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# Hidden in Plain Sight: Surrogate Marketing of Tobacco Products on Social Media in India



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### Publication date

December 2022

## Background

According to the 2017 Global Adult Tobacco Survey India Report, nearly 267 million Indians—or 29% of all adults—use tobacco.<sup>1</sup> The type of tobacco that is most commonly used is smokeless tobacco products, including khaini, gutkha and betel quid with tobacco. Indians also use smoking forms of tobacco including bidis, cigarettes and hookah.

Marketing leads to tobacco initiation and use, particularly among youth.<sup>2,3</sup> The World Health Organization’s Framework Convention on Tobacco Control, to which India is a signatory, calls for comprehensive regulations restricting tobacco advertising, promotion and sponsorship. Section 5 of India’s national tobacco control law, the Cigarettes and Other Tobacco Products Act (COTPA), 2008, prohibits any kind of direct or indirect advertisement, brand promotion or sponsorship of tobacco products.<sup>4</sup> However, tobacco marketing continues to occur, often through surreptitious means.

Digital media is becoming increasingly central to companies’ marketing strategies. India’s digital advertising expenditure is expected to grow tenfold over the next decade and will likely account for 70% to 85% of the total advertising market.<sup>5</sup> Tobacco marketing has also shifted to digital media as traditional media has become increasingly regulated.<sup>6</sup>

This report focuses on two particular forms of “hidden” marketing online. The first form is marketing via brand extension of the parent company (referred to in this report as “company brand extension”). In this case, the tobacco company’s brand, including logo and trademark, is applied to its non-tobacco products and services. By strengthening affiliation with the company brand, this practice also promotes the association with tobacco products and the normalization of tobacco (see Box 1). This form of marketing has been noted globally, however, its exact scale and prevalence online in India has not been examined before.

The second form of insidious marketing that appears to be particularly prevalent in the Indian subcontinent is “surrogate marketing.” In this case, non-tobacco products carry a similar or the same branding as tobacco products, rendering them virtually indistinguishable to an untrained eye (Box 1).<sup>7</sup> There have been reports of this form of marketing in India, though its presence online is unknown. This report seeks to fill the gap.

## Key Findings

- Two forms of surreptitious marketing—company brand extensions (80% of all observed tobacco marketing instances) and surrogate marketing (12% of all observed tobacco marketing instances)—are prevalent on social media in India.**
- All of the surrogate products that were observed being actively promoted were from smokeless-tobacco companies (100%). Most of the brand-extended products that were observed being actively promoted were from smoking-tobacco companies (70%).**
- Three-fourths of online surrogate marketing was observed on the Meta platforms, Facebook and Instagram.**
- Most of the surrogate marketing observed was in the form of “direct advertising” that explicitly encouraged sales (98%). Given the indistinguishable branding between the advertised non-tobacco products and regulated tobacco products, this likely has the effect of priming consumers to purchase tobacco products.**
- Surrogate marketing tended to use locally identifiable cultural frames to present products as rooted in local traditions. This included messaging on community celebrations and festivals (47%), such as Republic Day and Chaitra Navratri.**
- Brand extensions tended to apply to allied goods and services that included household products and personal care products. A significant number also applied to ultra-processed foods, which present health risks that are being increasingly recognized. This finding underscores the importance of comprehensive health policies that cover all known health-harming products, and not only tobacco.**

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### Box 1. Examples of Brand Extensions and Surrogate Marketing

#### Brand Extension



Left: ITC Limited's India Kings cigarettes, with the company's logo. Right: Sunfeast cookies and cakes, with the ITC Limited logo.

#### Surrogate Marketing



Left: Shikhar Group's tobacco product gutkha. Right: Shikhar Group's surrogate product pan masala, with the same branding as the tobacco product.

Hidden forms of tobacco marketing undercut the effectiveness of existing restrictions in reducing tobacco use and preventing tobacco uptake and put consumers who may lack insight into the true intention of the marketing, such as youth, most at risk. Recent policy efforts, such as the Central Consumer Protection Authority's new guidelines released in June 2022, have sought to curtail surreptitious tobacco marketing, particularly surrogate marketing.

