

A narrative analysis of a tobacco industry campaign to disrupt Aotearoa New Zealand's endgame policies

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ABSTRACT

Background Aotearoa New Zealand passed world-leading legislation to implement tobacco endgame policies, including greatly reducing the number of tobacco retailers. British American Tobacco New Zealand and Imperial Brands Australasia tried to undermine this policy via the 'Save Our Stores' (SOS) campaign, which purportedly represented small convenience store owners' interests.

Methods We used the Policy Dystopia Model as a framework to review discursive and instrumental strategies employed in the SOS campaign. Specifically, we critically analysed the arguments, narratives and frames employed in the campaign.

Results Most SOS arguments drew on discursive strategies that emphasised unanticipated costs to the economy and society, and presented a near-apocalyptic future. Adverse outcomes included economic mayhem, thriving illicit trade, increased violent crime, fewer police, and heavier individual tax burdens. The campaign framed the government as an authoritarian legislator with misplaced priorities and used disinformation to bolster these claims. We identified a new normalisation narrative used to present very low nicotine cigarettes (VLNCs) as experimental and, by implication, risky. A metanarrative of lawlessness and decreased public safety connected the different claims.

Conclusion To address the existential challenges they face, tobacco companies used several discursive strategies to oppose the retailer reduction and VLNC policies. Our findings could inform counterarguments, and help international policymakers and advocates anticipate opposition they may encounter when introducing endgame measures, such as reducing tobacco availability.

INTRODUCTION

In 2022, Aotearoa New Zealand (ANZ) passed legislation to reduce the availability, appeal, and addictiveness of tobacco products ('the Act'),¹ though the newly elected government intends to repeal this law.^{2,3} The statute proposed decreasing the number of retailers selling smoked tobacco products from around 6000 to no more than 600 from July 2024, setting a new low nicotine standard, and introducing a smoke-free generation. ANZ's Ministry of Health (Manatū Hauora) called for applications from retailers seeking approval to sell smoked tobacco products and assessed these according to their security, staff training and experience, supply capacity and stock management systems.⁴

British American Tobacco New Zealand (BATNZ) and Imperial Brands Australasia (IBA) strongly opposed reducing tobacco outlet numbers, which

WHAT IS ALREADY KNOWN ON THIS SUBJECT

⇒ The Policy Dystopia Model (PDM) outlines discursive and instrumental strategies that tobacco companies use to oppose and undermine tobacco control policies.

WHAT IMPORTANT GAPS IN KNOWLEDGE EXIST ON THIS TOPIC

⇒ Because the PDM was developed before tobacco endgame measures, such as proposals to greatly reduce retailer numbers, it is important to assess whether it captures tobacco industry arguments used to oppose these policies.

WHAT THIS STUDY ADDS

⇒ An industry-funded campaign to oppose tobacco supply reductions drew on economic, law enforcement and political governance arguments outlined in the PDM; it also developed new economic arguments linked to cost of living concerns.
⇒ The campaign developed a new normalisation argument and linked all PDM domains to a metanarrative claiming lawlessness and loss of public safety.

they argued would lead numerous small convenience stores to fail.^{5,6} Despite developing alliances with retailers and supporting a petition to oppose this measure,⁷ these companies did not prevent the legislation from passing. In August 2023, BATNZ and IBA moved to a disruption strategy, which included a 'Save our Stores' (SOS) campaign⁸ that claimed the outlet reduction measure would reduce convenience stores' viability, create economic harms and reduce public safety.⁹ Ostensibly a grassroots retailer initiative, BATNZ's and IBA's involvement was evident only to people who scrolled down the about page and was not outlined on the petition page.⁸

The SOS campaign reflects tobacco companies' sustained efforts to undermine policies, including plain packaging and the removal of tobacco 'powerwalls'.^{10,11} To foment unease, these campaigns often use metanarratives, inherent meanings conveyed across many stories,¹² to exaggerate the policy's aims and misrepresent its likely outcomes. Metanarratives convey a wider meaning about how the world works, who can be trusted, and actions that can or should be taken; they may exert a powerful influence on beliefs and social norms.¹³ Individual stories may appear as simple responses to a policy, such as a brochure critiquing it as 'nanny state', a



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press release predicting it will increase crime or a social media page fuelling fears of job losses. Yet collectively, these stories evoke a rapidly disintegrating society unprotected by an inept or corrupt government.

