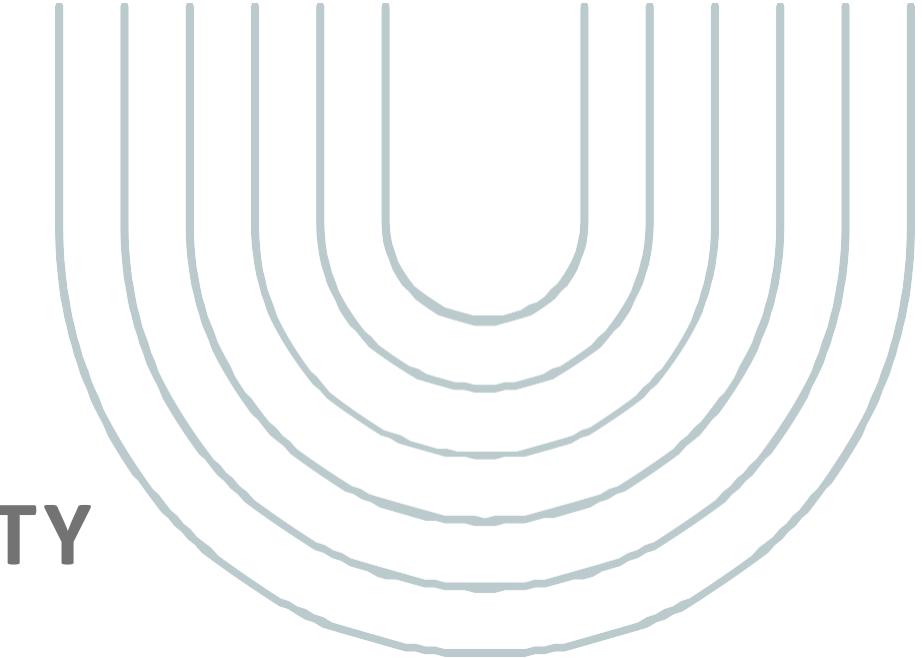
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01.

OVERVIEW OF FDA REGULATORY AUTHORITY

Youth appeal and modified risk

02.

HOW TOBACCO COMPANIES APPEAL TO YOUTH

Youth appealing features

Social media

03.

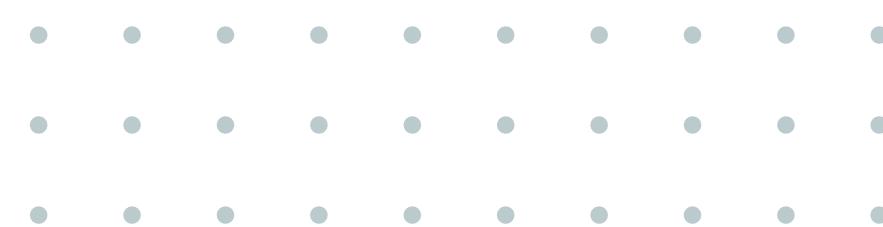
MISLEADING PEOPLE ABOUT PRODUCT RISK

Greenwashed advertising

04.

TAKEAWAYS

What can be done



OVERVIEW

01.

FDA AND TOBACCO PRODUCTS

FDA'S AUTHORITY TO REGULATE TOBACCO PRODUCTS

- 2009 Family Smoking Prevention and Tobacco Control Act
 - Unauthorized modified risk claims
 - Advertising to youth

SEC. 3. PURPOSE.

The purposes of this division are—

(1) to provide authority to the Food and Drug Administration to regulate tobacco products under the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et seq.), by recognizing it as the primary Federal regulatory authority with respect to the manufacture, marketing, and distribution of tobacco products as provided for in this division;

(2) to ensure that the Food and Drug Administration has the authority to address issues of particular concern to public health officials, especially the use of tobacco by young people and dependence on tobacco;

“(A) IN GENERAL.—With respect to a tobacco product, the term ‘sold or distributed for use to reduce harm or the risk of tobacco-related disease associated with commercially marketed tobacco products’ means a tobacco product—

“(i) the label, labeling, or advertising of which represents explicitly or implicitly that—

“(I) the tobacco product presents a lower risk of tobacco-related disease or is less harmful than one or more other commercially marketed tobacco products;

“(II) the tobacco product or its smoke contains a reduced level of a substance or presents a reduced exposure to a substance; or

“(III) the tobacco product or its smoke does not contain or is free of a substance;

“(ii) the label, labeling, or advertising of which uses the descriptors ‘light’, ‘mild’, or ‘low’ or similar descriptors; or

TOBACCO COMPANIES HAVE HISTORICALLY ENGAGED IN YOUTH APPEALING TACTICS



URGEON GENERAL'S WARNING: Quitting Smoking now Greatly Reduces Serious Risks to Your Health.

11 mg. "tar", 0.8 mg. nicotine av. per cigarette by FTC method
© 1994 R.J. REYNOLDS TOBACCO CO.

Get a Taste of the Genuine Article.

A Camel cigarette advertisement. It features a camel wearing a leather jacket and sunglasses, holding a cigarette. The text 'Get a Taste of the Genuine Article.' is prominently displayed. In the bottom right corner, there is an inset image of a white t-shirt with 'CAMEL' and 'Genuine Taste' printed on it. The background includes a motorcycle and a catalog titled 'CAMEL CASH CATALOG SIX'.

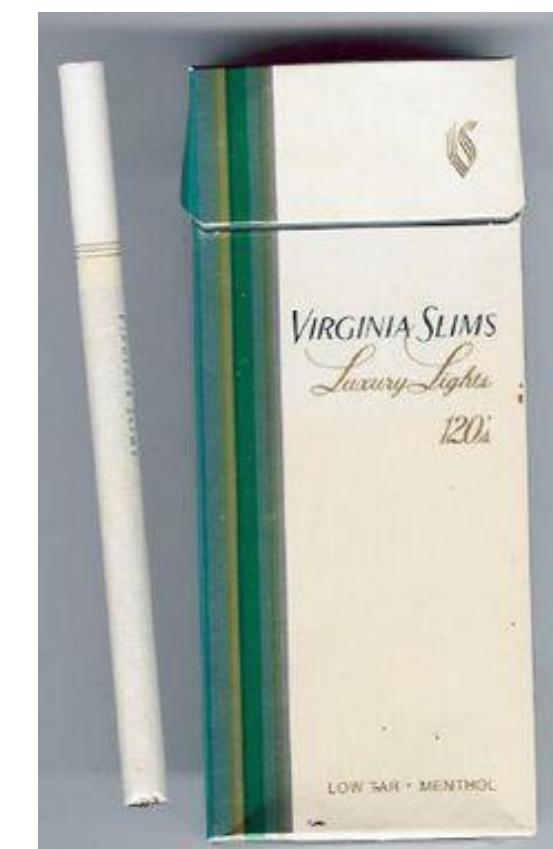
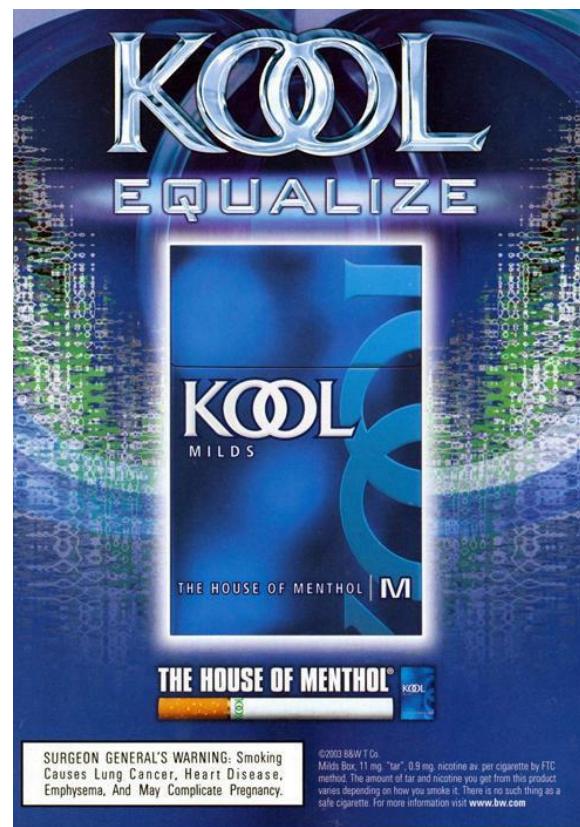
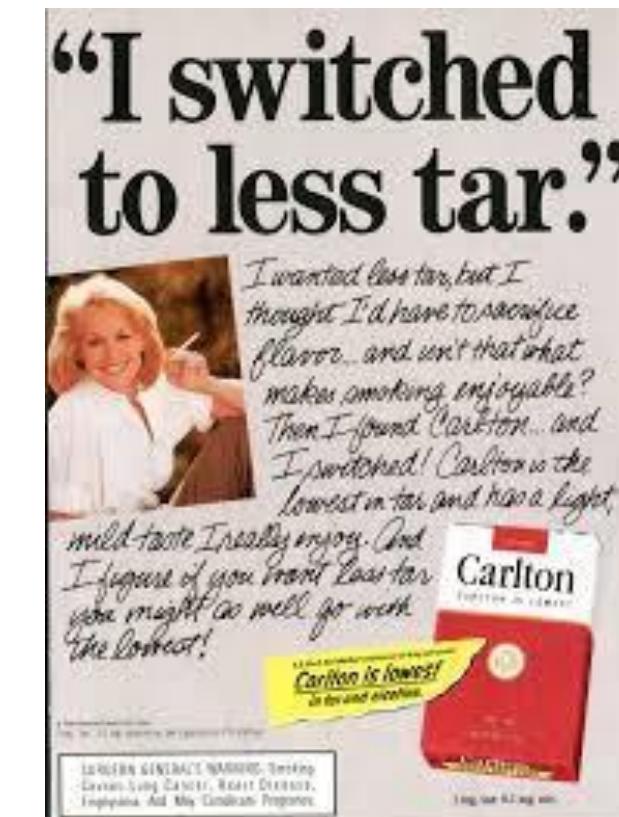
Only Camel has an 80-year history of delivering Genuine Taste. And only the new Camel Cash Catalog has genuine articles like this Genuine Taste White T-shirt.

Offer restricted to smokers 21 years of age or older.

