SNAPT!
DOCUMENTING TOBACCO INDUSTRY TACTICS AROUND MUMBAI'S SCHOOLS

CONDUCTED BY:
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EXECUTIVE SUMMARY

India is experiencing an epidemic of child tobacco use. Today, 14.6% of children aged 13 to 15 years report tobacco use. Within the next year, an additional 15% of youth are likely to start using tobacco. Tobacco use patterns are almost exclusively developed during the adolescent years. Tobacco companies know that once children are hooked, they become customers for life.

To attract children and youth, tobacco companies use a combination of tactics including advertisement, promotion and sponsorship to target kids where they spend their time - around schools. The combined effect of the tobacco industry’s tactics make tobacco appear acceptable, accessible and highly desirable.

In 2015, Salaam Bombay Foundation conducted a survey of tobacco industry marketing and promotion tactics around 40 schools in Mumbai. This report provides a comprehensive look at the strategies employed by the tobacco industry to market tobacco to kids around Mumbai schools.

This report shows that point-of-sale advertising in the areas surrounding schools has become an important final frontier for a tobacco industry looking to market its products to impressionable and price-sensitive youth. Of schools surveyed, 90% of them had at least one tobacco shop operating within 100 yards of the school. On average, each of the 40 schools was surrounded by 9 shops selling and marketing tobacco products.

The report found that the tobacco industry (driven by ITC and Godfrey Philips) is using carefully calculated marketing strategies to reach children around Mumbai schools. The tobacco industry uses many tactics at the point-of-sale to promote tobacco sales around Mumbai schools, including:

- Placing advertising and products at children’s eye level and near candy or other child-friendly items.
- Advertising and selling youth-friendly flavoured products.
- Promoting cheap tobacco products and advertising the availability of loose cigarettes which cost as little as Rs. 1.

This survey found a significant number of violations of India’s tobacco control law, known as COTPA. Every shop surveyed had at least one violation. The most common violations included:

- Sales of tobacco products within 100 yards of a school

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b Mistry et al. (2015) Banning Tobacco Sales and advertisements near educational institutions may reduce students’ tobacco use risk: evidence from Mumbai, India. Tobacco Control: 24:e100-e107
Two companies, ITC Ltd. and Godfrey Philips India Ltd., account for 93% of all tobacco ads

The display of tobacco advertisements that include brand names, brand shots or images

The display of tobacco advertisements that are larger than permitted

Failing to display health warning boards

Displaying incorrect health warning boards

The results for the survey show that the tobacco industry is aggressively marketing around schools and violating India's tobacco control laws. In order to combat the tobacco industry's efforts to target youth, we urge the Commissioner of Mumbai's Municipal Corporation (BMC) to act immediately to:

- Remove tobacco advertisements from the point-of-sale and at shops and vendors within 100 yards of schools.

- Cancel licenses from shops that violate India's tobacco control laws.

- Hold tobacco companies responsible for the advertisements, promotions and sponsorships of their brands.

- Establish a single agency or group charged with enforcing tobacco control laws, particularly Section 6 (a and b).

- Enact a complete ban on direct and indirect tobacco advertisement, promotion, and sponsorship.
Based on packages of smokeless tobacco observed by Salaam Bombay Foundation in 2015.

1.9 ads were found per shop.

48% displayed ads below the counter.

54% of shops had ads.

26% had a below the counter feature.

35% of shops had external feature.

19% of shops had internal feature.

24% of ads were for flavoured tobacco.

92% of flavoured ads included menthol.

2 shops had general fair price ads.

35% of shops had external feature.
MARKETING TOBACCO TO KIDS NEAR SCHOOLS

- 27% of shops had a power wall
- 17% of power walls showed health warnings
- 58% of shops had hanging display
- 81% of shops placed tobacco next to candy
- Rs. 1 lowest cost for products
- 18% of ads were for loose cigarettes
- 5 types of ads emphasized price
- 27% of shops had general fairness ads

PRODUCT POSITIONING

PRICING

81% of shops had hanging display

58% of shops had hanging display
India is currently experiencing an epidemic of tobacco use. Among youth aged 13 to 15 years, 14.6% are current tobacco users. An additional 5,500 adolescents try tobacco in India for the first time every day. Children and youth in India, particularly those between the ages of 15 and 24 years, are vulnerable to tobacco initiation – the majority of tobacco users report initiation before turning 18 and some begin their habit before the age of 10.

Tobacco places a tremendous social and economic burden on India. Each year, one in six of all global tobacco-related deaths occur in the country. Tobacco use is associated with more than half of the deaths caused by cardiovascular disease, cancers and chronic lung diseases in India. Tobacco use is associated with two out of every five deaths due to tuberculosis. The direct and indirect costs of premature mortality from tobacco have been estimated at Rs 300 billion (or $6.6 billion USD) in India in 2002-2003.

Public health researchers and policy advocates have suggested that the diversity of tobacco products available in India creates additional challenges for tobacco control advocates. In addition to cigarettes, the Indian market includes numerous indigenous forms of smoked and smokeless tobacco (including bidi, gutkha, khaini, mawa and misheri).

Significant evidence, including internal tobacco industry communications, has documented decades of the industry’s intentional marketing of tobacco products to children and youth.

Globally, tobacco industry marketing to children and youth includes advertising, promotions and sponsorship under the umbrella of marketing communications and strategies.

The National Cancer Institute has identified three major themes in tobacco marketing designed to attract children and youth:

- Emphasizing satisfaction associated with the use of tobacco products through taste and other product characteristics.

- Emphasizing desirable outcomes associated with tobacco use including feelings of independence, attractiveness, adventure and popularity.

- Countering health warnings about the consequences of tobacco use.

