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# The use of the Corporate Social Responsibility strategy by the tobacco industry in the promotion of electronic smoking devices

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## **The use of the Corporate Social Responsibility strategy by the tobacco industry in the promotion of electronic smoking devices**

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Changes related to the interference of interested sectors and the role of the State in the economy and society are a phenomenon that has been happening worldwide in recent decades and has consequently generated discussions about the role of private organizations in public health issues (Serpa & Fourneau, 2007). A growing number of companies worldwide have been striving to incorporate corporate social responsibility (CSR) as an integral part of their business. Currently, there is no consensus on the definition of the term CSR. However, authors such as Harjoto & Jo (2011) and Cai and colleagues (2011) suggest that the definitions of CSR refer to the efforts of companies to serve the society and the environment beyond what is required of them.

In an attempt to report the tobacco industry (TI)'s CSR actions in promoting electronic smoking devices (ENDS), this document presents the current context of ENDS use in Brazil and a proposal of CSR definition in the ENDS promotion context in order to support this analysis. It also intends to identify TI's CSR strategies in Brazil's previous, current, and future political scenarios, examine their effects on the current regulatory measures, and identify new approaches to neutralize TI's influence. This content is fundamental to inform and involve the Brazilian population in discussing the impact generated by the possible marketing of ENDS in Brazil and supporting decision-makers on the best strategies and responses addressing public health.

### **Context**

Awareness about the health risks of smoking and the consequent growth of national regulations have led to the reduction of sales of conventional cigarettes in high-income countries (da Costa e Silva, 2021). The response to these two phenomena resulted in the search for "cleaner" alternatives to smoking, with nicotine-containing products initially in cigarette format, called electronic cigarettes (e-cigs), and the introduction of new and emerging tobacco products, in particular in the form of heated tobacco and chewing tobacco (snus). TI has focused, therefore, on developing and marketing "products for the future generation." It has

been producing and promoting snus (oral smokeless tobacco, different from the Brazilian snuff, containing flavorings and a tea bag shape), electronic cigarettes (e-cigs or vapes) and heated tobacco products (HTPs) (University of Bath, 2021d). These products are part of TI's new harm reduction policy offering consumers "less harmful products".

The ENDS are already part of most multinational companies' portfolios. They have an alarming number of new consumers in countries where they have been marketed, particularly among curious young adults and adolescents influenced by their technological appeal, despite being reportedly destined only to current adult smokers (Collins et al., 2019; Truth Initiative, 2019). Their marketing portrays the idea that they are low toxicity products that can help in cessation, seeks mechanisms to ensure prices and regulatory measures that promote their consumption, and offers products in different formats and flavors to increase their attractiveness. The practice is different: ENDS are smoking products that contain nicotine and cause dependence and illness to the ones voluntarily or unintentionally exposed to them (Paumgartten, 2019).

## **Use of CSR strategies by the industry**

### *Globally*

With the sharp drop in the worldwide smoking prevalence, the tobacco industry has acted to curb tobacco control advances (Truth Initiative, 2019). Among them is the investment in electronic cigarettes and vaporizers as a way to offer nicotine to current smokers and at the same time promote smoking initiation (Paumgartten, 2019; Santos, 2018). To promote ENDS, the tobacco industry created and relied on the support of front groups to make public relations campaigns that aim to discredit tobacco control advocates and pressure decision-makers to regulate ENDS (Silva & Moreira, 2019). TI pioneered using front groups to promote its interests (Apollonio & Bero, 2007). Front groups intend to represent an agenda when, in reality, they serve another party's interests and rarely have their sponsorship disclosed (University of Bath, 2021c).

### *In Brazil*

Brazil was one of the first countries in the world to ban ENDS (ANVISA, 2009; Silva & Moreira, 2019). In response to the ban, the Brazilian Health Regulatory Agency (ANVISA) has been receiving strong criticism, especially from users and front groups (Paumgartten, 2019; Silva & Moreira, 2019).

On August 28, 2009, ANVISA issued Board Resolution No. 46 (RDC 46/2009), prohibiting these devices' marketing in Brazil. As can be seen on the measure and

pronouncement timeline on ENDS by ANVISA (Figure 1), from 2016 on, it has expanded initiatives focusing on the subject, possibly reflecting the increasing pressure to market ENDS.

The tobacco industry, its front groups, and even ESD's users have been directly responsible for these attempts or have supported actions to allow ESD marketing in Brazil since ANVISA's regulatory framework with the precautionary principle about these products was approved 12 years ago (ANVISA, 2009). However, TI pressure has been increasing. According to the Tobacco Industry Interference Index, published annually by TI strategy monitoring groups, including the tobacco Industry monitoring center (Observatory) at *FIOCRUZ*/Brazil, 19 meetings were recorded between tobacco companies and ANVISA in 2019 (Assunta, 2020; Salgado et al., 2020).

TI's interference strategies in Brazil were also described in the Brazilian investigative journalism (Sudré, 2020) when ANVISA launched a new consultation as part of its regulatory agenda, supposedly steered by TI. The agency initiated the process in 2018, convening a technical-scientific panel to readdress the position on ESD marketing in the country. The panel gathered national and international researchers and tobacco control entities. TI's representatives were also invited. In 2019, ANVISA held two public hearings, receiving more than 350 contributions with technical-scientific evidence on ENDS. A new public hearing directed to specific sectors followed in 2021 (ANVISA, 2021a).

### **Corporate Social Responsibility in the promotion of ENDS**

#### **Definitions used**

This document defines ENDS as products that deliver nicotine with low or no combustion, including electronic nicotine delivery systems, such as electronic cigarettes, and heated tobacco products (HTPs).

According to Bower (1957), CSR is the adoption of attitudes, postures, decisions and values that some companies employ to value their image before society. This performance of the tobacco industry has been recently classified and in three layers: corporate philanthropy (creating a product that will replace tobacco); risk management (generosity after some reputation-damaging event, such as a lawsuit for smuggling or causing harm to consumers); and value creation (institutions on which the industry is betting that will publicly certify TI's value) (Franklin, 2008). The industry has been using CSR strategies in three major approaches concerning ENDS:

1. Corporate philanthropy – the tobacco industry has been investing in research and development to create a “cleaner” product in recent decades and has recently launched vaporizers with heated tobacco (University of Bath,2021d). It also expanded its industrial park to produce electronic nicotine delivery systems, which might have initially appeared in China (University of Bath,2021d). It has been publicly touting the eventual end of cigarette production and betting on electronic smoking devices as a healthier alternative (University of Bath,2021d).
2. Risk management – the tobacco industry’s reputation has been tarnished for producing a product that kills one in two regular consumers and using strategies it has been using to increase its profits. It has also had its image compromised by litigation worldwide (Daynard et al., 2000). The industry is interested in producing and promoting alternative products that address society's demands about the harms of traditional smoking. Today, the three largest transnational cigarette industries sell ENDS in many markets (Truth Initiative,2021).
3. Value creation – the industry uses institutions and people to promote its "cleaner" alternatives. Recently, one of the largest transnational industries funded the creation of an institution that promotes its agenda (Foundation for a Smoke-free World, 2021a).

In conclusion, IT identified a niche in ENDS production and marketing that yielded profits and could place it as a potential tobacco control agent through a well-articulated advertising and public relations campaign, which uses CSR strategies with actors who promote its agenda, creating the illusion that it would be helping public health (University of Bath,2021d).

## *Methodology*

This document analyzes coherent publications on electronic smoking devices and their variations from 2009 to 2021. The starting point was 2009 because ANVISA issued Board Resolution No. 46, prohibiting ENDS’s marketing, importing, and advertising. The endpoint was October 2021.

Descriptors - electronic cigarette, also called vape, e-cigarette, or e-cig, is an electronic smoking device (ESD) that simulates smoking. The terms used for research in the academic area (e.g., abstract, report, record, scientific article, review, monograph), in traditional media (e.g., radio, television, newspapers, pamphlets), and digital media (social media, blogs, YouTube channels, e-mail, among others) include the descriptors: smoking devices; ENDS;

electronic cigarettes; e-cigs; e-cigarettes; vaping; AND industry; tobacco industry; and corporate social responsibility.

Use of Federal Law No. 12,527/2011, known as the Law on Access to Information. Based on this law, we searched for links between organizations and people with the tobacco industry in Brazil and their relationship with some government bodies. Thus, we were after large companies in the tobacco sector (Philip Morris International, British American Tobacco, Japan Tobacco International, China Tobacco, among others) using corporate social responsibility actions to promote their products to the population.

### **Preliminary results**

#### ENDS regulation in Brazil

In 2009, responding to the ESD marketing in several Western countries, ANVISA used its prerogatives (described in Federal Law No. 9,782/1999 Art. 7, item IX) to regulate the manufacture, import, storage, distribution, and marketing of products and inputs which poses health risks. Its Public Hearing No. 41/2009 submitted a proposal on ESD marketing prohibition to society. After the public hearing and the analysis of the documents presented by the interested parties, the ANVISA's Board of Directors issued RDC No. 46/2009 (ANVISA, 2009). This board resolution follows Federal Law No. 9,782/1999, Arts. 6 and 8, paragraph 1, item X (Congresso Nacional, 1999), which gives ANVISA the institutional purpose of promoting the protection of the health of the population, with competence to regulate, control and supervise products and services involving risk to public health, including cigarettes, cigarillos, cigars and any other product for smoking, derived or not from tobacco. To protect public health from smoking damages, RDC No. 46/2009 prohibits ESD marketing, importing, and advertising in Brazil, stating that toxicological studies and specific scientific tests must be handed proving the products' reportedly purposes, subjected to ANVISA's technical analysis and approval so that ENDS can be registered in the country (ANVISA, 2009). It should be noted that there has been no public reference that the tobacco industry presented toxicological studies and specific scientific tests to any government proving these products' promoted purposes (da Costa e Silva, 2021).

Since RDC No. 46/2009, ANVISA has carried out a series of surveys on the subject to obtain updated scientific support on ESD potential health risks. In 2016, it published an article review on ENDS, gathering information on the steam composition and damages to health, the role of ENDS in reducing harm and treating nicotine dependence (Instituto Nacional de Câncer

José Alencar Gomes da Silva, 2016). In 2017, ANVISA included the theme in the Agency's Regulatory Agenda 2017/2020, item 11.3 (ANVISA, 2020b), in order to discuss it in the face of updated scientific studies and international discussions and experiences.