Vital Strategies' [Tobacco Enforcement and Reporting Movement \(TERM\)](#) is a continuous digital media monitoring system that collects marketing instances from social media platforms and news sites. The data is

then analyzed and presented through regular situation reports and special issue briefs. This report focuses on instances of "hidden" marketing—surrogate marketing and company brand extensions—captured online from the accounts that TERM tracks over a four-month period from Jan. 16 to May 15, 2022. The report is divided into three parts: In the first part, we summarize observations of all tobacco marketing instances. In the second, we provide more details on the observed instances of surrogate marketing. Finally, we summarize the evidence on observed instances of company brand extensions.

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### Definitions

#### Marketing Tactics

**Surrogate products:** Non-tobacco products with a similar or identical visual brand identity as the company's tobacco products. "Surrogate marketing" is the marketing of surrogate products.

**Brand-extended products:** Non-tobacco products that use the established brand name or trademark of a tobacco company, but do not have the same visual identity as the company's tobacco products. "Company brand extension" is the marketing of brand-extended products.

**Allied products:** A company or brand's surrogate and extended products.

**Direct marketing:** Marketing of products with clear visuals of the product and/or its use, or the product brand name.

**Indirect marketing:** Promotion of the tobacco company and/or product and its use through brand extension, surrogate marketing, price discounts and giveaways, and sponsorship of events or activities.

#### Products

**Smokeless tobacco products:** A type of tobacco that is chewed or sucked, including:

- **Khaini:** Mixture of sun-dried tobacco and slaked lime.
- **Gutkha:** Mixture of tobacco, crushed areca nut (also called betel nut), spices, and other ingredients.
- **Betel quid with tobacco:** A mixture of areca nut, catechu, slaked lime and tobacco.

**Smoking tobacco products:** A type of tobacco that is burned and the smoke inhaled, including:

- **Bidis:** Sun dried, flaked tobacco rolled in a piece of tendu leaf and secured with a thread.
- **Hookah:** Water pipe used to smoke tobacco mixtures that come in different flavors.
- **Conventional cigarettes:** Thin cylinders of ground or shredded tobacco that is wrapped in paper.

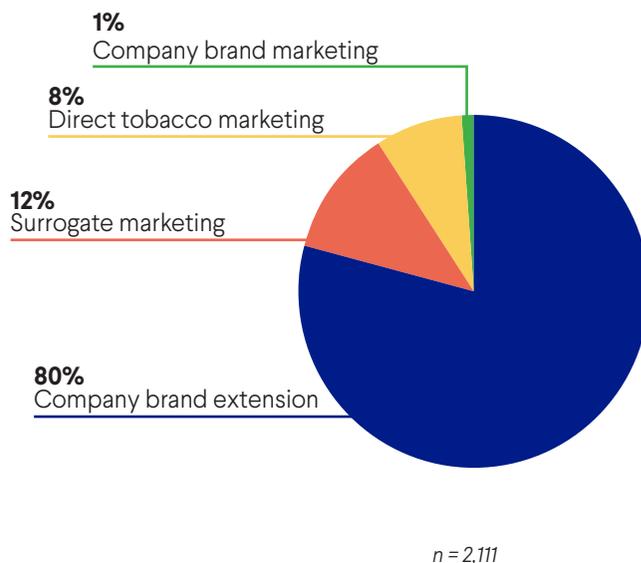
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**Detailed Insights**

Surrogate marketing was observed in up to 12% of the total 2,111 observed instances of online tobacco and allied product marketing.

The majority of observed marketing was for tobacco companies' extended products (80%). Direct tobacco marketing was observed in 8% of instances.