The most reliable information on the extent and strategies of tobacco marketing comes from the United States. From 1940 to 2005, the tobacco industry spent $250 billion USD (in 2006 dollars) on the advertisement and promotion of cigarettes in the United States. In 2005 alone, the...
The tobacco industry spent a reported $13.5 billion USD on promotions and advertisements – or the equivalent of $1.5 million USD per hour.\textsuperscript{13} Internal tobacco industry documents show clear, unequivocal evidence that tobacco companies have intentionally targeted their products to children. Internal industry documents highlighted by The Campaign for Tobacco Free Kids, for example, include statements such as:

"Evidence is now available to indicate that the 14-18 year old group is an increasing segment of the smoking population. RJR-T must soon establish a successful new brand in this market if our position in the industry is to be maintained in the long term."\textsuperscript{14}

Tobacco marketing to youth is effective. For example:

\begin{itemize}
  \item A recent study conducted in India found that exposure to cigarette brand names in media and through branded promotions and merchandise was significantly associated with tobacco use\textsuperscript{23}
  \item Brands that have the largest advertising presence are the
\end{itemize}

\begin{table}
\centering
\begin{tabular}{|c|c|c|}
\hline
Type & \% of Youth Use & \# of Youth Use \\
\hline
Cigarettes & 4.4 & 2.7 million \\
Other Tobacco & 2.7 & 1.8 million \\
\hline
\end{tabular}
\caption{Youth Tobacco Use by Type in India}
\end{table}
same brands youth are most likely to report using. A meta-analysis published in 2016 found “consistent evidence of a positive association between exposure to point-of-sale (POS) tobacco promotion and increased smoking and smoking susceptibility among children and adolescents”. The analysis concluded that frequent exposure to POS tobacco promotion increased the odds of youth having tried smoking by 1.6 times.

A meta-analysis published in 2006 comprising the results of 51 studies from 11 countries found that exposure to tobacco industry marketing doubled the risk of youth initiating tobacco use. Active exposure to tobacco marketing tripled the odds of a youth using tobacco.

19 Barnoya J, Glynn T (2012) Reducing global health inequities through tobacco control. Cancer Causes Cont; 23(s.1):7–9. from
Heightened awareness and restrictions on tobacco industry marketing in high-income countries including Australia, Canada, and the United States, have motivated tobacco companies to push aggressively into low- and middle-income countries, including India, where tobacco control laws are often weaker, or are inadequately enforced.\textsuperscript{17,18,19,20,21}

Low- and middle-income countries prove a profitable environment for the tobacco industry, where more than 80\% of the world’s one billion tobacco users live.\textsuperscript{22}
In order to market to children and youth, tobacco companies need to reach them in the places they frequent the most. The area around schools, where students spend a significant amount of their time, offer tobacco companies a valuable platform for marketing. Globally, evidence suggests that the tobacco industry actively targets the neighbourhoods surrounding schools for point-of-sale marketing.28

In Mumbai, the environment surrounding schools is often filled with tobacco. A study published in 2013 found 221 tobacco vendors and 42 tobacco advertisements present within 100 yards of 26 schools.29

Marketing around schools works. Numerous studies have shown that reducing the amount of exposure youth have to tobacco products and advertisements can reduce the number of tobacco users in a city. Conversely, high levels of point-of-sale marketing in school neighbourhoods are associated with higher levels of school smoking.31,32
SCHOOL POSITION OF TOBACCO VENDORS (CIRCLES) AROUND A SCHOOL IN SOUTH MUMBAI

29 Mistry et al. (2015) Banning tobacco sales and advertisements near educational institutions may reduce students’ tobacco use risk: evidence from Mumbai, India. Tobacco Control; 24:e100-e107. doi:10.1136/tobaccocontrol-2012-050819
Tobacco marketing in India is regulated under a national tobacco control law known as the Cigarettes and Other Tobacco Products (Prohibition of Advertisement and Regulation of Trade and Commerce, Production, Supply and Distribution) Act (COTPA, 2003). COTPA was enacted in 2003 and came into effect on May 1st, 2004. Among the 33 Sections of COTPA, Section 5 relates most directly to tobacco marketing. Under Section 5, advertisements that directly or indirectly promote the use or consumption of tobacco products is banned with the exception of advertisement in or on product packaging and advertisements at the entrance or inside a warehouse or shop where tobacco products are sold or distributed. COTPA Section 5 further prohibits the promotion of tobacco products, trademarks or brand names through sponsorship, gifts or prizes.

COTPA describes advertisements as "any visible representation by way of notice, circular, label, wrapper or other document and also includes any announcement made orally or by any means of producing or transmitting light, sound, smoke or gas"

India is also a signatory to the Framework Convention on Tobacco Control (FCTC), a legally binding global treaty drafted by the World Health Organization. The FCTC provides the framework for national tobacco control programmes along with strategies to implement and monitor tobacco control efforts.

Despite significant regulation of tobacco advertisements under COTPA, tobacco control advocates have identified loopholes and poor implementation as barriers that allow the tobacco industry to promote their products. Such loopholes include loose provisions for brand stretching and use of non-traditional advertising features which permit tobacco companies to continue to reach children and youth.
MILESTONES IN TOBACCO LEGISLATION

2000  Indian Central Government bans tobacco advertisements on cable television

2003  World Health Organization’s Framework Convention on Tobacco Control (FCTC) is adopted by the 56th World Health Assembly setting global guidelines for tobacco control

2004  India signs into law the Cigarettes and Other Tobacco Products (Prohibition of Advertisement and Regulation of Trade and Commerce, Production, Supply and Distribution) Act outlining restrictions and regulations to tobacco industry marketing

2005  FCTC enters into force

2008  US National Cancer Institute releases Monograph outlining the role of media in promoting and reducing tobacco use

2009  COPTA amended to prescribe pictorial health warnings on all tobacco product packages

2012  US Surgeon General’s Report declares that tobacco company advertising and promotions cause youth to initiate and continue to use tobacco products

2013  Supreme Court of India lifts the Bombay High Court stay orders impeding the implementation of point-of-sale advertising rules outlined in COTPA
For the SNAPT Project, 40 schools (20 schools run by the municipal government, and 20 private and government-aided schools) were identified based on focus group discussions and scouting by field staff from Salaam Bombay Foundation. The schools were selected to cover all regions of Mumbai (south, central, western suburbs, eastern suburbs, and harbor line) and to ensure a diversity of neighbourhoods (low-, medium-, and high-density residential and mixed use areas) were covered.

