

PR AND CSR PRACTICES OF THE TOBACCO INDUSTRY IN POLAND



Kraków, June 2013

Contents

1. INTRODUCTION.....	3
2. THE MARKET FOR TOBACCO PRODUCTS IN POLAND.....	5
3. THE LAW ON ADVERTISING AND PROMOTION OF TOBACCO PRODUCTS AND SPONSORSHIP OF LARGE-SCALE EVENTS BY THE TOBACCO INDUSTRY	10
Public relations.....	15
Brand stretching.....	15
Cigarette packets as a vehicle for advertising.....	18
The use of points of sale for promoting tobacco products	19
Supporting large-scale events.....	20
Trade fairs.....	22
Recruitment and employment strategies	23
Media cooperation.....	26
Examples of other PR activities.....	27
CSR –Corporate Social Responsibility	28
The „Stop 18” Campaign.....	28
The “Don’t Smoke” Initiative	29
The „Don’t Smuggle” Campaign.....	29
The "Stop fakes!" Campaign.....	30
Training programmes for customs officers	30
The "Stop smuggling!" initiative.....	31
BAT as an ECO-company	31
The disabled – nothing unusual	32
5. SUMMARY	33
6. EXPERT OPINIONS	35
7. BIBLIOGRAPHY	40
8. AUTHOR OF THE REPORT	44

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1. INTRODUCTION

In response to restrictions imposed on tobacco product markets, the advocates of tobacco products have worked out a variety of strategies allowing for legal promotion of companies and tobacco products. The most common of those practices are used to reinforce the positive image, which, in turn, facilitates cooperation with a variety of stakeholders as well as provides direct and indirect advertising opportunities.

The objective of this report is to explore the practices of the tobacco industry in Poland, in the areas of public relations (PR) and corporate social responsibility (CSR), based on selected initiatives and examples from the past few years.

The report takes into account the legal norms related to promotion and advertising of tobacco products, sponsorship of large-scale events by the tobacco industry as well as a brief characteristic of the Polish market.

Among the tactics used by pro-tobacco stakeholders in Poland, the following categories have been included:

- brand stretching,
- legal means of advertising products,
- supporting large-scale events,
- trade fairs,
- employment and recruitment strategies,
- awards and rankings,
- cooperation with the media,
- activity in social media,

CSR activities are illustrated by the following examples of initiatives and campaigns:

- *Stop 18*
- *Don't smoke*
- *Don't smuggle*
- *Training programmes for customs officers*
- *Stop fakes!*
- *The handicapped - nothing unusual*
- *The Centre for Integration*
- *Stop smuggling*

The summary and expert opinions follow.

We hope that this report will increase your awareness about the activities of the tobacco industry, particularly the ones addressed to young audiences, susceptible to advertising. Enjoy reading.

MANKO Association team

2. THE MARKET FOR TOBACCO PRODUCTS IN POLAND

The market for tobacco products in Poland has experienced declining trends over the last 20 years. However, it still remains a large and attractive market, with both production and sales of tobacco products reporting strong profitability¹.

Perhaps the best way to illustrate the scale of the business is through numbers: there are over 15,000 tobacco plantations in Poland, employing 60,000 employees². There are 120,000 sales outlets for tobacco products. 6 out of 31 factories in Europe are located in Poland. We produce around 40,000 tonnes of the raw material on an annual basis, of which 70% is for export. As a result, Poland is the biggest producer of finished tobacco products (cigarettes) in Europe as well as the second-biggest producer of tobacco after Italy³.

The key centres of tobacco farming lie in the south-eastern part of Poland, including the following regions: Lublin, Kraków, Kielce, Rzeszów. Polish tobacco farmers grow three types of tobacco: *Burley*⁴, *Virginia*⁵, *Dark*⁶. Export production comprises a significant part of the production output in individual tobacco-processing factories in Poland. The *Philip Morris Polska* plant, located in Kraków, exports 60% of its production to 70 countries⁷.

The *WHO Framework Convention on Tobacco Control* lists the following entities under the tobacco industry heading: tobacco producers, *WHO* lesalers, distributors, importers of tobacco products as well as persons and institutions *WHO* work for promoting the interests of the tobacco industry⁸.

The biggest tobacco companies in Poland include ***Philip Morris Polska*** (the producer of the most popular cigarette brands in Poland: *Marlboro*, *L&M*, *Red&White*), ***Imperial Tobacco Polska*** (the owner of the following brands: *Davidoff*, *West*, *Mocne*), ***British American Tobacco Polska*** (includes: *Vogue*, *Pall Mall*, *Lucky Strike*, *Viceroy*, *Męskie*) and ***Japan Tobacco International Polska*** (includes the following brands: *Camel*, *Winston*).

The tobacco industry does not only comprise tobacco companies. It includes a well-organised network of organisations and associations which look after the interests of the tobacco industry in multiple areas.

¹ Raport. Rynek wyrobów tytoniowych [The market for tobacco products; a report], [w:] „Poradnik Handlowca”, nr 08/114/2002.

² M. Antczak, P. Gembricki, *Zielona księga. Rola branży tytoniowej w polskiej gospodarce narodowej* [Green paper. The role of the tobacco sector in the Polish national economy], Wydawnictwo Pracodawców RP, Warszawa 2010, s. 6.

³ J. Szczęsny, *Papierosy to pewny interes* [Cigarettes are a secure business], [http://www.poradnikhandlowca.com.pl/archiwum/07-2011,Raport--Rynek-produktow-impulsowych,Rok 2011,50,700.html](http://www.poradnikhandlowca.com.pl/archiwum/07-2011,Raport--Rynek-produktow-impulsowych,Rok%202011,50,700.html)

⁴ W rejonie lubelskim, dolnośląskim, małopolskim odmiana typu *Burley* stanowi ok. 40% uprawianego tytoniu [In the lubelski, dolnośląski, małopolski regions *Burley* comprises 40% of the total output]

⁵ W rejonie mazurskim, podkarpackim, świętokrzyskim odmiana typu *Virginia* stanowi niemal 60% uprawianego tytoniu. [In the mazurski, podkarpacki, świętokrzyski regions *Virginia* comprises almost 60% of the total tobacco output]

⁶ Tytoń ciemny uprawiany jest w regionie małopolskim i świętokrzyskim. [Dark is grown in the małopolski and świętokrzyski regions]

⁷ M. Antczak, P. Gembricki, *Zielony raport...*, dz. cyt., s. 24. [Green report]

⁸ <http://isap.sejm.gov.pl/Download.jsessionid=A55DC9EC17678611936D2FBEF9AD197C?id=WDU20070740487&type=2> [13.05.2013]

➤ Organisations and associations of tobacco producers

One of the organisations for tobacco producers is **The National Association of the Tobacco Industry**. It represents 99% of the Polish market of tobacco producers. Its members include the following companies: *Philip Morris Polska, British American Tobacco Polska, Japan American Tobacco Polska, Imperial Tobacco Polska*. The stated objective of the Association is: “developing permanent contacts and exchanging information between its Members, both state and local authorities, as well as associations of tobacco-product producers and other institutions and organiS.A.tions in Poland and abroad”⁹. **The Polish Association of the Tobacco Industry** is another organisation representing the interests of tobacco producers. Its key objective is to promote tobacco farming and counteract the smuggling of tobacco products by means of, among others, active participation in the legislative process. Membership in the association includes: *Orion, Tobacco Fermentation Plant in Krasnystaw, Luxor Sp. z o.o., Tobacco Trading International Poland Sp. z o.o., The Lublin Tobacco Plant*¹⁰.

