Surveillance of Tobacco Industry Activities Toolkit

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Abbreviations and Acronyms:

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>ASEAN</td>
<td>Association of Southeast Asian Nations</td>
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<tr>
<td>BAT</td>
<td>British American Tobacco</td>
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<tr>
<td>BATC</td>
<td>British American Tobacco (Cambodia)</td>
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<tr>
<td>BATM</td>
<td>British American Tobacco (Malaysia)</td>
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<tr>
<td>CSR</td>
<td>Corporate Social Responsibility</td>
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<td>FCTC</td>
<td>Framework Convention on Tobacco Control</td>
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<td>JTI</td>
<td>Japan Tobacco International</td>
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<td>NCCP</td>
<td>National Commission for Child Protection</td>
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<tr>
<td>PMI</td>
<td>Philip Morris International</td>
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<tr>
<td>POS</td>
<td>Point-of-sale</td>
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<tr>
<td>WHO</td>
<td>World Health Organization</td>
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<tr>
<td>TISN</td>
<td>Tobacco Industry Surveillance Network</td>
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<tr>
<td>TTCs</td>
<td>Transnational Tobacco Companies</td>
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<tr>
<td>TTM</td>
<td>Thailand Tobacco Monopoly</td>
</tr>
<tr>
<td>VINATABA</td>
<td>Vietnam National Tobacco Corporation</td>
</tr>
<tr>
<td>YSP</td>
<td>Youth Smoking Prevention (Programme)</td>
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# Contents

Acknowledgements                        3  
Preface                                4  
Introduction                           5  
Tobacco Industry’s Global Strategies    6  
Tobacco Industry Players in Selected ASEAN Countries 7  
Types of Tobacco Industry Marketing Tactics 8  
FCTC Article 13: Tobacco Advertising, Promotion and Sponsorship 9  
What is Surveillance                    10  
Conducting Surveillance of Tobacco Industry Activities 11  
  Types of activities to be monitored 11  
  Sampling approach                    12  
  Monitoring advertising and promotion 13  
  Monitoring point-of-sale (POS)       15  
  Monitoring CSR activities             17  
The Tobacco Industry Surveillance Network (TISN) 18  
Surveillance conducted in selected ASEAN countries 20  
Summary of SEATCA Publications on Tobacco Industry Tactics 24  
Conclusion                            27  
References                            28  
Annex : Tracking tool for types of tobacco industry activities 29  
About SEATCA                           34
Acknowledgements

This toolkit documents the design and implementation of a Southeast Asia Tobacco Control Alliance (SEATCA) project on surveillance of tobacco industry activities in the ASEAN region which was implemented in collaboration with the Clearinghouse for Tobacco Control (C-Tob), Universiti Sains Malaysia from December 2006 to July 2008. This project involved the establishment of a Tobacco Industry Surveillance Network (TISN) involving seven ASEAN countries: Cambodia, Indonesia, Laos, Malaysia, the Philippines, Thailand and Vietnam. Country surveillance teams led by a country coordinator were formed to closely monitor industry marketing tactics and strategies within each country and the region. SEATC and partners developed a surveillance approach and tracking tool for gathering information on industry activities.

We gratefully acknowledge and thank the country coordinators and their surveillance teams for their invaluable contributions and active participation in the project: Dr Mom Kong (Cambodia), Ms Dina Kania (Indonesia), Dr Maniphanh Vongphosy (Laos), Mr Yong Check Yoon (Malaysia), Dr Jessica De Leon (Philippines), Dr Piyarat Nimpitakpong (Thailand) and Dr Nguyen Tuan Lam (Vietnam).

We wish to thank the Rockefeller Foundation and Thailand Health Promotion Foundation for providing financial support for the first phase of this project. We also thank Campaign for Tobacco-Free Kids for their support to strengthen the network and the next phase. Sincere thanks are also extended to SEATCA team members for their kind assistance during project implementation. We greatly appreciate C-Tob, the National Poison Centre, and the Centre for Knowledge, Communication and Technology at Universiti Sains Malaysia for administrative and technical support. A special thanks goes to Ms Nurul Syahidah binti Adnan for design of this toolkit.
Preface

Tobacco use is prevalent world-wide but ASEAN countries are among the developing countries that are worst affected. This is despite the fact that most countries in the ASEAN region have ratified the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) now possess a very effective tool to advance tobacco control in their respective countries. While this is the case, we have been informed in the preamble to the WHO FCTC to be “alert to any efforts by the tobacco industry to undermine and subvert tobacco control efforts and the need to be informed of activities of the tobacco industry that have a negative impact on tobacco control efforts”. Industry internal documents have exposed the range of tactics adopted by the industry. To counter strategies of the industry, tobacco control advocates should be vigilant of their activities and this can be conducted through routine surveillance of industry activities.

In response to this need, the Southeast Asia Tobacco Control Alliance (SEATCA) in collaboration with the Clearinghouse for Tobacco Control (C-Tob), Universiti Sains Malaysia (USM) initiated a project to monitor the activities of the industry. The project entitled, “Surveillance of Tobacco Industry Activities in ASEAN”, funded by The Rockefeller Foundation, Thai Health Promotion Foundation and WHO Western Pacific Regional Office, was aimed at: a) establishing a regional surveillance network of ASEAN countries to systematically track tobacco industry activities within each country and the region; b) developing a methodology for conducting surveillance of industry activities; c) mapping the expansion of industry activities in the region; and d) disseminating information generated to various stakeholders to advance tobacco control policies pertaining to tobacco advertising, promotion and sponsorship.