In 2018, ANVISA held a technical panel to discuss ENDS, which had the participation of the regulated sector, tobacco control bodies in Brazil, national and international researchers, and the organized civil society (ANVISA, 2018). This panel also had the TI's participation, such as British American Tobacco (BAT, formerly *Souza Cruz*), *Philip Morris Brasil*, *JTI Processadora de Tabaco do Brasil*, and politicians to force RDC No. 46/2009 revision, claiming that ENDS are less harmful to health because tobacco is heated instead of burned (ANVISA, 2018). BAT, represented by Christopher Proctor, chief scientist, presented data from scientific papers whose authors are employed by BAT and whose essays' financing was done by Nicoventures Ltd, BAT's subsidiary. BAT also stated that ESD regulation would not reduce tobacco product consumption, and Brazil could become a nicotine exporter (ANVISA, 2018). Similarly, *Philip Morris Brasil*, represented by Vice President of Public and Scientific Communications, Dr. Moira Gilchrist, presented the PMI's reduced-risk product scientific rationale, stating that ENDS represent "an opportunity for smokers who cannot quit smoking." It also pointed to data in favor of the use and regulation of ENDS produced or financed by PMI Research and Development (ANVISA, 2018).

In 2019, ANVISA issued the *Termo de Abertura do Processo Administrativo de Regulação* [Administrative Regulatory Process Opening Form], related to ENDS (ANVISA, 2019b), which marks the beginning of discussions within the new regulatory model. The National School Health Survey (*PeNSE*) (Instituto Brasileiro de Geografia e Estatística, 2019) showed that 16.8% of the students had already used ENDS at least once, suggesting the TI's actions in advertising and selling ENDS in Brazil, despite RDC No. 46/2009 prohibition. Also, in 2019, ANVISA held two public hearings with those interested in the ESD regulatory problem to get technical and scientific subsidies (ANVISA, 2019a). Once again, TI was present at both hearings (ANVISA, 2019a).

In 2021, ANVISA held three consultations on electronic smoking devices. The first was directed to Health Surveillance (*Visas*) managers in states and municipalities, the second to research and educational institutions and governmental bodies, and the third to companies that sell these products in other countries (ANVISA, 2021b). The report on the regulated sector's submissions provided seven contributions: three from companies with representatives in Brazil, two from Portugal, one from Argentina, and one from Paraguay. The companies informed about ESD types and regulations in 38 countries (ANVISA, 2021c).

Table 1 describes the timeline of ANVISA's activities related to ENDS and reported in the analyzed period.

**Table 1:** ANVISA's actions after ESD regulation in 2009

2009	ANVISA carries out a public hearing on ENDS
2009	ANVISA prohibits the sale, importation, and advertising of ENDS, conditioning marketing to proof of benefits
2014	The Brazilian Medical Association and Federal Medical Council warn physicians and society about the ESD ineffectiveness to reduce cigarette consumption
2016	ANVISA, INCA, and PAHO publish technical review called Electronic Cigarettes: What We Know
2017	ANVISA includes the theme in its 2017-2020 Regulatory Agenda
2018	ANVISA convenes a technical panel to discussion ENDS
2019	ANVISA warns physicians about a severe lung disease associated with ESD use
2019	ANVISA holds the first public hearing on ENDS in Brasilia
2019	ANVISA holds the second public hearing on ENDS in Rio de Janeiro
2021	ANVISA carries out three targeted consultations on ENDS with: 1. Visas; 2. research, teaching and government institutions; 3. Companies

The Brazilian regulatory process is related to the international discussion ESD worldwide, as can be seen in Table 2 (da Costa e Silva, 2021).

**Table 2:** Timeline of international market-defining events, industry pressure and national initiatives

2007	Electronic cigarette market invented in China in 2003; expansion into the west
2008	WHO FCTC Articles 9 and 10 Working Group recommends that COP3 identify good practices on the regulation of electronic cigarettes (ENDS)
2010	Secretariat of WHO FCTC prepares COP4 report expressing concern about ENDS market expansion
2012	Tobacco industry begins to buy electronic cigarette factories and invest in heated tobacco product R&D COP5 calls for a report on the prevention and control of electronic nicotine delivery systems (ENDS) and evidence on their health impact
2014	Pro-ENDS group of scholars asks for their marketing COP6 proposes to regulate or prohibit ENDS taking into account the protection of human health
2016	COP7 acknowledges the existence of heated tobacco products (HTPs) in the market and proposes to prohibit or restrict the manufacture, importation, distribution, sale and use of ENDS
2018	Large tobacco companies include heated tobacco products in their portfolio COP8 assesses ENDS market expansion and considers HTPs as subject to FCTC measures
2021	Pro-ENDS group of scholars asks for their marketing COP9 discusses ENDS' and HTPs' documents submitted by the Secretariat and WHO, maintaining scientific position on ENDS

**Note:** Adapted from da Costa e Silva, 2021.



Electronic nicotine delivery systems were invented in 2003 in China, but only in 2007, they expanded into the United States and Europe (da Costa e Silva, 2021). This topic was brought up for the first time in 2008 during the third session of the Conference of the Parties (COP), WHO Framework Convention on Tobacco Control (WHO FCTC) governing body. It was part of a report from the COP working group that addressed FTCT Articles 9 & 10 (WHO Framework Convention on Tobacco Control, 2008). Brazil was represented in this working group by ANVISA, which accompanied and contributed to the discussions until 2018, and then at a new technical group created at COP8 to bring its considerations on the subject to COP9 (Framework Convention on Tobacco Control, 2019; Portes et al., 2019; WHO Framework Convention on Tobacco Control, 2020). As seen in Figures 1 and 2, there is chronological synchrony between the electronic nicotine delivery system and heated tobacco product markets, ANVISA initiatives, and the discussion and development of international policies focused on what COP7, in 2016, classified into three groups (ENDS – electronic nicotine delivery systems, ENNDS - electronic non-nicotine delivery systems and HTPs - heated tobacco products), and used through successive COPs (WHO Framework Convention on Tobacco Control, 2016). However, concern on the subject began to arise in 2010 and now is present in all COPs with a polarized academic discussion for and against them. In 2019, scientists described a new disease (EVALI) related to the use of these products (Health, 2021), and the industry kept a growing pressure on promoting new nicotine and tobacco products for their marketing in other countries (University of Bath, 2021b). The increased tobacco industry pressure at the international level is evident from the moment heated tobacco products become part of its portfolio as an alternative to the regular tobacco user (da Costa e Silva, 2021), and large tobacco multinationals buy electronic nicotine delivery system factories.

### **The industry's response to ESD regulation in Brazil**

The tobacco industry has had a strong performance in traditional media (e.g., radio, television, newspapers) and digital media (websites, social media, blogs, YouTube channels, e-mail, among others), since the marketing, importation, and advertising of all types of electronic smoking devices were prohibited in Brazil (Assunta, 2020; Salgado et al., 2020).

Among its main strategies is using high-ranking members of their companies to give interviews and defend their interests. During this period (2009 to November 2021), names such

as Fernando Vieira, Director of Corporate Affairs at Philip Morris Brazil; Wagner Erne, Philip Morris Brazil's president; Liel Miranda, Souza Cruz's former president; and Jorge Iribarra, BAT Brazil's president frequently appeared on the media talking about the "benefits" of electronic cigarettes compared to traditional cigarettes. They all claim that electronic cigarettes are less harmful and that their regulation is critical to reducing harm and controlling smuggling. Table 3 lists the tobacco industry leading representatives involved in ENDS promotion.

**Table 3:** Tobacco industry representatives involved in ESD promotion

Name	Filiation	Link	Link	Year
Analucia Saraiva	Scientific Relations Manager at BAT Brazil	<a href="https://www.correiobraziliense.com.br/app/noticia/cidades/2020/01/13/interna_cidadesdf.820097/electronic-to-smoking-sao-proibido-but-still-sao-ve.html">https://www.correiobraziliense.com.br/app/noticia/cidades/2020/01/13/interna_cidadesdf.820097/electronic-to-smoking-sao-proibido-but-still-sao-ve.html</a>	Works at BAT Brazil and advocates that electronic devices without combustion, such as those that heat this product, are reduced risk mechanisms that can represent a safer way out for those who want to quit smoking and cannot or for those who do not give up the habit	2020
Delcio Sandi	Director of External Relations at BAT Brazil	<a href="http://olajournal.com.br/bat-brasil-aponta-revisao-do-sistema-tributario-para-enfrentamento-do-contrabando-de-cigarros/">http://olajournal.com.br/bat-brasil-aponta-revisao-do-sistema-tributario-para-enfrentamento-do-contrabando-de-cigarros/</a>	BAT Brazil's Director of External Relations, Delcio Sandi, believes: "Brazil needs to seek, in its own territory, solutions so that the illegal market does not grow again"	2021
Dérica Serra	Head of Medical Affairs at Phillip Morris Brazil	<a href="https://exame.com/negocios/phillip-morris-faz-nova-aposta-para-aprovar-cigarro-do-futuro-no-brasil/">https://exame.com/negocios/phillip-morris-faz-nova-aposta-para-aprovar-cigarro-do-futuro-no-brasil/</a>	Phillip Morris understands that there is still a significant stigma to ENDS in Brazil. To bypass it, the company bet on the creation of a position to	2021

			dialogue with the medical and scientific community - the Head of Medical Affairs – with Dr. Dérica Serra in charge	
Fernando Vieira	Director of Corporate Affairs at Philip Morris Brazil	<a href="https://saude.abril.com.br/medicina/cigarro-eletronico-faz-menos-mal-para-to-health-that-there-common/">https://saude.abril.com.br/medicina/cigarro-eletronico-faz-menos-mal-para-to-health-that-there-common/</a>	Works for the industry	2021
Wagner Erne	Philip Morris Brazil's former president	<a href="https://www1.folha.uol.com.br/mercado/2018/01/1952903-nao-tem-como-cigarro-ele-being-worse-than-the-traditional-says-president-of-philip-morris-no-brasil.shtml">https://www1.folha.uol.com.br/mercado/2018/01/1952903-nao-tem-como-cigarro-ele-being-worse-than-the-traditional-says-president-of-philip-morris-no-brasil.shtml</a>	Worked for the industry	2018
Jorge Iribarra	BAT Brazil's President	<a href="https://www.cnnbrasil.com.br/business/agora-bat-brasil-souza-cruz-cresce-em-2020-mas-ve-problemas-no-pais/">https://www.cnnbrasil.com.br/business/agora-bat-brasil-souza-cruz-cresce-em-2020-mas-ve-problemas-no-pais/</a>	Works for the industry	2021
Liel Miranda	Souza Cruz's former president	<a href="https://www.istoedineiro.com.br/souza-cruz-apaga-o-cigarro/">https://www.istoedineiro.com.br/souza-cruz-apaga-o-cigarro/</a>	Worked for industry	2019
Rafael Bastos	Senior Manager of Corporate Affairs at Philip Morris Brazil	<a href="https://www.gazetom.br/cigarros-eletronicos-estao-na-pauta-de-discussao-da-anvisa/">https://www.gazetom.br/cigarros-eletronicos-estao-na-pauta-de-discussao-da-anvisa/</a>	Works for industry	2019

Among the industry's latest initiatives, we can mention the introduction of medical professionals in the large companies in the sector to convey an image of concern for consumer health and the planet's future. It can be reported as a corporate social responsibility activity, as it aims to show that companies are concerned with providing products of less damage to the

consumer and thereby fewer diseases resulting from the continuous use of tobacco among the Brazilian and world population (O Joio e o Trigo, 2020).

