

Foundation for a Smoke-Free World's Response to the Addiction at Any Cost Report by Stopping Tobacco Organizations and Products (STOP)

In a recent [report](#), Stopping Tobacco Organizations and Products (STOP) made several false statements about the Foundation for a Smoke-Free World (FSFW or the Foundation). Not only are the assertions made in the report false, as outlined below; but the entirety of the report should be read with skepticism because it apparently is influenced by the dogmatic approach of Bloomberg Philanthropies, which funds STOP.

This report is not the first time that Bloomberg Philanthropies has attempted to monopolize conversation in this field. All in, Mr. Bloomberg has committed almost \$1 billion to tobacco control. His philanthropies now fund tobacco programs for the World Health Organization and the World Bank—potentially leading to outsized policy influence. This funding is being used to undermine tobacco harm reduction (THR) and intimidate those who are more open-minded—a practice that has no place in science.

Indeed, both the style and the substance of the attack on Foundation runs counter to core tenets of public health. By pushing a myopic message, STOP is advocating against tools that studies indicate could reduce death and disease caused by tobacco. This approach disregards expert voices in the field. For example, the FDA recently approved the marketing of snus as a modified risk product, stating that “Using general snus instead of cigarettes puts you at lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema and chronic bronchitis.” Further, Public Health England has concluded that use of e-cigarettes is substantially safer than smoking. Yet, STOP promulgates a prohibitionist message and has smeared the Foundation because we do not follow its antiquated script.

Calls by STOP to boycott, shun and ignore the work of the Foundation conflict with basic principles of academic freedom and seriously undermine the goals of the Framework Convention on Tobacco Control. Instead of wasting resources attacking us, Bloomberg Philanthropies and the groups they fund should focus on the many critical gaps that exist in global tobacco control. These include: smoking cessation and harm reduction; smoking in people with mental health conditions, tuberculosis, and chronic diseases; tobacco use in women and girls; massive gaps in science and technology in developing countries; and development of alternative livelihoods for the poorest tobacco farmers who already seeing their incomes decline.

FSFW currently is working to address the above gaps. We invite STOP to join us in this fight and to help us end smoking in this generation.

STOP's Incorrect Assertions

False claim: It appears the Foundation may not be working freely from the influence of the tobacco industry.

Facts: The Foundation's independence is not a "claim;" it's a fact. We operate with complete independence from PMI. Under the Foundation's pledge agreement and bylaws, PMI and the tobacco industry are precluded from having any influence over how the Foundation spends its funds or focuses its activities. Independence and transparency are core principles of the Foundation, and we have set ourselves up from the beginning to operate in alignment with the most rigid principles available to avoid conflicts of interest.

Additionally, in setting up the Foundation, we closely adhered to criteria laid forth by Cohen et al., which are considered the gold standard of evaluation criteria when determining whether to accept funding from tobacco entities for tobacco control efforts and research. Contrary to STOP's claims, the Foundation adheres to every one of the eight stringent criteria Cohen, et al. recommend and we clearly detail how we follow these guidelines on our website.

Specifically, we call attention to the Cohen et al. criteria that STOP has incorrectly said that the Foundation is not following.

- Criterion 1: Transparency and independence – The funding mechanism should be transparent and independent.

FSFW's governance: The Foundation's **bylaws and funding agreement** are publicly available on its website and fully disclosed in public materials. Pursuant to these documents, the Foundation's funder is prohibited from influencing or directing how funds are used and what the research agenda is. These documents also make clear that the funder is not involved in any way in the Foundation's operations.

- Criterion 3: Ownership of data and freedom to publish – Research endeavors should have scientific integrity to enable data and results to be used broadly.

FSFW governance: To safeguard the integrity of each research endeavor, the Foundation ensures that grant recipients are free to publish their findings, studies, and results as submitted to the Foundation, regardless of whether those findings are unfavorable to the product being tested or any commercial interest.