Students participating in Salaam Bombay Foundation’s Super Army School Leadership Programme were invited to participate in the SNAPT Project. In November 2015, student participants received an orientation session with a SNAPT facilitator at their school.

During the orientation, students learned about common forms of tobacco marketing, including advertisements, brand stretching, product positioning, power walls, product displays, and product promotions. Following the orientation, the students surveyed the area surrounding their school with an emphasis on the area within 100 yards of the school grounds. A staff mentor assisted the students in the community survey.

For each shop selling tobacco products, or other sites of tobacco marketing (billboards, sponsorship, etc.), students completed a brief survey and took photos of the marketing strategies observed.
Today’s teenager is tomorrow’s potential regular customer

All tobacco marketing strategies uncovered in the SNAPT survey were observed at the point of sale for tobacco products. This observation reflects the results of previous studies in Maharashtra, which indicate that tobacco marketing is most noticeable at the point-of-sale for users and non-users. While India is home to a diversity of tobacco products including smoked tobacco (cigarettes, bidis, cigars, and water pipe) and smokeless tobacco products (gutkha, mava, misheri, khaini, pan with tobacco, dry snuff, and others), and related products (supari and pan masala), cigarette brands accounted for almost all of the advertisements, product displays and store beautifications observed in the survey.

Point-of-sale venues observed in the SNAPT survey fell into four major categories:

- Permanent, general-purpose shops: grocery stores and general stores that sell a variety of goods including food and household products in addition to tobacco

- Permanent, tobacco-focused shops: stores and kiosks primarily selling tobacco products often with products displayed behind the vendor and no interior space for customers

- Temporary and mobile shops: a variety of structures that can be disassembled or have features (like wheels) that make them movable. These shops include temporary structures (such as tables, or shelving that can be easily moved to a new location), vendors selling tobacco products from collapsible tables and cases, and those that sell tobacco products from bicycles and other vehicles.

- Other shops and locations, such as fast food vendors, consumer goods sellers that have tobacco products as well
LOCATIONS, DENSITY AND PROXIMITY

The SNAPT survey found that for many students in Mumbai, their school environment was filled with tobacco shops and tobacco marketing. In many cases, the density of tobacco vendors around school made it almost impossible to avoid a tobacco vendor when arriving or leaving the school grounds. In total, 368 tobacco vendors were identified by students in the areas surrounding schools. Among those shops, 56.0% (n=206) were within 100 yards of a school. Nine out of ten schools surveyed had at least one tobacco shop operating within 100 yards.

On average, students observed 9.2 tobacco vendors (range 3 to 11). Two thirds of the tobacco vendors were operating out of permanent shops structures, while one third were selling tobacco from temporary or mobile operations. No marketing strategies beyond the point-of-sale for tobacco products were observed by students or facilitators during the survey.

9.2 SHOPS PER SCHOOL SURVEYED
Tobacco advertisements were the most noticeable marketing strategy observed in the SNAP Project. India’s tobacco control law, the Cigarettes and Other Tobacco Products Act (COTPA, 2003), places restrictions on direct and indirect advertisements of tobacco products. Under COTPA, tobacco advertisements are only permitted at warehouses and point-of-sale locations. Permitted advertisements cannot exceed specified dimensions (60cm x 45cm), and must include a health warning in black text with a white background stating “Tobacco Kills” or “Tobacco Causes Cancer”. Advertisement boards are not permitted to display tobacco brand shots, brand names, promotional messages or pictures. The only items permissible on advertisement boards are the type of products available. Illuminating such display boards is not permitted.

The Global Youth Tobacco Survey for India has found that three quarters (74.4%) of students aged 13 to 15 years of age have seen a pro-cigarette ad on a billboard in the last 30 days. An article published in 2013 found 42 advertisements at 221 tobacco vendors operating within 100 yards of 26 schools in Mumbai. In Mumbai, evidence...
suggests that tobacco companies are fueling the display of advertisements by tobacco vendors. Two thirds of vendors surveyed in 2013 reported being approached by tobacco companies to display advertisements and two thirds reported being paid by tobacco companies to engage in such marketing activities.\textsuperscript{36}

Tobacco advertisements and promotions are an effective tool used by the tobacco industry to attract children and youth. In numerous studies, a direct link between exposure to advertisements for tobacco products and a heightened risk of tobacco use has been observed.\textsuperscript{37}

Advertisements and promotions impact children and youth in the following ways. Advertisements and promotions:

- Foster positive attitudes, beliefs and expectations about tobacco use\textsuperscript{38}
- Promote intentions to use tobacco and increase the likelihood that children and youth will start using tobacco,\textsuperscript{39,40}
- Children and adolescents exposed to a greater number of tobacco advertisements at the point-of-sale are more likely to have tried smoking.\textsuperscript{41,42}

Advertisements displayed at the point-of-sale were commonly observed in the survey. A total of 368 advertisements were observed. More than half of the vendors (54.1\%) surveyed displayed advertisements for tobacco products. And, on average, tobacco vendors displayed 1.9 advertisements at shops.

There was no significant difference in the the probability of tobacco advertisements displayed within 100 yards of schools and those found beyond 100 yards. However, permanent shops were more likely to display tobacco advertisements (57.9\%) compared to temporary and mobile shops (46.3\%).

In both permanent and temporary/mobile shops, tobacco advertisements were exclusively for cigarette brands. No smokeless tobacco advertising was observed in the surveyed shops.