The Catalog's FREE. So's the call.
1-800-CAMELCASH
(1-800-226-3522)

TOBACCO COMPANIES HAVE LONG MISLED CONSUMERS ABOUT PRODUCT RISK

- Descriptors
 - Light, low, mild, smooth
- Design features
 - Filter; longer, skinnier stick
- Colors
 - Light colors, silvers, blues

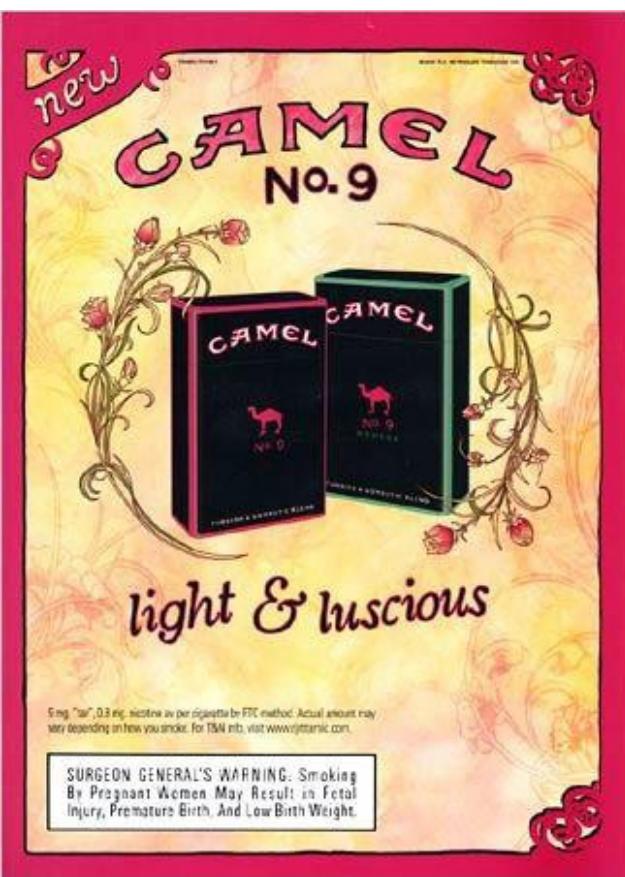
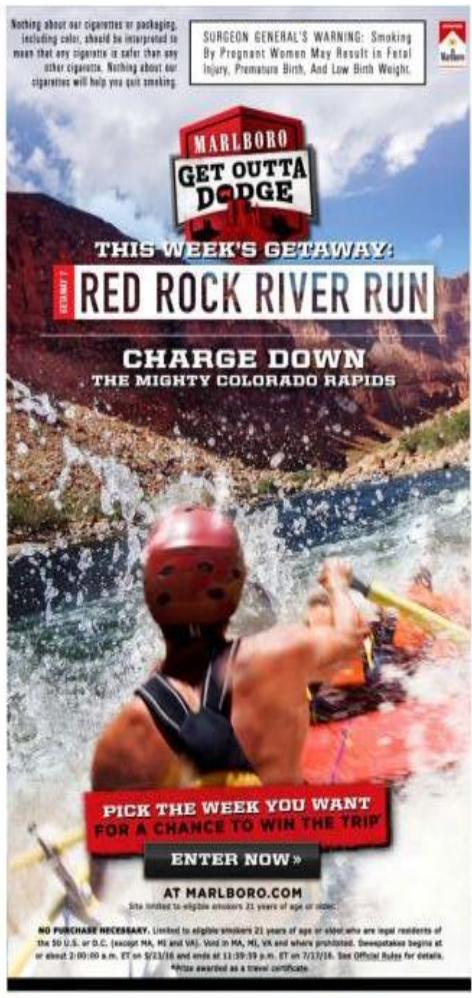


02.

HOW TOBACCO COMPANIES APPEAL TO YOUTH

TACTICS APPEALING TO YOUTH INCLUDE...

- Animation
- Rebellion themes
- Independence themes
- Socialization themes
- Young people in advertisements
- Celebrities
- Humor
- Sexuality/Romance



BUT THE TOBACCO
INDUSTRY...AND YOUTH
INTERESTS....AND THE
MEDIA LANDSCAPE....

ARE RAPIDLY CHANGING

*HOW CAN WE KEEP ON
TOP OF THIS?*



METHODS

Collect and content code
tobacco advertisements

Surveys to assess
perceptions of
advertisements

Randomized controlled
experiments testing
effects of ad features

CONTENT CODING

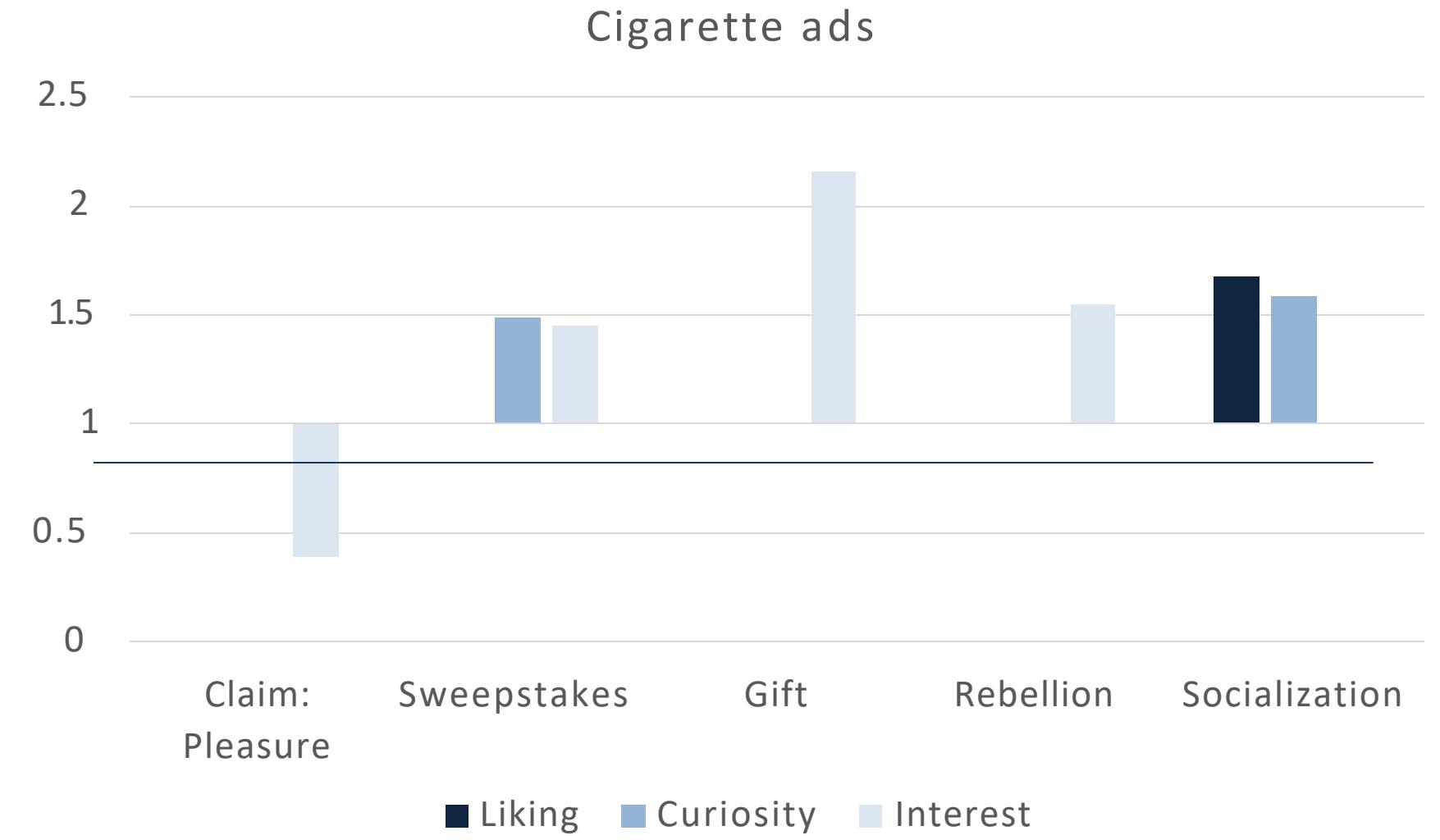
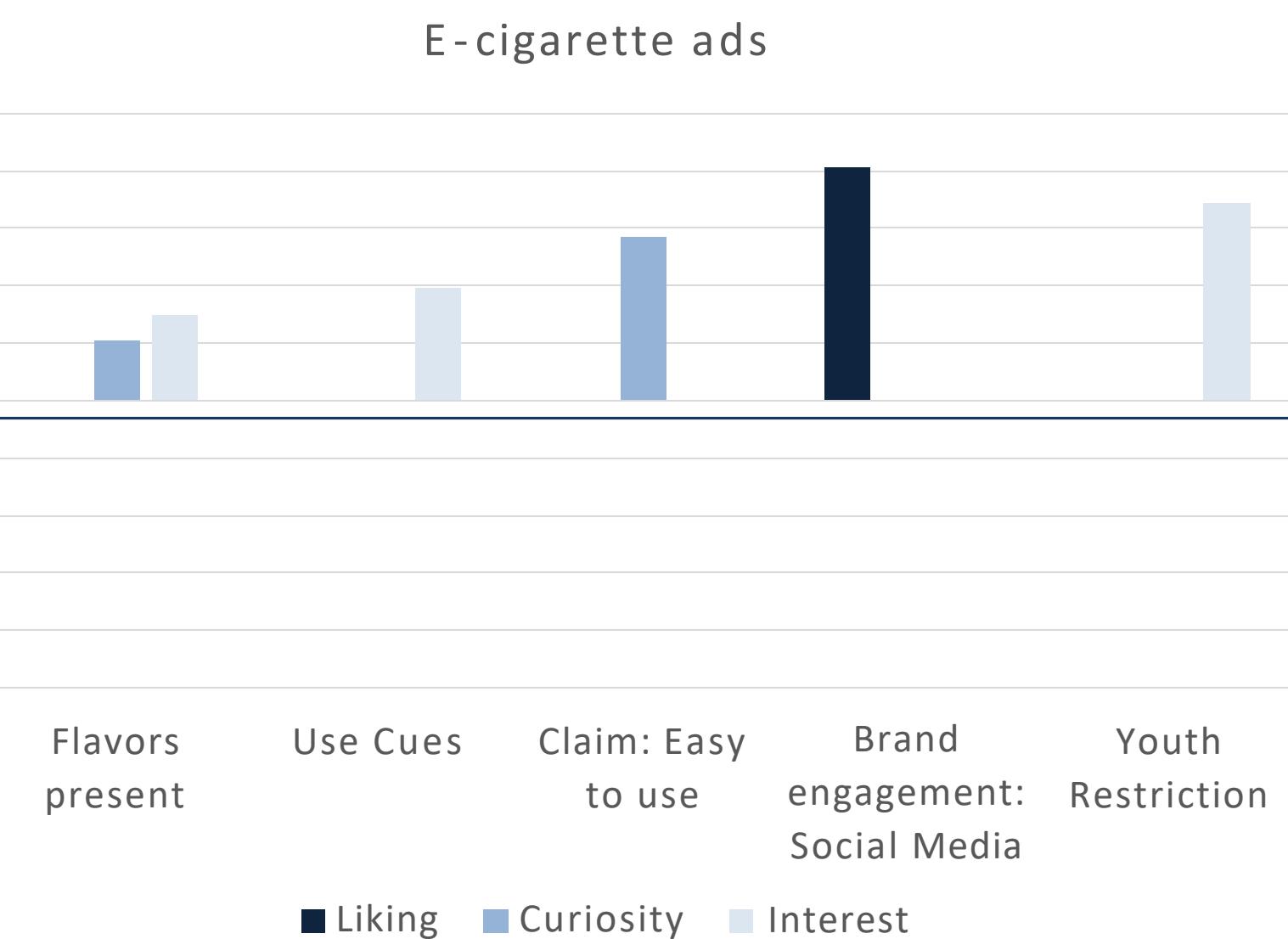
- Download ads from Vivicx (Numerator, Kantar), Trinkets and Trash¹, and social media (to date have coded >10,000)
- Double-coded ($k \geq .80$) for characteristics including
 - Marketing claims (e.g., product is easy to use, high quality, new)
 - Brand engagement opportunities (e.g., social media follow, subscriptions, sweepstakes entry)
 - Product features (e.g., flavors)
 - Themes (e.g., eco-friendliness, independence, sex/romance, sociality)
 - Promotions (e.g., coupons, discounts)

STUDY 1: What features are common to ads that appeal to youth?

