

Tobacco Company Strategies to Undermine Tobacco Control Activities
at the
World Health Organization

Report of the Committee of Experts on Tobacco Industry Documents

July 2000

FOREWORD

Evidence from tobacco industry documents reveals that tobacco companies have operated for many years with the deliberate purpose of subverting the efforts of the World Health Organization (WHO) to control tobacco use. The attempted subversion has been elaborate, well financed, sophisticated, and usually invisible.

The release of millions of pages of confidential tobacco company documents as a result of lawsuits against the tobacco industry in the United States has exposed the activities of tobacco companies in resisting tobacco control efforts. That tobacco companies resist proposals for tobacco control comes as no surprise. What is now clear is the scale and intensity of their often-deceptive strategies and tactics.

The tobacco companies' own documents show that they viewed WHO, an international public health agency, as one of their foremost enemies. The documents show further that the tobacco companies instigated global strategies to discredit and impede WHO's ability to carry out its mission. The tobacco companies' campaign against WHO was rarely directed at the merits of the public health issues raised by tobacco use. Instead, the documents show that tobacco companies sought to divert attention from the public health issues, to reduce budgets for the scientific and policy activities carried out by WHO, to pit other UN agencies against WHO, to convince developing countries that WHO's tobacco control program was a "First World" agenda carried out at the expense of the developing world, to distort the results of important scientific studies on tobacco, and to discredit WHO as an institution.

Although these strategies and tactics were frequently devised at the highest levels of tobacco companies, the role of tobacco industry officials in carrying out these strategies was often concealed. In their campaign against WHO, the documents show that tobacco companies hid behind a variety of ostensibly independent quasi-academic, public policy, and business organizations whose tobacco industry funding was not disclosed. The documents also show that tobacco company strategies to undermine WHO relied heavily on international and scientific experts with hidden financial ties to the industry. Perhaps most disturbing, the documents show that tobacco companies quietly influenced other UN agencies and representatives of developing countries to resist WHO's tobacco control initiatives.

That top executives of tobacco companies sat together to design and set in motion elaborate strategies to subvert a public health organization is unacceptable and must be condemned. The committee of experts believes that the tobacco companies' activities slowed and undermined effective tobacco control programs around the world. Given the magnitude of the devastation wrought by tobacco use, the committee of experts is convinced that, on the basis of the volume of attempted and successful acts of subversion identified in its limited search, it is reasonable to believe that the tobacco companies' subversion of WHO's tobacco control activities has resulted in significant harm. Although the number of lives damaged or lost as a result of the tobacco companies' subversion of WHO may never be quantified, the importance of condemning the tobacco companies' conduct, and taking appropriate corrective action, is overriding.

The committee of experts urges WHO and member countries to take a strong position against the tobacco companies' conduct as described in this report. This report contains a number of recommendations aimed at protecting against the strategies employed by tobacco companies. Among the most important of these recommendations are that: (1) member countries carry out similar investigations into tobacco company influence on those countries' tobacco control efforts, (2) WHO monitor the future conduct of the tobacco industry to determine whether the strategies identified in this report are continuing, and (3) WHO assist member countries to determine what steps are appropriate to remedy tobacco companies' past misconduct.

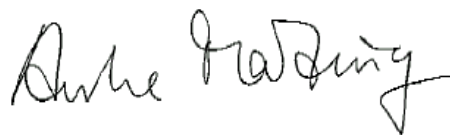
Some tobacco companies in the US have made public claims that they have reformed their behavior and therefore need not be penalized for past misconduct. Such promises, even if true, must not be limited to the industry's conduct in a single country. It is not enough for tobacco companies to now begin acting "responsibly" in the US, if they continue to use unacceptable strategies and tactics in the rest of the world. If the strategies and tactics identified in this report continue to be used internationally by tobacco companies, WHO must bring this behavior into the world's view. Member countries must also carefully assess the impact of past influence of tobacco companies on the health and welfare of their citizens and consider appropriate actions both to correct past misconduct and to deter future abuses.



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EXECUTIVE SUMMARY

A. Introduction

In the summer of 1999, an internal report to the Director-General of the World Health Organization (WHO) suggested that there was evidence in formerly confidential tobacco company documents that tobacco companies had made “efforts to prevent implementation of healthy public policy and efforts to reduce funding of tobacco control within UN organizations.” In response to this report, Director-General Gro Harlem Brundtland assembled a committee of experts to research the once confidential, now publicly available, tobacco company documents.

The documents reveal that tobacco companies viewed WHO as one of their leading enemies, and that they saw themselves in a battle against WHO. According to one major company’s master plan to fight threats to the industry, “WHO’s impact and influence is indisputable,” and the company must “contain, neutralize, [and] reorient”¹ WHO’s tobacco control initiatives. The documents show that tobacco companies fought WHO’s tobacco control agenda by, among other things, staging events to divert attention from the public health issues raised by tobacco use, attempting to reduce budgets for the scientific and policy activities carried out by WHO, pitting other UN agencies against WHO, seeking to convince developing countries that WHO’s tobacco control program was a “First World” agenda carried out at the expense of the developing world, distorting the results of important scientific studies on tobacco, and discrediting WHO as an institution.

Tobacco company strategy documents reveal the companies’ goals and tactics:

“Attack W.H.O.”²

“[U]ndertake a long-term initiative to counteract the WHO’s aggressive global anti-smoking campaign and to introduce a public debate with respect to a redefinition of the WHO’s mandate.”³

“[B]lunt [WHO’s] programme initiatives.”⁴

“[Try] to stop the development towards a Third World commitment against tobacco.”⁵

“[A]llocate the resources to stop [WHO] in their tracks.”⁶

“Discredit key individuals.”⁷

“[Contain WHO’s] funding from private sources.”⁸

“Work with journalists to question WHO priorities, budget, role in social engineering, etc.”⁹

“[Reorient]/reprioritiz[e] IARC [International Agency for Research on Cancer] priorities/budget allocations.”¹⁰

“[Try] to change the very nature and tone of the [WHO-sponsored] conference.”¹¹

“[Establish] ITGA [International Tobacco Growers Association] [as a] front for our third world lobby activities at WHO.”¹²

“[P]ersuade PAHO [Pan American Health Organization] to take tobacco off their list of priorities for this year.”¹³

“[I]nhibit incorporation of ILO [UN’s International Labor Organization] into WHO Anti-Smoking Program.”¹⁴

“Split F.A.O. [U.N. Food and Agriculture Organization]/W.H.O.”¹⁵

This report serves as the final product of the committee of experts’ research, to be submitted to the Director-General for review.