The European Smoking Tobacco Association comprises European producers, distributors and importers of tobacco products. Its list of members includes, among others, *Tobacco Trading International Poland* and *The Polish Association of the Tobacco Industry*¹¹.

➤ Organisations of tobacco farmers

The organisations of tobacco farmers include **Polish Association of Tobacco Farmers** based in Kraków as well as **The National Association of Tobacco Farmers**, both cooperating very closely with the tobacco product market as well as the national administration. In Poland, there are 15,000 farmers producing the raw materials for tobacco products.¹²

➤ Organisations of employers (linked to tobacco)

The main representative in this category is **Polish Confederation of Private Employers Lewiatan (PKPP Lewiatan)**, with over 3500 member companies¹³, including *British American Tobacco Polska* and *Philip Morris Polska*. *PKPP Lewiatan* provides external representation services for its members. **Employers of Poland** is an even bigger organization comprising 7000 companies, mostly private, representing a variety of sectors, including

⁹ Krajowe Stowarzyszenie Przemysłu Tytoniowego [National Association of the Tobacco Industry], <http://www.kspt.org.pl/O-Nas/Cele-Stowarzyszenia/>, data dostępu: 24.03.2012

¹⁰ Polskie Stowarzyszenie Przemysłu Tytoniowego [Polish Association of the Tobacco Industry], <http://www.pspt.org.pl/>, data dostępu: 24.03.2012.

¹¹ <http://www.esta.be/about-esta>; <http://www.esta.be/our-members> [13.05.2013]

¹² the answer given by Mr. Tadeusz Nalewajk, the undersecretary of state in the Ministry of Agriculture and Rural Development, to the Parliamentary question number 20014 on the subsidies for farmers cultivating tobacco and hop, 10 February 2011.

¹³ Polska Konfederacja Pracodawców Prywatnych Lewiatan [Polish Confederation of Private Employers Lewiatan (PKPP Lewiatan)] http://pkpplewiatan.pl/o_nas/o_lewiatanie/dolacz_do_nas, access date: 24 March 2012.

British American Tobacco Polska and Philip Morris Polska. This organization publicly defends the interests of its members, including media relations.

➤ **Organizations of employees (linked to the tobacco sector)**

The employees of the tobacco sector look after their own (indirectly also the industry's) interests in a variety of ways, including by establishing associations. One of such associations, *The National Section of the Employees of the Tobacco Industry within the Food Industry Secretariat of NSZZ Solidarność*, comprising almost 1700 members working in tobacco production plants. Another example, *The Federation of Trade Unions of the Employees of the Tobacco Industry in Poland, operating under The All-Poland Alliance of Trade Unions (OPZZ)*, comprises 1400 members. The interests of the tobacco sector are also supported by *The Association of Polish Bartenders*, and in particular, the employees of the food-and-entertainment industry, by supporting the position that smoking should be permitted in public places.

➤ **Organizations of tobacco trading entities**

The main organization representing the interests of tobacco-product traders is *Polish Chamber of Trade (PIH)*, comprising 42 companies. The management board of the Chamber has defended the interests of the tobacco sector by participating in the legislative process related to implementing pictorial warnings on cigarette packets.

Polish Chamber of Commerce (KIG) is an independent Polish business organization, representing the largest number of entrepreneurs. It combines over 150 business organizations and is member of *Eurochambres (the Association of European Chambers of Commerce and Industry)* and *International Chamber of Commerce in Paris*. It has signed cooperation agreements with the majority of national chambers of commerce worldwide¹⁴.

➤ **Business organisations**

Business Centre Club (a business association) is an organisation comprising 2500 members, including *British American Tobacco Polska S.A.* and *Imperial Tobacco Polska S.A.*, *Business Centre Club* „sustains active economic lobbying, promoting the growth of free-market economy, creating good law, defending the interests of Polish entrepreneurs”. Representatives of this organisation have participated in the legislative process linked to the changes in the government order on investigating specific substances in cigarette smoke as

¹⁴ Krajowa Izba Gospodarcza [National Economic Chamber] <http://www.kig.pl/o-nas.html> [13.05.2013].

well as the information and warnings placed on tobacco-product packets. *Business Centre Club* supported the demands of tobacco companies and defended their interests¹⁵.

The organizations listed above comprise tobacco producers and farmers, traders for those products, business people, employers and employees in the tobacco and food sectors. They operate within an institutionalized framework. Their specific interests are intertwined and complement one another. Restrictions placed on production, sales and promotion of these products translate to direct losses for all those organizations and are a threat to further growth¹⁶.

¹⁵ These activities took place in September 2011. Business Centre Club submitted its remarks to the government order during the social consultations stage conducted by the Ministry of Health. It supported the interests of pro-tobacco stakeholders.

¹⁶ D. Kawalec, *The critical analysis of the discourse around the anti-tobacco policy in Poland*, Kraków 2012.

3. THE LAW ON ADVERTISING AND PROMOTION OF TOBACCO PRODUCTS AND SPONSORSHIP OF LARGE-SCALE EVENTS BY THE TOBACCO INDUSTRY

3.1. Promoting tobacco products in Poland

Promoting tobacco products in Poland is subject to many restrictions and limitations. While promoting their products, tobacco companies have to comply with the Polish law as well as the *WHO Framework Convention on Tobacco Control* (WHO FCTC).

Until 1993, there were no regulations in Poland restricting advertising of tobacco products. It was only in the Act of 1993 on unfair competition (Article 28)¹⁷, that changes were introduced to the decree of 24 June 1954 on tobacco farming and production of tobacco products¹⁸. These changes consisted in introducing a partial ban on advertising tobacco products. The act prohibited advertising tobacco products on the radio, on television, in press publications dedicated to children and teenagers¹⁹.

Currently, advertising cigarettes and tobacco products in Poland is regulated by the Act of 9 November 1995 on the Protection of Health against the Consequences of the Use of Tobacco and Tobacco Products.²⁰

This Act defines advertising and further specifies its scope, beyond the commonly accepted definition. Article No. 2, item 5 of the Act, defines advertising tobacco as public propagation of images representative of tobacco-product brands or graphic symbols related thereto, as well as names and graphic symbols of companies producing tobacco products which are identical with the names and graphic symbols of tobacco products, aimed at promoting the brands of tobacco products²¹.

¹⁷ The Act of 16 April 1993 on counteracting unfair competition.

¹⁸ The Decree of 24 June 1953 on farming tobacco and producing tobacco products.

¹⁹ P. Frankowski, The Legal Aspects of Internet-based advertising.

http://cbke.prawo.uni.wroc.pl/files/ebiuletyn/Prawne_aspekty_reklamy_w_sieci.pdf, 21.03.2012.