Commercial actors use fatalistic narratives to arouse fear (or other negative emotions), erode public support for policies,¹⁰ weaken implementation and pave the way for later policy reversal or deter uptake by other countries.¹⁴ Analysing narratives presented in the SOS campaign could inform how policy-makers communicate new measures and support international policy development.

METHODS

We used the Policy Dystopia Model (PDM) as a conceptual framework to analyse metanarratives the SOS website used to suggest ANZ's new policies would bring catastrophic social and economic failures.¹⁴ The PDM describes tobacco companies' 'influence strategies', presents these as discursive (argument-based) or instrumental (action-based), and informs apposite responses.¹⁴

EO and JH carefully read and reviewed the SOS website and accompanying social media posts and deductively coded the core arguments presented using the PDM framework. We reviewed coding frequently to discuss and test our sense-making processes and used NVivo (V.1.6.1) to manage the data. Online supplemental file 1 contains details of the source material analysed.

RESULTS

The SOS website implied the proposed retailer reduction policy would lead to a near-apocalyptic future. Core arguments drew on discursive strategies, including the economy, law enforcement and politics/governance domains of the PDM (see online supplemental file 2). Featured claims exaggerated the retail reduction policy's risks and costs while ignoring established benefits, including supporting smoking cessation, reducing youth smoking initiation^{15 16} and decreasing health inequities caused by smoking.^{17 18} We identified new arguments relating to current concerns, such as the cost of living and rising crime, and a normalisation narrative that framed very low nicotine cigarettes (VLNCs) as 'unconventional'. This latter narrative aligned with claims the retail reduction measure lacked a strong evidence base.

Economy

The SOS campaign claimed that reducing retailer numbers would cause financial harm and "destroy small businesses. It's as simple as that", and asserted dairies (small convenience stores) obtain 'up to 55% of their revenue' from tobacco.⁸ This discursive strategy denied the policy's benefits while presenting small businesses as innocent parties that will be harmed.

A second economic argument linked the policy to cost of living concerns and crime doomsday scenarios. It suggested losing tobacco tax revenue would create additional economic strain for 'Kiwis [who] are already feeling the pinch [and] would hurt families who are already struggling to make ends meet'.⁸

A Facebook advertisement incorrectly stated that tobacco excise tax 'pays for 35 000 police officers' and connected economic arguments with a metanarrative of rising lawlessness and decreasing public safety.

Law enforcement

The SOS homepage asserted the Act 'will increase crime'; this claim underpinned illicit trade threats,⁸ which would allegedly

'boom and be controlled by criminal networks'.⁸ Facebook advertisements rhetorically asked: 'Could your community cope with even more crime?' and implied the Act would increase ram raid burglaries (which use a vehicle to break into a storefront) and gang power, and diminish public safety. More generally, legitimate actors would suffer while unspecified 'gangs' benefited.

Politics/governance

The SOS campaign framed the government as anti-free enterprise, incompetent and authoritarian, and implied poor policy-making process would create economic and other hardships, and curtail citizens' freedoms. Assertions the government's misplaced priorities had lost touch with the country's needs connected the incompetent policymaker argument to the overarching 'crime crisis' metanarrative.

The SOS homepage described the Act as 'experimental, misguided and unnecessary', and implied reducing retailer numbers was unscientific, illogical and irrational, attributes antithetical to sound policymaking. These claims echoed IBA's submissions, which argued the retailer reduction measures were '...unproven, untested, unnecessary, and unreasonable', and not 'based on sound public policy or compelling evidence' but 'purely on emotive speculation and pressure from tobacco control groups'⁶ (p7).

Descriptions of the Act as 'prohibition', a 'ban', and a 'mandate'⁸ implied the policy did not align with people's needs and segued into arguments suggesting citizens would have fewer freedoms while criminal groups enjoyed fewer restraints. Social media advertisements described the Act as 'The Government's War on Smoking', reinforced by words such as 'brutal', 'punitive', and 'aggressive'. This language evoked an uncaring state, the antithesis of a beneficent government that protects its citizens from harmful products, and privileged assumed commercial rights to generate revenue over citizens' rights to safe environments.

Social justice and community

The SOS site also proposed that reducing tobacco retail outlets would affect entire communities by imposing additional time and travel costs on neighbourhoods whose local convenience stores closed.