B. Methodology

The investigation focused on the collection and review of tobacco company documents made publicly available as a result of US lawsuits against the tobacco industry. The available documents come from Philip Morris Companies, Inc. (Philip Morris), R.J. Reynolds Tobacco Company (RJR), Brown & Williamson Tobacco Company (B&W), American Tobacco Company (ATC), Lorillard Tobacco Company (Lorillard), the Tobacco Institute (TI), the Council for Tobacco Research (CTR) and the British American Tobacco Company (BAT). Unless specifically noted otherwise, where the report refers to “tobacco companies,” it is a reference to two or more of these companies. The phrase “tobacco companies” is not intended to refer to any other companies not listed here.

In addition, a limited number of individuals were interviewed, following consultation with the Director-General. The information provided by these individuals served to clarify information already found in the tobacco company documents.

C. Strategies and Tactics Used by Tobacco Companies to Influence WHO Tobacco Control

The tobacco company documents reviewed by the committee of experts reveal

that tobacco companies have focused significant resources on undermining WHO tobacco control activities and have used a wide range of tactics to achieve their goal. Evidence before the committee of experts suggests that some of these strategies were successful in influencing WHO activities, while others were not. In some cases, the committee of experts was not able to determine the success of certain strategies based on available information. In several cases, where the committee of experts found an incident or strategy described in the documents to be particularly suggestive of successful influence or illustrative of tobacco company strategies and tactics, the committee of experts included in the report a longer case study of the incident or strategy. (See Chapters IV-IX.)

- **Establishing inappropriate relationships with WHO staff to influence policy**

In one of their most significant strategies for influencing WHO’s tobacco control activities, tobacco companies developed and maintained relationships with current or former WHO staff, consultants and advisors. In some cases, tobacco companies hired or offered future employment to former WHO or UN officials in order to indirectly gain valuable contacts within these organizations that might assist in its goal of influencing WHO activities. Of greatest concern, tobacco companies have, in some cases, had their own consultants in positions at WHO, paying them to serve the goals of tobacco companies while working for WHO. Some of these cases raise serious questions about whether the integrity of WHO decision making has been compromised. All of them illustrate the need for rules requiring that current and prospective WHO employees, including consultants, advisors, and members of expert committees, disclose any ties to the tobacco industry.

- **Wielding financial power to influence WHO policy**

In several cases, tobacco companies have attempted to undermine WHO tobacco control activities by putting pressure on relevant WHO budgets. Tobacco companies have also used their resources to gain favor or particular outcomes by making well-placed contributions.

- **Using other UN agencies to influence or resist WHO tobacco control**

The committee of experts' research reveals that tobacco companies attempted to use other UN agencies to acquire information about WHO's tobacco control activities and to interfere with or resist WHO's tobacco related policies. Most of the tobacco companies' efforts appear to have focused on the Food and Agricultural Organization (FAO), but the documents also reveal that tobacco companies targeted other UN agencies, including the World Bank, the United Nations Conference on Trade and Development (UNCTAD), the United Nations Economic and Social Council (ECOSOC) and the International Labor Organization (ILO), either directly or through surrogates. Tobacco company lobbying was aimed at influencing the FAO to take a stance against WHO's tobacco control policies and to promote the economic importance of tobacco as more significant than the health consequences of tobacco use.

- **Discrediting WHO or WHO officials to undermine WHO's effectiveness**

Tobacco companies used "independent" individuals and institutions to attack WHO's competence and priorities in published articles, and presentations to the media and to politicians, while concealing its own role in promoting these attacks.

- **Influencing WHO decision making through surrogates**

Documents in this study illustrate that tobacco companies utilized a number of outside organizations to lobby against and influence tobacco control activities at WHO including trade unions, tobacco company-created front groups and tobacco companies' own affiliated food companies.

Additionally, delegates of member states from developing countries were lobbied by tobacco companies. The documents indicate that tobacco companies believe that as a result, an increasing number of delegates from these countries have resisted WHO tobacco control resolutions.

- **Distorting WHO research**

Tobacco company strategies and tactics included manipulating the scientific and public debate about the health effects of tobacco. Tobacco companies secretly funded "independent" experts to conduct research, publish papers, appear at conferences and lobby WHO's scientific investigators with the intention of influencing, discrediting or distorting study results. Their own agenda was promoted through tobacco company-funded symposia, counter-research and scientific coalitions developed specifically to criticize studies used to support anti-tobacco legislation. The most notable result of this tobacco company strategy is the misrepresentation of the 1998 study on environmental tobacco smoke (ETS) by the International Agency for Research on Cancer (IARC). The tobacco company distortion of these study results continues today to shape public opinion and policies surrounding the health effects of ETS.

- **Media events**

The documents show that tobacco companies staged media events to distract attention from tobacco-related WHO events such as the World Conference on Tobacco OR Health.

- **Surveillance of WHO activities**

Finally, the documents show that tobacco companies have carried out intensive monitoring of WHO and its Regional Offices to gather intelligence about its tobacco control programs. In some cases, tobacco companies have secretly monitored WHO meetings and conferences, had confidential WHO contacts, and obtained confidential documents and information.

D. Case Studies

The following case studies offer specific examples of many of tobacco company strategies discussed in this chapter. These case studies show that:

- One tobacco company targeted WHO as part of a massive and far-reaching campaign to subvert tobacco control activities around the world.
- Tobacco companies have conducted an ongoing, global campaign to convince developing and tobacco-producing countries to resist WHO tobacco control policies.
- One tobacco company consultant attacked WHO in the media and in presentations to regulatory authorities, without revealing his ties to tobacco companies. This consultant was also named to a WHO committee where he attempted to use a WHO Regional Office in tobacco company plans to distract attention from a WHO-sponsored conference.

- Tobacco companies attempted to stage elaborate diversions from, and disruptions of, a WHO-sponsored conference on tobacco.
- Tobacco companies secretly funded a temporary adviser to a WHO committee, raising questions about whether WHO's international standard-setting activities related to pesticide safety were affected.
- Tobacco companies carried out a multi-million dollar campaign to halt or influence the results of an important IARC study on the relationship between passive smoking and lung cancer, relying on consultants to conceal their role.

Some of these cases raise serious concerns about whether the integrity of WHO decision making has been compromised. Each case study includes specific recommendations for WHO to consider in preventing future tobacco company influence.