Three shops had televisions displaying video tobacco advertisements.

Advertisements for nine tobacco brands were found...
ITC Limited and Godfrey Philips India Ltd. brands dominated the marketing landscape. Gold Flake, Four Square, Classic and Marlboro accounted for over 95% of the advertisements observed. ITC brands (Classic, Gold Flake, Bristol and Navy Cut) accounted for 51% of all observed advertisements. Godfrey Philips India Ltd., with its brands Marlboro, Four Square and Hawkeye accounted for 45% of all advertisements observed.

Below the counter advertisements are particularly important features for children and youth. Below the counter advertisements are positioned at the eye level of small children and youth and “eye level is buy level”.43 Providing advertisements at this height allows marketers of tobacco products to

43 Pollay RW (2007) More than meets the eye: on the importance of retail cigarette merchandising. Tob Control; 16(4): 270-74
Tobacco marketing in India is so effective, that a study published in 2013 found that more than three quarters of 5 and 6 year olds surveyed in India could identify at least one tobacco brand.  

Flavoured tobacco products, particularly cigarettes, have been highlighted as gateway products for tobacco use among youth. The Food and Drug Administration in the United States has identified flavoured tobacco as "starter" products that can initiate non-smokers to tobacco use. Internal documents from the tobacco industry have shown that tobacco manufacturers have targeted youth and inexperienced smokers with menthol cigarettes in the past. Such internal documents indicate that children and youth are more open to novel and exciting flavours, and that such tobacco products may be more socially acceptable due to their pleasing aromas and taste. Young smokers have also reported greater enjoyment from flavoured cigarettes and indicate that these products have a "high curiosity to try factor".

Numerous studies and systematic reviews confirm tobacco industry reports of the appeal of flavoured tobacco products. A systematic review of use and attitudes toward flavoured tobacco products published in 2015 found that flavoured tobacco use was associated with a younger age of initiation than non-flavoured products. Furthermore, use of menthol cigarettes among youth has been associated with a greater likelihood of reporting signs of nicotine dependence, such as reduced time before needing a cigarette.

compared to smokers of non-flavoured cigarettes. Flavoured tobacco products may provide an opportunity for tobacco companies to market to children and youth in the face of increasing restrictions on advertisements and promotions. As the number of outlets and means of marketing have increased, tobacco companies turn to product innovations (new flavours, new flavor delivery systems, etc.) and their associated packaging and advertisement as a means to attract new users.

The student surveyors in the SNAPT product found a total of 91 advertisements for flavoured tobacco products - 25.4% of all tobacco advertisements observed.

Mint and menthol flavoured cigarettes were the most commonly observed flavoured tobacco products advertised. Eighty-four tobacco advertisements (92.3% of all flavoured tobacco advertisements) were for products that included a mint or menthol flavor. Three brands, Classic Gold Flake and One and Only, advertised mint and menthol cigarettes. Five advertisements promoted cigarettes with bubblegum flavor (One and Only Bubblegum Blast) and two advertisements were for fruit-flavoured brands (Classic Mild Citric Twist).

In 2013, the US FDA reported that menthol cigarettes posed a greater public health risk than non-menthol cigarettes noting that menthol cigarettes created a cooling and anesthetic sensation that reduced the harsh experience of tobacco smoking. It was further
found that menthol cigarettes encouraged initiation and continued use among youth and young adults.\textsuperscript{52}

Numerous strategies have been employed by the tobacco industry to deliver flavours to tobacco users, including additives to the paper wrappers, tobacco, and filter agents.\textsuperscript{53} Among the sampled schools in the SNAPT project, the most commonly advertised flavored tobacco products were Gold Flake Mint Switch and Classic Ice Burst, both of which emphasize the use of a flavor ball in the filter that users press to release flavor to the cigarette. In these products, users can manipulate the flavor of the product by determining when to release the flavor. Advertisements for these products found in the SNAPT survey emphasized the “on-demand” quality of the flavor release process, and used wording and imagery related to the technological aspect of these products.
ABILITY TO ATTRACT NEW SMOKERS AND DEVELOP THEM INTO A YOUNG ADULT FRANCHISE IS KEY TO BRAND DEVELOPMENT.


ADVERTISING IMAGERY AND MESSAGING

MARKETING ON FEATURES

Previous analyses of tobacco product advertisements have found a heavy reliance on aspirational imagery and messaging.\textsuperscript{54} Such imagery and messaging focuses on themes including independence and freedom, aesthetics and appearance of users, adventurous behaviour, rebellion, popularity, glamour, luxury and inclusion – all concepts that are highly desired by children and youth and are aimed at promoting social acceptability of tobacco use.\textsuperscript{55} Evidence suggests that this approach to marketing tobacco products is successful.

The SNAPT Project documented 30 marketing slogans and text features in advertisements. Advertisements documented in the SNAPT Project included imagery and messaging based on aspirational themes, product features and price.

Product feature messaging observed in the SNAPT survey emphasized the quality and character of the product, or an action in the user associated with the product. For example, words like “the taste of gold”, “fresh”, “signature”, “smooth” denote a sense of quality or luxury associated with the brand. Action words, such as “press filter”, “dual taste choice”, “experience”, and “Click. Shift!” all denote ideas of movement, choice, personal preference and energy.

Twenty-two advertisements emphasized key product features:

- Flavor (“Fine Taste”, “Signature Taste”, “Icy burst”, “Experience the bubblegum burst”)

- Filters (“Meteor Filter”, “Four filter technology”, “The taste of gold now with a firm filter”)


- Packaging (“New stylish edge pack”, “Download the app and see the musician [on the package] come alive”)

A number of the tobacco advertisements used technology-related messaging, including phrases “fusion ball technologies”. In one advertisement, for Classic Mild cigarettes, the advertisement linked to a downloadable smart phone application that turned the cigarette packag into an interactive, music video. These messages reflect strongly with wording and messaging for highly desired personal technology products like smart phones, tablet computers, media applications, and digital social networking services. The use of technology wording would be familiar and accessible to children and youth who regularly download music videos “on-demand” and click icons on a computer to access a feature, or downloading gaming applications.