- 1 Collect and content code ads
 - >10,000 ads downloaded from Vivicx, Trinkets and Trash (Rutgers INTS), and social media
 - Double-code ads for advertising features, including: marketing claims, themes, promotions
- 2. Survey youth to assess ad ratings
 - 836 18-20 year olds, recruited via Qualtrics panel in Summer/Fall 2022
 - Participants randomized to view 3 cigarette and 3 e-cigarette advertisements from a pool of 147 ads (Blu, Juul, Vuse, Logic, Bidi, Leap; Camel, Marlboro, American Spirit, Newport, Winston, L&M)
 - Reported liking of the ad, curiosity about the product and interest in trying the product
 - Coded dichotomously: any liking, any curiosity, any interest
- 3. Analyze data
 - Merge content coding data from ads with participant responses
 - Mixed effects logistic regression analyses controlling for brand and participant characteristics, with ad identifier as a random effect

STUDY 1: WHAT ADVERTISING FEATURES ARE COMMON TO ADS THAT APPEAL TO YOUTH?

Adjusted odds ratios, Mixed effects logistic regression models of liking, curiosity and use interest among youth (age 18-20)



Most appealing e-cigarette and cigarette ads

Top 3 most liked e-cigarette ads



3 most liked cigarette ads



Least appealing e-cigarette ads

Top 3 least liked e-cigarette ads



Top 3 least liked cigarette ads



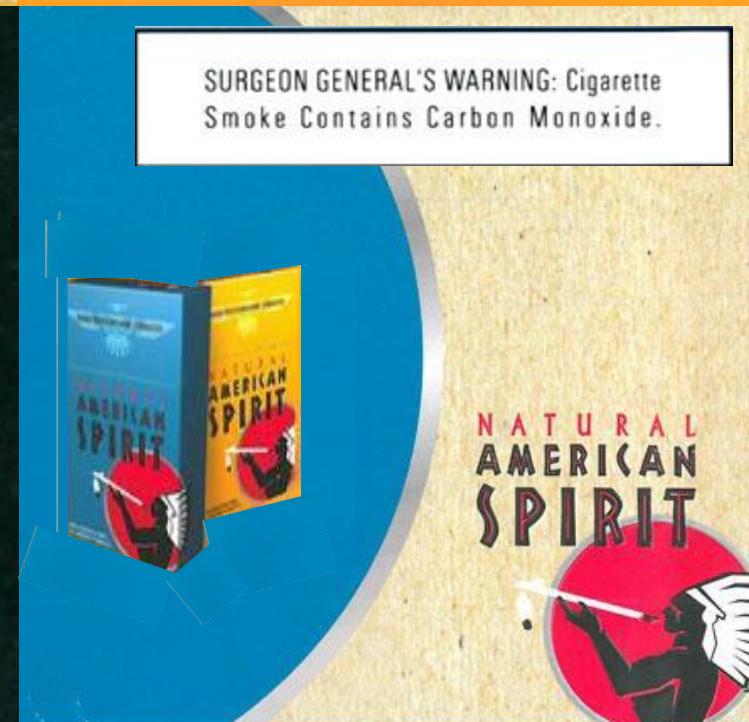
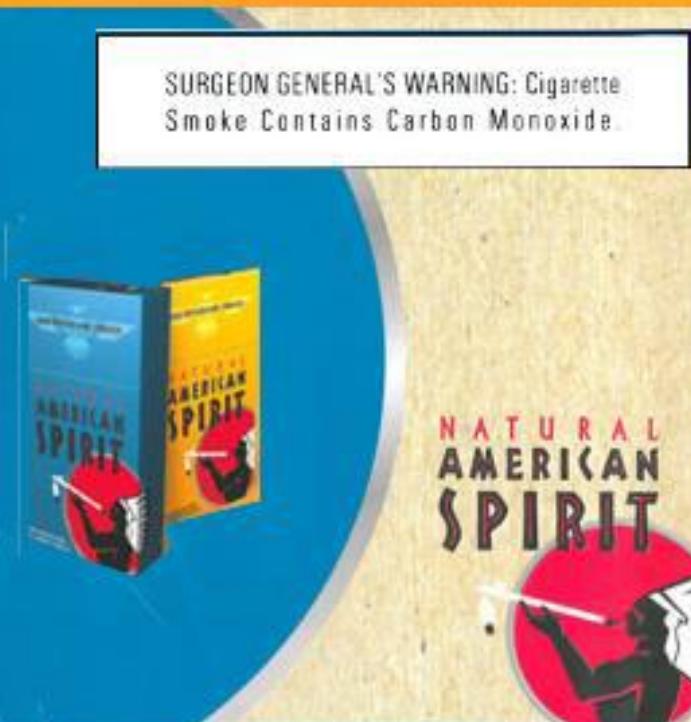
SURGEON GENERAL'S WARNING: Quitting Smoking
Now Greatly Reduces Serious Risks to Your Health.

STUDY 2: What ad features are causally related to appeal among youth?

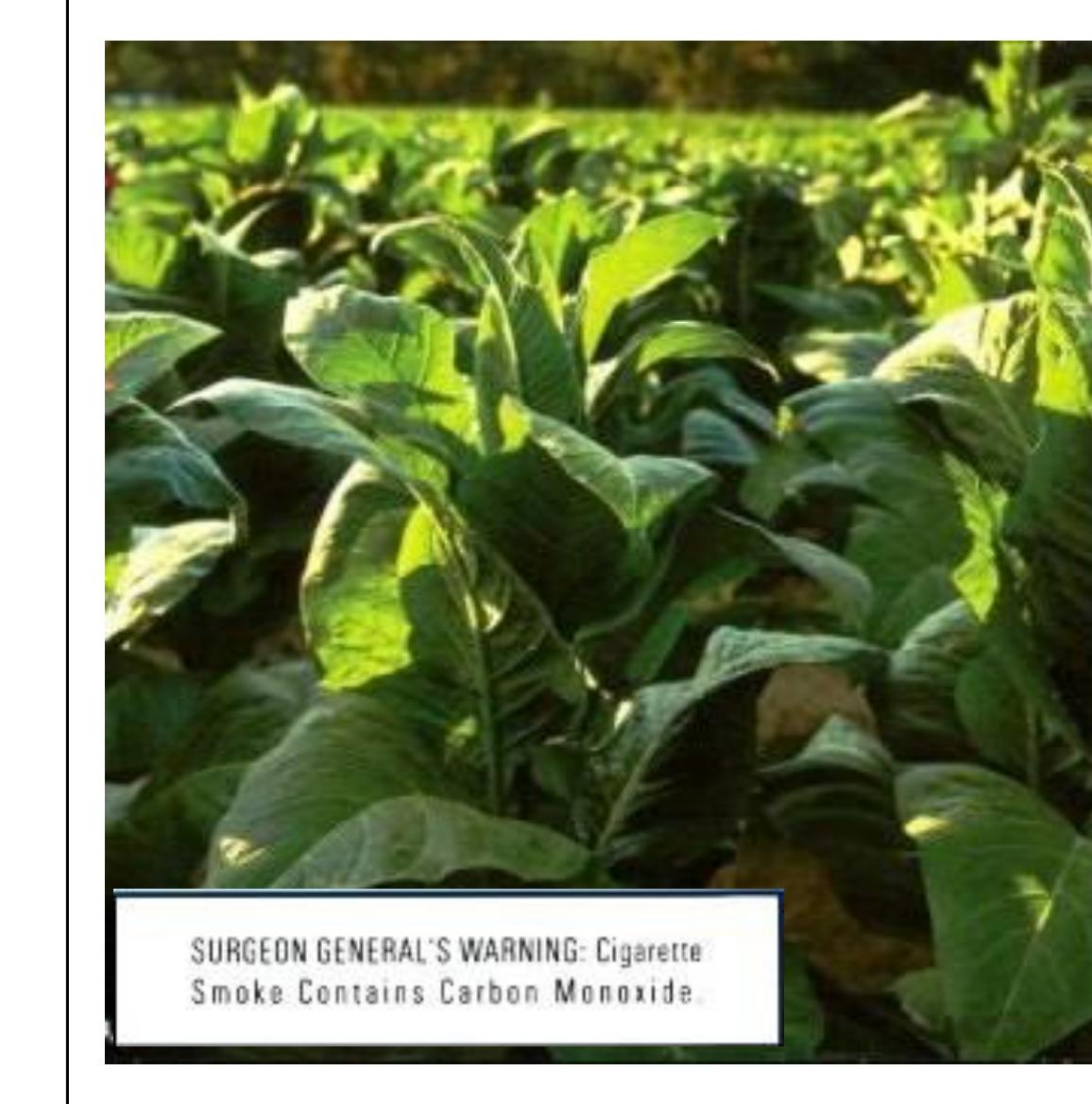
- 1,000 15–17-year olds (adolescents) and 1,000 18–24-year olds recruited via online panel (SSRS.org)
 - Quotas for smoking status (adolescents: 500 ever smokers and 500 never smokers; young adults: 500 current smokers and 500 non-current smokers)
- Viewed 3 experimental modules (Sweepstakes, Flora imagery, Eco-friendly language), randomized presence/absence and brand
- Primary outcome: Receptivity
 - Any liking, curiosity, interest in using
- Chi-square tests and multiple logistic regression to calculate adjusted odds ratios of receptivity for each condition
 - Adjusted for brand of ad viewed, condition order, smoking status, gender, race/ethnicity, age, parental education, and sexual orientation (in young adults)
 - Exploratory analyses included a brand x condition interaction term