1. The Boca Raton Action Plan

In November 1988, under the direction of Geoffrey Bible, then President of Philip Morris International (now Chief Executive Officer of Philip Morris Companies Inc.), top executives from Philip Morris' regional offices and its New York headquarters convened in Boca Raton, Florida, to plan for the succeeding year. The resulting Action Plan - one of the publicly available tobacco company documents - is a master plan for, among many goals, attacking WHO's tobacco control programs, influencing the priorities of WHO Regional Offices, and targeting the structure, management and resources of WHO. The Plan identified 26 global threats to the tobacco industry and multiple strategies for countering each. First among these threats was the World Health

Organization's tobacco control program, addressed under the heading, "WHO/UICC/IOCU Redirection/containment strategies."

- **Tobacco company surrogates to "redirect WHO"**

Tobacco company documents reveal that in order to "redirect" WHO, Philip Morris used its powerful food companies and other non-tobacco subsidiaries, as well as tobacco industry organizations, business organizations, and front groups and other ostensibly independent surrogates. These organizations were used to influence WHO directly and indirectly through the press, national governments and international organizations.

- **Creation and use of ostensibly independent organizations to gain access to WHO**

Much of the Boca Raton Action Plan involved the creation or manipulation of seemingly independent organizations with strong tobacco company ties. The documents show that some of these organizations such as LIBERTAD, the New York Society for International Affairs, the America-European Community Association and the Institute for International Health and Development, were used successfully to gain access to dozens of national and world leaders, health ministers, WHO and other United Nations agency delegates.

- **Mobilization of INFOTAB and CORESTA against WHO**

Another key element of the Boca Raton plan was Philip Morris' decision to transform the industry organizations INFOTAB (International Tobacco Information Center) and CORESTA (Cooperation Centre for Scientific Research

Relative to Tobacco) into political instruments and to mobilize them to lobby against WHO health advocacy programs. The documents also illustrate that Philip Morris used its regional offices and non-tobacco subsidiaries to press business groups like the International Chamber of Commerce (ICC) to lobby the World Health Assembly (WHA), WHO's governing body, and ILO. Additionally, Philip Morris attempted to use FAO, ILO, and other United Nations agencies, WHO Regional Offices and Coordinating Centers, and the governments of developing countries to influence WHO tobacco policies and WHA resolutions.

- **Boca Raton status reports**

Details of the Plan's implementation were outlined in status reports prepared every two months from January 31, 1989 through September 30, 1989. A final summary followed on October 30th, 1989. Under each of the 26 issues addressed in the Plan was a list of accomplishments for each. The reports refer to numerous detailed appendices, which were originally attached to the reports, but which are rarely included in the electronic versions of the reports available at the Minnesota Document Depository or posted on Philip Morris' document website. With considerable effort, the committee of experts was able to locate many of the attachments but several crucial documents could not be located. Other tobacco company documents were used to fill in these gaps when possible.

The Boca Raton Action Plan appears to have lasted for one year. It is unclear whether similar master plans were adopted in subsequent years, as the committee of experts was unable to locate any such plans in the public documents. There is, however, evidence that elements of the Plan continued well into the 1990s. The Plan itself provides

insight into the magnitude and sophistication of the ongoing opposition to WHO's work.

The impact of the Boca Raton Action Plan must be judged within the context of its entire set of goals and strategies. The Plan was remarkable in its scope, encompassing 26 wide-ranging and ambitious goals, to which Philip Morris dedicated its top executives, scientists, attorneys and consultants. It was organized internationally, coordinating all of the company's regional offices and using both tobacco industry organizations and front groups to accomplish an impressive list of achievements.

As one of the world's largest multinational corporations, Philip Morris had the advantage of an international structure which is, in many ways, parallel to that of WHO, with regional offices in several of the same countries or areas of the world, including Philip Morris' research and development center in Neuchatel, Switzerland, near WHO headquarters. These local offices allowed Philip Morris personnel to develop relationships with WHO and UN contacts, especially in Geneva. Through at least one of these contacts, Philip Morris was able to aid in the adoption of a pro-tobacco amendment to a WHA smoking and health resolution, as described in Chapter V.

Philip Morris' business interests and ties to other tobacco companies enabled it to use organizations such as the International Chamber of Commerce (ICC) and the International Tobacco Growers Association (ITGA) to influence international agencies that, in turn, have influence on WHO. Through surrogates, Philip Morris was able to meet with numerous senior officials of both national governments and international organizations, including current and former Director Generals of the ILO and FAO.

Perhaps more significant than any specific policy achievement of the Boca Raton Action Plan, however, was its erection of elaborate and well-concealed mechanisms for sustained opposition to WHO. Today, a decade after these mechanisms were set in place, it is likely that they will soon be mobilized for action against WHO's Tobacco Free Initiative and the proposed Framework Convention on Tobacco Control. If these predictions are correct, the Boca Raton Plan may offer more than insight into the past: it may offer a preview of what lies ahead.

2. The "Third World Issue"

As the 1970s drew to a close, tobacco industry officials worried that WHO and the anti-tobacco movement would use criticism of tobacco industry activities in the developing world to fuel a global campaign against smoking. Quickly, tobacco companies launched a massive campaign to win developing countries' attention and assistance within the UN. Tobacco company lobbyists attempted to foster the concerns of officials from developing countries, as well as economically oriented UN agencies, about the economic importance of tobacco to these countries. Tobacco company representatives attempted to convince developing countries that the loss of tobacco as a cash crop would result in economic destabilization in tobacco-growing countries, significantly increasing the burden of poverty and malnutrition in tobacco-growing countries. According to tobacco company documents, the companies fostered the view that tobacco control was a "First World" concern and that the damage to health in the Third World from tobacco control activities might exceed the toll from tobacco use itself.

When tobacco industry officials first became aware of international criticism of

its activities in developing countries, they perceived a serious threat to long-term profitability. At a tobacco company conference in July 1980, a workshop taught participants that “third world issues can’t be 'left for tomorrow to deal with' since they affect the very basis of raw material supply.”¹⁶ An anti-tobacco effort by developing countries might limit tobacco growing in such countries as Brazil, Zimbabwe, and Malawi. Even more worrisome was the possibility that the countries of the United Nations might find common purpose in attacking tobacco companies, creating a universally appealing enemy.

Faced with such a threat, industry officials recognized the need to develop a developing country strategy of its own. An industry consultant proposed the following goals:

“We must try to stop the development towards a Third World commitment against tobacco.

We must try to get all or at least a substantial part of Third World countries committed to our cause.

We must try to influence official FAO and UNCTAD [United Nations Conference on Trade and Development] policy to take a pro tobacco stand.