²⁰ The Act of 9 November 1995 on the Protection of Health against the Consequences of the Use of Tobacco and Tobacco Products (Journal of Laws, 30 January 1996).

²¹ P. Frankowski, The Legal Aspects of Internet-based advertising,

http://cbke.prawo.uni.wroc.pl/files/ebiuletyn/Prawne_aspekty_reklamy_w_sieci.pdf, 21.03.2012.

The Act of 9 November 1995 on the Protection of Health against the Consequences of the Use of Tobacco and Tobacco Products (Journal of Laws of 30 January 1996) prohibits advertising and promoting tobacco products.

Article 8

1. *It is forbidden to advertise or promote tobacco products and accessories as well as products imitating tobacco products and accessories as well as tobacco-related symbols, and in particular:*
 - 1) *on television, the radio and in cinemas, newspapers and magazines for children and teenagers, healthcare establishments, schools, cultural and educational facilities, within the premises of institutions of higher education and sports facilities as well as other public spaces,*
 - 2) *in printed media other than under item 1 ,*
 - 3) *on posters, including large-format hoardings,*
 - 4) *via IT services,*
2. *Sponsorship by tobacco companies of sports, cultural, educational, health, and socio-political activities is prohibited.*
3. *Displaying items imitating tobacco product packets in S.A.les outlets is forbidden.*

In compliance with Article No. 12, anyone *WHO* is found in breach of the provisions of this Act “is liable to a fine of up to 200 000 PLN or a prison sentence, or both combined”.

3.2. Restrictions on advertising tobacco products in the European Union and worldwide

Since 1980, the European Union has conducted legislative initiatives aimed at reducing tobacco consumption within the EU. Among the key objectives of this legislative process is regulating the tobacco product market in order to ensure uniform standards and adequate information for customers as well as defining **restrictions related to advertising these products, with due care for public health.**

As a general rule, the EU legislative framework forbids all types of TV advertising for cigarettes and tobacco products. This ban also applies to indirect forms of advertising, which do not refer to tobacco products directly, looking for ways and means of bypassing this ban by presenting products imitating tobacco products or tobacco accessories and symbols linked to tobacco consumption (Article No. 13 of the consolidated Council directive

89/552/EEC of 1989²², amended by the Council and the European Parliament's directive 97/36/EC of 1997²³).

In 2001, the tobacco directive 2001/37/EEC²⁴ was approved, based on two regulations: the directive on tobacco products and the **directive on tobacco product advertising**²⁵ (directive 2003/33/EC prohibits transnational advertising in the press, on the radio and via online services, as well as sponsorship of transnational events, if linked to promoting tobacco products)²⁶.

The *World Health Organization (WHO)* is yet another entity issuing guidelines for member states' policy related to public health. *WHO* experts work on standards and guidelines, support research and help implement its outcomes across national healthcare systems²⁷. In May 2003, the *World Health Assembly* adopted and implemented the **WHO Framework Convention on Tobacco Control**.

During the second Conference of the Parties of FCTC, which took place in July 2007, the parties approved the scope of work aimed at defining the guidelines for Article No. 13 related to warnings on packets, advertising, sponsorship and promotion of tobacco products. The main objective of those guidelines was to create the practical reference material for defining the effective ways of implementing the rules on placing warnings on packets as well as bans on advertising and promotion of tobacco products, as well as sponsorship activities undertaken by the tobacco product market. The guidelines were drafted individually by the parties and adopted unanimously during the Third Conference of the Parties of FCTC in November 2008, with over 160 signatories of the treaty present²⁸. To date, the treaty has been ratified by 176 countries and organizations, including the European Union (the Parties), thus agreeing to its implementation²⁹.

²² Directive 89/552/EEC of the European Parliament and the Council of 3 October 1989 on coordinating specific statutory, executive and administrative provisions for individual member states, related to audiovisual media services (the directive on audiovisual media services).

²³ Directive 97/36/WE of the European Parliament and the Council of 30 June 1997, which changed the directive of the Council (89/552/EEC), on coordinating specific legislative, executive and administrative provisions in individual member states related to TV broadcasting activities.

²⁴ Directive 2001/37/WE of the European Parliament and the Council of 5 June 2001 on consolidating the statutory executive and administrative regulations among Member States, related to production, displaying and sales of tobacco products. The tobacco Directive 2001/37/WE was created before the EU ratified the FCTC Convention. As a result the tobacco directive in its current shape is not compliant with article 13 and the guidelines included therein. The tobacco directive is currently being revised; http://www.smokefreepartnership.eu/IMG/pdf/ERS3977_Spotlight_Po_Hr.pdf, 21 March 2012.

²⁵ Directive 2003/33/WE of the European Parliament and the Council of 26 May 2003.

²⁶ DG Health and Consumers, EC, 2009, *Kontrola rynku wyrobów tytoniowych w UE [Controlling the market for tobacco products in the EU]*, http://ec.europa.eu/health/archive/ph_information/documents/tobacco_control_pl.pdf, 21.03.2012.

²⁷ http://www.un.org.pl/opis_agendy.php?agenda=4, 14.09.2011.

²⁸ http://www.smokefreepartnership.eu/IMG/pdf/ERS3977_Spotlight_Po_Hr.pdf, 21.03.2012.

²⁹ The list of 22 May 2013, *WHO*, Updated Status of the *WHO* FCTC: Ratification and Accession by country <http://www.fctc.org/>, 22 May 2013.

4. PR AND CSR PRACTICES OF THE TOBACCO INDUSTRY IN POLAND

The market for tobacco products was privatized as one of the first branches of the Polish economy, which is linked to the huge profitability of this sector. Poland is the biggest producer of finished tobacco products in Europe, and one of the most attractive markets for tobacco products³⁰.

In response to actions taken by pro-health stakeholders, resulting in the introduction of various restrictions on advertising and promotion of tobacco products, as well as sponsorship of large-scale events by tobacco companies, the pro-tobacco stakeholders have developed new promotion tools, which enable them to promote their products in the most effective manner possible, within the limits of legal restrictions.

Public relations

PR initiatives are designed to foster the positive image of brands with the use of both indirect and direct tools. With the ban on promoting tobacco products in place, public relations has become an excellent means of legal promotion. Tobacco companies rely on the services of professional PR agencies for promoting their products.

➤ Brand stretching

Brand stretching is a strategy designed to expand the outreach of a brand. Within this strategy, companies introduce new products (not related to the tobacco sector), under a well-known brand. Common product categories would include, among others, clothing. The main objective of brand expansion (or stretching) is to preserve the image of a given brand in the awareness of consumers. This process is facilitated by means of all legally permissible forms of promotion. *Marlboro Classics* and *Camel Active* are good examples in the clothing sector. Both brands rely on the colour palette which is consistent with their respective lines of tobacco products as well as the long-standing image of the original brand.

Expanding the brand to the clothing industry makes it possible for tobacco companies to bypass the existing advertising limitations as well as build the positive image. It also provides a platform for multidimensional communication, through direct contact (sales outlets) as well as indirect (with the use of other information channels such as the Internet and other media). An excellent example of the above was the publication in 2010 of the *Marlboro Classics* advert in *Polityka*, a weekly magazine.