- Criterion 6: Protection against conflict of interest – There should be a written conflict of interest policy and mechanisms for enforcement.

FSFW governance: The Foundation maintains a robust written conflict of interest policy, including mechanisms for enforcement, which is publicly available on the Foundation's website. The policy requires disclosure of not only relevant financial relationships, but also interests in any tobacco and/or nicotine-containing products company or in any commercial

entity involved in the tobacco reduction or cessation field or that otherwise may be affected by the scientific research conducted or funded by Foundation.

- Criterion 7: Industry Public Relations Gains that Counteract Public Health – Industry public relations gains realized from funding of research that counteract public health should be minimized.

FSFW governance: The Foundation's **bylaws** strictly prohibit the Foundation's research agenda being used to advance the image of the tobacco industry or any other industry or commercial entity. In addition, as part of its mission around tobacco industry transformation, the Foundation will be publishing an independent assessment of the tobacco industry's activities in relation to tobacco control, which is free to be critical of industry participants.

False claims:

The Foundation appears to be playing a key public relations role for PMI.

The Foundation for a Smoke Free World should not be seen as the independent scientific organization it claims to be, but as a tobacco industry front group and an integral part of PMI's corporate affairs strategy.

The Foundation spent "just \$6.46 million on 'grants and contributions' in 2018 – 8% of its \$80 million annual donation from PMI"(198). This figure (which includes all expenditures on science) can be compared to US\$7.59 million on "communications"– most of which went to public relations firms.

Facts:

The Foundation for a Smoke-Free World is an independent, nonprofit organization. It has no role in PMI's organization. We are not a part of PMI's corporate affairs strategy and to say there is evidence that we are is completely false.

The Foundation's spending reflects our dedication to funding health, science, and technology research to fill the gaps in the existing smoking cessation and tobacco harm reduction knowledge. Our key investments in 2018 included the issuance of \$25.7 million in approved research grants across the globe. In 2019, grant expenditures were approximately 60% of all Foundation spending, while the total communications spend made up about 7%. The Foundation now has more than \$150M authorized for grants and our communications costs have never exceeded our grant funding.

The Foundation's mission is to accelerate progress toward ending smoking. Our Health, Science, and Technology agenda explicitly addresses product assessment and development for cessation and harm reduction innovations. We are agnostic to what product category is used and focus rather on how to ensure that the most effective means of ending smoking is safe and readily available. We agree that more research is needed across all of the product categories. Therefore, we are funding research projects that will enhance knowledge in this area.

As outlined in our strategic plan, one of the gaps in tobacco control that the Foundation addresses is improving public awareness of the drivers of smoking harm and the availability of alternatives. Our goal in leveraging public relations support is to educate both the public and policymakers about the need for collaboration and innovation toward tools that can help smokers kick the habit.

False claim: The Foundation has not been transparent about its scientific activities to date.

Facts: The Foundation follows all U.S. laws requiring disclosures and these are made on our 990PF, which is publicly available on our site and includes the value of each grant. We update the list of grantees in two ways that are also accessible on our website: through the annual 990PF filings and the awarded grants page, which includes links to grantee reports. The Annual Report also features an overview of the grants. Additionally, we showcase the grantee reports on our published reports page, through blog posts, and in newsletters—all of which are available on the website.

Foundation grantees are required to disclose their funding source for projects supported by the Foundation. STOP specifically claims that The Centre of Research Excellence: Indigenous Sovereignty & Smoking (COREISS) has been obscuring its funding resource. This is false as the COREISS website features a disclosure of funding link on the home page, which takes you to a page that clearly discloses FSFW as their funder and our pledge agreement with PMI.

False claim:

The Foundation claims to be a champion of social justice. The Foundation appears to be the latest tobacco industry-funded organization to hijack issues of justice for PR gains.