We must try to mitigate the impact of WHO by pushing them [sic] into a more objective and neutral position.”¹⁷
[Emphasis in original.]

Throughout the 1980s and well into the 1990s, tobacco companies sought to mobilize officials from developing countries to advance a pro-tobacco agenda on the world stage. The goal was for representatives from UN member states in

the developing world – and not tobacco companies themselves – to make tobacco’s case within the FAO, WHO and other UN bodies. This developing country strategy was coordinated by an international consortium of tobacco industry officials that was first called ICOSI (International Council on Smoking Issues) and later re-named INFOTAB. Individual companies, most notably Philip Morris and British American Tobacco Company, also made important contributions.

Although the documents reveal only a part of the tobacco companies’ activities, their strategy involved research, concerted lobbying of diplomats from developing countries, and extensive public relations. Industry representatives contacted government officials and UN delegates from around the world. At meetings that followed a common pattern, tobacco company officials would provide presentations on the economic importance of tobacco to developing countries, providing research on such topics as the “social and economic benefit” of tobacco and the lack of sustainable alternatives. Tobacco company lobbyists also tried to build resentment against the developed world, stressing that tobacco-related illnesses were a concern of rich countries, and that the developed countries were unconcerned about the economic realities or real health issues of the developing world.

In this campaign, tobacco companies made prominent use of the International Tobacco Growers’ Association (ITGA). ITGA claims to represent the interests of local farmers. The documents indicate, however, that tobacco companies have funded the organization and directed its work. Through their persistent outreach to officials from developing countries, tobacco companies gradually built a base of support within UN agencies and structures, most

notably the WHA and the FAO. Tobacco companies then worked to turn this support into action. Through contacts and influence with numerous officials from developing countries, the tobacco companies aimed to promote their agenda within multiple UN agencies and structures.

- **Food and Agriculture Organization**

Because FAO's agricultural activities supported tobacco growing for many years, by the late 1970s and early 1980s, tobacco companies considered FAO a "natural ally"¹⁸ and a "pressure point for dealing with WHO."¹⁹ In the 1980s and 1990s, by appealing to delegates from developing countries, tobacco companies sought to keep FAO's support and use the agency to make the case for the economic importance of tobacco within the United Nations. As a result of lobbying FAO delegates from developing countries, as well as FAO's Permanent Representatives, industry officials believed they were successful in gaining FAO's support at the UN in resisting tobacco control efforts by WHO. During this period the FAO issued several reports and statements that industry representatives used to support their position on the economic importance of tobacco for developing countries.

- **World Health Assembly**

Documents demonstrate that tobacco companies sought to influence the outcome of several WHA sessions. Tobacco company representatives lobbied delegates from developing countries to propose amendments and resolutions aimed at limiting the scope of the WHO tobacco control program. The case study focuses on the 39th, 41st, and 45th World Health Assemblies, held in 1986, 1988, and 1992, respectively. These sessions were characterized by a massive tobacco

company lobbying effort to get delegates from developing countries to oppose new tobacco control resolutions. In 1992, tobacco companies celebrated the adoption at WHA of a resolution – dubbed the "Malawi Resolution" – that led to the creation of a so-called UN "focal point" for tobacco issues in the UN Economic and Social Council (ECOSOC). Industry representatives viewed this event as a victory that would open new doors at the UN to tobacco company arguments about the economic importance of tobacco.

- **UN Economic and Social Council**

The "focal point" was directed to coordinate a UN collaboration on tobacco issues, including several UN agencies that would be more receptive to tobacco companies' economic arguments. Taking advantage of this opportunity, tobacco companies continued the successful pattern that they had long used as part of their developing country strategy. Industry representatives lobbied government officials, UN delegates, and UN officials about the economic importance of tobacco. Although the focal point in ECOSOC was closed down before producing any notable achievements, industry officials believed that they were successful in their attempts to get FAO, once again, to take a pro-tobacco position with ECOSOC.

Tobacco companies' developing country strategy involved extensive outreach to government officials and UN delegates of these countries. By pressing the economic importance of tobacco and stirring resentment against the developed world, industry officials believed that they had influenced delegates to alter WHO and FAO policy on tobacco. Rather than face world condemnation for its actions in developing countries, the tobacco industry benefited

from these countries' representation of tobacco's interests at the international level.

By the mid-1990s, tobacco company documents show that industry representatives believed their developing country strategy had successfully led the FAO to release pro-industry reports on the economic importance of tobacco, had inspired delegates from developing countries to make pro-tobacco objections, amendments and resolutions at the WHA, and had countered anti-tobacco efforts at the UN "focal point" on tobacco.

The publicly available tobacco company documents, which largely end in the mid-1990s, do not reveal what further activities industry representatives pursued to resist tobacco control efforts through their developing world allies. However, all indications are that the developing country strategy is still active and may play a role in the tobacco company campaign against the Framework Convention on Tobacco Control.

Several recommendations follow this case study. Among them are suggestions that other UN agencies and national governments examine influence by the tobacco industry on their decisions and programs, and that WHO raise for consideration at the WHA some form of disclosure of tobacco industry affiliations by delegates. The committee of experts also included a recommendation that WHO learn to counter tobacco company lobbying in developing countries, while at the same time seeking to address the legitimate economic concerns of those states about the loss of tobacco as a cash crop.

3. An "Independent" Critic of WHO

A key part of tobacco companies' strategy to undermine tobacco control activities at WHO in the 1980s and 1990s was to redefine the mandate of WHO, or at least redirect its priorities away from tobacco. To this end, tobacco companies used "independent" academic institutions, consultants, and journalists to undermine the organization's credibility, to question its "mission and mandate," and to divert its priorities from tobacco control to other health needs. These individuals and institutions were, in fact, secretly paid by tobacco companies to promote pro-tobacco or anti-WHO opinions.

Many tobacco company documents suggest that Paul Dietrich, an American lawyer with long-term ties to tobacco companies, played a significant role in this element of the tobacco company strategy. Dietrich wrote articles and editorials attacking WHO's priorities, which were published in major media outlets and widely disseminated by tobacco company officials. He also traveled around the world for tobacco companies, giving presentations to journalists and government officials on WHO's inappropriate spending and priorities. No mention was ever made in his articles and presentations that he received significant tobacco company funding.

In 1990, Dietrich, while still working with tobacco companies, was appointed to the Development Committee of the Pan American Health Organization (PAHO), an organization that also serves as WHO's regional office for the Americas. While there, the documents indicate that Dietrich attempted to redirect PAHO's priorities away from tobacco. According to the documents, he also played a role in getting PAHO to produce and sponsor an important

media event that was used by tobacco companies to divert attention from the WHO-sponsored 8th World Conference on Tobacco OR Health. Dietrich denies that he ever knowingly participated in any tobacco industry event or project, or that he was ever paid by the tobacco industry for his work.