³⁰ The illegal market of excise products in Poland. The estimated scale and tendencies based on the data from the period: January 2010 – July 2011.

Marlboro Classics is an example of the *Marlboro* (Philip Morris International) brand expansion to a line of clothing products.

The Internet website of *Marlboro Classics*³¹ clothing line is visually attractive and saturated with multimedia, which, while providing information, *activate* its target audiences. These multimedia include: the Internet-based magazine called *The Wild Citizen*, a film promoting the season's collection entitled *Freedom Made*, desktop wallpapers marked with the MCS logo, advertising photographs, a possibility to subscribe to the product catalogue, browse through the photographs from the current collection. The titles themselves point to the direction the company is taking in developing a customer profile through the brand, very much in line with the image of the original *Marlboro Man*³², bringing up connotations of a free, uncompromising man, portrayed in a harsh, exacting environment, the man that other *men are jealous about and women desire*.

Original *Marlboro* adverts³³:



advertising photographs for the *Marlboro Classics*³⁴ clothing products.



³¹ <http://www.mcsapparel.com/en/index.html> [12.09.2011].

³² Marlboro Man symbolized a lifestyle in which a cigarette was an inseparable attribute of manhood. All three men *WHO* advertised the *Philip Morris* products in various periods of their glory, by playing the part of the Marlboro Man, died of illnesses caused by nicotinism: David Millar died of pulmonary emphysema in 1987, Wayne McLaren went down with the lung cancer and died in 1992, David McLean died of lung cancer in 1995.

³³ source: <http://adgirlzmdx.wikispaces.com>

³⁴ source: <http://www.marlboroclassics.be>

Camel Active –expansion of the *Camel* brand (JTI – Japan Tobacco International) to a line of clothing products.

The image of a *Camel* brand client is shaped through clothing-product advertising, to represent: travellers roaming the world, choosing austere, unfrequented tourist routes and locations. The photographs promoting the clothing products correspond with cigarette packets, both through the choice of colours and exotic landscapes.

Original *Camel* adverts³⁵:



advertising photographs of the *Camel Active* clothing products³⁶:



³⁵ <http://bambootrading.com>

³⁶ <http://www.camelactive.de>

➤ Cigarette packets as a vehicle for advertising

A cigarette packet constitutes an important element of the general sales strategy. It helps to establish the brand's identity on a competitive market, and is also an efficient promotion tool, both at the moment of purchase and during the use of the product³⁷. John Digianni, the former designer of cigarette packets once observed: *a packet of cigarettes is exceptional because the smoker carries it around everywhere he or she goes, all day long ... It's part of the outfit (...) As a result, a cigarette packet serves as a sign (a symbol) pointing to the product and is an important form of advertising in its own right*³⁸.

In-house documents from *British American Tobacco* suggest that packets are designed to compensate for formal limitations on advertising: (...) *taking into account the consequences of the ban on advertising, packets should be designed in a manner that creates visual impact for the product as well as reflects the spirit of the brand*³⁹.

An excellent example of **packets as vehicles for advertising** are the cigarette packets designed for women (as their target audience). The commonly used colours for this category of products would include different shades of pastels, pinks, violets, whites and bright yellows. These colours are to imply positive qualities such as: freshness, purity, health and intelligence¹. Cigarette produces also revert to other symbols of femininity, for example jewellery-inspired themes or lipstick-resembling cigarette packets (size and shape). Such means of visual representation contribute to cigarette smoking being seen not only as womanly but also stylish.



Among other interesting examples are cigarette packets produced for *Euro 2012 in Poland (UEFA EURO 2012 Football Championships)*⁴⁰.



³⁷ D. Hammond, *Tobacco labelling and packaging toolkit: A guide to FCTC Article 11.*, February 2009, s. 10.

³⁸ As above.

³⁹ D. Hammond, *Tobacco labeling...*, dz. cyt., s. 11.

⁴⁰ Photo: *Polskie Towarzystwo Programów Zdrowotnych [Polish Society for Health Programmes]*.

➤ The use of points of sale for promoting tobacco products

Presenting tobacco products in a point of sale is in itself a form of advertising and promotion. Displaying tobacco products in highly exposed locations is the main tool for promotion. Among others, it stimulates unplanned shopping decisions for those products, creating the impression that smoking is socially acceptable. Additionally, shops selling tobacco products also have branded shelves and money trays. Young people are particularly susceptible to the promotional effect of displaying goods in highly exposed locations.

Promotion in points of sale



adverts in shops (on interior-decoration accessories)⁴¹



⁴¹ Photo: Polish Society for Health Programmes.

➤ Supporting large-scale events

Within the existing legal framework, tobacco companies are not allowed to sponsor sports, cultural, educational or sociopolitical initiatives. However, advertising stands representing individual brands are displayed during the biggest large-scale events, both for sports and music entertainment. Examples in this category would include the *UEFA EURO 2012 Football Championships* as well as the *Heineken Music Festival*.

The Kraków FUN UEFA EURO 2012 Zone

One of the exhibitors was *Media Project LLC*. For every packet of *Lucky Strike* cigarettes purchased (produced by *British American Tobacco*), the company offered a free lighter. For purchasing two packets of cigarettes the buyer would get a watch.



(Kraków, 8 June - 1 July 2012)



During the championships, the authorities turned up to investigate whether the reported activities were not a violation of the law. Both institutional parties informed have confirmed that the law was broken (in the FUN zone of Kraków's Błonia Meadows). The Prosecutor's Office looking into this incident refused to launch an inquiry.

Heineken Open'er Festival

Lucky Strike cigarettes sales outlet (*British American Tobacco*). A cigarette lighter was added to every packet of cigarettes; the bonus for buying two packets was a free ride on the so-called *devil's wheel* carousel.



(Gdynia 4-7 July 2012)

Evidence was collected and the incident was reported to the Gdynia police, which, however, did not see any violation of the law and refused to take legal action.

OFF Festival

El Padre set up its stands within the festival premises, rented by *Japan International Tobacco* for the purpose of promoting the *Camel* cigarettes.



(Katowice, 2-5 August 2012)

The bonus received for buying five packets of cigarettes was a ZIPPO lighter (the market value of this classic model is about 150 zł) or a 8Gb *Kingston* pendrive.



➤ Trade fairs

During the trade fairs the list of exhibitors would include: tobacco companies, cigarette, cigar and pipe produces, as well as manufacturers of accessories used for unprocessed tobacco. Fairs provide the advertising space for new products and sales in attractive prices. Additionally, the so-called “*sampling*” is organized during the fairs.

EuroTab – International Tobacco Products and Accessories Fair

EuroTab – The International Tobacco Products and Accessories Fair – is an annual tobacco fair during which tobacco companies from all over the world present and sell their products. The main organizer of this event is a trade magazine dedicated to the distribution and retail sales of the Tobacco Products International products.