Facts: The Foundation has never presented itself as a purveyor of social justice to promote or sell any product. We are dedicated to identifying and addressing the unique needs of communities underrepresented in the developing world as they relate to tobacco cessation and harm reduction. Our work supports and complements the Framework Convention on Tobacco Control (FCTC) by filling gaps in the treaty that have received inadequate attention or funding. This includes gaps in how farmers and economies are being adversely impacted by the falling demand of tobacco leaf and the gender dimensions of tobacco. Our Agricultural Transformation Initiative is preparing for a future of reduced tobacco demand by working with smallholder tobacco farmers in Malawi to facilitate the development of complementary structured value chains to make the country's agriculture sector globally competitive. One of the many projects we have launched in Malawi is a permanent Center for Agricultural Transformation—a world-class hub that combines scientific research, smallholder farming, and business cultivation to drive transformational agricultural development. The project draws on the expertise of a consortium of partner organizations including Land O'Lakes International Development, the University of Minnesota, Stellenbosch University, and the Malawi University of Science and Technology.

The Foundation has a comprehensive Gender Policy, created in close consultation with global health and agriculture experts, which documents our commitment to gender equality and the application of a gender perspective to all of our work. For more than thirty years, there have been many calls for the mainstreaming of gender into tobacco control; however, insufficient progress been made with dire

health and economic consequences. The Foundation strives to exercise strong leadership in promoting awareness and support of effective strategies to address the sex- and gender-based biological, social, and cultural dimensions of smoking cessation, tobacco harm reduction, and sustainable livelihoods for smallholder tobacco farmers. We are spearheading research projects that look closely at how the tobacco epidemic affects women, including how and why the lung cancer death rates in women now exceed breast cancer death rates in over 10 large countries with trends set to worsen.

The Foundation also acknowledges that women are globally underrepresented in scientific research, less likely to be funded, and tend to receive smaller grants than men. As such, we actively work to secure women's involvement in the leadership of institutions submitting grant proposals, in capacity-building programs, as the participants of research, and as the implementers and beneficiaries of interventions.

False claim: The Foundation attempts to undermine global tobacco control. Smoke-Free World has promoted tobacco harm reduction strategies of unproven effectiveness, and opposed evidence-based tobacco control interventions.

Facts: The Foundation has been asking STOP and other like-minded organizations to join us in our collective mission: to end smoking in this generation. The Foundation's work supports a full array of tobacco control measures, as proposed by the FCTC, and we agree that more research is needed to improve the effectiveness of tobacco harm reduction and cessation strategies. However, there are some gaps in the tobacco control strategies and the implementation of certain measures. While other organizations neglect FCTC-agreed elements such as harm reduction and tobacco control measures in vulnerable populations, we are addressing these elements. By investing in institutions and projects in countries where most smokers live, we address the global research capacity mismatch. We support the building of research centers of excellence worldwide to counter the limited global research capacity. By identifying data and knowledge gaps, we discover the most urgent research questions in need of an answer.

False claim: On several occasions PMI (or its subsidiaries) and the Foundation have seemingly synchronized their global and in-country public relations and lobbying activities.

Facts: The Foundation for a Smoke-Free World has never engaged in nor has it requested that anyone else engage in any lobbying efforts on its behalf. As a private foundation, the Foundation for a Smoke-Free World is subject to strict IRS regulations that prohibit lobbying.

The Foundation is an independent, nonprofit organization that is committed to reducing deaths and diseases caused by smoking. Our mission is to end smoking in this generation.

To imply that the Foundation is following a strategic plan other than our own, which is publicly available on our website, is false. We're accountable to our Board of Directors, which has no ties to PMI.

False claim: The decision from the Foundation’s board that it would, in principle, collaborate with ex-tobacco industry employees who “demonstrate expertise in scientific, technical, and clinical areas as well as a commitment to the Foundation’s purposes and strategies” (174) clearly leaves it open to further industry.