The Tobacco Industry Surveillance Network (TISN) consisting of a team of focal points from seven of the 10 ASEAN countries including Cambodia, Indonesia, Laos, Malaysia, the Philippines, Thailand, and Vietnam was established in end of 2006 to closely monitor and respond to industry activities within each country and the region. Country focal points, SEATCA and C-Tob worked together to develop a surveillance system and tool to gather, collate and analyse data on tobacco industry activities on a regular basis. A web-based data reporting and surveillance system was developed with technical support from the Center for Knowledge, Communication and Technology at USM to compile and record up-to-date information on tobacco industry activities within each country and the region. The types of industry activities that were monitored include: advertising and promotional activities, marketing activities at point-of-sale including product and pack design; and corporate social responsibility (CSR) activities.
Introduction

The tobacco industry aggressively markets its products in the ASEAN region, which comprises of 20% of the total number of smokers in the world. In addition to its marketing and promotional tactics, the industry also engages in activities that undermine tobacco control policies and public health.¹

The industry does not have a single strategy for all countries but rather applies versatile and highly adaptable strategies according to the prevailing situation in each country. In countries where tobacco control regulations are in place, the industry creates innovative counter strategies to circumvent current and future tobacco control legislation. In countries where restrictions are non-existent or minimal, the industry is free to market its deadly products using all kinds of advertisements, promotions and sponsorships. To counter strategies of the industry and to press for passage of tobacco control laws and policies, tobacco control advocates should be vigilant of their activities and this can be conducted through routine surveillance of industry activities. It is thus necessary to closely monitor their activities in order to plan advocacy actions.

In response to this ‘hit-and-run’ battle, the Tobacco Industry Surveillance Network (TISN) has produced a tested toolkit in response to the needs of the participating seven countries: Cambodia, Indonesia, Laos, Malaysia, the Philippines, Thailand, and Vietnam. We found that the toolkit is practical given the existing limitations in resources.

This surveillance toolkit documents a practical approach used for tracking tobacco industry activities within each country. Included are descriptions of experiences and lessons learned during the implementation of this project together with case studies from Malaysia, Indonesia and Thailand. A description of TISN is presented as well. The toolkit also provides a brief account of tobacco industry’s marketing strategies and the key tobacco industry players within selected ASEAN countries.

This toolkit will serve as resource material for training and provides guidance on what, where, when and how to use a range of tools and strategies to monitor different industry activities such as direct and indirect advertising and promotion, point-of-sale advertising and corporate social responsibility (CSR) activities. It is intended for use by researchers and tobacco control advocates who are interested to gather evidence on industry activities that support advocacy and enactment of tobacco control laws and policies such as complete tobacco advertising bans.
Tobacco Industry’s Global Strategies

There are more than 120 companies producing tobacco products worldwide. However, about 40% of the world’s cigarette market is controlled by a handful of transnational tobacco companies (TTCs) which include Altria Group, Inc. (formerly known as Philip Morris), British American Tobacco (BAT) and Japan Tobacco International (JTI).  

The tobacco industry generally adopts similar strategies worldwide. There are few strategies that the industry uses and these strategies are evolving, depending on the legislations of a country. One of the industry’s strategy is its aggressive marketing and promotion of tobacco products in new and innovative ways such as via:

- point-of-sale advertising,
- brand-stretching,
- promotional items,
- event sponsorship,
- internet advertising and sales,
- using young promoters to distribute, sell and promote at places frequented by youths.

The industry also uses its size and wealth to influence the political process, focusing on its main goals of opposing taxation and regulation and maintaining freedom and social acceptability of smoking. It also creates influential networks and front groups that act as the industry’s spokesperson.

Transnational tobacco companies also engages in other forms of activities such as creating controversies, changing names and enhancing their corporate image through corporate social responsibility activities. After the devastating revelation by the internal tobacco industry documents, the industry tried to salvage its image by claiming the start of an era of ethical behaviour. For example, BAT launched its Corporate Social Responsibility (CSR) programme and Philip Morris changed its name to Altria Group, Inc.
Tobacco Industry Players in Selected ASEAN Countries

<table>
<thead>
<tr>
<th>Country</th>
<th>Tobacco Manufacturers</th>
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<tbody>
<tr>
<td></td>
<td><strong>International</strong></td>
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<tr>
<td>Cambodia</td>
<td>• British-American Tobacco Cambodia (BATC) (40.3%, 2005)</td>
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<tr>
<td></td>
<td>• Altadis (18.8%, 2005)</td>
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<tr>
<td></td>
<td>• Japan Tobacco International (0.3%, 2005)</td>
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<tr>
<td></td>
<td>• Philip Morris International (0.7%, 2005)</td>
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<tr>
<td>Indonesia</td>
<td>• PT Philip Morris Indonesia/Sampoerna (29.5%, Sept. 2008)</td>
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<tr>
<td></td>
<td>• PT BAT Indonesia/Bentoel (8.3%, Sept. 2008)</td>
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<tr>
<td>Laos</td>
<td>• French company (34%)</td>
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<tr>
<td>Malaysia</td>
<td>• British American Tobacco Malaysia (BATM) (60.8%, 2008)</td>
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<td></td>
<td>• Japan Tobacco International (18.6%, 2008),</td>
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<td></td>
<td>• Philip Morris International (12.8%, 2008)</td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Philippines</td>
<td>• Philip Morris Philippines Manufacturing Inc (30.5%, 2005)</td>
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<tr>
<td></td>
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<tr>
<td>Thailand</td>
<td>• Philip Morris (PM) (19.8%, 2007)</td>
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<td></td>
<td>• British American Tobacco</td>
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<td></td>
<td>• Japan Tobacco (JT)</td>
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<td></td>
<td>• RJ Reynolds Tobacco (RJR)</td>
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<td>Vietnam</td>
<td>• British American Tobacco (BAT)</td>
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<td></td>
<td>• Philip Morris International (PMI)</td>
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<td>• Japan Tobacco Inc. (JTI)</td>
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Note: Figure in brackets () refer to percentage of total market share, year

Source of information:

- Indonesia: AC Nielsen 2008
- Malaysia: Nielsen Retail Audit
- Thailand: Excise Department, Ministry of Finance
Types of Tobacco Industry Marketing Tactics

Transnational tobacco companies and local manufacturers have a myriad of ways to market their products. As restrictions increase, the industry is coming up with highly creative and innovative marketing tools. Some of the ways the tobacco industry conducts its marketing and promotions in ASEAN countries and elsewhere include:

**Advertisements**

**Direct advertisements** are those forms of advertisements that communicate directly with the consumers such as putting up tobacco product-related billboards, advertisements in the print and electronic media, and other means without any attempt by the industry to conceal their advertising attempts.