(Kraków, 04.2011)

During the fair, which took place in Kraków, between 11–13 April 2011, *exclusive trade deals* were offered, such as: 15% discounts, discounts for new products, free shipment, gifts for new customers. One of the exhibitors was *Imperial Tobacco Polska* – the fourth-largest international tobacco company⁴².

⁴² <http://www.eurotab.com>

➤ Recruitment and employment strategies

While looking for new employees, tobacco companies present themselves in the positive light, as institutions where working is the source of satisfaction while talent and initiative are rewarded.

The Internet website of *British American Tobacco* displays the following announcement: *"it is thanks to our employees that we are so exceptional, we are a group of people with diverse experience, competence areas and ideas. Each and every one of us is different so we all contribute unique ideas to the company as well as individual working styles. As an organiS.A.tion we create comfortable, development-fostering environment for our talents. (...) We invest in training because we want our talented employees to develop in the direction they choose"*⁴³.

British American Tobacco

This tobacco company distributes electronic invitations (to the recruitment process) to its potential employees, including students.

➤ Annual summer apprenticeship programme (for II–V year students)

*"during your apprenticeship you will become a fully eligible member of the team and face real business challenges. **You will receive compenS.A.tion for your work.** (...) The programme can be an excellent introduction to your future cooperation with British American Tobacco"*⁴⁴

➤ Management Trainee Programme (for students and graduates)

*"Management Trainee is a two-year development programme which, thanks to its intensity and dynamics, will allow you to take up a managerial function"*⁴⁵

➤ Talent BAT Game (workshops for senior students and graduates)

"Talent BAT Game is a series of workshops conducted by our managers, which allow its participants to confront theoretical knowledge with practice, to learn the practical aspects of business" (candidates are selected based on the applications submitted earlier)⁴⁶



⁴³ <http://www.batchallenge.pl/kariera/dlaczego-warto-u-nas-robic-kariere/>

⁴⁴ <http://www.batchallenge.pl/studenci-i-absolwenci/program-praktyk-letnich/>

⁴⁵ As above

⁴⁶ <https://www.batchallenge.pl/studenci-i-absolwenci/talent-bat-game/>

Philip Morris International – recruitment strategy

The tobacco company distributes mailing lists to its potential employees (among others, students) with invitations to the recruitment process.



Trade fairs for schools of higher education



Tobacco companies display their stands during annual job fairs in schools of higher education as well as during the so-called career days organised in many cities. The purpose of such activities is to promote the company among students as well as to recruit future employees.

Philip Morris International displayed a stand, among others, during a job fair organised by the

University of Economics in Kraków, in 2010; also during the career fair organised by the Jagiellonian University in 2013, as well as during the JOBBING Academic Trade Fair in 2013.

During the 2013 Career Days, the following companies were represented: *British American Tobacco Polska* (in Wrocław and Warsaw), *Japan International Tobacco Polska* (in Warsaw), *Imperial Tobacco Polska* (in Poznań), *Philip Morris International* (in Katowice and Poznań).

➤ Awards, rankings

Imperial Tobacco Polska is the winner of the following awards for producers

Pearls of the FMCG Market – the competition designed to, among others, promote new products and foster the image of strong FMCG brands and businesses in the trading sector by promoting brands and highest-quality companies⁴⁷.

In 2011: the second place and a distinction in the *Cigarettes* category, for Route 66 Original 100's and Route 66 Blue 100's⁴⁸.

In 2010: the first place for introducing *West Superslims Silver* and *West Superslims Ice* to the market in 2009.



The Gold Receipt – the Award of Polish Merchants 2011 among the participants of the competition there where companies whose products or services are addressed to the fast-moving consumer goods sector (FMCG)⁴⁹.

The first prize and the Gold Receipt in the category for tobacco products was awarded for the Route 66 Blue 100's cigarettes.



The Highest Quality - Quality International 2010 – a competition designed to identify and honour entities/businesses that stand out in terms of quality control and care for the quality of products and services offered⁵⁰. The first place awarded for the highest quality management of control systems.

The ranking of successful women

In 2012, *Rzeczpospolita* published an article entitled *the 10 rising stars of the Polish business*, among whom, two representatives of the tobacco sector were found; members of the board in the biggest companies in Poland. These ladies emphasize the fact that while pursuing one's career what matters is passion and *the best results in human resources management are achieved by inspiring them with an ambitious vision of their future*⁵¹.

⁴⁷ http://wiadomoscihandlowe.pl/REGULAMIN_PERLY_RYNKU_FMCG_2011.pdf [12.09.201].

⁴⁸ <http://www.imperial-tobacco.pl/centrum-prasowe/centrum-prasowe,11,2011,37> [12.09.2011].

⁴⁹ http://www.hurtidetal.pl/article/art_id,5180-94/regulamin-konkursu-8222zloty-paragon-8211-nagroda-kupcow-polskich8221/ [21.09.2011].

⁵⁰ <http://forumbiznesu.pl/index.php?action=analizy&id=19> [20.09.2011].

⁵¹ <http://ekonomia.rp.pl/arttykul/705507,834983-Dziesiec-wschodzacych-gwiazd-polskiego-biznesu.html>

➤ Media cooperation

This area of public relations is heavily exploited by the pro-tobacco stakeholders *WHO* are fully aware of the importance of the media (in shaping the public opinion) and its potential of exerting influence on political initiatives.

An important element of creating influence consists in **establishing cooperation with journalists from the leading media** by supplying them with materials and expert commentaries. This area of activity is well-developed, largely thanks to its low cost/high impact ratio. The mechanism for exerting influence on the media is not visible to outside observers. The process of obtaining experts' comments often takes place in a non-transparent way. It is hard to conclude which section of the article is written by the journalist and which by the parties *WHO* want to influence the overall message, taking their interest into account. Another example of exerting influence is organising luxury trips for journalists, designed to bring them around to their views⁵².



➤ Social media presence

Tobacco companies use the Internet as a tool for external communication.

- **GoldenLine.pl:** a social network for professionals, where the following tobacco companies are represented:

*British American Tobacco, Philip Morris, Imperial Tobacco Polska*⁵³.

- **YouTube.pl:** video clips summarising the initiatives of *British American Tobacco*⁵⁴.
- **Facebook:** the social-networking platform is used by, among others, *Philip Morris*, to extend invitations to a company-organised event⁵⁵.



⁵² Pan American Health Organization (PAHO), *Profits over People: Tobacco Industry Activities to Market Cigarettes*.

⁵³ <http://www.goldenline.pl/firma/british-american-tobacco>

<http://www.goldenline.pl/firma/imperial-tobacco>

⁵⁴ <http://www.youtube.com/watch?v=hm6CT3buIXE>, <http://www.youtube.com/watch?v=Pvdm7o3vxl>

⁵⁵ <https://www.facebook.com/events/126655460821343/>

➤ Examples of other PR activities

The “Eyes Open” Campaign (Philip Morris S.A.)

Campaign objective: as part of the annual competition for journalists, the best publications are being promoted, especially the ones that raise the awareness of readers, listeners and viewers, concerning important social problems and their causes. At the same time, they help them to better understand the fundamental nature of these problems as well as encourage them to become socially involved in the process of looking for possible solutions⁵⁶.