A recent example is the hiring of Dr. Dérica Serra as Head of Medical Affairs at Phillip Morris Brazil (PMI, 2021). The company has more than 400 people focused on research and others responsible for global performance in its research center in Switzerland. However, it did not have a spokesperson with Brazil's medical and scientific community (PMI, 2009).

Dérica Serra is responsible for interface with the sector and being the spokesperson for scientific research. Being an ophthalmologist, the professional has extensive experience in the pharmaceutical industry, especially in immunotherapies and therapies to treat melanoma and lung cancer (PMI, 2021).

BAT Brazil also has a medical professional among its employees. Analucia Saraiva, Manager of Scientific Relations, openly argues that electronic cigarettes are a “safe exit” from traditional cigarettes and that their flavors are attractive to new consumers. When asked about Evali, a disease related to e-cigarettes and already diagnosed in the United States, Analucia mentions the lack of regulation as its cause. According to her, “non-regulation is what leads ESD users to misuse the products and opt for low-quality ones” (Eufrásio, 2020). BAT seems to have also hired a former ANVISA's director to come public to speak in favor of ENDS. In a recent article, Alessandra Bastos, BAT Brazil's consultant, defended ENDS marketing to guarantee consumers' right to choose (Exame, 2021).

**Table 4:** Tobacco Grower's representatives and workers in the tobacco production chain involved in ESD promotion

Name	Filiation	NkLi	Link	Year
Benicius Werner	<i>Afubra's</i> president	<a href="http://olajournal.com.br/afubra-vai-de-fender-em-audien-cia-cigarro-eletronico-que-utiliza-tabaco/">http://olajournal.com.br/afubra-vai-de-fender-em-audien-cia-cigarro-eletronico-que-utiliza-tabaco/</a>	Advocates the release of electronic smoking devices that use tobacco in their composition, and not the most common ones, with nicotine solution	2019
Carlos Galant	<i>Abifumo's</i> president	<a href="https://www.produtorsouzacruz.com">https://www.produtorsouzacruz.com</a>	He advocates the presentation of	2019

		<a href="https://br/noticias/audien-cia-da-anvisa-gathers-representatives-of-the-health-and-the-tobacco-sector">br/noticias/audien-cia-da-anvisa-gathers-representatives-of-the-health-and-the-tobacco-sector</a>	technical reports by industry, which “reveals” that ENDS significantly are less harmful to health than conventional cigarettes, and criticizes entities contrary to regulation, saying they have a more ideological agenda.	
Gualter Baptista Junior	<i>Fentifumo's</i> president	<a href="https://folhadomate.com/noticias/geral/governador-defende-debate-sem-preconceito-sobre-os-produtos-de-tabaco-aquecido/">https://folhadomate.com/noticias/geral/governador-defende-debate-sem-preconceito-sobre-os-produtos-de-tabaco-aquecido/</a>	To <i>Fentifumo's</i> president, Eduardo Leite, Rio Grande do Sul governor, shows sensitivity to the tobacco production chain: “His position is very positive, as the government shows that, in addition to investments, it has acted strongly to control the smuggling and considers the marketing of new products such as electronic cigarettes and heated tobacco products as positive”	2020
Iro Schünke	<i>SindiTabaco's</i> president	<a href="https://www.gazetom.br/setor-de-tobacco-or-neutrality-of-government-in-relation-to-cigarette-electronics/">https://www.gazetom.br/setor-de-tobacco-or-neutrality-of-government-in-relation-to-cigarette-electronics/</a>	He asked the Brazilian government to take a neutral position towards ENDS	2021
Paulo Solmucci Junior	<i>Abrasel's</i> CEO	<a href="https://www.istoedineiro.com.br/o-ci-garro-eletronico-na-berlinda/">https://www.istoedineiro.com.br/o-ci-garro-eletronico-na-berlinda/</a>	During a fiery speech in defense of ESD marketing, <i>Abrasel's</i> president, Paulo Solmucci Júnior,	2019

			took an electronic cigarette out of his pocket, which he had purchased on the Internet.	
Romeu Schneider	<i>Afubra's</i> secretary and Tobacco Sector Chamber's president	<a href="https://www.gaz.com.br/setor-de-tabaco-quer-neutralidade-do-governo-e-m-relacao-aos-cigarros-eletronicos/">https://www.gaz.com.br/setor-de-tabaco-quer-neutralidade-do-governo-e-m-relacao-aos-cigarros-eletronicos/</a>	He asked the Brazilian government to take a neutral position towards ENDS (2021).	2021

Institutional lobbying is one of the most frequent tactics used by the industry to achieve its goals, which is nothing more marketing its products and obtaining advantages through the Brazilian legislation (O Joio e o Trigo, 2021). The industry has the help of Brazilian organizations such as *Associação dos Fumicultores do Brasil (Afubra)*, *Sindicato Interestadual da Indústria do Tabaco (SindiTabaco)*, *Associação Brasileira da Indústria do Fumo (Abifumo)*, *Associação Brasileira de Bares e Restaurantes (Abrasel)*, and *Federação Nacional dos Trabalhadores nas Indústrias do Fumo e Afins (Fentifumo)* (Mathias, 2021a).

These organizations participated in ANVISA's public hearings to defend ENDS marketing (ANVISA, 2018, 2019a). They argued that they would be a way to reduce damage and maintain active tobacco-related agricultural activities. Their representatives are already known for being on the industry's side in the ENDS debate in the country and presented "data" that validated the thesis that ENDS are less harmful than traditional cigarettes during the hearings (ANVISA, 2018, 2019a).

Among the prominent names (Table 4) that appear in the media and who actively participated in the public hearings are Benício Werner (*Afubra's* president), Iro Schünke (*SindiTabaco's* president), Gualter Baptista Júnior (*Fentifumo's* president), and Carlos Galant (*Abifumo's* president).

*Afubra's* secretary, Romeu Schneider, is another one who is often in the media defending ENDS. On July 14, 2021, he took over the coordination of the Tobacco Sector Chamber in the state of *Rio Grande do Sul* (Garcia, 2021). Schneider is also the president of the Tobacco Sector Chamber linked to the Ministry of Agriculture, Livestock, and Supply (MAPA).

Normative instruction No. 02/2021, issued by the State Secretariat of Agriculture, Livestock and Rural Development to rule the operation of sectorial chambers, defines that

Schneider's coordination will have a two-year term (SECRETARY OF AGRICULTURE, LIVESTOCK AND RURAL DEVELOPMENT OF THE STATE DO RIO GRANDE DO SUL, 2021). The chamber has a consultative status and is an instrument of dialogue between the private and the public sectors. According to Schneider, the Tobacco Sector Chamber has four pillars: government, producers, the industry's workers, and the industry (Garcia, 2021).

**Table 5:** Politicians involved in ESD promotion

Name	Filiation	Link	Link	Year
Ana Amelia	Former senator (PP) In December 2018, Eduardo Leite (PSDB), Rio Grande do Sul's governor, announced Ana Amélia to command the Department of Federative and International Relations in the state	<a href="https://elefanteeditora.com.br/vic-e-de-alckmin-ana-amelia-e-defensora-da-industria-do-cigarro">https://elefanteeditora.com.br/vic-e-de-alckmin-ana-amelia-e-defensora-da-industria-do-cigarro</a>	Attends meetings openly defending the tobacco industry's interests	2018
Cida Borghetti	Paraná's former governador	<a href="https://www.aen.pr.gov.br/module-s/noticias/article.php?storyid=95615&amp;tit=Em-Bologna-Cida-se-reune-com-diretor-of-Phillip-Morris">https://www.aen.pr.gov.br/module-s/noticias/article.php?storyid=95615&amp;tit=Em-Bologna-Cida-se-reune-com-diretor-of-Phillip-Morris</a>	He visited the Philip Morris plant and stressed that he is committed to making ESD regulation happen. For him, it is necessary a debate without prejudice on the subject, seeking to ensure the continuity of the sector's business	2017
Eduardo Leite	Rio Grande do Sul's governor	<a href="http://olajournal.com.br/governo-do-estado-se-alia-na-busca-por-regulamentacao-do-tabaco-aquecido/">http://olajournal.com.br/governo-do-estado-se-alia-na-busca-por-regulamentacao-do-tabaco-aquecido/</a>	He met with the Phillip Morris board and visited the PMI's Reduced Risk Product manufacturing facility, located in Bologna, Italy.	2020

Fernando Schwanke	<p>Former Secretary of Family Agriculture and Cooperativism of the Ministry of Agriculture, Livestock and Supply (MAPA)</p> <p>and</p> <p>He currently holds the position of Project Director of the Inter-American Institute for Cooperation on Agriculture (IICA);</p>	<a href="http://olajournal.com.br/governo-do-rio-grande-do-sul-quer-fabrica-de-cigarros-eletronicos">http://olajournal.com.br/governo-do-rio-grande-do-sul-quer-fabrica-de-cigarros-eletronicos</a>	He commanded the MAPA's Department of Family Agriculture and Cooperativism from the beginning of Bolsonaro government until July 1, 2021. He is Rio Pardo's former mayor – one of the exponents in tobacco production in Rio Grande do Sul – and has a daughter who has been a Philip Morris Brazil's employee for seven years	2019
Luis Carlos Heinze	Senator (Progressistas)	<a href="https://www.cartacapital.com.br/sociedade/lobby-do-fumo-ataca-colegiado-chave-politica-antitabaco/">https://www.cartacapital.com.br/sociedade/lobby-do-fumo-ataca-colegiado-chave-politica-antitabaco/</a>	Contrary to tobacco control policies	2021
Marcelo Moraes	Federal Representative for Rio Grande do Sul (PTB)	<a href="https://www.gazetadopovo.com.br/setor-de-tabaco-quer-neutralidade-governamental-em-relacao-aos-cigarros-eletronicos/">https://www.gazetadopovo.com.br/setor-de-tabaco-quer-neutralidade-governamental-em-relacao-aos-cigarros-eletronicos/</a>	Federal government leader in the House of Representatives, he defends that the government should not agree with “harmful” measures to the tobacco chain	2021
Onyx Lorenzoni	Minister of Labor and Social Security	<a href="https://www.cartacapital.com.br/sociedade/lobby-do-fumo-ataca-colegiado-chave-politica-antitabaco/">https://www.cartacapital.com.br/sociedade/lobby-do-fumo-ataca-colegiado-chave-politica-antitabaco/</a>	The Minister of Labor and Welfare, Onyx Lorenzoni, received a group of people related to the tobacco industry on August 25, 2021. This meeting is not on its official agenda	2021



The tobacco industry also counts on politicians when it comes to defending their interests. Politicians from several parties and positions are at its service, using their power to submit or oppose to bills of law, raise issues relevant to industry and discuss issues of interest in the Legislature (Table 5).