Facts: Collaborating with “ex-tobacco industry employees,” who are carefully vetted for conflicts of interest, as STOP accuses FSFW of doing, does not impinge on FSFW’s independence, but instead highlights the Foundation's strategy for achieving a smoke-free world. This strategy fundamentally is one of ecosystem transformation, and requires the input, skills, and experience necessary to drive it.

The Foundation is committed to being thorough and thoughtful about how it works with past employees of industries relevant to its mission, such as the tobacco industry, to protect its scientific independence and reputation. Former employees of tobacco, pharmaceutical, and alternative nicotine delivery system industries, who demonstrate expertise in relevant scientific, technical, and clinical areas as well as a commitment to the Foundation's purposes and strategy can add value to the Foundation. For this reason, the Foundation established a protocol to vet actual or potential conflicts of such individuals.

STOP claims that there are signs that the Foundation is failing by listing false narratives. In reality, the Foundation has made significant progress toward our goal to advance research into the health, science and technology associated with smoking cessation, agricultural transformation, and the transformation of the tobacco ecosystem.

False Narrative	Facts
<ul style="list-style-type: none"> - Apparent failure to secure additional funders 	<ul style="list-style-type: none"> - The Foundation has not yet sought additional funders. There is no validity to the claim that we have failed to secure additional funding partners.
<ul style="list-style-type: none"> - Apparent failure to spend its funds on science 	<ul style="list-style-type: none"> - The Foundation is dedicated to funding health, science, and technology research to fill the gaps in the existing smoking cessation and tobacco harm reduction knowledge. Our spend clearly reflects this goal. <ul style="list-style-type: none"> ▪ We have committed over \$150 million in grants to date, including funding that supports the work of over 100 researchers. ▪ The Foundation spent more than \$40 million on grants in 2019, approximately 50% of its \$80 million annual funding. ▪ The Foundation will release its annual financial reports for 2019 by May 15, 2020.
<ul style="list-style-type: none"> - Difficulty in securing research relationships with credible tobacco control scientists 	<ul style="list-style-type: none"> - The unwarranted and incessant attacks on the Foundation by organizations like STOP have created a hostile environment for researchers and scientists who have wanted to work with us.