ASPIRATIONAL MESSAGING

Nineteen advertisements included aspirational or socially desirable messaging appealing to children and youth, including “Live your passion”, “Famous”, “International Style”, “Jet. Set. Go!”, “Don't be a maybe”, “Not for the ordinary”, “Superstar”, “Stylish edge pack”. The aspirational messages reflect images of a jet-set, fast-pace lifestyle, fame and popularity, luxury and uniqueness in the part of the user. These messages were coupled with images of airplanes, electricity, and city landscapes. These ads featured rich colors of red, gold, silver and black.
While COTPA Section 5 permits some tobacco advertisements at the point-of-sale, such advertisements are required to include health warning messages. Under Section 5 of COTPA, health warning messages, reading either “Tobacco Kills” or “Tobacco Causes Cancer” must be written and legible along the top edge of the advertisement. Health warning messages must be written in black on a white background.

The SNAPT survey found that the majority of tobacco shops with advertisements (82.4%) had health warning messages included in advertisements. Advertisements documented in the SNAPT Project Survey found advertisement messaging almost exclusively in English (except for Cavendars Gold), health warning messages observed in the survey were exclusively written in Hindi.

Most health warnings included in advertisements did not meet the COTPA requirements.
Marketing products on the basis of price is a major tactic used by the tobacco industry to attract children and youth.\textsuperscript{56} In fact, the relationship between the price of tobacco products and the rate of tobacco use is highly predictable. The availability of low-cost tobacco products correlates with the higher rates of tobacco use. Similarly, when the price of tobacco products rise, the number of tobacco users decline.\textsuperscript{57,58}

Researchers have estimated that an increase in taxes on cigarettes from 38% to 78% of the retail price could reduce the number of smokers by 4.7 million and could save the lives of 3.4 million Indians from tobacco-related deaths.\textsuperscript{59,60}

Children and youth are the most price-sensitive demographic due to their limited income and disposable money.\textsuperscript{61,62,63} Previous studies have shown that youth are up to three times more responsive to tobacco price changes compared to adults.\textsuperscript{64}

Five advertisements highlighted the price in their messaging: “Famous offer – Rs. 36”, “Famous offer – Rs. 68”, “Only Rs. 29” and “Wills Navy Cut Rs. 8/-. Two

FOR THE PRICE OF A COLA IN MUMBAI, YOU CAN BUY\textsuperscript{65}:

\begin{itemize}
  \item \textbf{up to 37 cigarettes}
  \item \textbf{up to 37 smokeless tobacco packets}
\end{itemize}

cigarette brands, Four Square and Gold, had advertisements that highlighted the low or reduced price of their brands' products.

A second price promotion strategy was also observed in the SNAPT Project. Some shops displayed signs that read “Fair Price Shop – Cigarettes Sold at MRP”. These advertisements did not include any reference to a particular brand or company. Unlike the advertisements for specific brands and products mentioned above, the fair price shop does not promote a special discount or economical tobacco product options. Instead, the advertisement emphasizes MRP, or maximum retail price, to suggest that tobacco products at other retail outlets sell products at a higher price.

Instead of suggesting to a consumer that they should buy a specific product (over more expensive competitors), these advertisements signal to consumers that they should buy tobacco products generally from a specific shop (compared to more expensive competitors). Fair price shop advertisements were observed at two permanent shops and in both cases, were displayed below the counter.

Additional price marketing strategies have been previously identified, including buy-one-get-one promotions on tobacco products, and providing gifts with purchases. However, these strategies were not observed by the student surveyors in the SNAPT project.
TOBACCO VENDOR WITH LOOSE CIGARETTE CANNISTERS IN MUMBAI
LOOSE CIGARETTES

Loose cigarettes can be an entry point to tobacco use for children and youth. Loose cigarettes are attractive to youth for a number of reasons:

- Loose cigarettes are affordable: A single stick can cost as little as Rs. 1 ($0.014 USD)\textsuperscript{66}. The most expensive loose cigarette observed in Mumbai was Rs. 20 ($0.28 USD)\textsuperscript{67}. Loose cigarettes are more affordable than cigarette packages (which are available with 10 and 20 stick options in Mumbai).

- With no package to carry or hide, smoking loose cigarettes leaves less incriminating evidence of tobacco-use for parents, peers and teachers to discover.

In the SNAPT Project, a number of strategies were documented to market loose cigarettes:

- Pasted advertisements showing the name of the brand and the price of per stick (6 shops, 18 advertisements).

- Positioning canisters of loose cigarettes in built-in displays at the eye level of children and youth (15 shops).

- Positioning open packages of various cigarette in highly visible locations, signaling and prompting users to make a purchase (46 shops).

\textsuperscript{66, 67} Loose cigarette prices based on the lowest and highest price cigarette purchases made by Salaam Bombay Foundation purchases in 2015 and 2016.
To bypass existing laws that limit forms of tobacco product marketing at the point-of-sale, the tobacco industry has developed tools that are easily identifiable, but do not include images of the tobacco products, or the product brand name. The most common tools observed in the SNAPT Project were the use of colour schemes, patterns and abstract designs. While the specific brand being marketed may not be immediately apparent, this strategy allows users to easily identify shops selling tobacco products, and can promote tobacco by making it more visible, appear socially acceptable, and may trigger impulse purchases.

Non-traditional advertisements help tobacco companies establish brand identities and character. Different colours allow brands to convey meaning. For example, silver and gold colours represent luxury, quality, and prestige often associated with “premium” tobacco products with higher price points. Bright colours like red and yellow can convey energy and excitement.