**Indirect advertisements**, also known as brand stretching, are those forms of advertisements that carry tobacco product brand names on non-tobacco products, e.g., the selling of Davidoff coffee, Camel adventure gear, perfumes and luxury products by Dunhill.

**Cross-border advertising** in the form of placement advertisements in movies or sports sponsorships.

**Promotions**

**Promotional activities** such as sample distribution of cigarettes, offering coupons, contests, and lotteries that come with purchase of cigarettes for the redemption of gifts, distributing promotional items for free, as well as person-to-person promotion.

**Sponsorships**

**Event sponsorships** such as Formula I, pop concerts, and street parties where cigarette booths and billboards are set up.

**Corporate Social Responsibility**

**Corporate Social Responsibility (CSR)** activities such as providing scholarships, supporting environmental projects, and Youth Smoking Prevention (YSP) programmes under either company name or brand name.
FCTC Article 13: Tobacco Advertising, Promotion and Sponsorship

Since aggressive advertising, promotion and sponsorship activities by the tobacco industry have contributed to an increased tobacco use in the region, ASEAN countries should implement Article 13 of the World Health Organization Framework Convention on Tobacco Control. This Article states that “Each Party shall, in accordance with its constitution or constitutional principles, undertake a comprehensive ban of all tobacco advertising, promotion and sponsorship”. A comprehensive ban will reduce the consumption of tobacco products and should:

- Prohibit all forms of tobacco advertising, promotion and sponsorship that promote a tobacco product by any means that are false, misleading or deceptive or likely to create an erroneous impression about its characteristics, health effects, hazards or emissions;

- Require that health or other appropriate warnings or messages accompany all tobacco advertising and, as appropriate, promotion and sponsorship;

- Restrict the use of direct or indirect incentives that encourage the purchase of tobacco products by the public;

- Require, if it does not have a comprehensive ban, the disclosure to relevant governmental authorities of expenditures by the tobacco industry on advertising, promotion and sponsorship not yet prohibited;

- A comprehensive ban on cross-border advertising, promotion and sponsorship originating from its territory.

The above are minimum standards and Parties are encouraged to implement measures beyond the obligations set out in the FCTC.

“Parties recognize that a comprehensive ban on advertising, promotion and sponsorship would reduce the consumption of tobacco products”

What Is Surveillance

Surveillance involves ongoing systematic collection, analysis, and interpretation of health-related data that are necessary for planning, implementation, and evaluation of public health practice. Closely linked with surveillance is the timely dissemination of data to those agencies and policy makers responsible for prevention and control. In this instance, the purpose of surveillance of tobacco industry activities is to assess the magnitude and nature of the industry’s marketing and promotional activities, determine the geographic distribution of these activities, and also to monitor changes in these activities over time.

Surveillance of tobacco industry activities thus involves routine gathering of data on how tobacco industry markets and promotes its products, how it influences the political process, and conducts corporate social responsibility activities. Information collected can be used to support tobacco control policy advocacy.

Aims of Surveillance of Tobacco Industry:

- Determine the range of industry activities
- Determine the industry’s target groups
- Monitor trends in marketing tactics
- Evidence for advocating total ban on tobacco advertising, promotion and sponsorship

Steps in Conducting Surveillance of Tobacco Industry Activities

1. Define types of industry activities to monitor
2. Determine sampling approach and sources of data
3. On-going systematic collection of data
4. Organization and analysis of data collected
5. Use of results for counter-action, policy advocacy and change
Conducting Surveillance of Tobacco Industry Activities

Types of Activities to be Monitored

For the purpose of tobacco control advocacy, we are interested and concerned about the existence and emergence of new marketing/promotional methods, cigarette packaging, new efforts and new strategies to curb or circumvent tobacco control efforts. Hence we should track and look for changes over time.

We have identified six broad categories and within each, sub-categories of tobacco industry activities that should be monitored, namely (please refer to tracking tool on page 24):

I. Advertising and promotion
   - Direct advertising
   - Product placement
   - Trademark diversification or brand stretching
   - Promotional events
   - Cross-border advertising
   - Viral marketing

II. Point-of-sale (POS)
   - Advertising
   - Promotion
   - Functional objects
   - Pack design

III. Corporate social responsibility (CSR)/Philanthropic activity
   - Sponsorships
   - Other CSR activities

IV. Industry involvement in national inter-agency committee/governmental/ministries on tobacco control

V. Activities of tobacco industry’s allies (front groups)

VI. Other industry activities

The range of industry activities covered in the surveillance is dependent on the current status of tobacco control within the country. For example,

If a country does not have any ban on tobacco advertising there would be a need to monitor the whole range of advertising and promotional tactics used by the industry.

Collecting evidence on the prevalence of tobacco marketing and how it is targeting youth will aid in pushing for a ban on tobacco advertising.

In countries where a comprehensive advertising ban is in place, surveillance would involve tracking to identify new industry strategies or violations committed by the industry.
Sampling Approach

Coverage of the surveillance can be widespread, where all geographical areas or a representative sample is monitored. However, much resources are needed. Alternatively, sentinel sites can be chosen. Sentinel sites are key targets for monitoring changes. Targets can be sites (i.e., point-of-sale), events (i.e., industry sponsored sporting events and concerts), television programmes, print media, etc.

One of the key issues in planning a monitoring activity is selection of the locations or targets for which observations are to be made. The options vary from a formal sampling plan for such locations to convenience sampling approaches, with the monitoring team covering those locations that may be easiest to reach. The use of a formal sampling plan has the potential to avoid bias from selecting any particular sites, but has the disadvantage of requiring the development of a sampling frame and incurs additional work and costs. On the other hand, a convenience sample might be readily approached, but may not be representative of the kind of sites of interest.