- **Media seminars**

One of the key public relations strategies tobacco companies have employed over the years is to invite a small number of selected journalists to a conference where they hear the views of people who will provide a tobacco company viewpoint on topics of importance to the industry. Paul Dietrich made presentations criticizing WHO at a long series of media seminars around the world, sponsored by Philip Morris and BAT between 1984 and 1992. The documents show that the assembled journalists were told that the experts making presentations were entirely independent of the industry.

- **Media/political tours on behalf of tobacco companies**

Dietrich appeared not only at individual seminars, but was invited by tobacco company officials to tour whole regions promoting an anti-WHO agenda to government officials. During at least one of these tours, he also gathered intelligence and reported to the industry about tobacco control activities in the region. In some cases, he allowed his contacts to believe that he was a tobacco control activist.

- **Criticizing WHO in the print media**

In the late 1980s, Dietrich began to publicly attack WHO through the press. From 1988 through to 1993, he wrote numerous articles criticizing WHO in the mainstream media, mainly in the US, including the *Wall Street Journal*,

International Herald Tribune and *Washington Times*. Dietrich's relationship to the tobacco industry was never mentioned in any of the articles.

Most of the articles published by Dietrich were timed to coincide with the annual sessions of the WHA, with the apparent goal of influencing the debates and resolutions of that body. The documents suggest that Philip Morris played a role in the publication and wide dissemination of some of Dietrich's articles, in furtherance of its campaign to undermine WHO and redirect its priorities away from tobacco control.

- **The Institute for International Health and Development**

Dietrich was the President of an organization called the Institute for International Health and Development (IIHD). The documents suggest that Philip Morris and BAT were involved with IIHD, and made use of the organization and its magazine, *International Health and Development*, in their campaigns to undermine WHO's tobacco control activities.

- **The Pan American Health Organization (PAHO)**

In 1990, Dietrich was appointed to the PAHO Development Committee. During at least part of the period that Dietrich was on the PAHO committee, the documents show that he also billed a monthly consulting fee from BAT. It was while at PAHO that Dietrich may have had the most significant opportunity to influence WHO policies on tobacco.

The documents suggest that Dietrich used his position there to try to redirect the organization's priorities away from tobacco,

by focusing more attention on childhood immunization and other diseases. A BAT document in 1991 reported that: “Paul has managed to persuade PAHO to take tobacco off their list of priorities for this year.”²⁰ The documents also suggest that Dietrich may have been able to use PAHO as an unknowing front for the tobacco companies’ strategy to divert attention from the 8th WCToH. (See Chapter VII.)

A PAHO official disputes the account provided by the documents, insisting that Dietrich had no influence over tobacco policy there. Dietrich claims that he carried out many of the activities described in the documents, but that they were not conducted for the tobacco industry.

- **Relationship with and financial ties to tobacco companies**

Tobacco company documents provide evidence of Paul Dietrich’s long association with and financial links to tobacco companies. According to the documents, Dietrich and the institutions he operated were at different times associated with the Tobacco Institute, Philip Morris, and, most significantly, BAT. Many documents show that Dietrich and the organizations he operated received significant funding from tobacco companies. Indeed, tobacco company documents include bills from Dietrich to BAT. Another document refers to Dietrich’s “expensive consultancy”²¹ with BAT.

The case study illustrates one of the ways that tobacco companies, whose public credibility is low, have their positions publicly advocated by ostensibly independent “third parties.” Although Dietrich denies that his long-standing campaign against WHO was funded by tobacco companies or that he worked with the industry on any of the projects described

in this case study, the documents paint a different picture. The documents strongly suggest that Dietrich had a long relationship with members of the tobacco industry and that tobacco companies used this relationship to promote their anti-WHO agenda.

The fact that Dietrich had such a relationship with tobacco companies raises concerns about his appointment to a committee at PAHO. The committee of experts believes that there are significant conflict of interest issues raised by holding a position on a PAHO committee while simultaneously working for the tobacco industry, and has made a series of recommendations to help ensure that such conflicts do not arise.

4. 8th World Conference on Tobacco OR Health

A review of internal tobacco company documents relating to the 8th World Conference on Tobacco OR Health (WCToH), held in Buenos Aires in 1992, shows that BAT and Philip Morris, the two largest private tobacco companies, initiated a campaign to undermine the Conference, using an extraordinary range of tactics, some of which might be termed “dirty tricks.” These included staging elaborate diversions from the Conference, and training journalists to both hound a conference participant and take over a WCToH press conference. Tobacco companies’ planned use of the media in this context deserves special mention. In this campaign, journalists were to play a central and, in some cases, a knowing role in the manipulation of public opinion. Like so many of the other tobacco company campaigns described in this report, this case study exemplifies tobacco companies’ consistent intent to conceal its role in carrying out plans to undermine WHO tobacco control initiatives.

The documents also suggest that tobacco companies made use of PAHO, an organization that also serves as WHO's Regional Office for the Americas, in its campaign. Through the offices of Paul Dietrich, identified in the documents as a tobacco company consultant who also sat on PAHO's Development Committee, the documents suggest that tobacco companies were able to guide the development of, and then exploit, a PAHO-sponsored media program, for the purpose of undermining the 8th WCToH. However, Dietrich claims that the industry was not involved in his media program, and PAHO officials dispute that Dietrich had any role in the media program.

- **Media Plan**

Integral to the tobacco company plan to weaken the 8th WCToH was a media event that the documents state was developed by Paul Dietrich. Dietrich's media program was created to promote the position that health spending in Latin America should not go to tobacco-control initiatives, but to other pressing public health issues such as children's immunization programs and AIDS prevention programs. The program called for popular US entertainer Gloria Estefan to star in a widely televised show advocating the importance of "vaccinating children" on a "Save the Children" tour, near the time of the Conference. A memo from Dietrich to BAT spelled out how this event would assist tobacco companies:

"We now have a major media event around which to work. Secondly, we have a major star, who will attract large audiences. We have also been assured we will get early prime time airing of the television special on March 19th. All of this is perfectly timed for our initiative at the Eighth World Tobacco Conference. For the month leading up to the Tobacco Conference, all of the press will be

focused on the major health priority in Latin America, which is to vaccinate all children."²²

Capitalizing on his role in the PAHO Development Committee, the documents suggest that Dietrich managed to have this program funded by PAHO. PAHO was unaware of its intended use by tobacco industry officials.