Some of them are Eduardo Leite, Rio Grande do Sul's current governor, a state that produces and sells tobacco to other parts in Brazil and the world, Marcelo Moraes (*PTB*), federal representative, and Luiz Carlos Heinze (*Progressistas*), senator. Other important people support the industry, fight for its interests and end up as the industry's public relations when they finish their terms. Among these are Cida Borghetti, Rio Grande do Sul's former governor, and Ana Amélia (*PP*), former senator and current responsible for the Department of Federative and International Relations in Rio Grande do Sul. Recently, Congressman Marcelo Moraes has attacked the National Commission for the Implementation of the FCTC (CONICQ) in an attempt to interfere in the Brazilian position at COP9, apparently without success (Mathias, 2021a). The companies wanted the government to take a "neutral" position on electronic smoking devices, but decisions on this topic were not taken at COP9 (Mathias, 2021b).

**Table 6:** Lobbyists hired by the industry to promote ENDS

Name	Filiation	Link	Link	Year
Cassio Cunha Lima	Former senator and <i>Paraíba's</i> former governor ( <i>PSDB</i> );	<a href="https://noticias.uol.com.br/politica/ultimas-noticias/2021/10/15/philip-morris-consultores-lobby-tcu-jo-se-mucio-monteiro-cassio-cunha-lima.htm">https://noticias.uol.com.br/politica/ultimas-noticias/2021/10/15/philip-morris-consultores-lobby-tcu-jo-se-mucio-monteiro-cassio-cunha-lima.htm</a>	Philip Morris hired the politician to act on behalf of the company when dealing with <i>Anvisa</i> ;	2021
Daniela Augusto	Consumer Engagement Director at Llorente y Cuenca	<a href="https://theintercept.com/2020/10/19/como-a-industria-of-the-cigarette-hide-the-dangers-of-vape-to-convince-you-to-smoke/">https://theintercept.com/2020/10/19/como-a-industria-of-the-cigarette-hide-the-dangers-of-vape-to-convince-you-to-smoke/</a>	Her agency was hired by Philip Morris to handle public relations for low-risk products;	2020
José Múcio Monteiro	Former minister of the Brazilian General Accounting	<a href="https://noticias.uol.com.br/politica/ultimas-noticias/">https://noticias.uol.com.br/politica/ultimas-noticias/</a>	Philip Morris hired the politician to act on behalf of the	2021

	Office and former federal representative for <i>PTB</i>	<a href="https://www.gazetadopovo.com.br/ver-bem/saude-e-bem-estar/cigarro-eletronico-can-reduce-damage-to-smoker's-health/">2021/10/15/philip-morris-consultores-lobby-tcu-jose-mucio-monteiro-cassio-wedge-lima.htm</a>	company when dealing with <i>Anvisa</i> ;	
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In October 2021, Philip Morris Brazil hired two professional politicians to act on behalf of the company when dealing with *ANVISA*: José Múcio Monteiro, former minister at *TCU* (the Brazilian General Accounting Office) during Lula government and the former federal representative for *PTB*, and Cássio Cunha Lima (*PSDB*), former senator and *Paraíba*'s former governor (Table 6).

Philip Morris also hired a communication, marketing, and public affairs agency. LLYC (formerly Llorente y Cuenca) is responsible for taking care of its low-risk product promotion and passing on the image that it is engaged in CSR activities (LLYC, 2019). LLYC has much content on its website about the power of corporate influence in government and says it has a team specialized in lobbying. According to the company, "lobbying is intrinsic to democracy" (LLYC, 2019). Daniela Augusto, Director of Consumer Engagement at LLYC, is responsible for Philip Morris Brazil's account at the agency (Sudré & Ferreira, 2020).

**Table 7:** Scholars involved in promoting ENDS

Name	Filiation	Link	Link	Year
Alice Chasin	Toxicologist at Oswaldo Cruz College	<a href="https://www.gazetadopovo.com.br/ver-bem/saude-e-bem-estar/cigarro-eletronico-can-reduce-damage-to-smoker's-health/">https://www.gazetadopovo.com.br/ver-bem/saude-e-bem-estar/cigarro-eletronico-can-reduce-damage-to-smoker's health/</a>	"The strange thing is that the harm reduction approach exists for alcohol and illicit drugs. However, when it comes to tobacco, a drug that kills many people in the world, there is no such policy," Chasin says. For the toxicologist, switching from conventional cigarettes to devices that heat	2017

			the tobacco can reduce the risk of smoking-related diseases. "There is no smoke, so you reduce exposure to many toxic substances present in cigarettes. If you can eliminate these compounds, we will reduce risk," she said;	
Humberto Bogossian	Pulmonologist at Albert Einstein Hospital	<a href="https://www.uol.com.br/vivabem/noticias/redacao/2019/11/21/oito-coisas-que-voce-precisa-saber-sobre-o-cigarro-eletronico.htm">https://www.uol.com.br/vivabem/noticias/redacao/2019/11/21/oito-coisas-que-voce-precisa-saber-sobre-o-cigarro-eletronico.htm</a>	"Although there are already studies that prove, for example, that the use of electronic cigarettes has more positive results than nicotine replacement therapies, there are still unclear issues. Among them, how the various substances in their composition behave when inhaled and the definitions of safe use", says pulmonologist Humberto Bogossian, from Albert Einstein Hospital in São Paulo;	2019
Monica Gorgulho	Clinical Psychologist	<a href="https://noticias.r7.com/saude/cigarro-eletronico-e-alternativa-ao-tabagismo-dizem-pesquisadores-21052019">https://noticias.r7.com/saude/cigarro-eletronico-e-alternativa-ao-tabagismo-dizem-pesquisadores-21052019</a>	According to the professional, there is a lack of Latin American studies to provide scientific evidence regarding smoking and new products marketed in the world;	2019

Pedro Farsky	Cardiologist	<a href="https://noticias.r7.com/saude/cigarro-eletronico-e-alter-nativa-ao-tabagismo-dizem-pesquisadores-21052019">https://noticias.r7.com/saude/cigarro-eletronico-e-alter-nativa-ao-tabagismo-dizem-pesquisadores-21052019</a>	According to the Ministry of Health data, smoking affects 17% of the population, a high rate in cardiologist Pedro Farsky's opinion. According to the physician, it is "necessary to get independent research proving the risks, and laws to protect people" from smoking hazards	2019
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Professionals from different health areas support the industry's interests and insist on the harm reduction policy, a frequently used tobacco industry strategy (Table 7). Some of these people appear in the media, making their favorable position to ESD regulation clear, and influencing ESD use (or experimentation). After all, medical professionals are references when it comes to health-related issues.

Two examples of professionals who appear in several pieces of news supporting the industry are Alice Chasin, a toxicologist at Oswaldo Cruz College, and Monica Gorgulho, a clinical psychologist. Both are strong supporters of the harm reduction policy and see electronic cigarettes as an essential ally in this issue (Gazeta do Povo, 2017; R7 news, 2019).

On the other hand, Humberto Bogossian, a pulmonologist at Albert Einstein Hospital, and Pedro Farsky, cardiologist, prefer to plant the doubt, another prevalent industry strategy. Both request research to prove the electronic cigarette's real damage but believe that they are less harmful than traditional cigarettes (R7 news, 2019; Viva Bem Uol, 2019).

**Table 8:** Events promoted or with participation of the tobacco industry in Brazil (academic or health congresses)

Event name	Involved institutions	TI involvement evidence
Change of Habits and Health Harm Reduction. 2017	Philip Morris <i>Folha de São Paulo</i>	Direct. Sponsorship of Philip Morris and dissemination in <i>Folha de São Paulo</i>
Toxilatin (2018)	Federal University of Rio Grande do Sul (UFRGS) British American Tobacco	Presentation of a scientific poster assessing ESD's risk reduction potential

Brazilian Congress of Cardiology 2018	PMI Brazilian Society of Cardiology (SBC)	Direct: PMI presented a scientific poster and had relationship stand
Brazilian Congress of Cardiology 2019	PMI Brazilian Society of Cardiology	Direct: PMI sponsored the event and presented 2 lectures.
Congress of the Brazilian Society of Toxicology (SBTox) 2019		I International Symposium on Alternative Forms of Exposure to Tobacco
International Seminar on Harm Reduction Policies: history, timeline and perspectives. 2019	Institute of Research and Support for Social Development (IPDAS); St. Leopoldo Mandic College	Disclosure by the website Vaporaqui.net which is sponsored by TI
Philip Morris promotes virtual seminar (webinar). 2020	PMI	Direct, webinar promoted by them to discuss the latest scientific evidence on tobacco and the importance of the harm reduction policy for smokers
II International Seminar on Tobacco Harm Reduction. 2020	São Leopoldo Mandic College, PMI, Human Rights Commission of the Brazilian Bar Association/SP, Brazilian Multidisciplinary Association for Drug Studies (Abramd)	Direct. Philip Morris Brazil's support
Latin American Panel at the 4th Scientific Summit – Tobacco Harm Reduction: Novel products, Research & Policy.2021	<i>DIRETA</i> and <i>ATS - Acción Técnica Social</i> (Colombia)	Direct

Another TI front is sponsoring academic events, focusing on public health, medicine, and decision-makers. Thus, TI changes its advertising campaign strategy and focuses on influencing physicians, public health workers, and decision-makers, who use scientific evidence for health promotion and seek to develop research and actions against the tobacco use impacts. One example is the Foundation for a Smoke-free World (FSFW), which claims to be an independent scientific body with the goal of “accelerating the end of smoking” (Foundation for a Smoke-free World, 2017) but is exclusively funded by Philip Morris International (Legg et al., 2019).

Therefore, the foundation’s support by PMI should be recognized as a tobacco industry “corporate social responsibility” activity (Goldberg et al., 2018). For example, FSFW granted resources for a project developed by Vida News LLC, which focused on Brazil, India, South

Africa, the U.S., and Mexico (Foundation for a Smoke-free World, 2021b). The project aimed to create a professional media center to improve global communication on harm reduction (Foundation for a Smoke-free World, 2021b). Although FSFW has the Vida News LLC project stated on its website, it does not happen on the Vida News website. However, the organization recognizes the FSFW's donation (Vida News, 2020).

In Brazil, TI is behind several academic activities, such as symposia, meetings, and lectures discussing ESD legalization and its use in medical nicotine dependence treatment. In 2017, the event “Change of Habits and Health Harm Reduction” was sponsored by Philip Morris International and took place in the auditorium of the Unibes Cultural Theater in São Paulo (Folha de São Paulo, 2017b). The event was brought to public notice by the newspaper *Folha de São Paulo*, discussed practices and policies to reduce health risks of people who cannot or do not wish to quit smoking or drinking., One of the main issues discussed on tobacco was the exchange of cigarettes for ENDS and their role in harm reduction (ACTBR, 2017).

Between 2017 and 2019, PMI Science, Philip Morris' research and development division, based in Switzerland, was one of the Brazilian Congress of Cardiology sponsors, the largest conference of this medical specialty in our country (O Joio e o Trigo, 2020). In both 2018 and 2019 editions, PMI focused on the benefits of ENDS when compared to cigarettes. In the 2018 edition, it presented a scientific poster, had a relationship stand, and promoted satellite symposia (Tares and Wheat, 2020). In the 2019 edition, PMI Science gave two lectures and was represented by Dr. Reuven Zimlichman from the Institute for Quality in Medicine in Israel (O Joio e o Trigo, 2020).