Campaign duration: since 2001



The “Vogue” Campaign (British American Tobacco)

Campaign objective: to change the cigarette packets, promote and adjust the shape and colour of the packet to customers’ expectations.

Initiatives undertaken within the campaign: a group of women was sent free packets of cigarettes, the so-called ambassadors’ packets – a set containing all cigarette flavours by Vogue. The participants’ task was to assess, among others, the look of the packets (within one year Vogue changed the cigarettes’ packaging design twice)⁵⁷. Campaign duration: April – July 2010.



Internal PR

Initiatives addressed to company employees; associated with the company's image.



Philip Morris organises New Year's balls, integration workshops and banquets for employees.

During one such event, in January 2013, cowboy dancing was organised, with

Zakopower as the star of the evening⁵⁸.



⁵⁶ http://www.nu.fob.org.pl/oczy-otwarte---philip-morris-161_566.html

⁵⁷ “Empower Women – Combating Tobacco Industry Marketing in the WHO European Region”, WHO Report, 2010.

⁵⁸ <http://www.neo.krakow.pl/konferencja-i-bal-noworoczny-dla-pmpl/>

CSR –corporate social responsibility

Both in Poland and worldwide, tobacco companies promote themselves as socially responsible. Their CSR (corporate social responsibility) activities are aimed at improving the company image in the eyes of investors and divert the attention from the core activity of the company. In view of the ban on direct advertising and promotion of tobacco products, this strategy allows for indirect promotion.

By promoting health organisations and sponsoring a variety of pro-social campaigns, tobacco companies present themselves as caring for those *WHO* may suffer from direct or indirect consequences linked to their products. Not only do they present themselves in a positive light but also ensure the attention of the media. However, such activities also mean something more: establishing cooperation with multiple organisations and supporting government initiatives allows them to exert influence on decision-makers.

Thanks to the level of financial contribution from tobacco companies it is hard to refuse them their involvement in the social activities. However, it is worthwhile to recognize a clear case of conflict of interest in this situation⁵⁹. Below, a few well-known CSR campaigns prepared by or co-authored by tobacco companies in Poland.

The „Stop 18” Campaign

Organiser: *National Association of the Tobacco Industry*

Partners (tobacco companies): *British American Tobacco, Philip Morris Polska*; sales and distribution networks: *Ruch, Kolporter, E.Leclerc, Real, Tesco, Żabka and WSS Spółem Praga Południe, PKN Orlen i Shell* as well as *The National Council of Associations of Trade and Services, Polish Chamber of Commerce, The Union Of Polish Retail Chains, The Friends of Children Association, The "U Siemachy" Association, "KONARD" – The Committee for Children in Poland and The Małopolskie Voivodship Plenipotentiary for Prophylactic and Counteracting Addictions.*



Campaign objective: the program is based on the cooperation between companies and organisations which undertake collective initiatives to prevent access to tobacco products for the underage.

Initiatives undertaken within the campaign: the sellers received stickers, leaflets, excerpts from the relevant parliamentary act as well as letters to parents *WHO* send their kids to buy cigarettes. The spots of this campaign were broadcast both on television and the radio. In 2002, a fictionalised film entitled *The Truant's Day* was released, instructing sellers how to respond in situations when the underage attempt to buy cigarettes. In 2002, *The Week of Responsible S.A.les* was organised, with the objective to draw the attention of the public opinion to the problem of access to cigarettes by the underage and encouraging sellers to follow best practice in the area of counteracting this phenomenon⁶⁰.

Website: <http://www.stop18.pl>

⁵⁹ Preventing Tobacco Industry Interference Southeast Asia Tobacco Control Alliance i Health Justice, Inc., 2010.

⁶⁰ British American Tobacco, Sustainability, Why it matters, dostępny: [http://www.bat.com/group/sites/uk__3mnfen.nsf/vwPagesWebLive/DO933J59/\\$FILE/medMD95XPJA.pdf?openelement](http://www.bat.com/group/sites/uk__3mnfen.nsf/vwPagesWebLive/DO933J59/$FILE/medMD95XPJA.pdf?openelement)

The “Don’t Smoke” Initiative

Organiser: KONARD – The Committee for Children in Poland, *Philip Morris Polska S.A.*

Campaign objective: the initiative’s main goal was to prevent smoking among the underage as well as support the legislation counteracting access to cigarettes for the underage.

Duration: 2009

website: <http://www.konrad.org.pl>

The „Don’t Smuggle” Campaign

Organiser: *The Customs Office*

Partners: *Ministry of Finance, National Association of the Tobacco Industry (British American Tobacco Polska, Imperial Tobacco Polska, JTI Polska, Philip Morris Polska)*



Campaign objectives: an information campaign designed to strengthen the social awareness of the negative consequences of smuggling as well as dangerous consequences resulting from buying goods from illegal sources. The campaign was addressed to smugglers, those *WHO* buy smuggled goods as well as people *WHO* turn a blind eye to smuggling⁶¹.

Initiatives within the campaign: over 1 million leaflets distributed to the campaign’s target groups. Posters were distributed to local parishes, containing references to smuggling as a sin. Educational initiatives were conducted at schools, informing students about smuggling and its consequences. In eight cities, large-format information billboards were used⁶².

Campaign duration: 13 June – 3 July 2011

⁶¹ [http://www.marketing-news.pl/mesS.A.ge.php?przemyt art=30060](http://www.marketing-news.pl/mesS.A.ge.php?przemyt%20art=30060), 22.09.2011.

⁶² <http://www.marketing-news.pl/mesS.A.ge.php?art=30060>, 22.09.2011.

The "Stop fakes!" Campaign

Organiser: *Imperial Tobacco Polska*

Campaign objective: The "Stop fakes!" initiative was designed to raise the social awareness about fake cigarettes and their content, e.g. arsenic, toxic materials, untested substances in unspecified quantities, as well as social consequences attached to buying smuggled, illegal cigarettes or cigarettes produced in illegal factories in Poland.

Initiatives within the campaign: consisted of issuing four supplements in *Rzeczpospolita* (29 October, 15 November) and in *SuperExpress* (5 November, 12 November). It also included placing adverts in the *Rzeczpospolita* daily as well as posters in cigarette sales outlets, customs offices as well as border-crossing points along the Polish eastern border.

Campaign duration: 29 October – 29 October 2010⁶³

Website: <http://www.imperial-tobacco.pl/>



Training programmes for customs officers

Organiser: *Imperial Tobacco Polska*

Description: supporting the authorities in counteracting smuggling and fake tobacco products by organising training for customs officers in chosen Polish cities. (November 2006–June 2011).

⁶³ <http://www.imperial-tobacco.pl/centrum-prasowe/centrum,22.09.2011-prasowe,11,2010,25,22.09.2011>

The "Stop smuggling!" initiative

Organiser: The Confederation of Polish Employers

Partners: Newsweek Polska, The Coalition for Fighting Smuggling

Initiative objectives: eradicate smuggling in Poland as well as demonstrate the scale of annual loss generated by smuggling.