Condition: Sweepstakes

Brand: Natural American Spirit



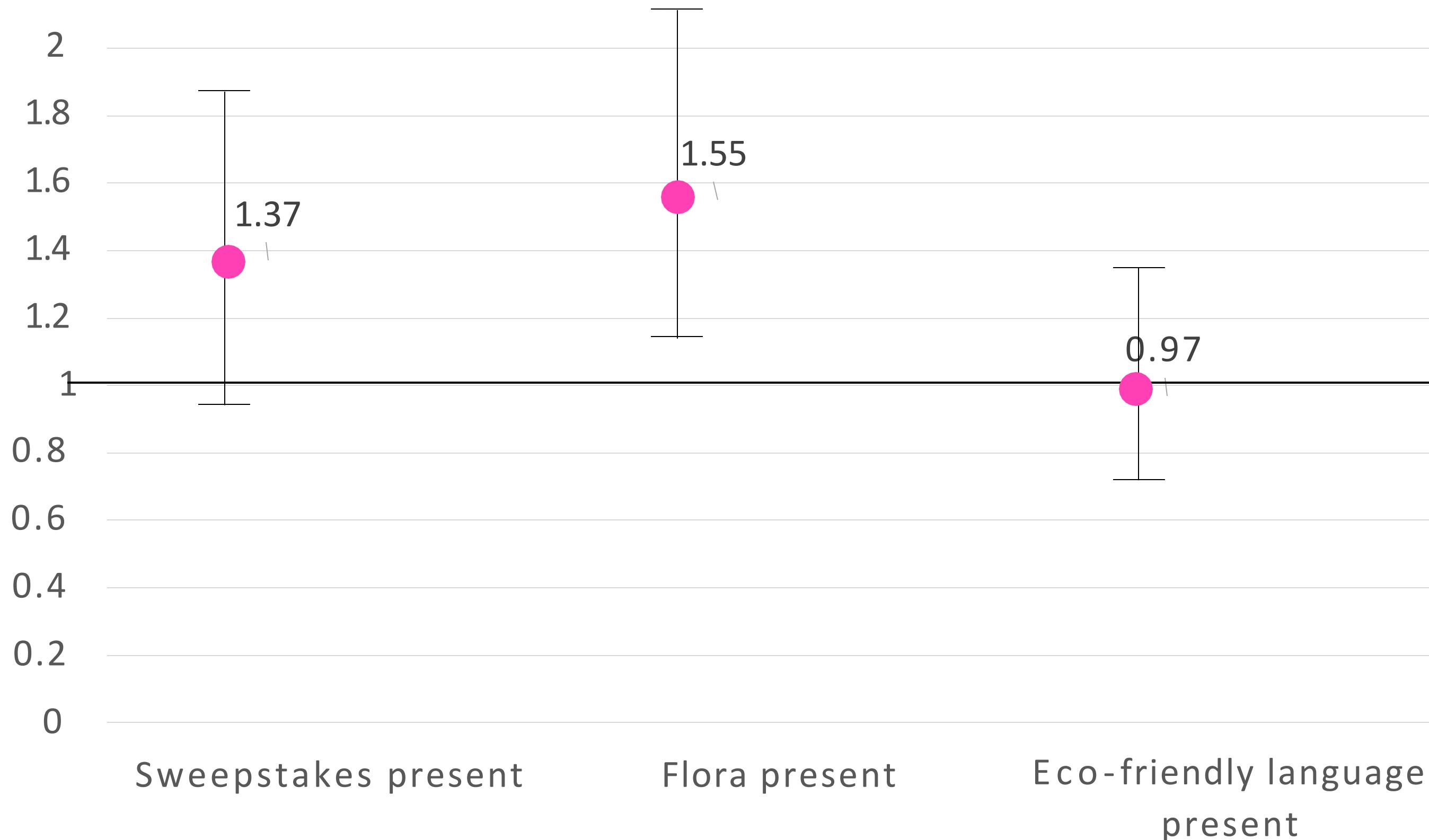
Condition: Flora imagery
Brand: 2000 (Novel brand)



Condition: Eco-friendly language
Brand: Camel

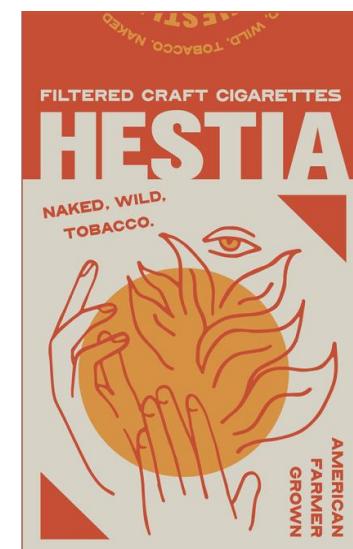
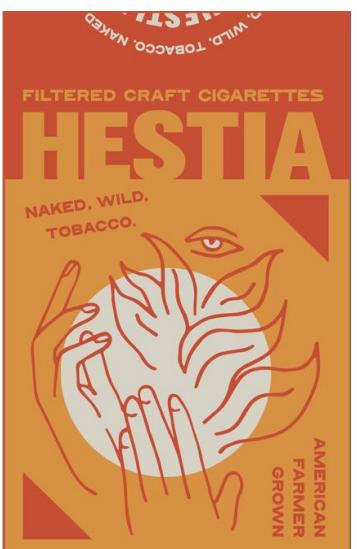


Findings: Adjusted odds ratios for ad receptivity among adolescents, by experimental condition



STUDY 3: Case study of how social media is used for tobacco promotion

- Analysis of social media for Hestia Tobacco
 - Founded in 2010
 - Position their product as an alternative to ‘corporate tobacco’
- We conducted a qualitative, thematic analysis of 318 Instagram posts and 690 Twitter/X posted between January 2022 – March 2024



SEARCH STYLE The New York Times

A Viral Cigarette Brand? In 2023?

You can't buy them at any bodega or tobacco shop in New York. But Hestia is getting its smokes into the hands of "cigfluencers."

Engaging influencers



hestiatobacco • Follow
Lower East Side, NY

hestiatobacco Is there a chicer, more rock and roll accoutrement than a sexy cigarette?
by @thecobrasnake, Obvs.
#HaveAHestia #Cigarettes
29w

hestiatobacco That's a rhetorical Q, fyi.
29w

51 likes
FEBRUARY 17

Comments on this post have been limited.

An Instagram post featuring two women in black and white bikinis standing in a trade show hall. The woman on the right is holding a pack of Hestia cigarettes. The post is from the account @hestiatobacco. The caption reads: "Inter-Tabac Fair Dortmund". The post has 127 likes and was made on September 16. The comments section is limited.

Connections to politics and culture



hestiatobacco · Follow

hestiatobacco our raison d'être. #HaveAHESTIA

swirlofyuzu Merch otw?

amoredinicotino2 Make smoking sexy again! (I'm sure you'll do!)

119 likes AUGUST 1

Comments on this post have been limited.



Why would he smoke anything else??

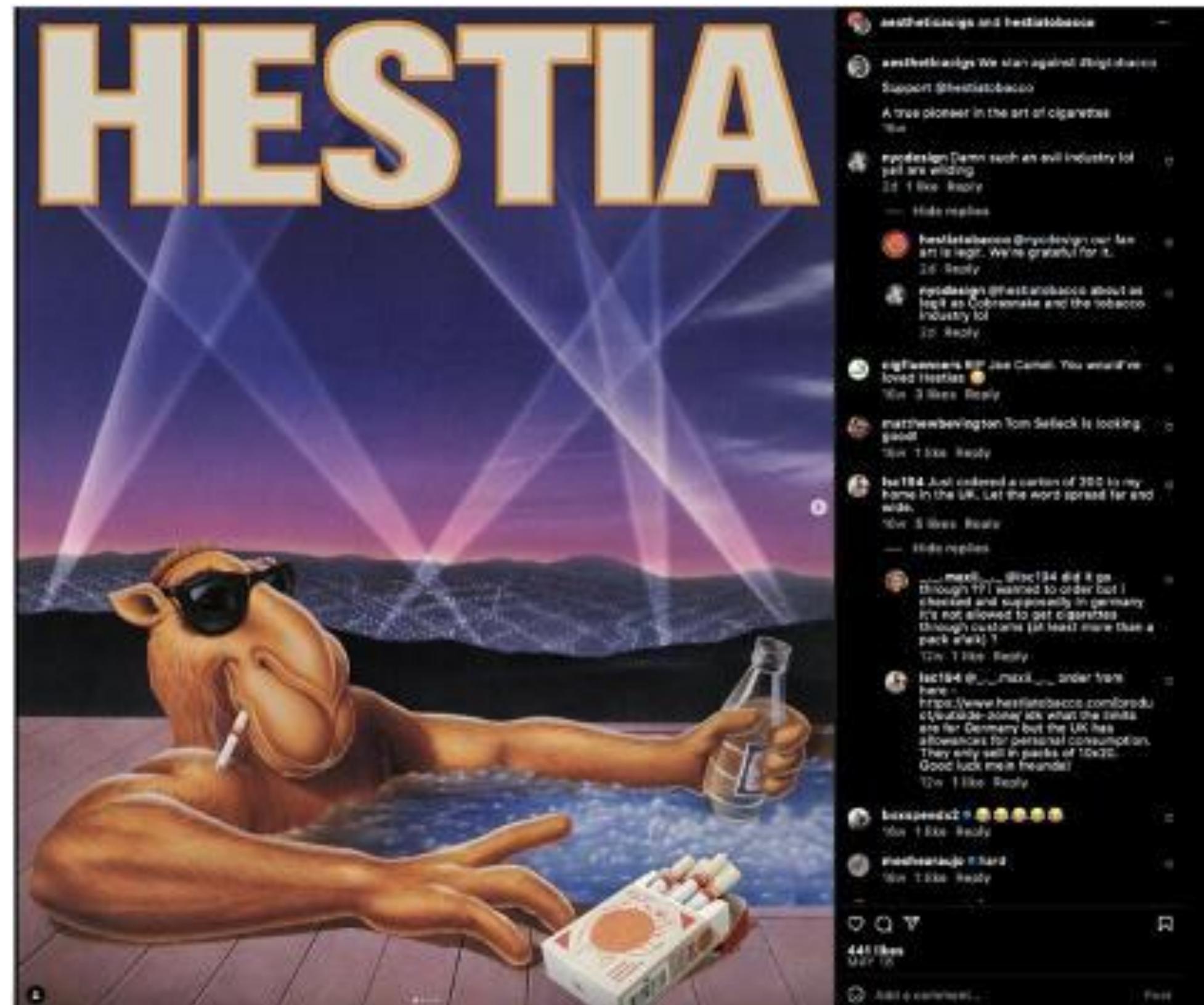
nattybudlite @nattybudlite · Feb 4
Replying to @ElectionLegal and @HestiaTobacco
hestia. good choice, king.



Normalizing smoking via celebrities



Co-opting old cigarette advertising



Implicit health-related claims

king of water cup city @null_fruit · 18h

r/Cigarettes
u/ProtocolEnthusiast · 27d

NSFW

What's the healthiest cigarette out there?

Question

I'm getting into fitness and I have a European mindset.

91 2.8K 31K 1.2M

Hestia Cigarettes @HestiaTobacco · 13h

Hi.

5 2 71 28K



Hestia Cigarettes @HestiaTobacco

This.