<p>- Grantees cutting ties</p>	<ul style="list-style-type: none"> - This type of interference from a community that says it wants to help improve global health is counterintuitive and inhibits the scientific innovations they claim to want. - Despite the efforts to thwart our progress, the Foundation has awarded grants to a number of world-renowned researchers who are spearheading innovative smoking cessation and harm reduction projects. For example, three who are leading FSFW's Centers of Excellence (COE) include: <ol style="list-style-type: none"> 1. Marewa Glover, PhD, an indigenous behavioral scientist who has worked on reducing the health burden from smoking for over 25 years. A 2019 finalist for New Zealander of the year, she leads the Centre of Research Excellence: Indigenous Sovereignty & Smoking in New Zealand, building indigenous peoples' capacity to reduce the harms from tobacco smoking. 2. Jed Rose, PhD, co-inventor of the nicotine patch and the Director of the Duke Center of Smoking Cessation, has authored more than 200 peer-reviewed articles in the field and is the recipient of numerous grants from the National Institutes of Health. His work is leading to the discovery of novel compounds and innovative treatments to develop more effective and personalized smoking cessation solutions. 3. Riccardo Polosa, MD, PhD, a respiratory physician and harm reduction expert, is the director of CoEHAR, the Center of Excellence for the Acceleration of Harm Reduction at the University of Catania. Dr. Polosa has published numerous peer-reviewed articles on electronic cigarettes and nicotine. The CoEHAR's multidisciplinary research program encompasses developed and developing countries and examines all aspects of tobacco harm reduction, from chemical characterization of products to conducting essential multi-year cohort studies. - The Foundation's grantee network also features researchers from a number of prominent academic institutions, such as Yale University, the University of Minnesota, and Stellenbosch University. - We believe that the fastest way to bring an end to smoking is to embrace innovation. In addition to public health experts and scientists from around the globe the Foundation is also partnering with experts from the
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	<p>pharmaceutical and medical device field, as well as mobile technology/wellness providers. Finally, the Foundation is developing big data and AI tools to accelerate insights and solutions.</p> <ul style="list-style-type: none"> - A full list of grants can be found on the Foundation site.
<ul style="list-style-type: none"> - Negative press coverage - Cancellation of events 	<ul style="list-style-type: none"> - A well-funded and disingenuous campaign by STOP, Campaign for Tobacco-Free Kids, and others to spread unfounded and false information about the Foundation has resulted in negative press coverage that began when we launched. This coverage has ignored the facts and has negatively impacted our ability to hold events.
<ul style="list-style-type: none"> - Difficulty in finding credible journals to publish its science 	<ul style="list-style-type: none"> - The Foundation’s executives and grantees have been published in a number of international science publications, including <i>The Lancet</i>, <i>BMJ</i>, <i>AJPH</i> and <i>F1000 Research</i>. - Our grantees are currently conducting important, original research. Once these studies have reached their natural conclusion, we expect that they will appear in appropriate peer-reviewed journals.
<ul style="list-style-type: none"> - Backlash against New Zealand grantee 	<ul style="list-style-type: none"> - Scientists and researchers who have accepted grants from the Foundation have been subjected to bullying and harassment. Their professional integrity is being assaulted and their reputations harmed for working diligently to reduce death and disease caused by smoking. - We strongly agree with Professor Jean-Francois Etter’s recent assessment on Qeios.com. He said: “The response of the scientific and tobacco control communities to this harassment has been weak to say the least, and there were very few denunciations of these unethical behaviors. Scientists and tobacco control people should stand more strongly against ad personam attacks and make it clear that they are not acceptable.”
<ul style="list-style-type: none"> - Key staff losses 	<ul style="list-style-type: none"> - For independent startup foundations such as ours, it is not unusual for there to be staff changes as organizational needs become more clear. - In recent months, we have added key talent that will drive the next important phase of the Foundation’s growth. This new executive leadership includes the following positions: Chief Operating Officer and Chief

	<p>Strategy Officer; General Counsel; and Chief Health, Science and Technology Officer.</p>
<ul style="list-style-type: none"> - The Foundation works with third parties previously affiliated with the tobacco industry 	<ul style="list-style-type: none"> - Like many startups, the Foundation works with third-party vendors to execute large-scale projects than cannot be completed by staff alone. These parties include large firms, such as Ernst & Young Global Limited and McKinsey & Company. - Being large, multinational organizations, these companies have worked with thousands of clients across diverse sectors, including the tobacco industry. The Foundation certainly did not seek out these firms due to such associations, but neither did it reject vendors on this basis. - STOP criticizes FSFW for using consultants who, they say, have taken money from big tobacco. Yet, STOP relies heavily on data from Euromonitor. This conduct exemplifies STOP's characteristic hypocrisy. - The organization also claims that FSFW cannot be independent because it has a single funder; yet STOP itself has but one funder. And whereas FSFW has established numerous layers and agreements to ensure its independence from its funder, we are not aware of STOP having any such measures in place and believe it executes the agenda of its funder.
<ul style="list-style-type: none"> - Rejection by the global health community 	<ul style="list-style-type: none"> - The Foundation is fully aligned with the World Health Organization and the global health community's desire to end smoking. In fact, the Foundation's work supports a full array of tobacco control measures, as proposed by the FCTC. - It's unfortunate that a hasty decision to reject the Foundation by the WHO, and subsequently by many in the global health community, was made when we launched without a full understanding of our independence, governance, transparency, and mission. - Our desire is to establish a productive dialogue with STOP and the entire health community to encourage them to reconsider their position. We're all working toward the same goal. We will accomplish more if we work together.