Within the initiative: billboards advertising the campaign appeared in big cities in Poland; a Facebook fan page was launched for the campaign; two competitions were organised: the first via Facebook, the second with the cooperation of TVN. One of the key elements of the campaign was the so-called *The coalition for fighting smuggling*. Entrepreneurs, farmers, politicians, journalists, scientists and social activists were invited to participate. In addition to the messages related to smuggling, a large part of the campaign was dedicated to challenging the initiatives for public health improvement.

Duration: since 5 September 2011⁶⁴

Website: <http://zatrzymacprzemyt.pl>



BAT as an ECO-company

In Augustów, a city which has the status of a spa resort, there is a tobacco-product factory belonging to *British American Tobacco*. In 2011, an article was published in *Kurier Poranny* describing the product development initiatives undertaken by the company. The factory was able to reduce its emissions as well as burdensome odour. Its sewer and water management systems were rebuilt. The waste materials are being recycled⁶⁵.



⁶⁴ <http://zatrzymacprzemyt.pl/>, 22.09.2011.

⁶⁵ „Kurier Poranny”, s. 7, 28.04.2011.

➤ Philip Morris S.A. –examples of CSR tactics

The disabled – nothing unusual

Partners: *The Association of Friends of Integration*, together with *Upstairs Young & Rubicam*

Campaign objective: attracting the public attention to stereotypes in perceiving persons with disabilities, running away from the problem and reluctance towards understanding its fundamental nature.



Within the campaign: art exhibitions (sculptures and disabled persons were juxtaposed); the sculptures included the classic Greek once – believed to be masterpieces, despite the damage). Additionally phone line was set up for disabled persons to be able to submit their problems⁶⁶.

Campaign duration: 01 January –30 June 2000.

The Centre for Integration

Philip Morris Polska S.A. has given financial and organisational support to *the Association of Friends of Integration* (a social welfare organisation, operating for the benefit of the disabled), to open its second information centre in Poland. The objective of Centre for Integration (lanuched on 7 June 2006 in Kraków), in addition to education and information activities, is fostering professional activity among the disabled. *Philip Morris Polska S.A.* supported the launch of the Centre in Kraków, among others, because this is where the company's factory is situated. It was a gesture towards the local community⁶⁷.



⁶⁶ http://www.kampaniespoleczne.pl/kampanie,78,niepelnosprawni_normalne

⁶⁷ http://www.nu.fob.org.pl/strona.php?id_a=1107&kat=

5. SUMMARY

Analysing the tobacco industry strategies in Poland, one may notice the diversity of tactics in use. With the awareness of how efficient advertising is as a means of manipulation, the tobacco sector has worked out a range of strategies enabling it to legally promote tobacco companies and their products. Because of the restrictions placed on the tobacco product market, the undertaken steps are creative and meticulously planned.

Direct and indirect initiatives in the field of public relations include participating in high-profile events such as large-scale events, but also internal initiatives addressed at the in-house staff. The strategies of tobacco companies operating in Poland are consistent with international standards. They also take into account domestic norms as well as the local characteristics of the Polish market. Their presence during festivals as well as in the form of event sponsorship demonstrates the existing problem with the implementation of relevant laws in Poland.

Fully aware of and taking into account the arguments used by the pro-health stakeholders, the tobacco companies promote themselves as socially responsible, friendly to their employees, caring for environment, or even the health of consumers⁶⁸. Their carefully thought out CSR initiatives improve their image, which in turn helps them secure investors, establish cooperation, and, indirectly, increase their product sales. With the use of highly effective management systems and massive financial resources, the tobacco industry is able to organise large-scale campaigns, creating benefits for both sides.

Establishing cooperation with multiple organisations and supporting government initiatives, provides them with the opportunity to exert influence on decision-makers. Their strong organisational and structural foundations make them powerful actors in the public discourse. All initiatives aimed at building the positive image lead to increased sales and distribution of tobacco products, which in turn, has a severely detrimental effect on public health.

The inevitable steps lying ahead entail introducing far greater detail to the relevant laws and regulations, which will allow the relevant supervising authorities to interpret the law without ambiguities and, consequently, take proper measures in all cases where infringements are reported with reference to advertising and promoting tobacco products.

⁶⁸ http://www.bat.com.pl/group/sites/BAT_84BCND.nsf/vwPagesWebLive/DO84BJJJ?opendocument&SKN=1;
http://www.pmi.com/pl_pl/responsibility/how_we_operate/pages/how_we_operate.aspx, 15.05.2013

6. EXPERT OPINIONS

Prof. Piotr Jankowski (Jagiellonian University)

Jagiellonian University professor, member of the Board of the Polish Cardiological Society, Chairman of the Committee of the Polish Cardiological Society for Promoting Health in the First Clinical Department of Cardiology and Arterial Hypertension in the Cardiology Institute of the Jagiellonian University, Collegium Medicum in Kraków.

Multiple research has proved that smoking tobacco is the main cause of deaths in the European populace. In Poland, smoking tobacco is the most important cause of deaths among men and one of the most important among women. This addiction continues to constitute one of the biggest social problems, despite the fact that over the last 25 years, a significant drop has been reported among smokers, especially men. Currently, around 37% of men and 23% of women smoke. Among the most common heavy smokers are the inhabitants of big cities, persons with low education, elementary education or vocational education as well as people with poor material situation.

It has been estimated that every second smoker dies of tobacco-related diseases. The consequences on health resulting from smoking cigarettes involve multiple organs, with the most important ones related to the cardiovascular system, cancerous conditions and lung diseases. It has been proved that the risk of suffering from a heart attack rises by 50% for persons *WHO* smoke up to five cigarettes a day; for 20 cigarettes a day the risk goes up four times. Also, people *WHO* smoke on an occasional basis are at risk because every cigarettes smoked is linked to an increase in the risk of tobacco-related diseases. It is estimated that in Poland, smoking tobacco is the cause of twice as many deaths compared to Western European countries. Lung cancer incidence in Poland belongs to the highest in Europe, which is linked, first and foremost, to widespread proliferation of both active and passive smoking of cigarettes. It was proved over a decade ago that passive smoking, in other words, long-term exposure to tobacco smoke, in the workplace or inside the household, is harmful. From the social standpoint, passive smoking is similarly harmful to active smoking.

It is now believed that the tobacco addiction syndrome is a social disease. Hence, the state plays an important role (e.g. adequate legislation, at least on preventive measures) in battling the proliferation of this disease. An important means of reducing the proliferation of the tobacco addiction syndrome lies in the tax policy. In many countries, reducing access to cigarettes and placing pictorial warnings on cigarette packets have proved to be an effective means.

In 2012, during the Congress of the *Polish Cardiological Society*, it was proposed that by 2040 Poland should become free of tobacco smoke. What is meant by that is not that in 2040 smokers become criminals. Instead, it is about creating an environment where young

people never, in their entire lifetime, have an opportunity to smoke a cigarette and, for those *WHO* have already become smokers, encourage them to live a healthier life. To achieve this goal, it is now time to plan adequate changes in legislation. Adequate media campaigns should be prepared as well. It is worth to plan the milestones on the road to free-of-tobacco-smoke Poland.