Following the broadcast, industry representatives planned to place articles in news outlets throughout Latin America questioning the 8th WCToH and health spending on tobacco programs. Industry representatives also planned to train journalists to take over WCToH press conferences:

"We must teach them [the journalists] how to be pushy and press the speakers aggressively (speakers will not want to compare spending on tobacco and funds for children. If they don't answer the question, our journalist must aggressively pursue the speaker with follow up questions until he finally addresses the issue - this will not be easy.) If we are successful in getting the journalists to be aggressive and work as a team, we should be able to dominate the press conference. Even if we only get a few journalists to write about the controversy we have created, I think this would be a success. We will also have succeeded in diverting the press conferences with "our" questions, so they have less time to attack us."²³

- **Other public relations strategies aimed at the 8th WCToH**

The documents also show that tobacco companies plotted to distract attention from high profile American politicians attending the conference. An important soccer match

between an American and Spanish team was to be arranged on the day that former US President Jimmy Carter was to arrive at the conference. Industry representatives also planned a campaign against US Senator Edward Kennedy, who was present at the Conference:

“Selected reporters will have to question his [Ted Kennedy’s] alcoholic dependence and highlight the sexual harassing blamed on him in the USA, thus reducing the importance of his presence at the Conference.”²⁴

- **Scientific strategies aimed at the 8th WCToH**

Philip Morris and British American Tobacco developed scientific strategies to thwart any smoke-free policies that would result from the 8th WCToH. Primary strategies involved a scientific consultant program in Latin America and an indoor air quality conference to be held at the time of the Conference.

Industry officials also prepared for the 8th WCToH by meeting with the Conference organizers prior to the Conference and planned to recruit scientists to infiltrate the conference, but as in the rest of the campaign, the tobacco companies would camouflage their role.

“With proper press handling we could, for the first time, create a controversy in areas in which public opinion is under the impression that none exists. This, of course requires that we are able to achieve the participation of top level scientists ... *The industry, obviously, can not [sic] appear to sponsor the activity nor finance participants trips. That would have to be done through donations to foundations or independent institutions....*”²⁵ [Emphasis added.]

Although a review of documents relating to the 8th WCToH reveals grand plans by tobacco companies to undermine the 8th WCToH, there is limited evidence in the documents as to what aspects of the plan were actually carried out. Accordingly, searches of media archives and other literature searches were conducted. Interviews with Paul Dietrich, Ciro de Quadros, the Director of Immunizations at PAHO, and Carlyle Macedo, former Director of PAHO disclosed that some elements of Dietrich’s media plan were carried out and others were not. The television program in which Gloria Estefan and other Latin American entertainers promoted childhood immunizations was produced in Miami and televised on national prime-time channels. However, Dietrich claims that while he was instrumental in the production of the program, the tobacco industry was not involved. PAHO officials claim that Dietrich was not involved in the program. Press accounts suggest that other planned events may also have occurred, including an AIDS event and a program for journalists on the economic importance of tobacco.

This case study demonstrates the lengths to which tobacco companies will go to undermine the success of a World Conference on Tobacco OR Health. Many of the tactics proposed by industry officials, such as staging an important soccer match to coincide with the arrival of Jimmy Carter or training journalists to hound Senator Edward Kennedy about drinking and sexual harassment allegations, had elements of a “dirty tricks” campaign. However, these tactics, and many others devised by industry officials in connection with the 8th WCToH, also had a more significant purpose: to distract media attention from the Conference and manipulate the media stories that emerged.

Two recommendations follow from this case study. First, the committee of experts recommends increasing media advocacy training and funding to WHO Regional Offices and Collaborating Centers. Second, the committee of experts recommends that WHO continue to require financial disclosure for submissions to future WCToHs, and consider expanding these disclosures to identify underlying sources of significant funding.

5. United Nations Standard-Setting for EBDC Pesticides

The ethylene bisdithiocarbamate (EBDC) pesticides protect tobacco and other crops from fungi and molds. In the 1980s, evidence began to mount that the common breakdown product of these chemicals, known as ethylene thiourea (ETU), causes cancer. In September 1989, anticipating a regulatory action, US manufacturers of EBDCs cancelled many uses for the fungicides – including all uses on tobacco crops. Soon after, tobacco industry officials at the Cooperation Centre for Scientific Research Relative to Tobacco (CORESTA), an industry organization, embarked on a campaign to ensure continued availability of the EBDCs.

CORESTA hired Gaston Vettorazzi, former pesticide official at WHO, to coordinate its campaign for the EBDCs. In the spring of 1991, Vettorazzi produced safety reviews of the EBDC pesticides for CORESTA. These reviews were revised and edited by tobacco industry scientists. In his reports, Vettorazzi initially concluded that ETU “is not a carcinogen.” A preliminary review by the committee of experts of these documents raises questions about the validity of Vettorazzi’s interpretation of the scientific evidence.

With Vettorazzi’s reassuring reports on the EBDC fungicides in hand, CORESTA considered releasing the information to the Joint Meeting on Pesticide Residues (JMPR), a combined program of WHO and the Food and Agriculture Organization (FAO). JMPR is responsible for setting safety standards for pesticides, and tobacco industry officials recognized the key role of this UN standard-setting effort. If JMPR had determined that safety concerns precluded the establishment of a safe intake level for the EBDCs, then the pesticide manufacturers might have considered stopping production of these chemicals altogether. On the other hand, if JMPR were to set a safe intake level, then manufacturers would be assured of an international safety standard and would have reason to maintain production.

After extensive discussion, in January 1992, the CORESTA Board decided to allow Vettorazzi to send his reviews to JMPR under the name of the International Toxicology Information Centre – with no mention of CORESTA’s role in the reports.

Soon after submitting his reports to JMPR, the WHO Secretariat asked Vettorazzi to serve as a temporary advisor and review pesticides. Vettorazzi sought and obtained funding from CORESTA to work at JMPR.

Over the ensuing 2 years, CORESTA paid Vettorazzi nearly US\$100,000 to work at WHO reviewing pesticides and serving as a temporary advisor to assist JMPR in its evaluation of EBDCs. This financial arrangement, which ensured that a tobacco industry consultant would be in a position to participate in a UN standard-setting effort, was not disclosed to WHO or to JMPR.