The main objective of conducting surveillance activity is to collect information on the types of industry activities and to track changes in these activities over time. It is thus, important to ensure that the coverage of targets and sources of data is comprehensive. After determining the types of information to collect you can identify all possible targets and data sources where routine observation and data gathering can be carried out. We thus recommend using a convenient sampling approach since we are not concerned about representation.
Monitoring Advertising and Promotion

Approach and targets for monitoring of direct advertising, product placement, trademark diversification or brand stretching, promotional events, cross-border advertising and viral marketing varies. For example direct advertising using large billboards are common when there is no ban on direct advertising. They are often placed in highly visible places, such as along main streets and on building tops. You can select places where many billboards are located such as particular streets and track changes over time.

Product placement is usually found in mass media such as in television dramas or movies as well as print media. Tracking this activity would require selecting specific air time and monitoring programmes or movies shown on those time. Common print media such as newspapers and magazines which are popular choices of young people should be selected for routine monitoring for product placement and other kinds of direct or indirect advertising. Monitoring trademark diversification or brand stretching can be carried out during surveillance of other forms of activities, such as at industry promotional events or at POS.
Tracking of industry’s **promotional/sponsored events** such as road shows, exhibitions, cultural shows and music concerts would require you to be alert to the occurrence of such events. An observational study can be made by attending each event to monitor the types of promotional and marketing activities. A systematic check list of what to look out for could be developed before hand. We encourage survey teams to keep tabs on name of event, date and time it was held, who are the co-sponsors, whether it is open to public or on invitation basis, and whether it is for free, if payment is required how much is the amount.

**Cross-border advertising** is carried out during Formula I events, through internet, in-flight and imported magazines, television and radio. You thus have to be alert to occurrences of these industry activities.

**Viral marketing** involves dissemination of tobacco-related messages via email and short messaging service (sms).
Monitoring Point-of-Sale (POS)

Direct advertising are prevalent at point-of-sale (POS) where tobacco products are sold and they include a variety of stores such as convenience store, petrol/gas station, supermarket, grocery store, liquor store, tobacco store, street vendor, etc. Advertising at POS may take various forms, where the whole stores could be painted in colors of cigarette brands, display of sale counters, lockers in brand colors and logos, as well as other forms of displays on counters and shelves.

Promotional activities such as sale of kiddie packs of less than 20 sticks, promotional prices, multi-pack discounts, free gifts with purchase, contests or prizes should be tracked. Other salient activities include use of functional objects that bear logo or cigarette brand name or company name. Packaging is an important advertising vehicle. Monitoring product and pack designs are also important especially when other forms of tobacco advertising are banned.

In selecting POS you can start by conducting a rapid observational survey to identify the types of POS where tobacco advertising and promotions are commonly found. You can then select a convenient sample of POS. The number of POS to sample is dependent on availability of resources. You can select two or three of each popular type of POS. You then visit these places at least once fortnightly to see if there is any change in forms of advertising and promotion.
**Observational study** of tobacco marketing activities at each selected POS will entail checking for the presence of advertising, promotional activities, functional objects, product design and pack design for the major cigarette brands. For example, there may be a new cigarette pack design or a display case of a new design.

You can also start a collection of new cigarette packs. Don’t forget to tag them: Place (name of shop, district/ state) and date of purchase.

Your cigarette pack collection can serve as an evidence to argue that:

- The industry can change cigarette pack designs faster than it would like to acknowledge.
- The industry is violating certain regulations or that it is coming out with new ideas (that, if successful, may be introduced to other countries).

**Routine monitoring** of the selected places do not mean that you ignore other places because we observed in Malaysia that tobacco companies sometimes distribute cigarette packs of new design to some shops but not to others. Therefore, if you see anything new at places other than the ones that you are tracking routinely, make a note of them as well.

**Taking photographs of places or objects observed** would be very useful, as a picture can depict a thousand words.

You can also do the surveillance while you are out for meals or even shopping! This is the beautiful part. You can even get fellow tobacco control advocates in your country to do the surveillance in their own area.
Monitoring CSR Activities

This usually involves tracking sources which are likely to record such CSR activities of transnational tobacco companies’ or large local manufacturers such as Thailand Tobacco Monopoly (TTM). To monitor transnational tobacco companies such as Philip Morris International (PMI), Japan Tobacco International (JTI) and British American Tobacco (BAT), it is useful to visit the websites of these TTCs. For example, BAT’s website holds information on the company’s CSR programme and Social Reporting documents.

You may also rely on google search using keywords such as Philip Morris or BAT. The names of partner companies and front groups can also be used as keywords. Besides online search, monitoring certain newspapers is equally critical where TTCs’ activities are often if not always publicized. Selection could be based on newspaper that carried past news report on tobacco industry activities.
The Tobacco Industry Surveillance Network (TISN)

The Tobacco Industry Surveillance Network (TISN), established in end of 2006 by the Southeast Asia Tobacco Control Alliance (SEATCA) in collaboration with Clearinghouse for Tobacco Control, Universiti Sains Malaysia, conducts tobacco industry surveillance in seven ASEAN countries: Cambodia, Indonesia, Laos, Malaysia, the Philippines, Thailand, and Vietnam.

TISN was set up to closely monitor and respond to industry activities in order to plan and develop advocacy actions and recommends for policy changes. For example, in countries where ban on tobacco promotions are non-existent, evidence on such activities should help initiate restrictions. And if bans are already in place the system can track industry violations.

Each participating country uses a standardised tool (refer to Annex) to collect data on a regular basis. A web-based data reporting system has been developed to compile and record up-to-date information on tobacco industry activities within each country.
TISN aims to:

- Systematically track industry activities within each country and the ASEAN region.
- Act as an early warning network concerning emerging industry tactics.
- Map the expansion of industry activities in the ASEAN region.
- Mobilize member countries to respond and strategically plan counter industry activities that are contrary to the FCTC.

Findings from this regional surveillance activities have been analysed and published. Evidence gathered from the surveillance activities have been utilized by individual countries to advocate for tobacco control policies.
Surveillance Conducted in Selected ASEAN Countries

Case Study I  Monitoring POS and cigarette pack design in Malaysia

Malaysia has banned almost all forms of advertisements with the exception of the cigarette packs. Ban on cross-border advertising has not been included in the Control of Tobacco Product Regulations (CTPR) 2004. Since the ban in advertising at point-of-sale in 2004, the industry has started to invest heavily on elaborate point-of-sale displays using colors and symbols and using the cigarette pack as a vehicle for advertising its products.