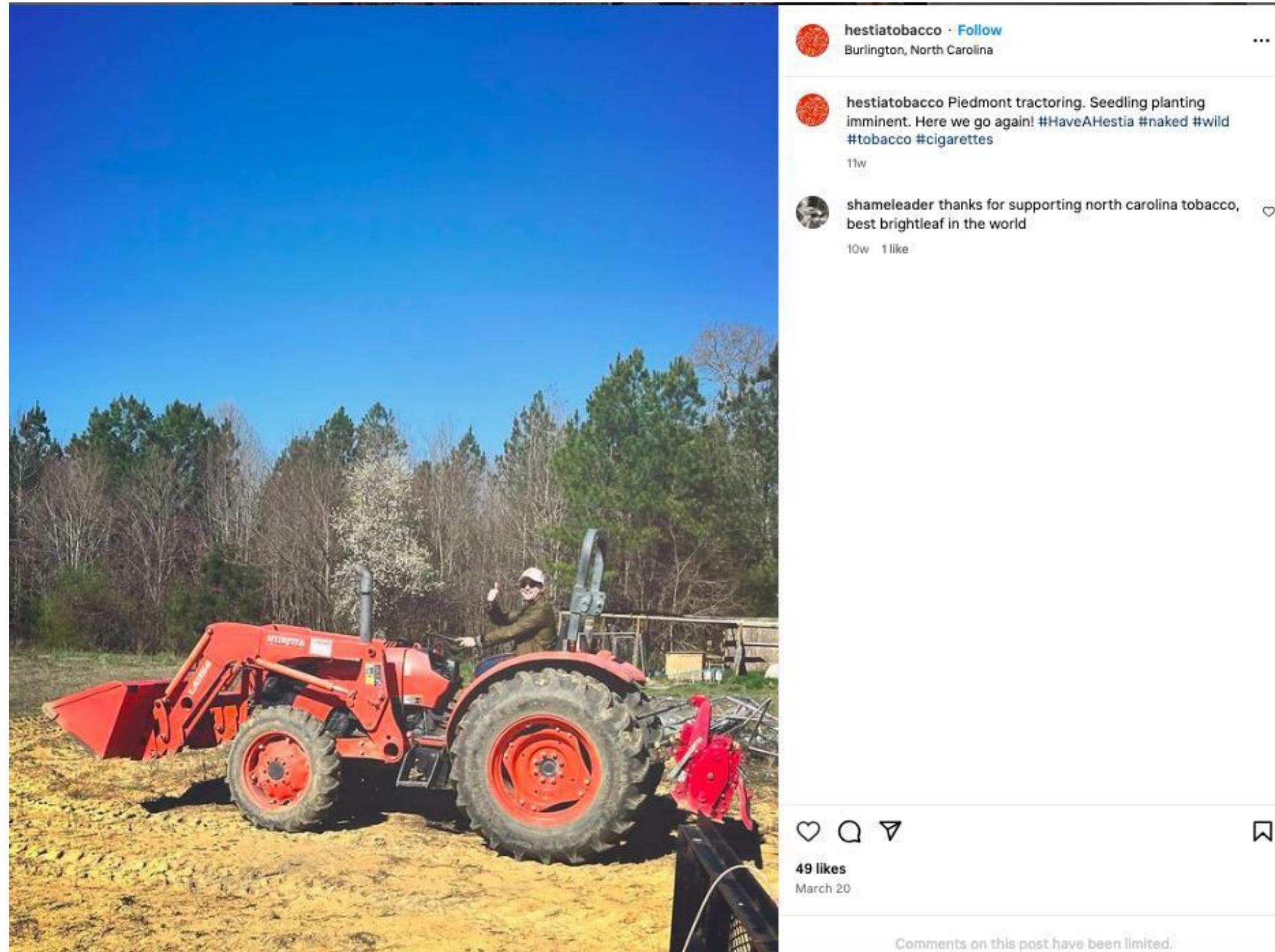
ro, PhD @fuglibetty · Jan 13

cigarettes are bad from a 'health' perspective yes. but culturally — for high art to be created, we need conditions which produce peer pressure & a culture of vice & self-destruction — smoking is actually necessary & vital. otherwise teens will have to start with heroin

12:00 PM · Jan 26, 2023 · 1,083 Views



Greenwashing: Connections to the environment



Engaging with other social media accounts

← Post

 **Hestia Cigarettes** 
@HestiaTobacco

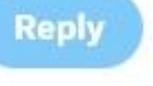
Yes! Our tobacco is 100% natural, additive free, American grown leaf - the difference between us and them is we use only top leaf tobacco (which gets most sun and therefore has most flavor), and our firesafe paper strips aren't plastic - but pure algae. Also, we not Big Tobacco!

 **Joshua Rainer**  @JoshRainerGold · Feb 6
Replies to @JoshRainerGold @ElectionLegal and @HestiaTobacco
What's the scoop on @HestiaTobacco should I cop? I'm an AmSpirit unfiltered kinda guy

6:11 AM · Feb 6, 2023 · 2,930 Views

1 Repost 16 Likes 2 Bookmarks

 Post your reply! 

 **3D shape rotator (e/acc)** @TaxFraudEnjoyer · Feb 6
smol tobacco

 1   1  149 

 **Hestia Cigarettes**  @HestiaTobacco · Feb 6
Indeed.

SUMMARY

- The tobacco industry engages in numerous youth-appealing tactics
- These may be difficult to detect without research and surveillance
- It may similarly be difficult to discern the extent to which a tactic is explicitly or implicitly youth-appealing

03.

MISLEADING PEOPLE ABOUT PRODUCT RISK



GREENWASHING TOBACCO ADS



- Use of 'additive-free' and 'natural' descriptors
- Individuals are more likely to perceive product marketed with these terms as low harm
- Use of these terms now restricted

"Your product labeling for Natural American Spirit cigarettes, which uses the descriptors "**Natural**" and "**Additive Free**," represents explicitly and/or implicitly that the products or their smoke do not contain or are free of a substance and/or that the products present a lower risk of tobacco-related disease or are less harmful than one or more other commercially marketed tobacco products."

-FDA Center for Tobacco Products, Warning Letter to Santa Fe Natural Tobacco Company, 8/27/15



CIGARETTES
10/20/14



100% 
TOBACCO
— INGREDIENTS —
ORGANIC TOBACCO & ORGANIC MENTHOL

No additives in our tobacco does **NOT** mean a safer cigarette.

TRY **1 PACK FOR \$2***
Visit NASCIGS.com or
call 1-800-435-5515
PROMO CODE 95202

*Plus applicable sales tax

Offer for two "1 for \$2" GIC Certificates good for any Natural American Spirit cigarette product (includes RYO pouches and 100g box). Not to be used in conjunction with any other offer. Offer and website restricted to U.S. smokers 21 years of age and older. Limit one offer per purchase per 12 month period. Offer valid in USA and where prohibited. Other restrictions may apply. Offer expires 06/30/15.

SURGEON GENERAL'S WARNING: Smoking Causes Lung Cancer, Heart Disease, Emphysema, And May Complicate Pregnancy.

CIGARETTES
10/20/14



MADE WITH ORGANIC TOBACCO
GROWN ON
AMERICAN SOIL
TOBACCO

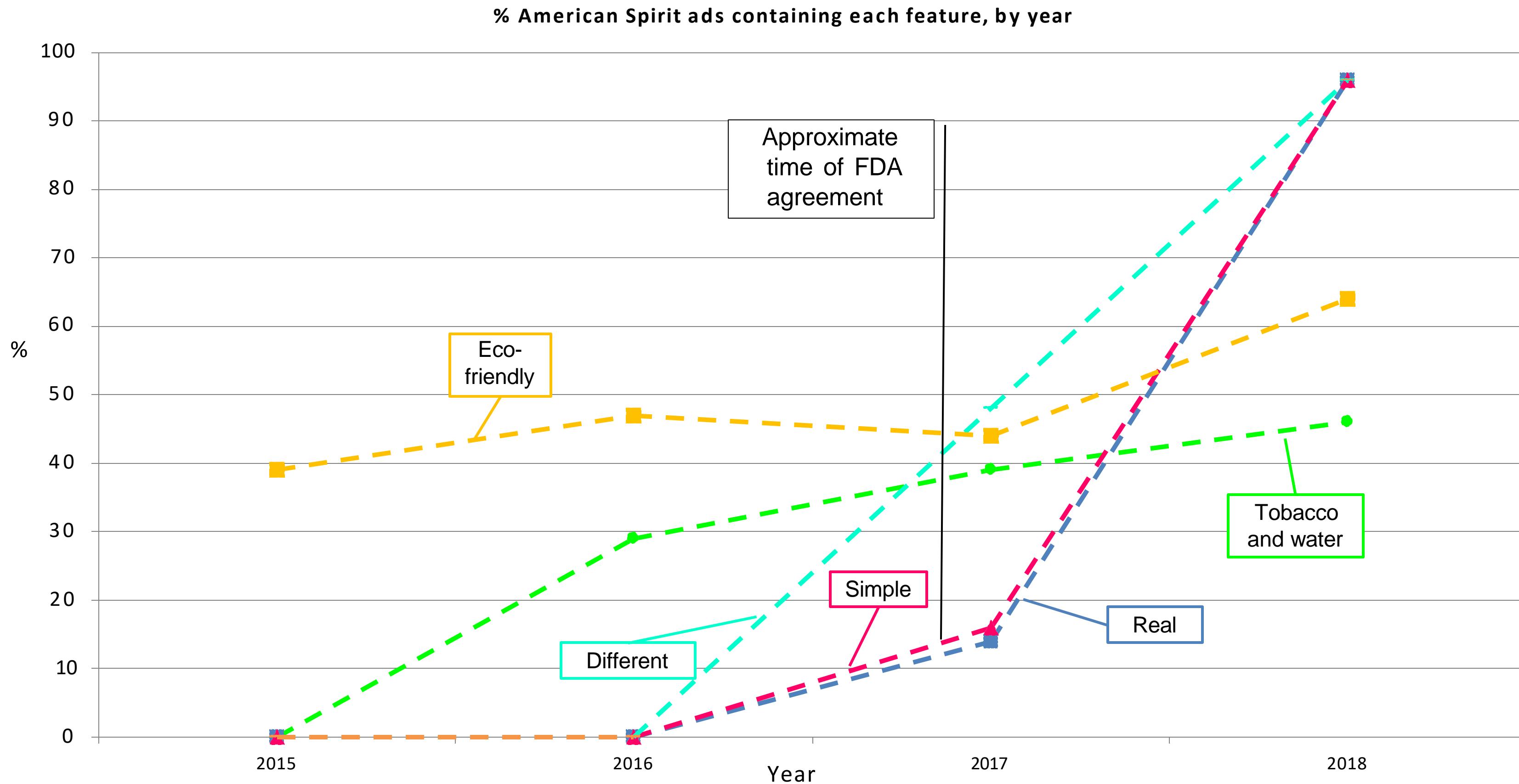
No additives in our tobacco does **NOT** mean a safer cigarette.

TRY **2 PACKS FOR \$2**
Visit NASCIGS.com or
call 1-800-435-5515
PROMO CODE 95105