Non-traditional advertisements were commonly reported in the SNAPT Project. In total, 153 shops (41.6%) observed had at least one form of non-traditional advertisement. Tobacco branding without explicitly showing the brand name or product image took the form of using recognizable shapes, patterns, and colour palettes on billboards above the shop, on panels on the top, side and bottom of the shop or kiosk and on product stacking units and shop features (like shelves, counters, shutters, etc.).

BRAND COLOURS

CLASSIC

FOUR SQUARE

GOLD FLAKE

HAWKEYE

MARLBORO
Within the SNAPT Project, store beautifications and branded store features used specific colours, shapes and patterns in designs on built-in features on the exterior or interior of the shop or kiosk. 35.1% (129) of tobacco shops surveyed included at least one external beautification feature. 25.8% (95) shops had at least one beautification feature on the interior of the shop or kiosk. 71 shops (19.2%) had beautification features on the interior and exterior of the shop.

Beautifications were most commonly observed under the counter. More than one in four shops that were observed in the SNAPT Project survey (26.1%) included at least one form of beautification below the counter. Such beautification features included stickers and adhesive panels applied to the exterior of a store or kiosk and mounted panels with shapes, colours and/or patterns.

Built-in features inside a store or kiosk were the second most commonly observed beautification in the SNAPT Project survey. Built-in beautification features included shelving units, product stacking units, counters, and decorative wall features. 22.8% of shops including at least one built-in feature.

Above-the-shop beautifications, including billboards, shop signs and built-in features above the counter were encountered at 11.4% of shops in the SNAPT survey. These beautification features were the most similar in style and presence to traditional tobacco advertisements.

The high number of beautifications below the counter level. These advertisements appear directly at the eye level of young children and are potentially more visible that beautification features that are found with a kiosk structure or above a shop.

![Beautification below the counter of temporary tobacco shop](image)
35.1% EXTERNAL FEATURES
25.8% INTERNAL FEATURES

LOCATION OF NON-TRADITIONAL ADVERTISEMENTS

BELOW THE COUNTER: 26.1%
BUILT-IN FEATURES: 22.8%
SHOP SIDES: 14.4%
ABOVE THE SHOP: 11.4%
SHUTTERS: 4.1%
Tobacco companies extend the impact of their brand at the point of sale by offering new varieties of products using a common brand name.\textsuperscript{81}


\textsuperscript{76} Feighery, EC et al (2004) Retailer participation in cigarette company incentive programs is related to increased levels of cigarette advertising and cheaper cigarette prices in stores. Prev Med; 38(6):876-84

\textsuperscript{77} Feighery, EC, et al. (2003) How the tobacco companies ensure prime placement of their advertising and products in stores. Tob Control; 12:184-188


Product stacking units (PSUs) and the display of many tobacco products and packages (known as “powerwalls”) allow tobacco companies to utilize the packaging and products themselves as marketing tool. PSUs and powerwalls have been identified as a means for tobacco companies to:

- Increase product visibility to youth\(^{71,72}\)
- Emphasize branded imagery\(^{73}\)
- Increase product accessibility\(^{74}\)
- Create an attractive and enticing image\(^{75}\)
- Create the appearance that tobacco products are socially acceptable consumer goods.\(^{76,77,78,79}\)
- Stimulate impulse purchases\(^{80}\)

Powerwalls and PSUs were commonly observed in the SNAPT survey, even among the most mobile and temporary tobacco vendors encountered. In total, 99 (26.9\%) shops included a powerwall or PSU. Powerwalls and PSUs were more common among permanent shops and kiosks compared to temporary and mobile shops. One in three permanent shops included at least one powerwall or PSU, compared to 13.0\% of temporary and mobile shops. 17.2\% (17) of shops with a powerwall or PSU displayed the health warnings present on the cigarette packages.

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76 Feighery, EC et al (2004) Retailer participation in cigarette company incentive programs is related to increased levels of cigarette advertising and cheaper cigarette prices in stores. Tob Control; 12:184-188
One of the most common tactics covered in the SNAPT Project was the close proximity of tobacco products to child-friendly products like candy, snacks and school stationary.

Product displays attract and encourage children and youth to start using tobacco. International studies have found that children exposed to tobacco product displays were three times more likely to report smoking. For example, adolescents exposed to tobacco displays in Ireland were more likely to think that a higher proportion of their peers use tobacco.

Tobacco industry documents have shown that for tobacco marketers, “eye level is buy level”. In addition to positioning tobacco advertisements at the eye level of children, positioning tobacco products in close proximity to child-friendly goods can be seen as a marketing strategy.

Within the SNAPT Project, 298 shops (81.0%) of shops positioned tobacco products within approximately 30 cm of products like candy, biscuits, mouth fresheners, and school stationary.

Tobacco products were positioned within close proximity to child-friendly goods in a number of locations at the point-of-sale, including hanging displays of smokeless tobacco, near PSUs and powerwalls, and in displays positioned on shop and kiosk counters.
MOUTH FRESHENERS (39.7%)

BISCUITS (14.1%)

CHIPS (8.4%)

OTHER (11.4%)
PRODUCT PACKAGING

Product packaging is a form of marketing that can be used independently or incorporated into marketing features observed in the SNAPT Project. Product packaging provides an opportunity for tobacco companies to attract attention, build brand identity, convey information about product features, and increase product visibility. As restrictions on traditional marketing strategies for tobacco products are imposed by governments, the role and importance of tobacco package marketing has increased.

Within the SNAPT Project, a number of strategies were used to mask the mandatory health warnings visible on tobacco packaging. For example, tobacco vendors with product staking units and powerwalls displayed tobacco products with the health warnings facing away from consumers. In other cases, health warning labels on packages were obscured by placing non-tobacco products including candy along the lower edge of tobacco packages.