Similarly, in 2018, BAT presented a scientific poster at the 2nd Toxilatín, held at the Federal University of Rio Grande do Sul (UFRGS), which discussed modern toxicology for health and prevention. The clinical review presented by BAT discussed a framework to evaluate the risk reduction potential of the next-generation products, such as ENDS (McEwan et al., 2018). Furthermore, in 2019, at the Brazilian Congress of Toxicology, the Brazilian Society of Toxicology (*SBTox*) promoted the I International Symposium on Alternative Forms of Exposure to Tobacco to disseminate the experiences on ENDS in countries where the sale is allowed, such as England and Japan (O Joio e o Trigo, 2020).

In 2019, Philip Morris supported the “International Seminar on Harm Reduction Policies: History, Timeliness and Perspectives,” held by the Institute of Research and Support for Social Development (*IPDAS*) and hosted at São Leopoldo Mandic College in Campinas, São Paulo. The event was open to the public and brought together students and health professionals to discuss drug regulations in Brazil, including ESD regulation (IPADS, 2019).

In November 2020, with the support of Philip Morris International and *Abramd* (Brazilian Multidisciplinary Association for Drug Studies), the II International Seminar on Tobacco Harm Reduction took place (Vaporaqui, 2020). The event, promoted by The São Leopoldo Mandic College in Campinas, São Paulo, was online and targeted health professionals, journalists, tobacco product consumers, and lawyers. Among the discussed topics, there was a panel to discuss medical experiences as collaborating agents in defining tobacco harm reduction practices and another to discuss legal aspects in regulating tobacco harm reduction practices (Vaporaqui, 2020).

Also, in 2020, PMI held an online seminar to discuss scientific evidence on tobacco and the importance of harm reduction for smokers. The event was displayed in *Folha de São Paulo* newspaper and targeted journalists (Folha de São Paulo, 2020b). In November 2020, the II International Seminar on Tobacco and Harm Reduction addressed public tobacco control policies, Brazilian legislation on ENDS, and how they are viable alternatives to conventional cigarettes. The event was promoted by the *Vapor Aqui* website, *IPADS* (Institute of Research and Support for Social Development), São Leopoldo Mandic College, and *Centro de Convivência É de Lei*, with the support of Philip Morris Brazil and the Human Rights Commission of the Brazilian Bar Association/SP. There were two days of the event, with national and international speakers, on which attendees could listen to lectures, and ENDS users could talk about their experiences using the products. The event was displayed in *Folha de São Paulo*, in the sponsored content section, and on *vaporaqui.net*, an IT front group (Folha de São Paulo, 2020a; Vaporaqui, 2020).

In 2021, DIRETA, an IT front group, organized an expert panel on tobacco harm reduction at the 4th Scientific Summit – Tobacco Harm Reduction: Novel products, Research & Policy (DIRETA, 2021). The panel was coordinated by Mônica Gorgulho, who is part of DIRETA's advisory board, and was attended by Alexandro Lucian, a journalist specializing in tobacco harm reduction and DIRETA's president in Brazil (DIRETA, 2021).

These many examples show that the medical and academic areas, through certain professionals, end up being used as the industry's allies in its journey towards ESD regulation in Brazil. Grounding their theories and using partial studies, these professionals offer an attractive seal for new consumers to honestly believe they are opting for a less harmful product than traditional cigarettes or even an innocent product for the population's health (Table 8).

**Table 9:** Media professionals involved in ESD promotion

Name	Filiation	Link	Link	Year
André Luís Jungblut	President of <i>Grupo Gazeta de Comunicação</i>		Industry-friendly newspaper;	2021
Asuir João Silberschlag	<i>Folha do Mate's</i> partner	<a href="https://folhadomat.e.com/quem-somos/">https://folhadomat.e.com/quem-somos/</a>	Industry-friendly newspaper;	2021
Fausto Macedo	Political columnist at <i>Estadão</i>	<a href="https://politica.estadao.com.br/blogs/fausto-macedo/o-futuro-e-sem-fumaça/">https://politica.estadao.com.br/blogs/fausto-macedo/o-futuro-e-sem-fumaça/</a>	Fausto Macedo published an article written by Fernando Vieira, Director of Foreign Affairs at Philip Morris Brazil, in his column defending heated tobacco products;	2019
Guilherme Siebeneichler	<i>Olá Jorna's</i> partner and journalist	<a href="http://olajournal.com.br/author/guilhermesieb/">http://olajournal.com.br/author/guilhermesieb/</a>	Industry-friendly newspaper;	2021
Janine Niedermeyer	<i>Olá Jorna's</i> partner and journalist;	<a href="http://olajournal.com.br/author/janine/">http://olajournal.com.br/author/janine/</a>	Industry-friendly newspaper;	2021
Mariana Niederauer	Journalist at <i>Correio Braziliense</i>	<a href="https://www.correiobraziliense.com.br/app/noticia/brasil/2019/08/06/inter-na-brasil,775815/anvisa-promotes-first-debate-public-over-cigarettes-electronics.shtml">https://www.correiobraziliense.com.br/app/noticia/brasil/2019/08/06/inter-na-brasil,775815/anvisa-promotes-first-debate-public-over-cigarettes-electronics.shtml</a>	British American Tobacco invited him to go to London and write an article defending ESD marketing;	2019
Pedro Garcia	Journalist who was invited to travel to the federal capital by <i>Souza Cruz - Gazeta do Sul</i>	<a href="https://www.gaz.com.br/a-gazeta-es-teve-la-na-hearing-da-anvisa-no-rio/">https://www.gaz.com.br/a-gazeta-es-teve-la-na-hearing-da-anvisa-no-rio/</a>	He writes industry-friendly articles;	2021
Ricardo Mateus Silberschlag	<i>Folha do Mate's</i> partner	<a href="https://folhadomat.e.com/quem-somos/">https://folhadomat.e.com/quem-somos/</a>	Industry-friendly newspaper;	2021
Sérgio Luiz Klafke	<i>Folha do Mate's</i> partner	<a href="https://folhadomat.e.com/quem-somos/">https://folhadomat.e.com/quem-somos/</a>	Industry-friendly newspaper;	2021



The industry also uses media professionals to spread its ideas and defend its goals. They write biased articles, use unfounded studies, and give voice to people linked to the TI. These journalists and opinion makers are extremely valuable in disseminating a mistaken image of ESD use among the population (Table 9).

Among the industry's strategies is the use of the well-known "paid articles," those in which only at their end, in fine print, an asterisk appears, making it clear that the content is not impartial. Large companies such as PMI, JTI, and BAT use this tactic. An example is what happened in *Estadão*, one of the most respected newspapers in Brazil, where Fausto Macedo published an article written by Fernando Vieira, Director of Foreign Affairs at Philip Morris Brazil, in his column defending heated tobacco products (Macedo, 2019).

Another clear link between journalists and the industry is the famous exchange of favors. While the industry finances media professionals' trips, it is up to them to speak well of its products and write biased articles about how it positively influences society and how its corporate social responsibility activities have had benefited the population. Two clear examples are the articles written by journalists Mariana Niederauer, from *Correio Braziliense*, and Pedro Garcia, from *Gazeta do Sul*. While Mariana had a trip to London financed by BAT Brazil (Niederauer, 2019), Pedro had a trip to Brasília sponsored by the former *Souza Cruz*, which is now part of BAT Brazil (Garcia, 2020). There is an asterisk at the end of both articles where this information is given, with tiny print and close to the advertising content.

In addition to these cases disseminated in the Brazilian press, there are newspapers that express their favorable position to the industry and make their partnership and cooperation clear. These are the cases of *Olá Jornal* by Janine Niedermeyer and Guilherme Siebeneichler, *Folha do Mate* by Asuir João Silberschlag, Sérgio Luiz Klafke and Ricardo Mateus Silberschlag, and *Gazeta do Sul*, owned by André Luís Jungblut.

With all this support network and exchange of favors, the industry is strengthened (especially in tobacco-growing regions) and tries to convey an image of concern for social welfare. Those who contribute to the industry are always well articulated and lucid. So, the TI sends a message that it is searching for change to meet consumers' demands, which is not true, and masks the illegal acts.

**Table 10:** Social media influencers involved in ESD promotion

Name	Filiation	Link	Link	Year
Alexandro "Hazard" Lucian	Publicist, entrepreneur and <i>Vapor Aqui</i> project creator	<a href="https://www.vapor.aqui.net/">https://www.vapor.aqui.net/</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021
Filipe Collioni	Influencer (O <i>Poderoso Vapor</i> )	<a href="https://twitter.com/filipecollioni">https://twitter.com/filipecollioni</a>  <a href="https://www.instagram.com/opoderosovapor/?hl=pt">https://www.instagram.com/opoderosovapor/?hl=pt</a>  <a href="https://www.instagram.com/opoderosovapor/?hl=pt">https://www.instagram.com/opoderosovapor/?hl=pt</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021
Guilherme Sardinha	Influencer and Youtuber (Smoke Vapor)	<a href="https://www.youtube.com/smokevapor">https://www.youtube.com/smokevapor</a>  <a href="https://www.instagram.com/smokevaporoficial/">https://www.instagram.com/smokevaporoficial/</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021

Luís Otávio	Vapers Brazil's Influencer	<a href="https://twitter.com/vapersbrazil">https://twitter.com/vapersbrazil</a>	Advertising, product review, interviews with	2021
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		<a href="https://www.facebook.com/vapersbrasil/">https://www.facebook.com/vapersbrasil/</a> <a href="https://www.youtube.com/channel/UCASQ80aBk8Z7AA_IzumL_Uw">https://www.youtube.com/channel/UCASQ80aBk8Z7AA_IzumL_Uw</a>	medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	
MC Menor (Hualter Silva Santos)	Influencer and Funk singer	<a href="https://www.instagram.com/mcmenor/rmr/">https://www.instagram.com/mcmenor/rmr/</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021
MC Jottapê (João Pedro Correia de Carvalho)	Influencer and Funk singer	<a href="https://www.instagram.com/jottape/">https://www.instagram.com/jottape/</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021

Marcelo Fraresso	Influencer and Youtuber (Zona do	<a href="https://www.youtube.com/channel/UCsF62wfb5h_R1q">https://www.youtube.com/channel/UCsF62wfb5h_R1q</a>	Advertising, product review, interviews with	2021
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	Vapor)	<a href="#">QxqTp1y2A</a>	medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	
Miguel Okumura	Influencer and Podcaster (VaporCast)	<a href="https://vaporacast.com/author/miguel/">https://vaporacast.com/author/miguel/</a>	Advertising, product review, interviews with medical professionals and legislators, dissemination of academic articles favorable to industry, and spread of a lifestyle tied to ENDS	2021

With many followers and a captive audience, especially among young people, digital influencers are another industry's bet to promote ENDS (Table 10). This method repeats what was used with traditional cigarettes, promoting ESD use as a modern, stylish and rebellious lifestyle. Instead of Hollywood stars, the main focus is on digital influencers.