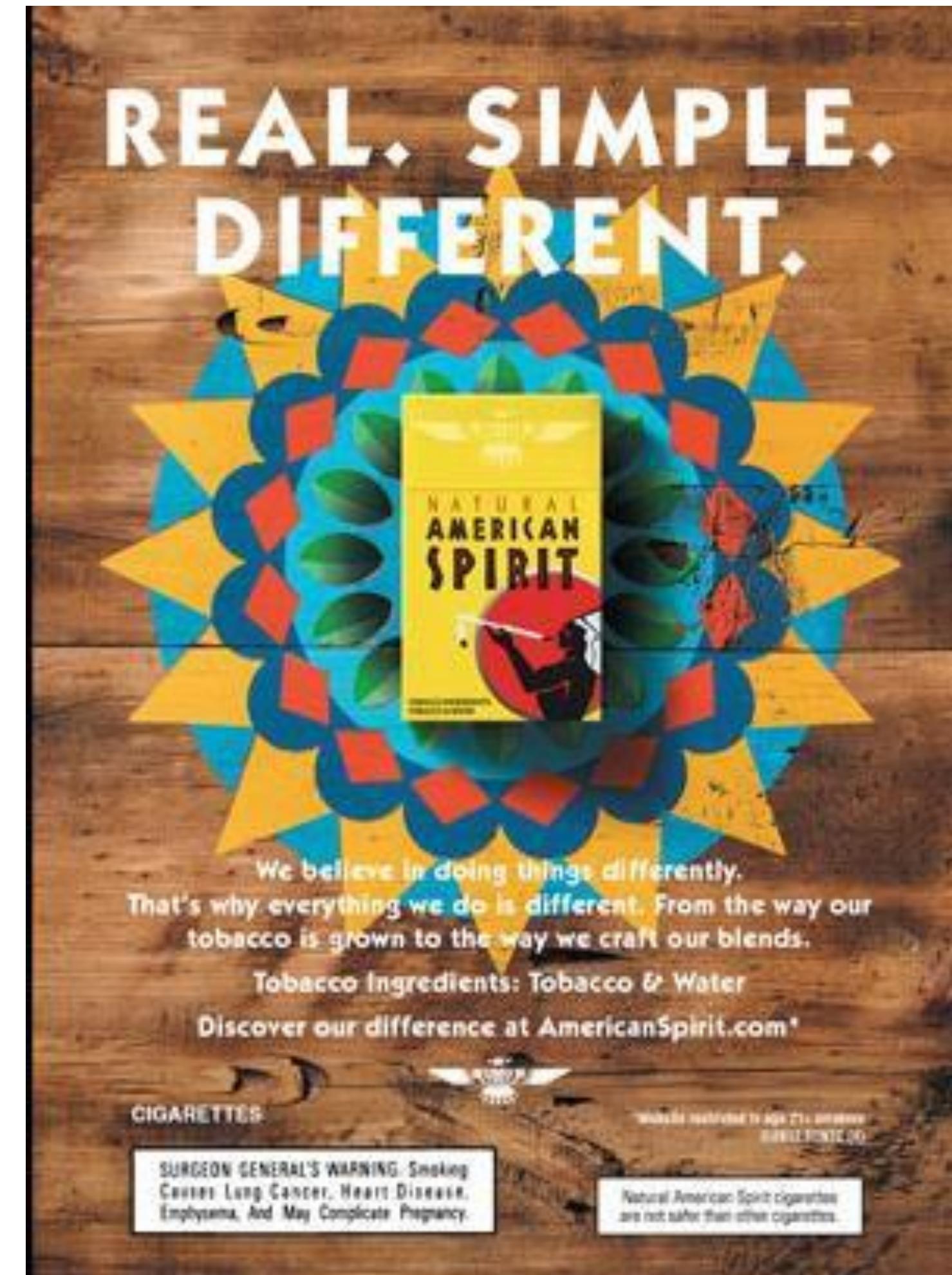
Offer for two "1 for \$2" GIC Certificates good for any Natural American Spirit cigarette product (includes RYO pouches and 100g box). Not to be used in conjunction with any other offer. Offer and website restricted to U.S. smokers 21 years of age and older. Limit one offer per purchase per 12 month period. Offer valid in USA and where prohibited. Other restrictions may apply. Offer expires 06/30/15.

SURGEON GENERAL'S WARNING: Cigarette Smoke Contains Carbon Monoxide.

CONTENT ANALYSIS OF CLAIMS POST-FDA AGREEMENT

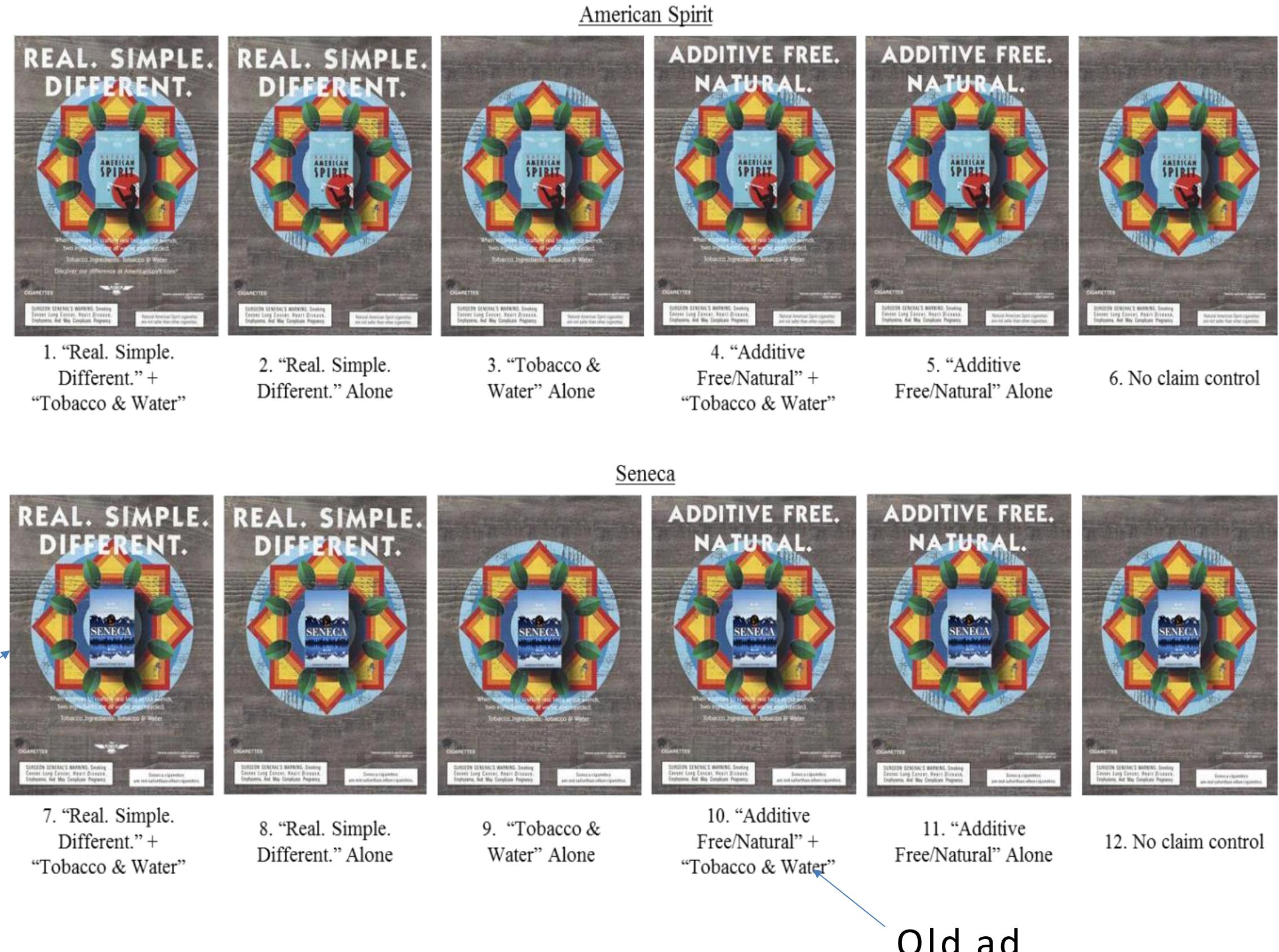


- New American Spirit campaign launched in 2017
- Additive-free & Natural no longer descriptors in the ad
- Tobacco & Water claim used more often
- **RQ: Do these tactics still convey reduced risk?**

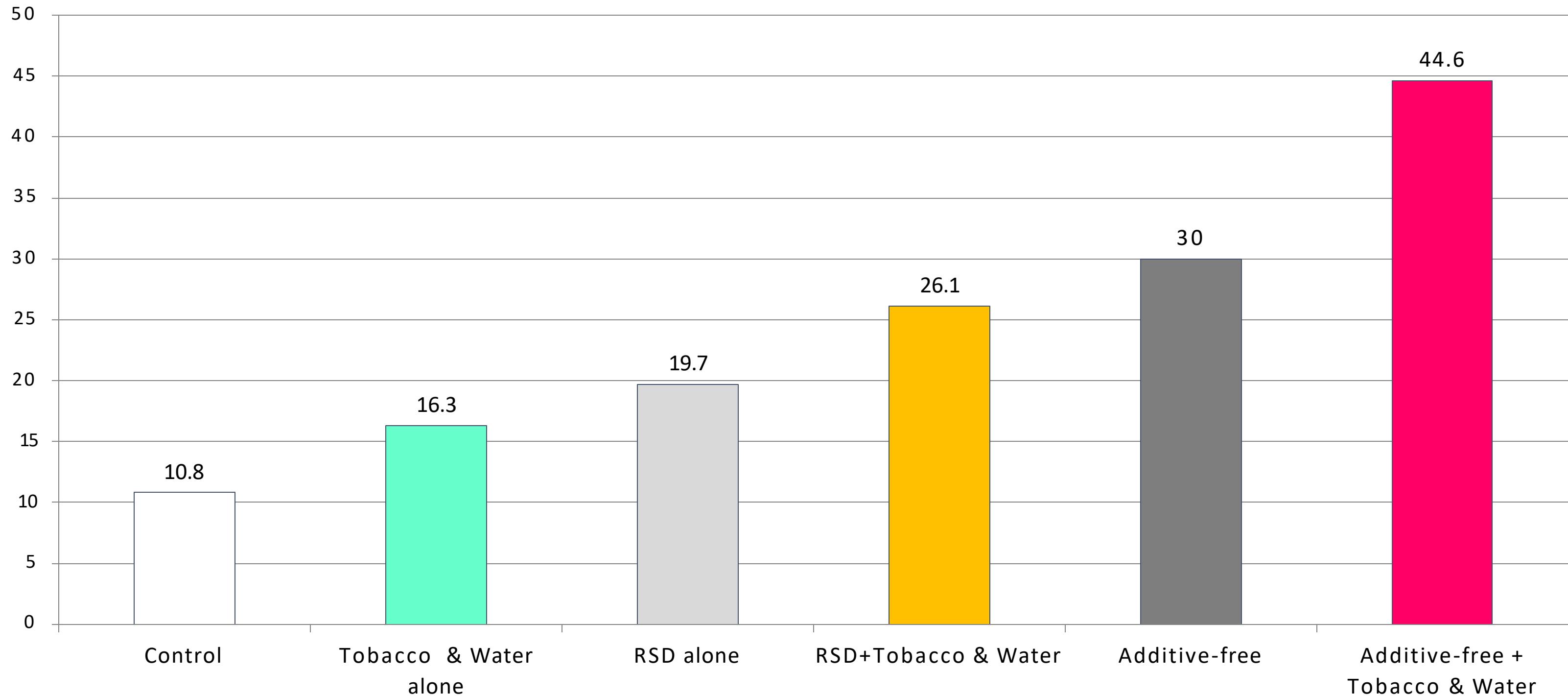


ANALYSIS OF EFFECTS OF 'NEW' CAMPAIGN

- 495 18-24 year olds recruited via Amazon Mechanical Turk
- Randomized to view 1 of 12 ads (6 ad tactics x 2 brands)
- Reported perceived relative harm