The use of dummy packages, empty packages provided by the tobacco company for the purpose of display, without health warnings were reported by students. A Salaam Bombay Foundation staff member was able to purchase a dummy package filled with Styrofoam cigarettes from a tobacco vendor in the area around one school in the SNAPT Project.
Tobacco product packaging in India is subject to restriction under COTPA Sections 7 and 8. Tobacco packaging must:

- Display a pictorial health warning and the phrase “Tobacco causes cancer” covering 85% of the tobacco pack. The text phrase must be written in black text on a white background.

- Not display deceptive or false information or any information that would create erroneous impressions about the health effects or hazards of tobacco use and tobacco product emissions.

In addition to the health warnings required on tobacco product advertisements at the point of sale, COTPA (2003) mandates sign boards containing health warnings and a notice of the ban on sales of tobacco products to minors be posted.

Under Section 6 of COTPA, a display board reading “Sale of tobacco products to a person below the age of eighteen years is a punishable offense” must be posted at the entrance of a place where tobacco products are sold. Such boards must include one of two pictorials demonstrating the health effects of tobacco use, must be a minimum of 60cm x 30cm in size, and must not include any advertisements for tobacco products. Failure to comply with Section 6 can result in a fine for the vendor.

Only ten shops (2.7%) posted sign boards that included a health warning and/or notice of the prohibition of sales to minors. Among those shops, 3 boards were obscured from view and five shops did not have the mandatory pictorial feature. All five shops that displayed the pictorial warning had boards displayed from the ceiling of the shop. By displaying warning boards at a significant height, and/or obscuring the health warnings from view, tobacco vendors diminish their impact on children and youth.

While most of the tobacco marketing strategies observed around schools related to cigarettes, smokeless tobacco product marketing strategies were also observed.

Smokeless tobacco products are more commonly used in India than smoked tobacco products. A number of smokeless tobacco products, including khaini, kharra, betel quid, gutkha, mava, misheri, pan with tobacco, snuff and zarda, are readily available across the country and typically sell for between Rs. 1 and Rs. 5 per packet.

The most recent round of the Global Youth Tobacco Survey for India found that 12.5% of youth aged 13 to 15 use a tobacco product other than cigarettes.85 One in five Indian adults (25.9%) report using smokeless tobacco and 5.3% report using smokeless tobacco and smoked tobacco.86 Smokeless tobacco is more commonly used by men (32.9%) compared to women (18.4%).87

Student viewing hanging display of smokeless tobacco

Smokeless tobacco products are an leading source of cancer-causing nitrosamines. Use of smokeless tobacco products is increasing the risk of oral cancer, esophageal cancer, pancreatic cancer and oral submucous fibrosis.89,90

In 2012, the Maharashtra Government banned gutkha and pan masala (a related preparation without tobacco). Under the ban, the sale, manufacture, distribution and storage of gutkha is illegal in Mumbai and across the state.91 To date, an additional 23 states and 2 union territories across India have also banned gutkha.

The SNAPT Project documented a number of marketing strategies related to smokeless tobacco products. These strategies include:

• The use of hanging product displays;
• The positioning of smokeless tobacco products near child-friendly consumer goods;
• Packaging designed to attract children and youth;
• Promotion of surrogate

Hanging displays of smokeless tobacco products were commonly observed in the SNAPT Project. Hanging displays utilize the linked design of the smokeless tobacco packaging to create elaborate displays where products are suspended from poles and hooks. Often, hanging displays include a variety of non-tobacco products including supari (areca nut), mouth fresheners, and household goods like shampoo and soap packets. Like the display of cigarettes in power walls, hanging displays promote smokeless tobacco products by increasing visibility, facilitating access, and promoting the belief that such products are socially acceptable.
A number of surrogate marketing and advertising features were observed in the SNAPT Project Survey. Surrogate marketing, also known as brand stretching, is marketing that is used to promote banned products or products with restrictions on advertisement through the use of legal or permitted products with the same brand identities. Numerous tobacco control advocates have identified the surrogate marketing trend in India with tobacco-free products like pan masala as the primary suspects.\textsuperscript{95,96} For example, a report from 2005 found that pan masala brand Pan Parag spent more in advertising than it received in sales revenue, indicating that the product was being used as a surrogate for marketing the company’s tobacco products.\textsuperscript{97}

Advertisements for surrogate tobacco products were observed at 6 shops in the SNAPT Project survey. In all cases, the advertisements were for products under the Pan Vilas brand. Three advertisements were for Pan Vilas candies, and three advertisements were for Pan Vilas sweet flavoured cardamom seeds. Pan Vilas flavoured cardamom seeds and pan masala products feature Shah Rukh Khan – one of Bollywood’s most popular stars. Shah Rukh Khan’s popularity is so strong, that Newsweek Magazine ranked him one of the 50 most influential people in the world.\textsuperscript{98}

Packaging of surrogate products like mouth fresheners and pan masala mimic trends and patterns associated with smokeless tobacco products. Surrogate products employ the same brand names and brand images, including colour patterns, brand logos, and use of shiny/reflective packaging materials.
In the SNAPT survey, thirteen surrogate products were observed, including:

- Ankur Pan Masala
- Baba Silver Coated Supari
- Goa 1000 Mouth Freshener
- Gold Mohar Pan Masala
- Manikchand Oxyrich Bottled Water
- Pan Vilas Pan Masala
- Pan Vilas Silver Dewz
- Pan Vilas Cardamom Candy
- Pan Vilas Refresh Candy
- Rajnigandha Flavoured Pan Masala
- Rajnigandha Silver Pearls Flavoured Cardamom Seeds
- Rajshree Pan Masala
- Shudh Plus Pan Masala

Tobacco-related candies found in the survey included:

- Cigarette-shaped mouth freshener candies (brand unknown)
- Montex Pan Banarasi Candy
- Phantom Sweet Cigarettes
During the SNAPT Project, ITC Limited launched a new marketing campaign for an electronic nicotine delivery system (known commonly as an e-cigarette) called Eon E-Vape. Available in two flavours (“Rich Flavour” and “Menthol”) at stores and kiosks across Mumbai. The Eon E-Vape represents the first e-cigarette product to be widely marketed at the point-of-sale in Mumbai.