In November 1993, JMPR issued its conclusion about the EBDCs. JMPR’s scientific conclusions were consistent with

Vettorazzi's reports, but not with the conclusions of the US Environmental Protection Agency (EPA). Accordingly, JMPR set a safe intake level for ETU that eventually led to a legal recognition of safety under international standards. CORESTA hailed the decision as a major victory for tobacco companies.

Because of the lack of documentation of the decisionmaking process at the JMPR, Vettorazzi's impact on JMPR's standard setting is unclear. A preliminary review of the JMPR toxicology monograph on ETU raises questions about whether the international committee satisfactorily addressed all available evidence.

Subsequent to JMPR's review, the documents indicate that CORESTA financed Vettorazzi to publish a scientific paper on the international evaluation of the EBDCs. This paper appeared in *Teratogenesis, Carcinogenesis and Mutagenesis* in 1995 without acknowledgment of tobacco company financial support. Various industry organizations have retained Vettorazzi to represent tobacco's interests at UN meetings, including the Codex Alimentarius Commission, and to assist tobacco companies on national pesticide issues around the world. Vettorazzi continues to consult for CORESTA today.

The story of the EBDCs demonstrates the ability of tobacco companies to involve one of their consultants in a UN standard-setting activity surreptitiously and highlights the role of financial stress in creating opportunities for tobacco companies. Financial pressure created an obvious incentive for WHO officials not to press Vettorazzi for too many details about the arrangement that brought him to Geneva.

This case study illustrates tobacco companies' willingness to influence any UN

processes related to tobacco and health. Industry officials identified a threat to the industry's future in pesticide regulation and quickly developed a strategy to protect its interests.

A fundamental question is whether a tobacco industry consultant – hiding his tobacco company ties – contributed significantly to a conclusion by a UN standard setting agency about the safety of a widely used group of pesticides and whether that conclusion was inappropriate.

The committee of experts' review of evidence raises troubling questions about whether Vettorazzi inappropriately favored the EBDCs. The committee of experts cannot reach a definitive conclusion on the safety of these pesticides, and the lack of adequate documentation within JMPR complicates an assessment of what happened prior to and during its 1993 meeting. A preliminary review cannot fully exonerate the JMPR process and conclusions, and the committee of experts believes that further investigation is necessary.

In conclusion, Vettorazzi's role in advising JMPR on the EBDCs represents a tobacco company attempt to influence the scientific community while hiding its own role and ultimately undermines the integrity of JMPR's decisions. To restore credibility and to prevent future occurrences of similar attacks on standard-setting activities, the committee of experts believes that WHO must reform its approach to conflict of interest and provide strong guidance and enforcement for ethical standards.

Among several suggestions specific to this case study, the committee of experts recommends that WHO obtain an independent evaluation of those pesticides in which Vettorazzi took an active interest.

6. IARC ETS Study

A multi-million dollar tobacco company campaign to undermine a large-scale epidemiological study on the relationship between environmental tobacco smoke (ETS) and lung cancer has recently been documented in *The Lancet*.²⁶ The ETS study was conducted by the International Agency for Research on Cancer (IARC), an agency established under the auspices of WHO. The tobacco company campaign aimed to influence the results of this study and to weaken its impact on the global regulation of ETS. The committee of experts has reviewed documents that describe this campaign and interviewed the IARC study coordinator.

The story demonstrates tobacco companies' willingness to compromise the integrity of an independent scientific study. The story also provides important information about how tobacco companies achieve their goals when attempting to influence scientific and regulatory decision-making.

Initiated in 1988, the IARC ETS study was an international, collaborative case-control study to assess the relationship between exposure to ETS and other environmental risk factors and the risk of lung cancer in subjects who had never smoked tobacco. When tobacco industry officials learned about the IARC ETS study, they became alarmed that a conclusion from the respected IARC that ETS causes cancer could result in new smoking restrictions in Europe and around the world.

In 1993, Philip Morris launched a wide-ranging, well-funded campaign to influence or contain the negative impact of the IARC study. The objectives of the campaign were to:

- “1. Delay the progress and /or release of the study.
2. Affect the wording of its conclusions and official statement of results.
3. Neutralize possible negative results of the study, particularly as a regulatory tool.
4. Counteract the potential impact of the study on governmental policy, public opinion, and actions by private employers and proprietors.”²⁷

Philip Morris and a task force composed of many tobacco companies developed an ambitious set of strategies to achieve their objectives:

- Influence IARC budgets or officials to cancel or delay the study.
- Establish contacts with the scientists carrying out the studies.
- Conduct and promote counter research.
- Promote scientific standards that would limit the use of epidemiology as a basis for public policy and create an “independent” coalition of scientists to criticize damaging studies.
- Manipulate the public and regulatory response to the study results.
- Cancel or influence the expected IARC monograph on ETS. (IARC publishes authoritative assessments of the risk of cancer from various agents, known as monographs, which are frequently used by governments considering regulatory action.)

From 1993 through the release of the IARC study report in 1998, the tobacco companies implemented their plans to

influence the conduct of the study and the interpretation of its results.

- Tobacco companies established contacts with IARC investigators, generally through outside scientists, to gather intelligence about the study, and influence the interpretation of the study results. Through these contacts, tobacco companies obtained certain confidential information about the study and its progress.
- Tobacco companies commissioned and promoted numerous studies and conferences designed to cast doubt on ETS's toxicity and on the methods used in the IARC study.
- In many instances, the tobacco companies appear to have successfully concealed their role in contacting IARC investigators and in their funding and marketing of counter research.
- Tobacco companies worked for adoption of epidemiological standards that would prevent governments from relying on the IARC study, and to form an ostensibly independent sound science coalition that would assist tobacco companies' legislative agenda by challenging the use of certain types of studies as the basis for policy making.
- Tobacco companies developed and carried out an elaborate media and government strategy in which they managed to distort the study results, spawning widespread, inaccurate media reports that the study showed no risk of cancer from ETS.
- Industry representatives worked to gain invitations for tobacco company consultants to participate in the expected monograph working group and to

produce studies that would influence the monograph results.

The least successful elements of the tobacco company strategy were those intended to (1) cancel or delay the study and (2) develop generally accepted epidemiological practice standards that would prevent regulatory authorities from using the IARC study in standard setting. Both plans appear to have been abandoned because they were not feasible.

Tobacco companies successfully established contacts with the IARC investigators and funded and publicized research designed to cast doubt on the validity of the IARC study. Through their contacts with IARC investigators and collaborators, tobacco companies were able to gain a great deal of information about the design, conduct, and analysis of the study, as well as information on preliminary results. Some of this information was intended to be kept confidential.