The main objective was to monitor types of tobacco advertising and promotion at point-of-sale (POS), new promotional approaches used and changes in product packaging. Survey of POS in Penang was conducted from January to December 2007 by the Clearinghouse for Tobacco Control.

Sentinel sites were selected in several locations: Upper Penang road, Bukit Jambul, Pekaka, Sungai Dua, and Taman Free school residential area. The most common types of POS include restaurants, cafes, coffee shops, newstands convenient stores and petrol kiosks. Surveillance of a variety of common point-of-purchase outlets (coffee shops, cafes, convenience stores, grocery stores and petrol kiosks) was conducted fortnightly to identify new promotional approaches used and changes in product packaging.

A standardized tracking tool was used to collect data on new promotional items, displays, new packaging, new designs and flavours, special/limited editions and functional objects. All new cigarette packs and designs of common brands that were produced by the three major tobacco manufacturers, British American Tobacco Malaysia (BATM), Philip Morris and JT International Berhad (JTI) such as Dunhill, Marlboro, Salem, Kent, Pall Mall as well as local brands were purchased and scrutinized. Observations of display practices were also made. Functional promotional categories were identified. Each pack was tagged: place (name of shop, district/ state) and date of purchase. Photographs were taken of each pack and documented. Qualitative information was documented over time.

Data collected over the whole period of surveillance were analysed and presented in a report that was submitted to the Ministry of Health. Evidence was used to support advocacy for graphic health warning on cigarette packages in Malaysia.
Tobacco industry in Indonesia is permitted to advertise its products in all means of media: outdoor, printed, and electronic media. Tobacco advertising on television is only banned from 5 am to 9.30 pm daily and is not allowed to feature tobacco product or people smoking. The primary objective of the surveillance was to gather evidence on industry activities that could be used for advocating a ban on tobacco advertising in the country.

Types of industry activities monitored include:
1. Advertising
2. Event Sponsorship
3. Pack Designs/New Flavor/New Cigarette Brand
4. Corporate Social Responsibility

Monitoring was carried out by the National Commission for Child Protection (NCCP) from January to October 2007.

Areas monitored regularly were South Jakarta, East Jakarta, and Depok. At many times pictures were also collected in random cities, such as Ciamis, Tangerang, Bogor, and Bandung.

Approach taken
Tobacco industry marketing and CSR activities were monitored through 3 media:

1. Outdoor media
Two youth volunteers regularly searched and took pictures on outdoor advertising (billboards, posters, flags, etc.) at least twice a month with the aim to track how often the advertising changes and to locate concentrated areas of these advertising.

Another two youth volunteers also regularly searched for tobacco event sponsorships advertised through outdoor billboards at least twice a month. They also attended some events, such as concerts and festivals sponsored by tobacco industry.

2. Printed media → daily newspaper and monthly magazine
One coordinator was in charge of monitoring daily newspapers. Things that were monitored from newspapers and magazines include advertising, advertising of events sponsored by tobacco industry, and publications of CSR activities and events sponsored by tobacco industry.
3. **Electronic media ➔ television and internet**
Television shows that were sponsored by the tobacco industry, such as concerts, news, sporting event, etc. were monitored. This was aimed to track new tobacco advertising.

The volunteers and coordinators reported their surveillance findings by filling out monthly monitoring sheets that were developed for routine data collection.

**Outputs**
The outputs of the 10 months of surveillance include the following:

1. **Collection of surveillance pictures**
Pictures collected from the outdoor by volunteers were compiled. Outrageous pictures were used for presentations, surveillance book, etc.

2. **Full Tobacco Industry Surveillance Report**
The book elaborates the surveillance findings, analysis, pictures and tables. Also included were recommendations to ban all forms of tobacco advertising, promotion and sponsorships.

3. **Tobacco Industry Surveillance Booklet**
This booklet summarises the detailed report above.

**Evidence for Advocacy**

NCCP’s tobacco industry surveillance plays an important part in NCCP’s overall advocacy project. It generated evidence on how children and youth are massively exposed to advertising, promotion and sponsorships.

To be more sophisticated, NCCP wrapped the surveillance findings in a form of a report and a booklet. NCCP disseminated these reports and booklets to the President and Ministers from various ministries (Youth and Sport, Women Empowerment, Communication and Information, Education, Social Welfare and Health), Chairman of House of Representatives, Head of Commission VIII House of Representatives, Head of Commission X House of Representatives. NCCP also disseminated the publications at in-country workshops on total advertising ban, where the participants were from local and central government and civil society. Press conferences were held prior to the workshops to release the surveillance findings, and the publications were disseminated to the media.
Thailand Tobacco Monopoly
The Thai surveillance team monitored Thailand Tobacco Monopoly (TTM) website which contains the list of CSR activities. The site usually provided detail information including type of activities, location, target audiences, amount of money involved, and sometimes pictures. These activities were posted on the website a few weeks after they were held. In addition, TTM’s annual report and current expenses report can be downloaded from the website. In these reports, CSR annual budget and expenses were illustrated.

International tobacco companies (Philip Morris, JT, BAT)
To monitor other companies, the Thai team gathered keywords in Thai and English and relied on google search. Usually google returned approximately 5,000-8,000 hits when used keywords “Philip Morris” (in Thai) alone. These are then narrowed down using combination of the word “news” (in Thai) or time period (e.g., November 2007). The names of partner companies and front groups were also used as keywords.

Print media
Besides online search, monitoring certain newspapers is equally critical. Four main newspapers (Matichon, Daylinews, Bangkok Business, and Bangkok Post) were subscribed and monitored. All have been selected based on past news report on tobacco industry activities.