Influencers are the right choice for ESD promotion in the country as they reach many people at once and they dialogue easily with the young public, the tobacco industry's primary target. This tactic has been used for some years in other countries, especially where ESD regulation is less demanding. In Brazil, however, its use is a little more recent (Sudré,2020). Despite this, famous influencers are already promoting ENDS and selling the idea that they are modern products and less harmful to the population.

For example, we can mention YouTubers Alexandro "Hazard" Lucian and Luís Octavio, respectively, with 17,000 and 60,000 subscribers on their YouTube channels. Both talk about ESD use, write "product reviews," disseminate dubious information about their use, interview medical professionals who support the use of electronic cigarettes *and vapers* as a way of reducing damage and promote the industry's interests (BAT Brasil, 2021).

Another category of influencers used as ESD promoters in Brazil is the Instagrammers. Two of them draw attention due to many followers and the various posts using and speaking

about ENDS on their Instagram pages. They are the funk singers MC “De Menor” and MC “JottaPê,” with 5.2 million and 6.4 million followers on Instagram, respectively. Both dialogue directly with the tobacco industry’s central public with a predominantly young audience.

Podcasters cannot also be left out of digital influencers. Influencer Miguel Okomura stands out in this category. He is the host of the VaporCast podcast and addresses topics as “Toxicology and Steam,” interviewing Luiz Ribeiro, who has a master's degree in toxicology and is a doctoral candidate in Molecular and Cellular Biology at the University of Paris (OKUMURA, 2021).

Two other Youtubers with more than 200,000 subscribers on their channels that we can also highlight are Marcelo Fraresso and Guilherme Sardinha, owners of the channels Zona do Vapor and Smoke Vapor, respectively. While Sardinha focuses on different ESD product reviews, Fraresso compares traditional cigarette smokers’ and ESD users’ lungs. All this with a jovial language and humor that captivates the younger audience.

With all these examples, we can see that thousands of young people have been reached by this type of content aimed at disseminating ENDS. With no theoretical basis and partiality, the propagated content is highly damaging when we think about how young people see ENDS. Today, social media is the primary source of information for young audiences, and the lack of responsibility with the posted content is recurrent. Therefore, it is evident that this is a source of fundamental importance for the industry’s exploitation and promotion of its products.

## **Discussion**

### *The tobacco industry arguments in promoting ENDS*

TI uses several arguments to promote electronic smoking devices. They are based on five aspects and areas of activity: economy, social, media, agriculture (in the rural environment where tobacco is grown), and health. On all these fronts, TI spreads its tentacles and convinces society that replacing traditional cigarettes with ENDS would benefit the population. Thus, we will discuss their arguments in each of these specific areas.

In the economy, the main argument presented by the industry is that tobacco consumption by the population is a market that already exists, there is demand for its products, and ESD regulation would be an important source of tax collection. According to tobacco companies, nothing takes more money from the legal tobacco industry than the illegal tobacco market (Prado, 2021). For example, executive Jorge Iribarra, BAT Brazil’s president, says the state fails to collect about R\$ 11 billion in annual taxes (Prado, 2021). IT bets that ENDS would

reduce cigarette consumption, but it does not consider ESD cost, the dual use of regular cigarettes and ENDS, and their illicit market (Bertoni & Szklo, 2021).

Another argument used by TI in economics is the expenses to treat patients with problems resulting from the continuous use of traditional cigarettes. Tobacco companies are based on a study by King's College London, which suggests that e-cigarettes are 95% less harmful than traditional cigarettes (MCNEILL and HAJEK, 2015). It makes TI believe that millions would be saved from patient treatment and that many other patients would cease to exist due to the possibility of cessation that ENDS provide to those who choose to use them in place of traditional cigarettes (Bernardo, 2021).

Smuggling is also constantly addressed regarding the damage done to the economy by ESD's lack of regulation. The industry argues that regulating ENDS would be a reliable measure to address the smuggling of electronic and traditional cigarettes (Olá Jornal, 2020). According to TI, not being able to purchase ESD legally leads consumers to look for irregular, low-quality products (GAZETA DO POVO, 2019). For the industry, the ban on ENDS does not prevent consumers from acquiring them, as they are easily found on the internet, in popular markets, and during trips abroad (Jansen, 2015).

When dealing with the social area, the central claim is that using ENDS or not should be every citizen's personal and particular choice. Individual rights are addressed to say that each citizen should have the freedom to choose what he wishes. The industry uses common arguments to allow any type of prohibited drug or product. This claim is even stronger when it comes to ENDS, because, according to TI, the consumer would be exchanging a more harmful product (traditional cigarette) for a less harmful one (ESD) (Conte, 2014). Therefore, the industry would only be giving an alternative and less destructive option than the one already available in the market. Another argument in the social area is that its production would be a new way of generating jobs. With ESD regulation, new factories would be opened, new job openings would emerge, and many lives would benefit from this change (Toledo, 2021). It would be a new market and a new area to employ the millions of unemployed in Brazil today (Collucci, 2021).

Pollution and secondhand smoke are other issues addressed by the industry to place ENDS as a more socially acceptable alternative. To support the thesis that ENDS are less polluting and less dangerous for secondhand smokers, they use a 264-page study by Public Health England on the available evidence under re vapor risks, which concluded that "to date, there have been no identified health risks of passive vaping to bystanders " (Gov.uk, 2018). This study attempted to estimate potential exposures from aerosols produced by electronic

cigarettes and compare these potential exposures to occupational exposure patterns. It concluded that bystanders' exposures tend to be of lesser magnitude, and thus there seems to be no apparent concern (Gov.uk, 2018).

The third argument used by industry is related to agriculture. According to the World Bank's 2019 report, Brazil is the second-largest tobacco producer globally, behind only China and followed by India. Besides, it has been the world's largest tobacco leaf exporter for some years (World Bank, 2019). Data indicate that Brazil's southern region is responsible for 98% of national tobacco production. The State of Rio Grande do Sul (RS) is the largest producer. Estimates indicate about 150,000 tobacco grower families in the south of Brazil and about 200,000 families in the country (Notícias Agrícolas, 2018).

According to TI, the tobacco production chain promotes important income generation, favors tax collection, and creates job opportunities (Castro & Monteiro, 2015). It says that tobacco growing profitability makes it a great option for planting on small properties, and tobacco growers in southern Brazil are dependent on this activity for their survival (Castro & Monteiro, 2015).

The industry uses these data as an argument to preach tobacco-growing survival and sees ENDS as vital allies in this journey. Two members of tobacco workers' organizations gave testimony about ENDS as a way to keep tobacco-growing alive: "Without doubt, we approve. We believe that alternative products to conventional cigarettes, as long as they contain tobacco in the composition, are positive. This gives us a guarantee because it shows that tobacco products will have a long life," said Benício Werner, president of *Associação dos Fumicultores do Brasil (Afubra)* (Garcia, 2017). Werner's statement shows TI's opportunism, which besides promoting electronic nicotine delivery systems, began to promote heated tobacco products. "It is difficult to make any kind of projection about these products because it depends on regulation, price, and even how anti-smokers will react. It is certainly one of the paths we are going to take, although it is not yet known with what speed," said Iro Schünke, president of *Sindicato Interestadual da Indústria do Tabaco (SindiTabaco)* (Garcia, 2017).

Another argument used by ESD activist groups to defend regulation is the pollution generated by traditional cigarettes. When butts are discarded, more than 600 chemicals leak into the environment. Cigarette butts are essentially non-biodegradable. Therefore, vaping instead of smoking could prevent the discharge of more butts in the environment (Blog do Vapor, 2019). An average smoker will discard about 430,700 butts during his life (Blog do Vapor, 2019). It is also known that for every fifteen packs of cigarettes, a tree is cut down and that an average smoker destroys six trees a year and 352 trees throughout their life due to their dependence (Blog do Vapor, 2019). Finally, it is known that the industry releases 22 million tons

of CO<sub>2</sub> into the atmosphere, and there are 5.5 trillion cigarettes produced annually (Blog do Vapor, 2019).

The media is another way to disseminate the industry's arguments to the population. The main vector is journalists, instructed to disseminate studies favoring the industry and show how electronic smoking devices work. The image is of an innocent product, without significant harm to those who choose them. From the disclosure that it is a product that leaves no smell, to being a product that does not bother people around, and coming to the conclusion that it is a product free of danger, especially for secondhand smokers (Gov.uk, 2018). Therefore, the goal is to demystify smoking, moving from traditional cigarettes, already disliked by society and with their widely known risks, to electronic cigarettes, modern and, according to TI, much less harmful to smokers and the bystanders (Sudré & Ferreira, 2020).

Public relations companies are another way to use the media to embed arguments favorable to the industry in society's mind. Generally speaking, the public relations professional, popularly known as PR, has the central role in building, disseminating, and preserving tobacco industry companies' good image to the internal or external public. They disclose ENDS as low-risk products, put corporate social responsibility campaigns in the media to pass an image that companies are concerned about the directions that the world takes, expose studies that benefit the industry, and make all industry strategies to regulate its products public, gaining the support of ESD fan community (Sudré & Ferreira, 2020).

The health area is not left out when it comes to disseminating the industry's arguments and validating the use of their products. The primary strategy is based on the concept of harm reduction, widely used when talking about other drugs such as cocaine and heroin. The industry wants to discredit the methods already in use, saying they are ineffective for smoking cessation (Gazeta do Povo, 2019). According to the industry, nicotine patches, therapies, physical activities are ineffective for most cases of cigarette consumption (Gazeta do Povo, 2019). They present ENDS as products that gradually and effectively reduce the smoker's desire to smoke traditional cigarettes without suffering (Eufrásio, 2020).