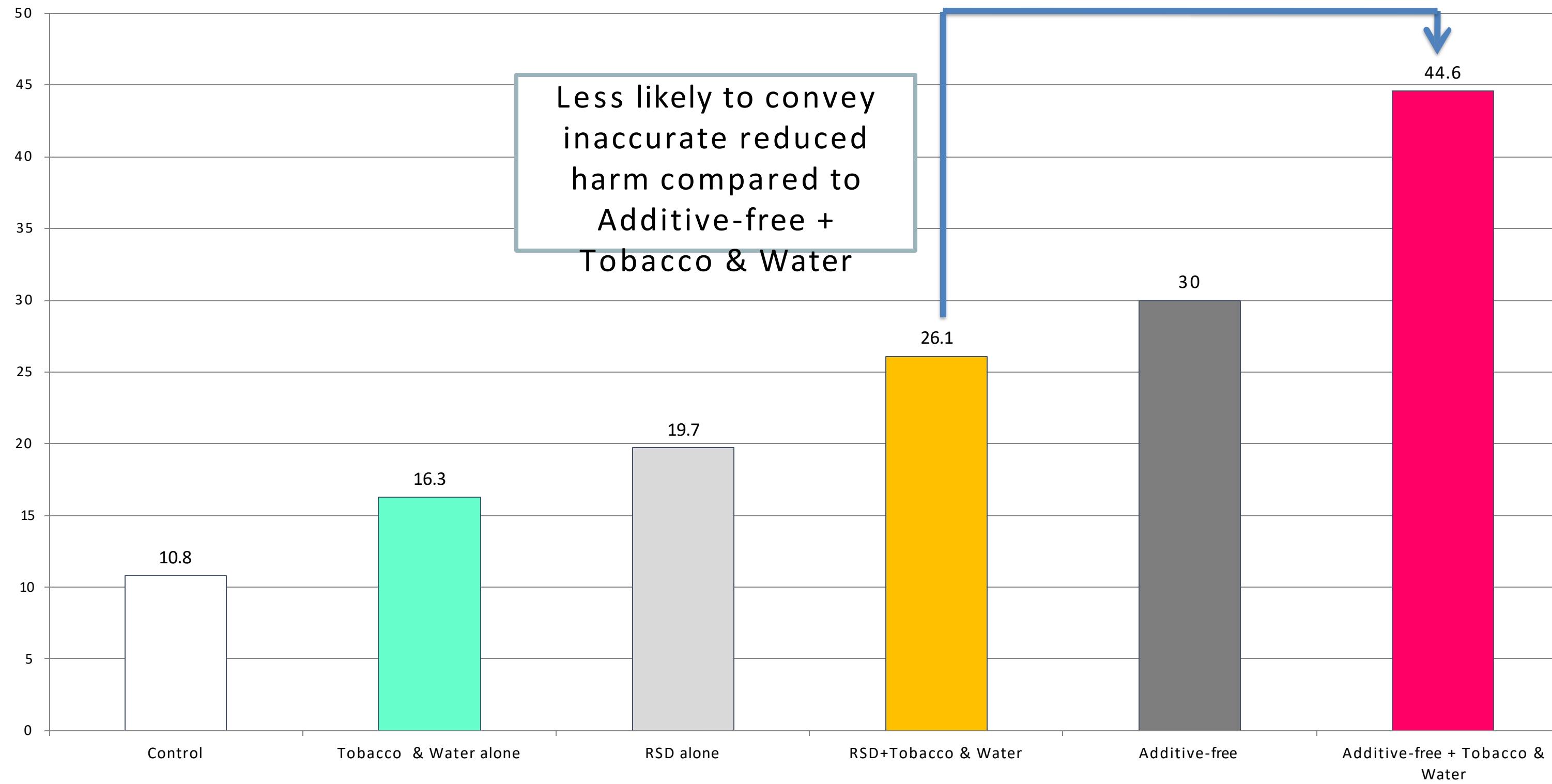


% PERCEIVING LESS HARM, BY AD CONDITION



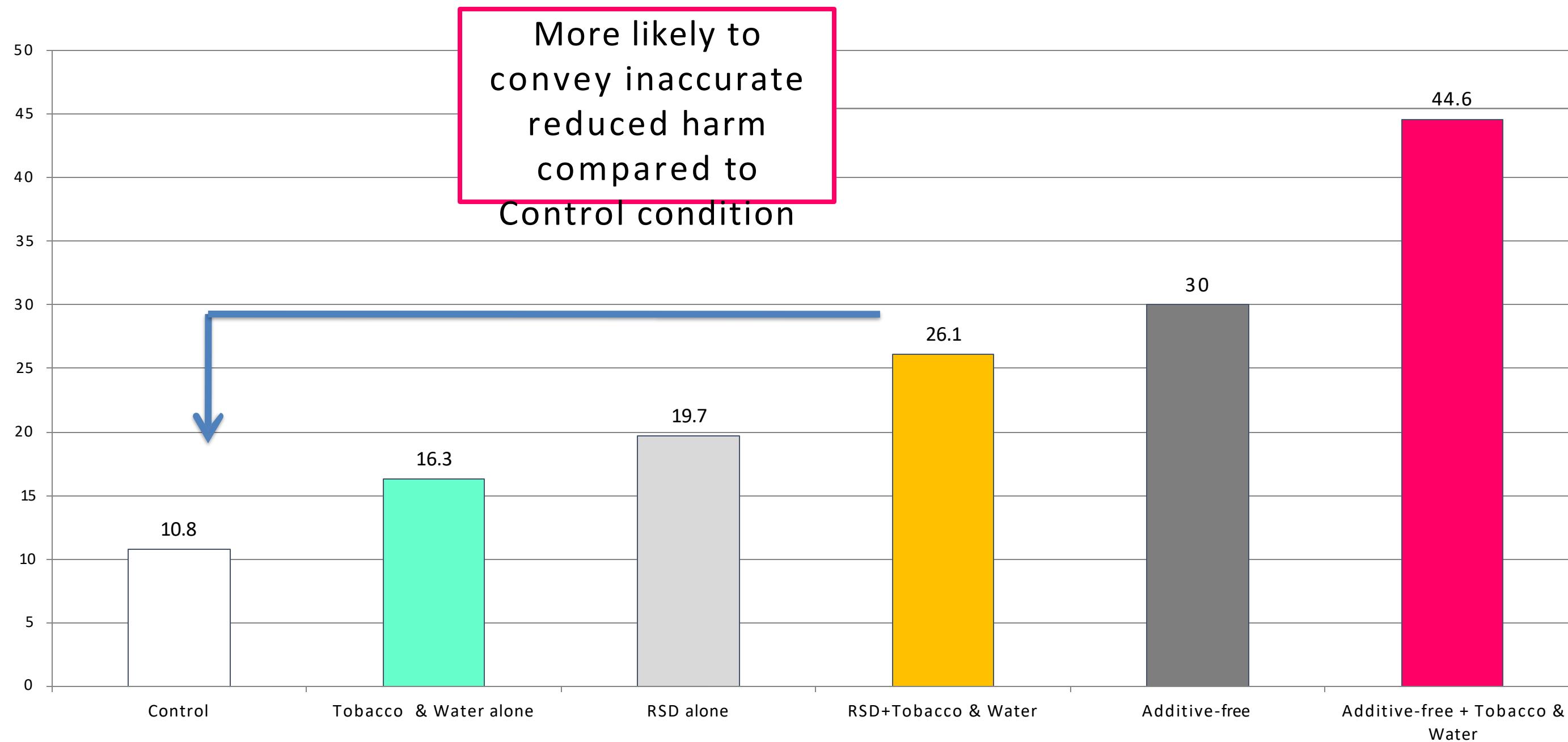
Language in new ad!

% PERCEIVING LESS HARM, BY AD CONDITION



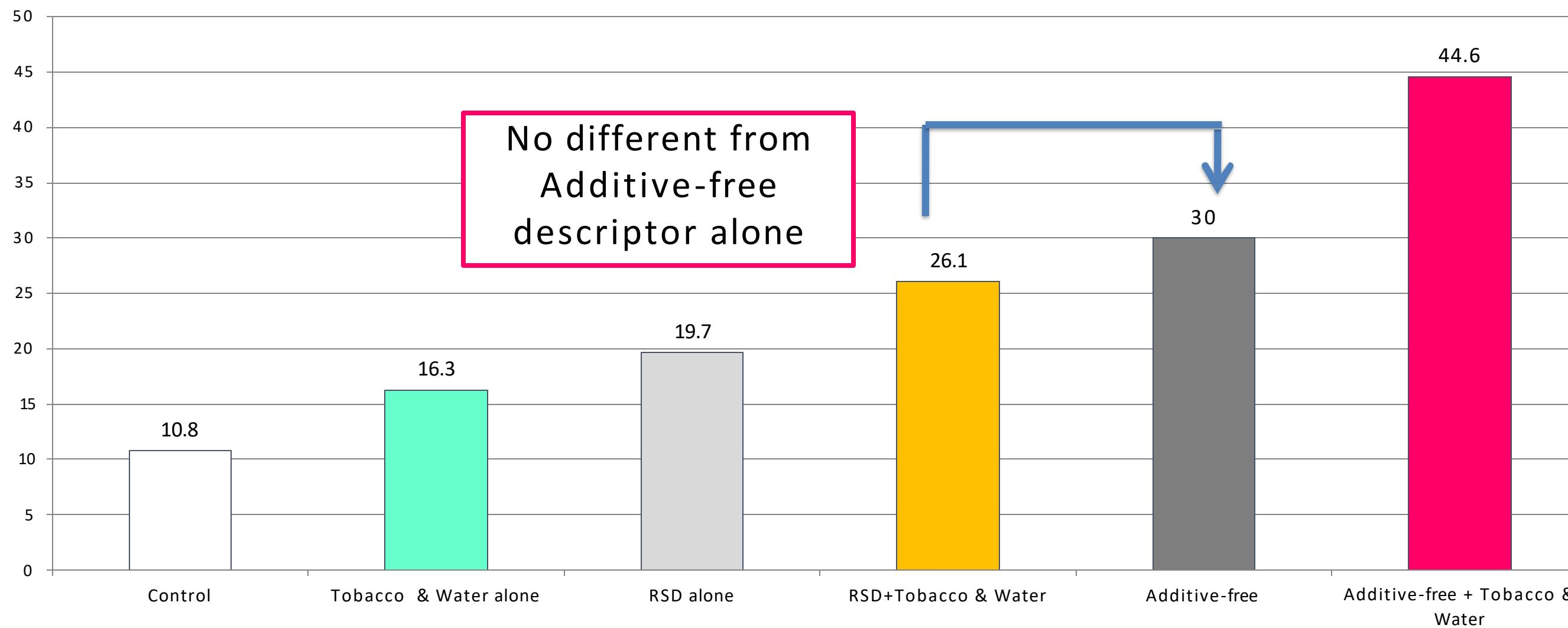
Language in new ad!