Obstacles and shortcomings
All CSR or sponsorship activities were long over when the team found the news. Advocacy work was very difficult to be carried out after the fact. Some activities that appeared on TV and other sources were not systematically monitored. There were some unofficial reports of advertising on close circuit TV in some pubs and bars, however, this surveillance project did not cover this area.
Summary of SEATCA Publications on Tobacco Industry Tactics

Profiting from Death: Exposing Tobacco Industry Tactics in ASEAN Countries
Authors: Yong Check Yoon, Foong Kin, Tan Yen Lian, et.al.

“Profiting from Death” summarizes the ways in which the tobacco industry markets its deadly products in the ASEAN region, home to about 125 million smokers. Marketing tactics vary depending on the existing laws on tobacco advertising, promotion and sponsorships. Tobacco control legislation differs between ASEAN countries. Thailand has a comprehensive ban on tobacco advertising, promotion and sponsorship, including point-of-sale display. In countries where there are either no laws or weak laws, such as Cambodia, Laos, Indonesia and Philippines, the industry targets the poor and has extensive advertising and promotions. In countries where direct and indirect advertising have been banned, point-of-sale remains the key marketing channel. Attractive features used to promote cigarettes were the availability of promotional prices, multi-pack discounts and free gifts with purchase. Another marketing strategy is the use of product and pack designs to entice specific segments of the population such as youths. When brand advertising is banned, vehicles or buildings are painted with brand colours and patterns. The tobacco industry buys its good public image through its corporate social responsibility activities. This has been used in every country. The tobacco industry circumvents partial advertising bans and thus are ineffective. To reduce tobacco use, all ASEAN countries should implement Article 13 of the Framework Convention on Tobacco Control (FCTC) that stipulates a comprehensive ban in tobacco advertising, promotion and sponsorship.

Cool but Deadly: How Cancer is Packed in Malaysia, the Philippines and Vietnam
Authors: Foong Kin, Yong Check Yoon, Tan Yen Lian

As countries in the ASEAN region are gradually implementing Article 13 of the Framework Convention on Tobacco Control (FCTC) which comprehensively bans tobacco advertising, promotion and sponsorship, the tobacco industry has devised new strategies to promote its products with innovative pack and product designs. The pack is believed to be a versatile and last advertising medium to reach out to their consumers. Malaysia has been seen as the ASEAN ‘Central’ market for pack designs as the industry has optimized the used of the cigarette pack by introducing special editions in conjunction with festival events, pack with promotional items and expanded size packs, and also attractive pack designs and flavoured cigarettes targeting at the youth especially women with the deception that these products are harmless.
The ban on posters and other channels of advertising in the Philippines led the industry to shift its attention to packs, promotions and point-of-sale. Easy availability of kiddie packs and single sticks have also increased children smoking prevalence, particularly those living in poverty. Emerging trend of innovative pack designs can also be seen in Vietnam despite its stringent ban on both direct and indirect advertisements including at point-of-sale. Best practice recommendations include implementing Article 11 of the FCTC on packaging and labeling of tobacco products; banning misleading information, flavoured cigarettes, display of cigarette packs and use of promotional items as incentives that encourage the purchase of tobacco products.

**Targeting the Poor: Casualties in Cambodia, Indonesia and Laos**

Authors: Foong Kin, Yong Check Yoon, Tan Yen Lian

The growing tobacco market in the ASEAN region provides a lucrative market for the industry especially in countries where there is no regulation on tobacco advertising, promotion and sponsorship, or where legislation is weak, products are freely marketed to entice and attract new young smokers and the poor. In Cambodia, the tobacco industry uses posters and conducts lucky draws to advertise and promote tobacco amongst young women, children, the poor and among the less educated. The tobacco industry utilizes various marketing strategies to entice new smokers and encourage smokers to smoke more. Young girls and boys were recruited as cigarette promoters to lure smokers together with lucky draws. Empty cigarette packs could be used to exchange for various items such as jackets and torch lights. With no ban on tobacco advertising, promotions and sponsorships, the tobacco industry in Indonesia has aggressively promoted its products through various channels. They sponsored various events ranging from music festivals, sports, movies, and cultural to religious events to cater for different target groups particularly the young. At many of these events, cigarettes are promoted and sometimes distributed free to the spectators, including youth. Despite having a partial advertising ban in Laos, similar marketing strategies were used such as exchanging empty packs for gifts and participating in lucky draws to lure the young and the poor. The tobacco industry also markets its products in both urban and rural areas using young girls.

**Fatal Attraction: The Story of Point-of-Sale in the Philippines, Thailand and Vietnam**

Authors: Foong Kin, Yong Check Yoon, Tan Yen Lian

With the increasing ban in direct and indirect advertising, the industry has shifted its focus to the point-of-sale (POS). When advertising using brand names at point-of-sale is banned, the tobacco industry started to invest heavily on elaborate POS displays with colors and symbols with the aim to sensitise consumers to associate certain colour schemes with a particular brand.
The ban in direct and indirect advertisements outdoors in the Philippines has led the industry to move indoors focusing on POS. Entire shops were painted with brand colours and displays of brand logos accompanied with illuminated advertisements pertaining to the particular brand. In the case of Vietnam, there is a ban on direct and indirect advertising, sponsorship, and promotions, including at point-of-sale where only one pack of a particular brand is allowed to be shown on the display shelves. This has led to brands creating a variety of flavours or types and retailers continued to display more than one pack of a particular brand by displaying different varieties – e.g. menthol, lights, regular, etc. Thailand on the other hand, has set the benchmark to be the first country in the region to ban cigarette displays at POS. Only a label which reads "Cigarettes are sold here" in Thai is allowed to be placed by the shop owners. Point-of-sale is an important avenue to advertise and market tobacco products. Thus implementation of Article 13 of the FCTC should define ‘advertisement’ in the legislation as anything that informs or suggests a tobacco product. There should also be a complete ban on display of tobacco products.