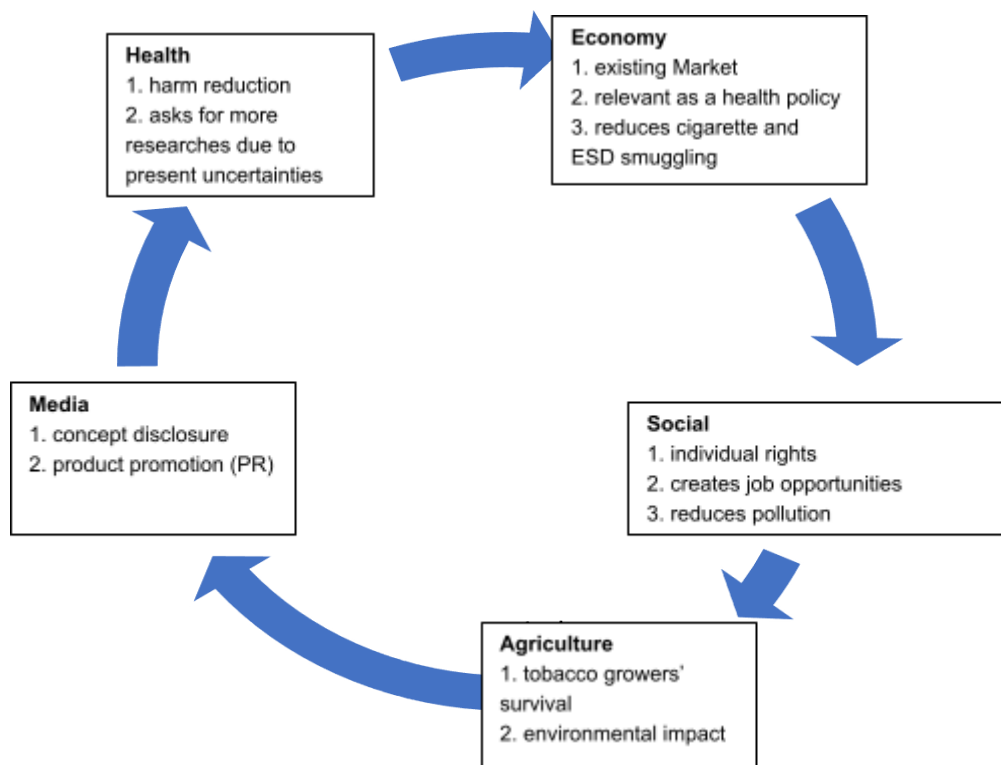
Finally, we can have another overall strategy and already been used for decades when it comes to TI, which is the dissemination that there are scientific uncertainties when it comes to ENDS. The primary vector of these theories' dissemination is medical professionals, who say that there are not enough studies to prove that ENDS are dangerous for health and society (ISTOÉ, 2019). These professionals ask for more studies to give a more informed opinion and with this plant doubt in consumers' minds. If there is no evidence against the use of electronic smoking devices, the consumer automatically believes that it should not bring any harm or at



least it will not affect them as much as traditional cigarettes, with their harms fully known and disclosed.

What can be seen after all this explanation is that TI spares no effort to disseminate arguments that validate its products' regulation, replacing the veiled strategies of promoting its products, from the previously called by public health as "a cloud of smoke" to today's "cloud of steam." Whatever the bias or the technique used, the industry is entrenched in the most diverse areas of our society. TI is fighting a tough battle to achieve its goals and maintain its current economic strength with many investments and acting on many fronts. If traditional cigarettes no longer have the same impact as before, principally among the new generations, it is up to TI to present something more adherent, modern, with a solid technological appeal that conquers these new consumers. The way TI found to do it was the introduction of ENDS into its product portfolio. An easy-to-use, innocent- and modern-looking product linked to a healthy and happy lifestyle.

Figure 1 shows a summary of the tobacco industry's arguments over promoting ENDS.



**Figure 1.** Tobacco industry's arguments over promoting ENDS

### *Industry strategy in promoting ENDS*

Industry strategies also follow the arguments' path and focus on five areas: economy, social, media, agriculture (in the rural environment where tobacco is grown), and health. We discuss how the tobacco industry operates and present its frequent tactics and activities to regulate ENDS for each of these areas.

The economic aspect is the most open and declared TI operating field. The primary strategy is to put high-ranking professionals from the major companies to be its "faces" in the media, conveying an image of credibility and commitment to the truth. Professionals such as presidents, directors, and CEOs give emphatic statements about the ESD non-regulation and what they believe society is losing with such measure. They always pass on an image of trustful people, committed to building a better world and concerned about the population and, especially, about the industry's workers.

TI also adopts the strategy of hiring former politicians to speak on behalf of the company and fight for their interests (Militão & Neves, 2021). They are very relevant to the industry because they know how the political process works and the effective forms of pressure in fighting for ESD regulation. The lobbying is done in a more targeted and veiled way, synchronized with the opportunities. There is, therefore, a behind-the-scene search for convincing that ESD regulation will benefit society and an exchange of un verbalized favors.

Concerning corporate representation, the TI's representation and workers, who are very active, struggles for the industry's interests. People from *Sindicato Interestadual da Indústria do Tabaco (SindiTabaco)*, *Federação Nacional dos Trabalhadores nas Indústrias do Fumo e Afins (Fentifumo)*, and *Associação Brasileira da Indústria do Fumo (Abifumo)* are always giving statements in the media, especially in newspapers that support the TI such as *Olá Jornal*, *A Folha do Mate* and *Gazeta do Sul*. They also pressure politicians and legislators, defending the TI in public hearings and lobbying (SINDITABACO, 2016).

Another clear TI strategy in the social area is society's awareness about ESD regulation being beneficial for all and that topics considered taboos should be discussed, allowing the population to decide what is best for the majority. One example is the institutional campaign "We Need to Talk," launched by Philip Morris Brazil, to inform society and foster the debate on alternatives to an adult who continues to smoke (PMI, 2019). The company reinforces that quitting smoking is the best option, the only one without risk. At the same time, it draws attention

to the fact that Brazilian adults who continue to smoke do not have the possibility of choosing less harmful options to health (Sudré & Ferreira, 2020).

The agriculture side is also exploited by TI when it comes to its strategies. There is the active participation of tobacco growers' representation in the media, public hearings, and debating with politicians and legislators (OLÁ, 2019). Two examples are Romeo Schneider (secretary) and Benício Werner (presidente) from *Associação dos Fumicultores do Brasil (Afubra)*.

In agriculture, there is also the use of politicians from tobacco-growing regions to benefit the industry fighting for ESD regulation (Mathias, 2021a). Active voices in the Brazilian Congress, these politicians always praise the industry and raise issues related to its interests. We can mention two examples: are Marcelo Moraes, federal representative for Rio Grande do Sul (*PTB*), and Luis Carlos Heinze, senator (*Progressistas*) (Mathias, 2021a).

The media is also widely exploited by the tobacco industry to spread the idea that ENDS are the best alternative for harm reduction and a suitable substitute for those who want to quit smoking. TI counts on the support of journalists from important newspapers, who are trained to speak in favor of the industry (Sudré, 2020). These journalists win national and international trips financed by tobacco companies (Niederauer, 2019). In short, there is an exchange of favors between the industry and journalists, who publish biased articles on the subject.

There is also the relevant performance of influencers with thousands of followers and who speak directly to young people, the industry's target audience. They usually write product reviews, discuss topics related to electronic cigarette regulation, discuss with health professionals, talk about the international scenario and studies to support ESD marketing in Brazil, and emphasize the supposed ESD "benefits."

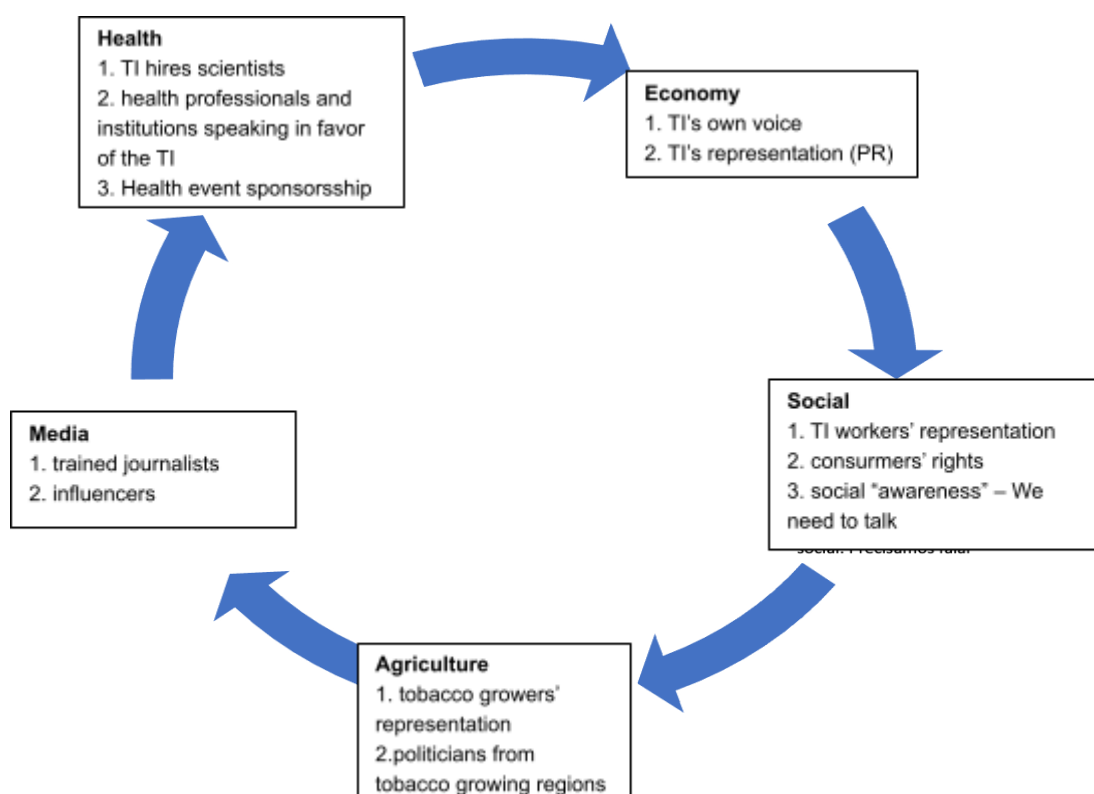
Finally, we will mention the health area, a persistent aspect in the ESD regulation debate, which can be very dangerous when used in a skewed way. Health professionals are fundamental to the TI because they are active voices and can validate certain behaviors in society. Speaking positively about ENDS or raising doubts about their non-regulation, these professionals can be a vital definer in consumers' choice to use or not these products.

The importance of health professionals is so evident that many companies such as BAT Brazil and Philip Morris Brazil have recently decided to hire health professionals (Sena, 2021). Their role is to interface with the tobacco industry and be its scientific research spokespersons, giving credibility to the industry and making contact with their peers easier. They also publish TI-funded or sponsored research without declaring conflicts of interest, bringing ambiguity into

the academy (University of Bath,2021a). An example is TI's sponsorship of academic events such as the Forum for Change of Habits and Health Harm Reduction in 2017, and the Brazilian Congress of Cardiology in 2019 (Folha de São Paulo, 2017a; O Joio e o Trigo, 2020). In these events, companies linked to industry give lectures on the use of heated tobacco products in the most popular Brazilian congresses in the medical area (O Joio e o Trigo, 2020).

The strategies of the industry are numerous and disseminated in the most different sectors of our society. It is up to us to fight these strategies and try to make the debate fairer and more correct. As long as TI has a free hand to act, ESD regulation will be a dark cloud hanging over our society.

Figure 2 Summarizes the tobacco industry's strategies in promoting ENDS.



**Figure 2:** Tobacco industry's strategies in promoting ENDS

### *Proposed responses to counter the tobacco industry's ESD promotion*

Finally, we propose ways to counter the tobacco industry's arguments and strategies. We also follow the proposal of dividing the efforts into the five areas suggested previously:

economy, social, media, agriculture (in the rural environment where tobacco is grown), and health.