% PERCEIVING LESS HARM, BY AD CONDITION



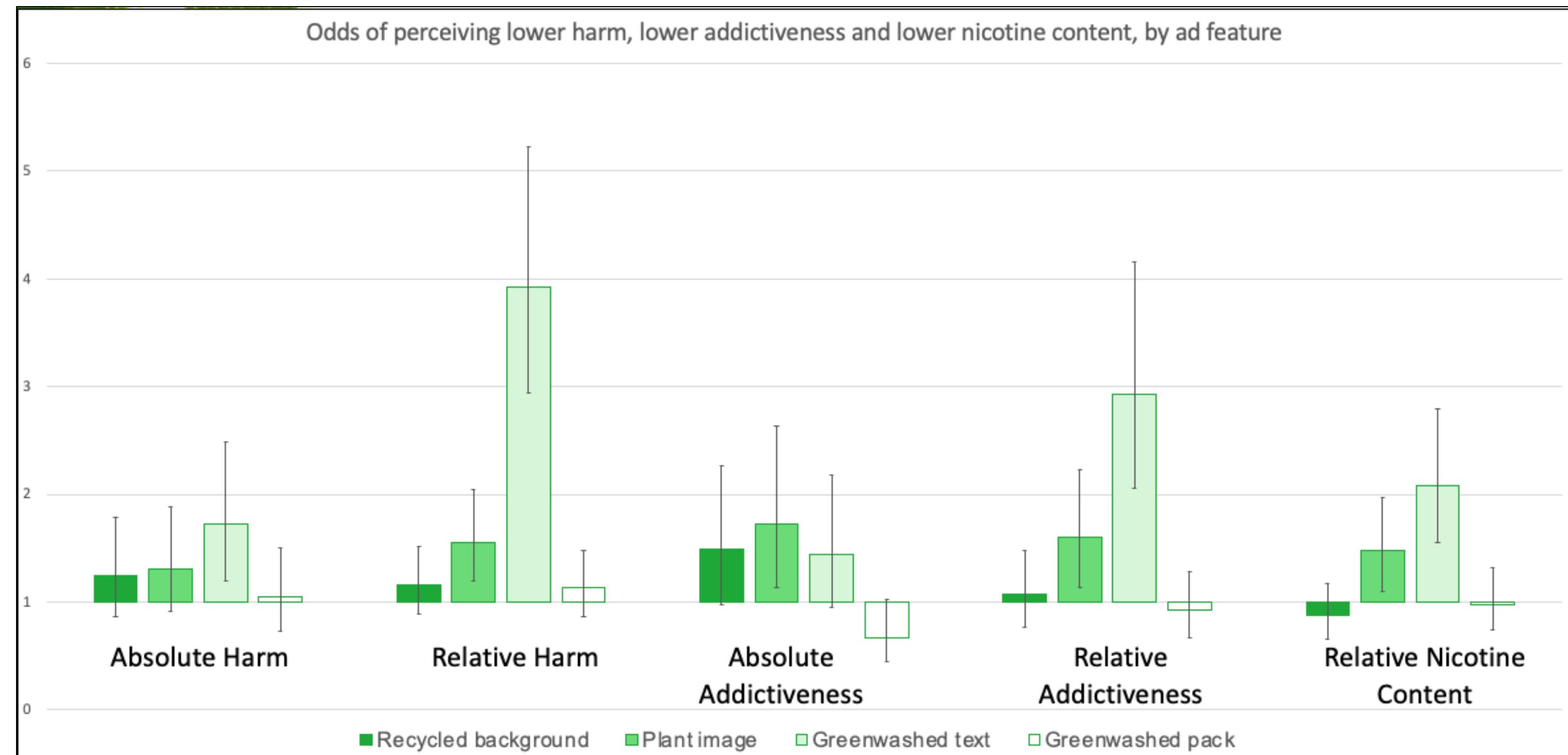
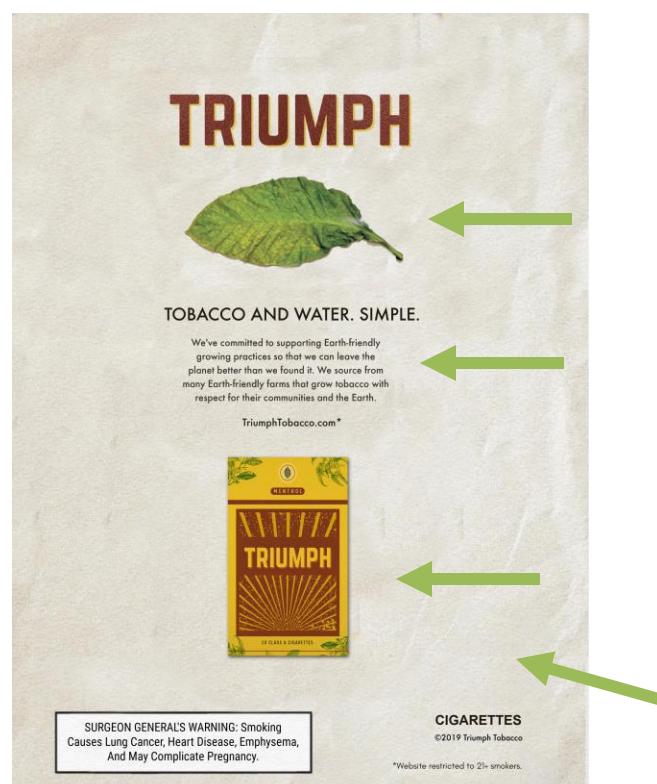
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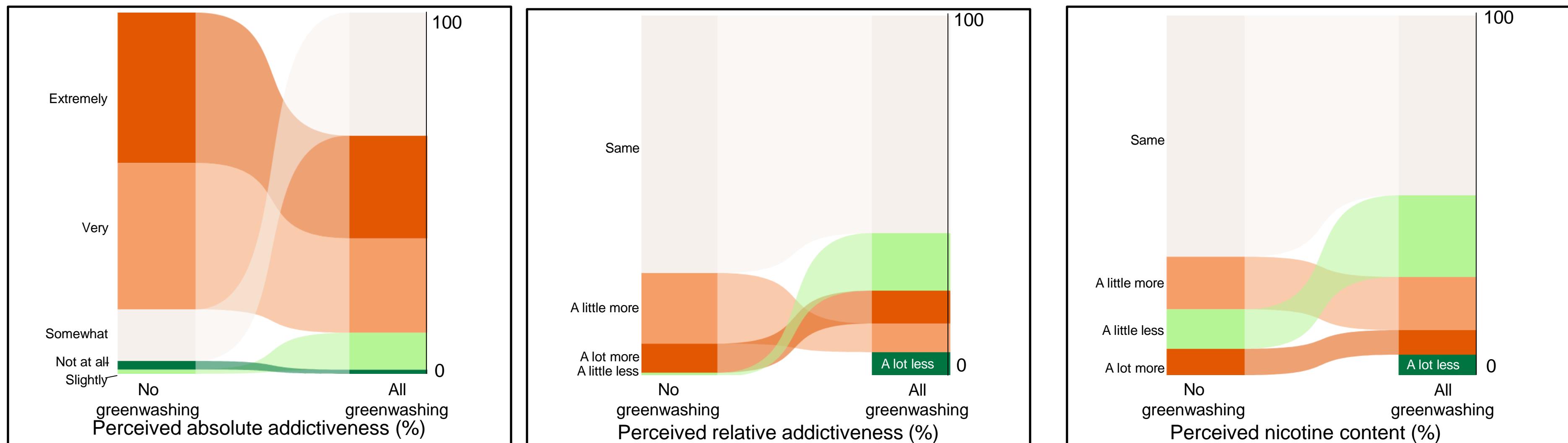
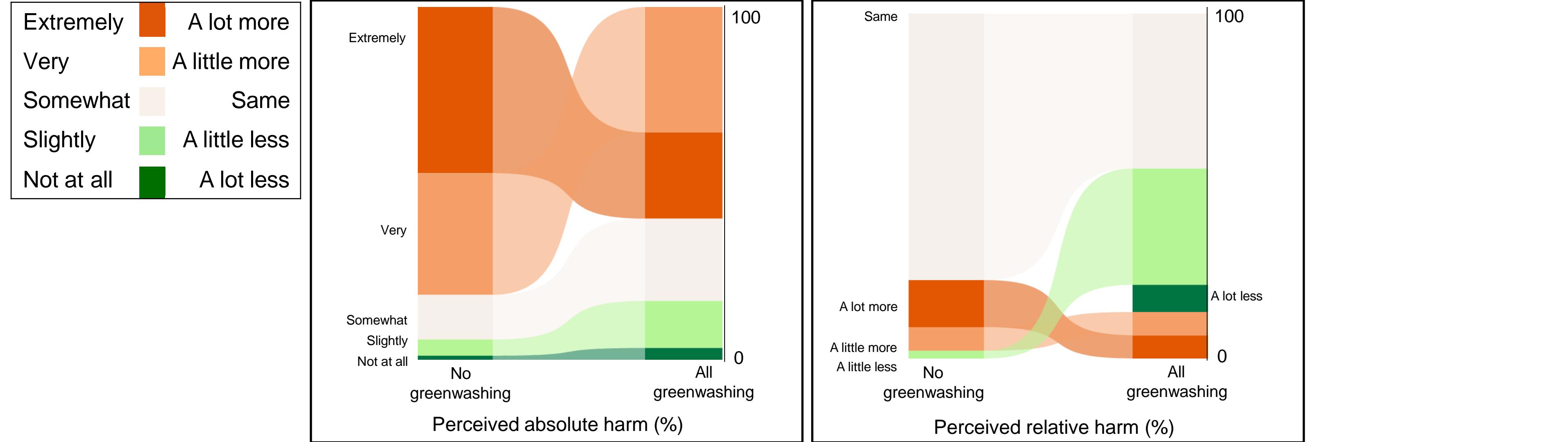
% PERCEIVING LESS HARM, BY AD CONDITION



Language in new ad!

Analysis of broader greenwashing tactics (Online randomized experiment, N=1500 13-24 year olds)





SUMMARY

- Greenwashing is a modern way the tobacco industry conveys inaccurate reduced risk to consumers
- Greenwashing tactics are commonplace
- There are many greenwashing tactics, thus regulating specific words may allow the industry to pivot to new tactics

04.

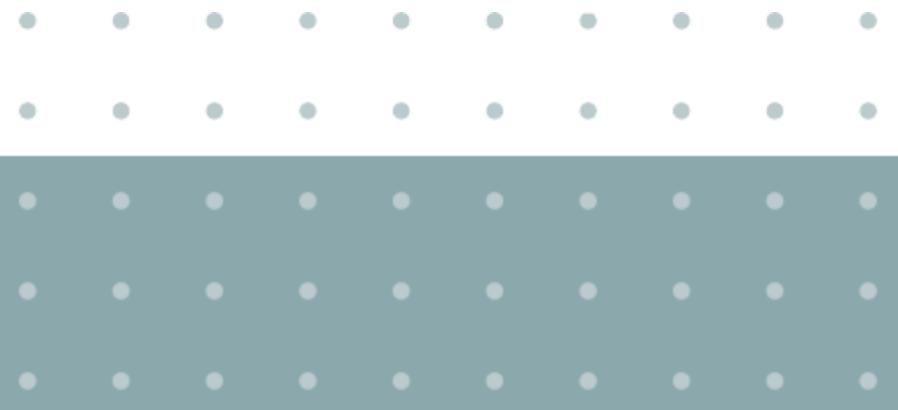
TAKEAWAYS

IMPACT: IDENTIFICATION OF YOUTH-APPEALING AND MISLEADING ADVERTISING TACTICS THAT COULD BE RESTRICTED

- Reduction of youth-appealing marketing would presumably result in lower rates of youth tobacco use
- Reduction of misleading claims could reduce tobacco use and help cessation
- BUT – What is worth the regulatory energy?
 - Tobacco industry can easily pivot to similar but allowed tactics
- Content-neutral regulations could have a bigger impact
 - Allowing only necessary text and imagery
 - Restricting use of color
 - Broader advertising bans

IMPACT: WHAT CAN WE DO?

- Educate youth on tobacco industry predatory marketing tactics
- Widely publicize the harms of tobacco via tobacco prevention campaigns
- Advocate for restrictions on tobacco marketing and sales
 - Flavor bans
 - Geographic restrictions on advertising and sales (e.g., within 500 feet of schools)
 - Complete bans on tobacco sales



THANK YOU

Questions?

Feel free to get in touch!
mmoran22@jhu.edu