A Perfect Deception: Corporate Social Responsibility Activities in ASEAN
Authors: Foong Kin, Yong Check Yoon, Tan Yen Lian, Mary Assunta

Tobacco companies engage in corporate social responsibility (CSR) activities to project its positive image as a good corporate citizen and maintain its public relations. This is one of the effective strategies used to re-brand themselves as “socially responsible” corporations and to protect their interests. The industry also uses CSR to fight for more lenient tobacco control legislations. A wide range of CSR activities were carried out in almost all ASEAN countries where tobacco industry markets its products. These activities can be broadly categorised into: Youth Smoking Prevention (YSP) programmes, funding for education and research, sponsorship of arts and cultural events, community development, disaster relief, donations and environmental protection. The tobacco industry provides subsidies to tobacco growers in countries such as Cambodia and Malaysia and funds reforestation programmes in Cambodia and Vietnam. Ineffective YSP programmes were implemented in Malaysia and the Philippines. In Indonesia, tobacco industry has been providing scholarships to students either directly or through its foundations such as the Sampoerna Foundation. In a country that has a comprehensive ban on tobacco advertising and promotion (including ban on display of tobacco products) such as in Thailand, CSR is one of the last frontiers for the industry to continue to project its corporate image in the public area. All ASEAN governments are urged to implement the FCTC Article 13 Guidelines and to prohibit conduct of YSP programmes. The industry should not be allowed to use either their company or brand names for CSR purposes.
Industry surveillance is an important component in tobacco control activities because it will help in alerting tobacco control advocates of new strategies adopted by the industry to prevent the formulation or implementation of stricter legislations.

Despite having legislations, the Tobacco Industry Surveillance Network (TISN) has observed that the industry would try to circumvent the law or blatantly violating it. They can also bully governments by threatening them with law suits to delay or deter an implementation. However, there is yet another factor that tobacco control advocates have not expected: the supporting industry.

When graphic health warning was implemented, some plastic product manufacturers have produced plain flip-top boxes for 20-stick cigarettes. This will enable smokers to transfer cigarettes from packs with graphic health warning into these plastic ones. The advantage of these plastic packs is that they can be reused.

Consequential to these innovative introductions, TISN is much needed to monitor the industry at virtually all places, from the corridors of power, karaoke lounges, down to roadside coffee stalls.

As a result of the observations made since 2007, TISN has come up with a rather versatile toolkit that enables an observer to note down what he/she observes of anything pertaining to tobacco industry. With such observations recorded and posted on-line, it is possible to alert those in other countries of what possibly can happen to them. Such alerts will enable effective measures to be taken faster than conventional means and also allows discussions to be held among its members. Moreover, with such observations, legal loopholes can be plugged.
References


This tracking tool was developed and used by TISN members to conduct surveillance of tobacco industry within each country. It is comprehensive and aims at gathering information on tobacco industry marketing and promotional activities as well as their CSR activities.

I. ADVERTISING and PROMOTION (Tick all that applies)

1. Direct advertising (Tick all that applies)
   - Large outdoor billboards advertising cigarette brands (e.g., Marlboro, Salem, Dunhill, Mild Seven)
   - Advertising in television, radio and printed media
   - Painting cigarette logo, designs, or color on the bodies of cigarette delivery vans, big umbrella, and front of retail stores
   - Launching new cigarette brands with giveaways, exchanges, etc.
   - “One to one” promotion (e.g., use of young teenage girls as sales promoter)
   - Others (please specify: ______________________)

2. Product placement (Tick all that applies)
   - Wear a t-shirt exhibiting logo in a TV drama
   - A cigarette pack visible in the set of TV drama or movies
   - Publishing pictures with cigarette brands & logos in magazines and calendars, advertising other products in newspapers, yearbooks, etc.
   - Other (please specify: ______________________)

3. Trademark diversification (TMD) (Tick all that applies)
   - Advertising a tobacco brand on a non tobacco product e.g., “Marlboro Country Tour”, “Winston-Style of the USA” across a street, “Kent Leisure Holidays”, “Camel Boots”, etc.
   - Selling non tobacco products carrying tobacco brand name e.g., hat, wine, t-shirts, etc.
   - Printing cigarette brand names on clothes and postcards
   - Other (please specify: ______________________)

4. Promotional events
   - Road shows
     Please provide further information on:
     Name of event:
     Date:
     Time:
     Co-sponsors:
     Open to public or on invitation basis:
     Free or a need to pay:
     If need to pay, how much (in local currency):
     Pictures
Exhibitions
Please provide further information on:
Name of event:
Date:
Time:
Co-sponsors:
Open to public or on invitation basis:
Free or a need to pay:
If need to pay, how much (in local currency):
Pictures

Cultural shows
Please provide further information on:
Name of event:
Date:
Time:
Co-sponsors:
Open to public or on invitation basis:
Free or a need to pay:
If need to pay, how much (in local currency):
Pictures

Music concerts
Please provide further information on:
Name of event:
Date:
Time:
Co-sponsors:
Open to public or on invitation basis:
Free or a need to pay:
If need to pay, how much (in local currency):
Pictures

Parties associated with cigarette brands
Please provide further information on:
Name of event:
Date:
Time:
Co-sponsors:
Open to public or on invitation basis:
Free or a need to pay:
If need to pay, how much (in local currency):
Pictures

Other (please specify:__________________________)
Please provide further information on:
Name of event:
Date:
Time:
Co-sponsors:
Open to public or on invitation basis:
Free or a need to pay:
If need to pay, how much (in local currency):
Pictures
5. Cross-border advertising
Please provide further information on each activity (attach documentation of activity, dates)
- Formula 1
- Advertising through internet
- Advertising through in-flight magazines
- Television
- Radio
- Other (please specify:________________________________________)

6. Viral marketing
- Dissemination of tobacco related messages via email or sms

II. POINT-OF-SALE (POS)

1. Marketing activities at Point-of-sale (POS) (Tick all that applies)
Please indicate the cigarette brand names for each category of advertising mentioned below.

a. Advertising
- Whole store painted with brand colors
- Full display with brand colors and logos (sale counters/ lockers, display cases)
- Posters (outside or inside)
- Displays on counters
- Display shelf
- Brand colors/logo, etc
- Other (please specify:________________________________________)

b. Promotion
- Promoting sale of single sticks
- Small or kiddie packs (less than 20 sticks packs)
- Promotional prices
- Multi-pack discount
- Discount coupons
- Free gifts with purchase
- Prize
- Contest
- Other (please specify:________________________________________)

c. Functional objects
- Functional objects such as ashtrays, clocks, calendar, lighters
- Other (please specify:________________________________________)