In the economic area, customarily exploited by the industry, it is vital to counter the voice of the industry's high position employees. They are always giving statements in the media and talking about the advantages that ESD regulation will supposedly bring to society. It is important to note that there are no studies proving ENDS cause less harm than traditional cigarettes. The damage is different because there is no combustion. However, studies prove that e-cigarette smokers can suffer as much or even more harm (Domingues, 2019). A study conducted by the University of Portland in the USA and published in The New England Journal of Medicine (Jensen et al., 2015) revealed that ESD vapor could be up to 15 times more carcinogenic than cigarettes because of a substance called formaldehyde. Another American paper from the University of Pennsylvania School of Medicine found that vaporizers can increase the risk of heart attack and stroke (Langham et al., 2019). It is also worth mentioning that nicotine dependence, more studied with the conventional cigarette use, is linked to more than 50 diseases, such as cardiovascular problems, chronic obstructive pulmonary disease (COPD), and several types of cancer (e.g., lung, larynx, esophagus, bladder) (INCA, 2021).

TI's representation must also be fought. TI's public relations, former politicians, and lobbyists should be identified and constantly confronted. Knowing both sides of the game, the industry and politics, these individuals have colossal influence and generally work behind the scenes to achieve TI's goals, as ESD marketing. Therefore, it is paramount to know who they are, what they do, and how they act to make it easier to draw up combat strategies and put us one step ahead of them.

Another point that must be fought is the idea that citizens should be free to choose the products that suit them, independently of the harm to their health and, especially, for the health of people around them. When one invades the space of others, one loses the power of freedom they are entitled. So, the population's right to health and well-being should prevail. There is no way to favor a single individual to the detriment of the people who have not chosen to smoke and have to inhale toxic products from the ones in their vicinity.

In the social area, it is essential to use some of the industry's weapons to fight back the ideas it spreads in the media, pretending to open the population's eyes about a topic of global importance. Campaigns such as "We need to talk" (PMI, 2019) are not intended to send any positive message and discuss any kind of subject. The goal is to advertise the industry's products and sell the idea that they are the future because they are supposedly less harmful to health and more modern and technologically developed.

The suggestion is that we use similar counter-tactics. Instead of “We need to talk,” the combat campaign should come with the slogan “We need to inform.” This campaign is of public interest to inform the population about the harm caused by ENDS and how much their regulation can be the kickoff for immersing many young people in the world of smoking, a disease that kills millions every year in our country (WHO, 2021). It is also of fundamental importance to inform and support tobacco growers when it comes to agriculture. They must know that while tobacco production is praised as an activity that generates wealth, development, and employment, studies show that the average monthly income of households per worker is one-third of the national minimum wage (ACTBR, n.d.-b).

They also need to know that in an analysis of the Human Development Index (HDI – life expectancy, literacy rate, school attendance rate, and per capita income), it was clear that the main smoking-producing areas in the southern region have an average below the state index. Besides, the rate of school attendance and income in the tobacco-growing municipalities are lower than in the ones where tobacco is not produced (INCA, 2018). The production also affects the workers’ health, and the tobacco-growing region has a high suicide rate. A solution to these problems is to support rural workers. Therefore, giving alternatives to these tobacco growers is a way of showing them that there is life away from tobacco. The National Program for Diversification in Tobacco Growing Areas (ANATER, 2021), suspended, aims to improve growers’ quality of life and safeguard them from the effects of the decreased tobacco consumption expected by the WHO Framework Convention for Tobacco Control implementation.

It is also necessary to monitor, inform and counter politicians captured by the industry and the ones from the tobacco regions. As they have a strong connection with these growing areas, these politicians know how this organism works and have the weapons available to convince tobacco growers that the industry works for them. Therefore, it is important to clarify that workers are not the industry’s focus – they are only TI’s tools to achieve its objectives: increase income and reduce costs.

We must also have a regular and robust performance in the media area. It is necessary to make the media accountable for the stories they write and the information they pass on. Journalists have to be committed to informing the population of the truth. It is their role to listen to both sides of the story, that is, the side of the industry and the side of those who worry about the population's health and well-being.

Another suggestion is to prohibit the industry from financing trips or any kind of benefits for press and media professionals. A journalist who receives some kind of benefit cannot write

an impartial story. The journalist's role is to be exempt; this is one of the profession's pillars. When there is an exchange of favors, the exemption is lost, and with it, everyone loses.

Influencers must be monitored and should suffer sanctions when disclosing prohibited products in Brazil and when they pass on false or minimally dubious information. The internet and social media should be monitored, alerted, and taken action – from minor sanctions to their ban – if necessary. Although there is freedom of expression, digital media cannot be treated as no man's land. Complaints must be constant, and names that propagate the supposed “benefits” of ENDS should be exposed for false information dissemination, especially to the new generations.

Finally, we address the issue of health. It is fundamental to train capable professionals aware of their rights and duties. Health professionals should commit more to what they say, their opinions, and the data passed on to the population. Professionals and health institutions should be aware of ESD harms and the consequences of their regulation in Brazil.

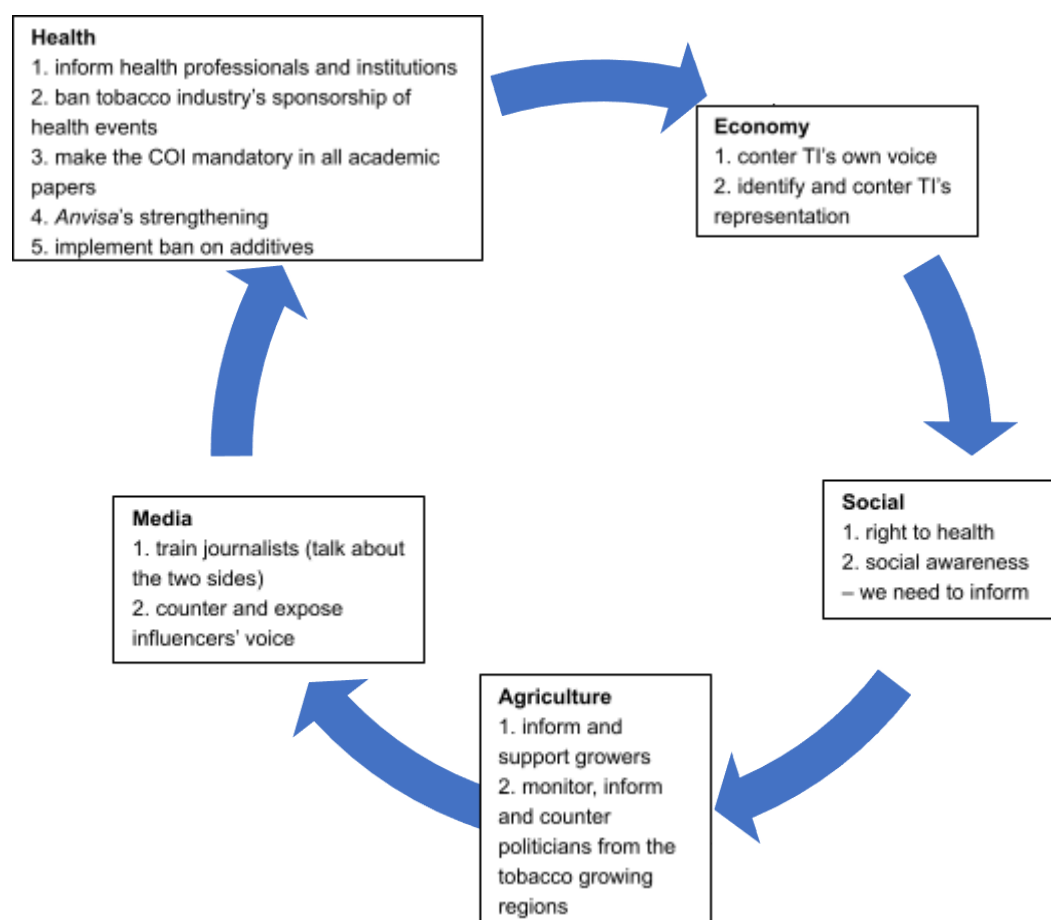
Another issue in health that should be curbed is the sponsorship of academic events by tobacco companies. It is incoherent to allow an industry that kills millions of citizens every year to become a health advocate. Traditional and electronic cigarettes cannot be tied to a healthy lifestyle. The population understands that if health institutions receive support from tobacco companies, their products are not so harmful to health. Based on this erroneous premise, the consumer feels protected about using these products and trusts that they will not harm him. We have to confront research in which there are conflicts of interest (COI), such as those used by manufacturers to claim that ENDS potentially have a reduced risk compared to conventional cigarettes and are intended for adult smokers who do not want or cannot quit smoking. Still, it is important to say that there is no conclusive evidence, from researches not funded by tobacco companies, that they are reduced-risk products (ACTBR, n.d.a).

An example of a recent conflict of interest is a study published in July 2020 that stated that smokers were less likely to develop Covid-19 than those who do not smoke. The article was taken off the air by the European Respiratory Journal after it was discovered that two authors had links to the tobacco industry (Rossini, 2021). The study analyzed the laboratory results of 236,439 patients in Mexico who took the Covid-19 test. Of these, 89,756 tested positive for the disease. After analyzing patient characteristics, the authors wrote that smokers were 23% less likely to be diagnosed with Covid-19 than non-smokers. They found that smoking was not associated with severe conditions of the disease. The Covid-19 tests and patient records were obtained through the Mexican Ministry of Health (Rossini, 2021). At the end of every scientific paper, researchers should state any conflict of interest that could have interfered with the results. In this study, the authors wrote that there was no conflict of interest. That statement,

however, was false. The journal editors found that the author José M. Mier worked as a consultant on tobacco harm reduction to tobacco companies. The author Konstantinos Poulas worked as a researcher for the Greek NGO Nosmoke. The organization studies and develops alternative e-cigarettes and receives funds from the Foundation for a Smoke-free World, funded by Philip Morris. There was a clear link between the study in question and the tobacco industry, which was fortunately identified and removed (Rossini, 2021).

Finally, it is necessary to implement a ban on cigarette additives. They are recognized by the World Health Organization and the scientific community as attractive to the use of cigarettes and ENDS, mainly the young public, facilitating initiation and nicotine dependence. Additives, such as menthol, vanilla, chocolate, cinnamon, and fruit, hinder the process of quitting, as they mask the products' awful taste (ANVISA, 2020a). Since RDC 14/2012, *Anvisa* has tried to prohibit using these aroma and flavor additives in the manufacture of cigarettes and other tobacco products. However, the tobacco industry has been using the courts to obtain injunctions that authorize the continued use of these substances.

Figure 3 Summarizes the suggested counteractions to ESD promotion.





### Figure 3: Proposed counteractions to ESD promotion

At the end of this round of suggestions to counter the strategies and arguments used by the industry, it is worth mentioning that there is still a long road ahead. It is a war that cannot be won overnight, and continuous efforts are needed to achieve the main goal: a smoke-free world.

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