Normalisation frame

Although primarily opposing the retail reduction policy, the SOS website challenged the denicotinisation measure and used a 'normalisation' frame to extend discursive strategies outlined in the PDM.¹⁴ The site described cigarettes currently available, which have unregulated nicotine levels, as 'regular' or 'normal-strength' cigarettes, thus implying VLNCs are irregular, abnormal and 'unconventional'.¹⁹ Given cognitive biases favour the status quo over change,²⁰ framing VLNCs as 'unconventional' aimed to elicit opposition, even if change offered benefits. Pre-emptively associating 'regular' or 'normal' attributes with current tobacco products reinforced claims the Act is 'experimental', 'unproven' and 'unnecessary'.

DISCUSSION AND CONCLUSIONS

Several arguments featured on the SOS website, including those relating to economic outcomes, law enforcement and policies/governance, mapped onto PDM domains.¹⁴ We identified new economic arguments focusing on cost of living concerns, and law arguments that claimed crime and gang power would increase. In addition, we proposed a normalisation narrative that frames

new policies as high risk and more likely to create adversity than offer benefits. We also suggested a lawlessness metanarrative that connects discursive arguments arousing opposition to the retail reduction policy, and aligns with disinformation strategies used to undermine government responses to the COVID-19 pandemic.²¹

Analyses of the SOS arguments suggested many have a questionable foundation. For example, economic arguments that retailers depend on tobacco sales overlooked tobacco products' very low profit margins, a core determinant of business success. A store owner's submission on the Smokefree Aotearoa 2025 Action Plan described tobacco as 'a loser category with no volume growth, low stock turn and low GP% [gross profit percentage]'²² (p641). With daily smoking prevalence of only 8%,²³ tobacco cannot logically drive foot traffic to the degree claimed; furthermore, intercept studies have found tobacco purchases are typically single-item transactions.^{24–26} As smoking prevalence continues to fall, tobacco will become an even less important revenue and profit source. The SOS website failed to consider economic benefits of delisting tobacco, which include reducing the security and insurance costs tobacco products impose on small businesses.²⁷

Economic arguments that reducing retailer numbers would increase the tax burden on citizens lacked a sound empirical basis. Income taxes do not fluctuate in proportion to tax revenue and there is no current proposal to increase income (or other) tax to compensate for reduced tobacco excise tax revenue.

Attempts to connect reduced tobacco excise tax revenue to reduced policing and rising lawlessness had no empirical foundation. While a Facebook advertisement implied tobacco excise tax paid for 35 000 police, the ANZ police force comprises 15 000 staff total (including civilian staff),²⁸ and revenue from the tobacco excise tax is not hypothecated and has never, to our knowledge, been dedicated to funding law enforcement.²⁹

Law enforcement arguments employed a common tobacco industry tactic of overstating the likelihood illicit tobacco trade would increase,^{30–31} even though the previous government increased funding for monitoring and enforcement to manage this risk.³² ANZ's strong border security measures,³² low corruption perceptions index score,³³ and scepticism about illicit tobacco among people who smoke,³⁴ suggest a manageable rather than a catastrophic risk. Ironically, and contrary to industry arguments, reducing tobacco outlet numbers may increase retail security, foster compliance, facilitate enforcement, and reduce ANZ's crime rate, which has declined since 2015.³⁵

Claims the policy lacked evidence do not align with the many studies that have found reducing tobacco availability will decrease youth smoking initiation and support cessation.^{15–16–36} Suggestions the policy reduced freedoms imply the government was unreasonably determined to impose its will on citizens and are inconsistent with evidence the legislation will free people from addiction. Commercial actors often resort to evoking the archetypal nanny state metaphor to elicit instinctive opposition, regardless of the proposition advanced.³⁷

The SOS website itself was an instrumental strategy that fabricated a constituency, behind which sat BATNZ and IBA. Tobacco companies have previously used retailer front groups when opposing policies to remove their products from open point-of-sale displays.³⁸ We suggest they should be required to disclose their public relations activities, lest their front groups be mistaken as legitimate grassroots voices.

As well as highlighting weak evidence base of the SOS arguments, our analyses suggest actions policymakers could take to pre-empt industry claims. Developing and popularising a term to

describe non-VLNCs, such as 'current strength cigarettes', could prevent terms such as 'normal strength cigarettes' from entering into everyday discourse.

Analysing the discursive strategies tobacco companies used in the SOS campaign illustrated how they create metanarratives to shape public thinking. Malone noted that tobacco companies use these narratives to 'wedge' themselves into policy debates where they have more power to disrupt policy innovation.³⁹ As the tobacco industry attempts to stare down the existential threat endgame policies pose, it may draw more frequently on metanarratives to generate public disquiet and impede policy implementation. Critical reviews such as ours could inform how governments communicate their policies while alerting the international public health community to industry arguments they will need to anticipate.

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