2. Product design
- Fruit flavours (strawberry, lemon, etc.)
- New flavours (clove, menthol)
- Introducing low tar cigarettes
- Other (please specify:________________________________________)

3. Pack Design (Tick all that applies)
Please indicate the cigarette brand names for each category of advertising mentioned below.
- Special editions/ Novelty packs coinciding with various events
- Twin packs
- Use of sleeves
- Other (please specify:________________________________________)
III. CORPORATE SOCIAL RESPONSIBILITY (CSR)/PHILANTHROPIC ACTIVITY

1. Sponsorships
   □ Sports (motor racing, football, snooker, golf, cricket, etc.)
   □ Cultural (arts, dances, music, etc)
   □ Exclusive parties
   □ Other (please specify: ____________________________)

For each sponsorship please provide information on which tobacco industry? Which organization was sponsored? Date and time? And the amount of funds given?

2. Other CSR activities
   □ Public relations activities
   □ Social development project (violence against women, leadership training)
   □ Youth smoking prevention programs (YSP)
   □ Scholarships/Education
   □ Environmental projects
   □ Training/Apprenticeships
   □ Subsidy to tobacco farmers
   □ Financial support for research
   □ Donations to survivors of catastrophes (floods, landslides, tsunamis, typhoons, etc)
   □ Donations to religious places (churches, temples, mosque)
   □ Donations to political parties
   □ Donations to charitable organizations, appeals, trusts
   □ Other (please specify: ____________________________)

For each category of programmes please provide RELATED information on:
   i. Who conducted the activity?
      □ The corporation directly (specify:........)
      □ A trust or body established by the corporation (specify:........)
      □ Public relations consultancy (specify:..........)
      □ Partnerships, joint projects with government agencies, ministries (specify:......)
      □ Partnerships with country-based UN agencies (specify:......)
      □ Partnerships with non-governmental organizations (specify:.....)
      □ Other (please specify: ____________________________)
      □ Don’t know/unsure

   ii. Which tobacco industry was involved?

   iii. Which organization was sponsored?

   iv. What is the amount of funds given?

   v. What is the nature of the activity?

vi. Data source:
   □ Printed media
   □ Electronic media (e.g., internet)
   □ Corporation’s publicity material
   □ Annual report
   □ Recipient’s documentation
   □ Other (please specify: ____________________________)

vii. Please attach documentation of philanthropic activity (e.g., website, copy of printed media, annual report, etc AND PICTURES).
viii. Dates of event or project? dd/mm/yy
- Date start
- Date completed or to be completed
- Don’t know/unsure

ix. Assessment of target group of the philanthropic activity?
- Political leaders
- General public
- Other elites (sporting, cultural, financial)
- Religious leaders
- Other (please specify:__________________________)
- Don’t know/unsure

IV. Industry involvement in national inter-agency committee/ governmental agencies/ministries on tobacco control
Please provide further information on each activity on WHO, do WHAT and WHEN and attach documentation of activity, if any)
- Attempts to delay implementation of stringent laws
- Lobbying committee members
- Seeking exemptions
- Other (please describe nature of involvement:______________)

V. Activities Of Tobacco Industry’s Allies (Front Groups)
Please provide further information on each activity on WHO, do WHAT and WHEN and attach documentation of activity, if any)
- Tobacco farmers /association
- Retailers
- Hospitality industry
- Scientist
- Researchers
- Other (please specify:______________________________)

VI. Other Industry Activities
Please provide further information on each activity on WHO, do WHAT and WHEN and attach documentation of activity, if any)
- Trade expos
- Ethical corporation conference
- Other (please specify:________________________________)
About SEATCA

The Southeast Asia Tobacco Control Alliance (SEATCA) works closely with key partners in ASEAN member countries to generate local evidence through research programmes, to enhance local capacity through advocacy fellowships, and to be the catalyst in policy development through regional fora and in-country networking.

By adopting a regional policy advocacy mission, it has supported member countries to ratify and implement the WHO Framework Convention on Tobacco Control (FCTC). SEATCA has been in existence since 2001 to act as supportive base for government and non-government tobacco control workers and advocates in the SEA region, primarily to Thailand, Malaysia, Cambodia and Vietnam. Currently, the alliance has formally extended to three more countries of Indonesia, Lao PDR, and the Philippines.

SEATCA was awarded the WHO Western Pacific Regional Office’s 2004 World No Tobacco Day Award in recognition of its major contribution to tobacco control in the region. “SEATCA has emerged as a major catalyst for advances made in tobacco control in the South East Asia Region, especially with regard to policy and legislation.”

- Dr Shigeru Omi, Regional Director for the Western Pacific Regional Office at the presentation of 2004 World No Tobacco Day Awards.

SEATCA Objectives
1. To form a supportive base for government and non-government tobacco control workers in their efforts to promote the implementation of effective evidence-based national tobacco control measures.
2. To encourage greater cooperation between tobacco control workers at national and regional levels and to act as a regional leader on issues which affect all countries in the region.
3. To facilitate information transfer and the sharing of experience and knowledge, to organize capacity building exercises, and to coordinate national and regional initiatives in tobacco control work.
4. To strengthen national tobacco control movements and to bring mainland Southeast Asian issues into the international tobacco control arena.

SEATCA Activities
1. Building local evidence through Collaborative research programme which provides funding, capacity building training, mentorship and platform to disseminate research studies to policy makers. The products from this programme are local evidences and knowledge for policy development.
2. Capacity building which focuses on strengthening local capacity on policy development through programmes named ASEAN fellowship programme and national tobacco control working group.
3. Regional network for policy development through SEATCA regional forum which highly responds to in-country policy movement. SEATCA organizes two regional fora per year focusing on policy issues like tobacco tax, health warnings, best practice on advertising ban, etc.

For more information www.seatca.org
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“Working together to promote the implementation of effective evidence-based tobacco control measures in Southeast Asia”