Łukasz Balwicki, PhD

A doctor, public health specialist in *the Gdańsk Medical University*. Deputy Chairman of *the Polish Society for Health Programmes*; acted in support of the legislative process for the *anti-tobacco act* in 2010; the initiator behind the bill on banning smoking on seaside beaches in Gdańsk; author of many research papers on the use of tobacco.

The tobacco industry operates in the economy creating huge controversy. It produces a product the use of which leads to dramatic deterioration of health and shortening life on a countrywide basis. There are no safe ways of consuming these products, as opposed to products of other branches of the industry. The social, health and economic consequences resulting from the functioning of those products affect the entire society. This is why the *World Health Organization*, together with the great majority of developed countries, reach for tools of reducing tobacco consumption. One of the most effective means is reducing the number of consumers before they reach the stage of addiction, beyond which it becomes difficult to recover. As demonstrated by the *Eurobarometr* data, these new consumers are mostly children and young people. This group is the target for tobacco industry's marketing even though the tobacco industry does not admit to it, as confirmed by the in-house documents of the tobacco industry, released after the court trials in the USA.

One of the tools with proven efficiency is the ban on advertising and promotion of tobacco products. Its key objective is to dispose of all images of tobacco products from public spaces, and in this way remove this method of encouraging others to buy and use this harmful substance. Despite efforts to restrict marketing opportunities by legal means, the tobacco industry is very quick in identifying legal loopholes or exploiting lack of legal clarity in order to conduct its advertising and promotion activities. Examples included in this report confirm the above. Only continuous monitoring of the tobacco industry as well as successive legal initiatives, supported with proper implementation can result in Polish institutions developing a genuine ability to protect children and young people from the designs of tobacco producers.

Łukasz Cioch

author of LCMedia.pl (www.lcmmedia.pl/en); designed and implemented an energy sustainability think-tank (www.caewse.pl), conference/event organiser; lecturer at *Tischner European University in Kraków*, author of media publications; has many years of experience in CSR, PR and media relations (former corporate function: director corporate responsibility & communications); specializes in custom-designed training on public speaking, business communication and presentation techniques.

In developing effective PR and CSR strategies, the tobacco industry represents a very interesting branch of the economy. The sector's stakeholder-interaction diversity, combined with multiple channels of exerting influence, allows for interesting conclusions about the very nature of strategic links between businesses institutions and social organizations. Furthermore, it allows for understanding the more subtle mechanics of advertising, promotion and the ways in which the tobacco-sector companies influence public opinion, the legislative process as well as the employees themselves.

At the same time, tobacco producers are disproportionately exposed to scrutiny from a variety of supervising authorities, pressure groups and opinion-forming organisations. It is therefore quite predictable that, in the face of such pressure, the sector would evolve to develop ever more sophisticated ways of fostering its own growth and identity-building tools, based on an ever more sophisticated network of interdependencies.

Against this background, the report compiled by the MANKO Association, entitled *PR and CSR practices of the tobacco industry in Poland* is an interesting and insightful compilation, exploring the key roles on the chessboard of the Polish tobacco industry. The report has a clear and disciplined structure. It is a valuable source of information supported by a broad and diverse bibliography drawing from both Polish and international sources. Despite its narrow focus on the selected PR and CSR practices, the authors have succeeded in exploring the many interrelated and interdependent areas of the tobacco industry. Taking, among others, *Marlboro Classic* and *Camel Active* as examples, the report puts forward interesting observations about the many interrelated strategies and processes, including the so-called 'brand extension' (even though, *ambush marketing* would be more justified in places). The report presents interesting analysis of marketing decisions by tobacco companies regarding product packaging and cementing positive associations with the brand.

The report does not delve into the issues of health complications resulting from tobacco smoking nor the many different methods used in trying to assess the costs of such complications. By analogy, other than the basic statistics for the tobacco sector in Poland, the report does not explore the financial or other benefits for the economy resulting from the strong position of the sector in Poland. Against this background, the presence of

tobacco-sector companies at university job fairs is a logical thing to do on the part of the tobacco sector. Fully aware of the harmfulness of the products produced by the tobacco sector, whether deliberately or not, tobacco brands make elaborate efforts to compensate for the generally assumed *damage to the public and the company image* by means of strong corporate governance, PR and CSR.

The strongest value propositions in the MANKO report appear to come between the lines. The authors provide their answer to the key question: to what extent are the activities of the companies' in the tobacco sector honest, and, are they proportionate to the real make-change possibilities of the companies involved? Consequently, are they distant from the world of politics where burning social issues are all too often used as a "*brand-launching springboard*"?

The borderline of honesty related to controversial products is doomed to suffer from various shades of hypocrisy and collective sense of helplessness. To illustrate how deeply entrenched this problem is suffice it to explore the prolonged immunity of the tobacco sector to implementing effective bans on smoking in public spaces. This fact alone demonstrates that, in the most important matters, the party that wins is always the one which is "*better organized*" and more efficiently institutionalized, at least until the "critical mass" of public tolerance is crossed.

In 1929, Edward Bernays, believed by many to be the father of public relations, used one dazzling stunt, rooted in the legacy of psychoanalysis, to break the historic taboo of ostracism towards women smoking tobacco. History will remember this moment as "*torches of freedom*", after which tobacco industry worldwide took a deep breath. Even though this event took place almost 100 years ago, the more contemporary measures of the tobacco industry, as referred to by the MANKO report, are deceptively similar to the master's lesson. If any product associates itself with the paradigms of manhood, femininity or any other positive, connotative attributes, any attempt at defending the argument that on the marketing level "*it is not addressed to children*" is completely false, by definition.

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MANKO is one of the most dynamic and creative non-governmental organisations in Poland. The mission of MANKO Association is to promote positive attitudes and values.

For almost fifteen years MANKO has been running the publishing house, carrying out projects and social campaigns such as **Smoke Free Poland, Smoke Free Zones.pl, Don't Smoke Next to Your Child, Risk of Love, Test Yourself, Watch Your Drink.**

MANKO is publishing magazines such as: **Magazine MANKO, High School Leaver's Guide, Think Healthily, Senior Voice.**

MANKO has created effective support for national and local enforcement offices, non-governmental organizations, and advocacy activists in order to strengthen smoke free legislation in Poland and ensure compliance with the highest standards of the WHO Framework Convention on Tobacco Control.

MANKO has built a strong partnership between government, public institutions, international institutions, NGO's and media. Thanks to strong cooperation with national and international institutions changes in the law became possible – in 15th November Poland introduced a smoking ban in public places, especially in the hospitality sector.

MANKO Association is co-initiator of Smoke Free Poland Partnership which unites more than 20 Polish organizations in tobacco control.

Association's activity was rewarded with some prizes and honored in prestigious competitions such as *Global Tobacco Control Alumni Awards for Excellence 2012*, organized by the Johns Hopkins Bloomberg School of Public Health in category "Tobacco Control Advocacy", *White Crows* – The Prize of Primate of Poland, double distinction in contest for the best PR campaign 2011 *Golden Clip* (which was organized by the Public Relations Companies Association) and last but not least, *Salt Crystal*- award given by the Marshal of Małopolska District.