The SNAPT Project documented the emergence of the first e-cigarette advertisement campaign as well as the roll-out process for new advertisements and communications strategies.

The Eon campaign included a mix of traditional and non-traditional advertisements along with digital content. The campaign messaging focused on the product’s “healthier” qualities (no tar, no ash) and the freedom to use the product anywhere.

In addition to traditional advertisements, the Eon E-Vape campaign has included the use of store beautifications, including product stacking units and powerwalls.

The Eon campaign includes a number of features that can be appealing to children and youth. Studies have indicated that children and youth are highly attracted and curious about the novelty of new products.

Messaging that implies that the Eon E-Vape is a safe or healthier alternative to cigarettes (with wording like “no tar”, “no smoke” and “only vapour”) may also attract children and youth. Finally, the campaign uses youthful imagery and social media references in its promotion. For example, advertisements show party scenes and youth, and include hashtag phrases popular on social media platforms like Facebook and Twitter.

The campaign highlights that the product can be used anywhere with text that includes “This is your planet. Let nothing stop you now”, “This is your planet. Vape on”, “Now puff away anytime, anywhere”.

EMERGING PRODUCTS
MARKETING STRATEGY

Traditional advertisements
Advertisements below the counter
Advertisements or products positioned near candy
Deceptive language used in advertisements
Branded product stacking units and power walls
Promotion of flavours

CIGARETTES

EON

EON ADVERTISEMENTS IN SOUTH MUMBAI
The SNAPT Project results suggest that the tobacco industry is aggressively marketing their products at the point-of-sale around schools. Often, the tactics used violate tobacco control laws. The most commonly observed marketing strategies were:

- Advertisements for tobacco products
- Product displays, powerwalls and hanging displays
- Positioning tobacco near child-friendly products
- Obscuring and failing to post mandatory health warnings and signs banning the sale of tobacco to minors
- Advertisements and promotions based on the price of the product
- The sale and promotion of surrogate tobacco products
- Store beautifications
- Sales of loose cigarettes

Among the 368 shops surveyed, only 18 (4.9%) shops did not include a violation. On average, shops featured 3.8 marketing strategies listed in this report.

Despite being smaller and less formalized, temporary and mobile shops exhibited many of the same strategies as permanent shops and kiosks. Permanent shops and kiosks were more likely to have marketing strategies present (96.0%) compared to temporary and mobile shops (93.5%), and had more strategies present on average (4.0 features per shop) compared to temporary shops (3.4 features per shop). The proximity of a shop to a school did not impact the number of marketing strategies present.

Cigarette brands dominated the marketing environment at the point-of-sale. Marketing strategies for smokeless tobacco products were more subtle and less apparent. The use of surrogate products and promotion of surrogate products is one such example of this trend.

CONCLUSIONS
The results of the survey suggest that point-of-sale advertising has become an important final frontier for a tobacco industry looking to market its products to impressionable and price-sensitive youth.

The location of tobacco marketing strategies near schools does not happen by accident. The proximity to schools is significant because smoking patterns are almost exclusively developed during the adolescent and teen years. Tobacco companies know that once children are hooked on smoking, they are customers for life.

To this end, tobacco companies are using carefully calculated marketing strategies to reach children:

- Advertising heavily at retail outlets near schools using ads and signs
- Placing cigarette ads at children’s eye-level
- Advertising near schools using large hoardings depicting glamorized images of tobacco use
- Tobacco products and advertisements are often placed near candy and children’s items at the front of the store and on counter tops, encouraging children to see them as harmless everyday items
- Advertising the affordable price and availability of the loose cigarette
The tobacco industry is violating the provisions of Section 5 of India’s tobacco control legislation (COTPA, 2003). The point-of-sale for tobacco products has become the prime, strategic location for tobacco companies to advertise their brands. Considering the impact of POS advertisement and promotion on increased smoking/tobacco initiation and use, there is an urgent need of effective implementation of comprehensive ban on advertisements at point of sale.
HOW TO FIGHT BACK:

THE RESULTS FOR THE SURVEY SHOW THAT THE TOBACCO INDUSTRY IS AGGRESSIVELY MARKETING AROUND SCHOOLS AND VIOLATING INDIA’S TOBACCO CONTROL LAWS. IN ORDER TO COMBAT THE TOBACCO INDUSTRY’S EFFORTS TO TARGET YOUTH, WE URGE THE COMMISSIONER OF MUMBAI’S MUNICIPAL CORPORATION (BMC) TO ACT IMMEDIATELY TO:

- REMOVE TOBACCO ADVERTISEMENTS FROM THE POINT-OF-SALE AND SHOPS AND VENDORS WITHIN 100 YARDS OF SCHOOLS
- CANCEL LICENSES FOR SHOPS THAT VIOLATE INDIA’S TOBACCO CONTROL LAWS
- HOLD TOBACCO COMPANIES RESPONSIBLE FOR THE ADVERTISEMENTS, PROMOTIONS AND SPONSORSHIPS OF THEIR BRANDS
- ESTABLISH A SINGLE AGENCY OR GROUP CHARGED WITH ENFORCING TOBACCO CONTROL LAWS, PARTICULARLY COTPA SECTION 6 (A AND B)
- ENACT A COMPLETE BAN ON DIRECT AND INDIRECT TOBACCO ADVERTISEMENT, PROMOTION, AND SPONSORSHIP
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Salaam Bombay Foundation has worked to prevent tobacco use among children and youth and ensure healthy environments for them since 2002. The Foundation believes strongly that children and youth must be empowered with the knowledge and tools to make the right decisions for their health, and aims to build an army of tobacco control change agents through the Super Army In-School Leadership Programme for students in Mumbai schools.