Ultimately, however, the tobacco companies' efforts to contact scientists and influence the methodology of the study do not appear to have altered the study results or analysis. Although IARC has not initiated a monograph on ETS, the committee of experts did not find evidence in the tobacco company documents that IARC's decision not to issue a monograph was influenced by the tobacco industry.

The tobacco companies' communications strategy was the most successful element of its attempt to undermine the IARC study. By distorting the statistical underpinnings of the study results, tobacco industry officials managed to convince journalists around the world to write news stories that the study showed no increased risk of lung cancer from ETS exposure in non-smokers. Tobacco

companies' distortions of the study results continue to be repeated in media accounts and in tobacco company presentations to regulatory authorities.

The committee of experts has included several recommendations for IARC to follow to help prevent successful manipulation of future scientific studies by tobacco companies. These include written guidelines for: (1) handling contacts with outside organizations, particularly industry representatives; (2) disclosure of information; and (3) acceptance of research grants or offers of employment from industries affected by the studies in which IARC investigators are participating. Additionally, the committee of experts recommends that IARC and WHO consider a policy of embargoing information about the results of tobacco-related studies until the full report is ready for release. IARC and WHO should also develop and maintain communication about tobacco-related issues.

E. Recommendations

In the course of this inquiry, the committee of experts has identified many reasons for concern about the integrity of the process for international decision-making about tobacco. The evidence shows that tobacco companies have operated for many years with the deliberate purpose of subverting the efforts of WHO to address tobacco issues. The attempted subversion has been elaborate, well financed, sophisticated and usually invisible. That tobacco companies resist proposals for tobacco control comes as no surprise, but what is now clear is the scale, intensity and, importantly, the tactics, of their campaigns. To many in the international community, tobacco prevention may be seen today as a struggle against chemical addiction, cancers, cardiovascular diseases and other health consequences of smoking. This inquiry

adds to the mounting evidence that it is also a struggle against an active, organized and calculating industry.

This has implications for WHO, and perhaps for other international bodies, in terms of both program activities and internal procedures. The committee of experts hopes this report will contribute to a broad discussion of those implications within the international community, and will lead to the necessary changes in practices and programs to ensure that the integrity of international decision-making is protected.

- **Increasing public awareness of tobacco company influence**

The committee of experts recommends that WHO increase public awareness of tobacco company influence on international tobacco control policies. Specifically, WHO should release and publish this report for discussion at public hearings on the Framework Convention on Tobacco Control in October 2000, in addition to a broader public distribution.

- **Further investigation by other UN agencies and member countries**

In the course of its review, the committee of experts has seen statements suggesting possible tobacco company influence on the policies of other UN agencies and member countries. The committee of experts therefore recommends that WHO urge other UN organizations and member countries to conduct investigations similar to this one to uncover possible tobacco company influence.

- **The Framework Convention on Tobacco Control**

It is likely that tobacco companies will attempt to defeat the proposed Framework

Convention on Tobacco Control, or to transform the proposal into a vehicle for weakening national tobacco control initiatives. Such a campaign is likely to be sophisticated and sustained, and to use tactics similar to those described in this report. The committee of experts recommends that WHO develop a sophisticated communications campaign to support the Framework Convention on Tobacco Control and counter any campaign of opposition by tobacco companies.

- **Protecting the integrity of WHO's decision making process**

In the course of this inquiry, the committee of experts identified several areas in which it felt the process and rules currently in place at WHO to guard against potential conflicts of interest involving the tobacco industry should be clarified, strengthened or expanded. These recommendations are intended for application throughout WHO, including within its Collaborating Centers.

The existing conflict of interest requirements for WHO employees are contained in one page of staff regulations promulgated by the WHA and one page of staff rules established by the Director-General. As a general observation, the committee of experts notes that these ethical rules have been clarified significantly in recent years, and that internal review of the rules is continuing.

Based on its review, the committee of experts identified specific opportunities for improving this regulatory regime. Taken together, the committee of experts hopes that the specific recommendations set forth in this report will help protect the integrity of WHO's decision making. They include suggestions for screening prospective employees, consultants, advisors, and

committee members for conflicts of interest, and clarifying the consequences of violations of ethical rules.

The recommendations also urge WHO to place before the WHA, for discussion by member countries, questions related to disclosure of affiliations between WHA delegates and tobacco companies, and between Non-Governmental Organizations (NGOs) and tobacco companies.

- **Protecting scientific integrity**

As demonstrated by this report's case studies of the IARC ETS study and the review of dithiocarbamate pesticides, additional safeguards are needed to protect against tobacco company attempts to distort scientific research sponsored by, or associated with, WHO and affiliated organizations. To this end, the committee of experts has offered: (1) recommendations for educating scientific investigators about tobacco companies' efforts to undermine research; (2) guidelines for contact with industry representatives and disclosure of information and funding sources; and (3) suggestions for interagency communication standards among UN bodies. The committee of experts also recommends that WHO and IARC develop affirmative communications plans to anticipate and counter tobacco company misrepresentation of important new research findings.

- **Addressing tobacco companies' developing country strategy**

Tobacco companies' successful efforts to reach out to developing countries based on the economic importance of tobacco suggest that WHO must address these countries' concerns to achieve a global consensus on tobacco control. WHO should develop a strategy to counter the tactics employed by tobacco companies to gain

opposition to tobacco control in the developing world. This strategy must address the legitimate economic issues raised by the loss of tobacco as a cash crop.

- **Correcting past tobacco company misconduct and protecting the public from future misconduct**

This report details a pattern of influence and misconduct by tobacco companies aimed at thwarting global tobacco control initiatives. The committee of experts believes that the harm caused by the tobacco companies' conduct was significant and far-reaching. The report recommends that WHO take two important steps to correct the results of past misconduct and guard against future tobacco company misconduct.

First, WHO should assist member states in determining whether they have a legal and factual basis to seek restitution from tobacco companies for past misconduct.

Second, WHO should monitor tobacco company activities to determine whether the pattern of behavior described in this report has ceased or is continuing. To ensure that tobacco company misconduct does not remain hidden, as it has in the past, WHO should make regular public reports on its findings.

F. Conclusion

This inquiry demonstrates the magnitude of tobacco companies' opposition to WHO tobacco programs, and offers insight into their activities, strategies and attitudes. Moreover, it demonstrates that tobacco is unlike other threats to health. Reversing the epidemic of tobacco use will be about more than fighting addiction and disease; it will be about overcoming a determined and powerful industry, many of whose most important counter-strategies are carried out

in secret. If this inquiry contributes to that understanding, the committee of experts will have succeeded in its work.

Notes

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