**Figure 1.  
Types of Marketing Tactics Used in All Observed Marketing**



**Table 1.  
Examples of Marketing Tactics Used**

Type	Example
<b>Brand Extension</b>	 <p>The mouth freshener brand Pass Pass is an extended brand from Dharampal Satyapal Group (DS Group), which manufactures and markets smokeless tobacco products.</p> <p><i>Image source: Pass Pass Twitter</i></p>
<b>Surrogate Marketing</b>	 <p>Surrogate products such as DB Signature's pan masala Silver Elaichi are packaged and marketed with the same name and branding as that of their tobacco counterparts.</p> <p><i>Image source: DB Signature Twitter</i></p>

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### Direct Marketing



Bidi products were the only tobacco products observed being directly marketed. Here, AB Bidi Company promotes their bidis with a clear image of the product packaging.

*Image source: AB Bidi Company Facebook*

### Company Brand Marketing



Third-party retailers like Cigar Conexio, which is the “official importer and distributor of premium handmade cigars in India,” were observed using social media platforms to connect with the public and raise awareness of the company.

*Image source: Cigar Conexio Facebook*

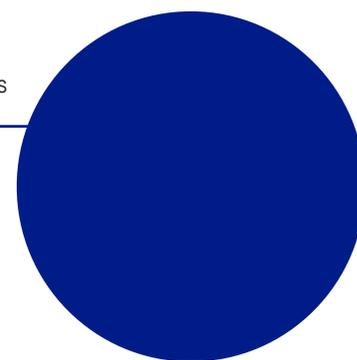
**Company brand extension marketing made up 80% of the total marketing observed, while surrogate marketing made up 12% of the total marketing observed.**

In this report, surrogate marketing is defined as the marketing of non-tobacco products that are given a similar or identical visual brand identity as a company’s tobacco products. The following were the observed instances of surrogate marketing online.

**Surrogate marketing was observed exclusively for smokeless tobacco products (100%).** There was no surrogate marketing observed for smoking tobacco products or e-cigarettes (0%).

**Figure 2.**  
**Types of Tobacco Products Marketed Via Surrogate Marketing**

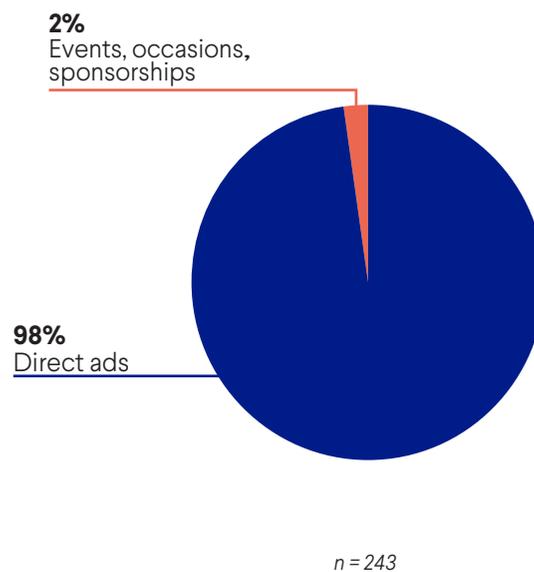
**100%**  
Marketing by smokeless tobacco company



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**Most surrogate products (98%) were marketed via direct advertisements, with clear product pictures and the tobacco company's logo.** The other 2% of surrogate products used events, occasions and sponsorships to promote products and the brand.

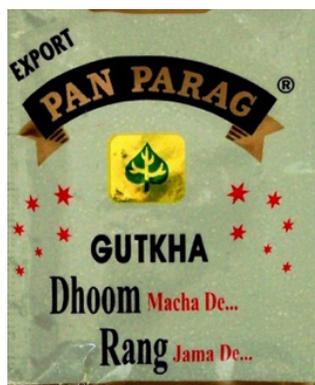
**Figure 3.**  
**Marketing Intention for Surrogate Products**



### Example of online surrogate marketing

All of the surrogate products being promoted were mouth fresheners and pan masala, which is a herb, nut and seed mixture that is often promoted for digestion. Each company sells its tobacco product with similar branding as the surrogate product; this includes the name, product, packaging, and other visual cues, as evidenced by the pack illustrations below. Here, Kothari Products Ltd.'s pan masala product, Pan Parag, has packaging and branding that is similar to its gutkha tobacco product.

#### Tobacco Product



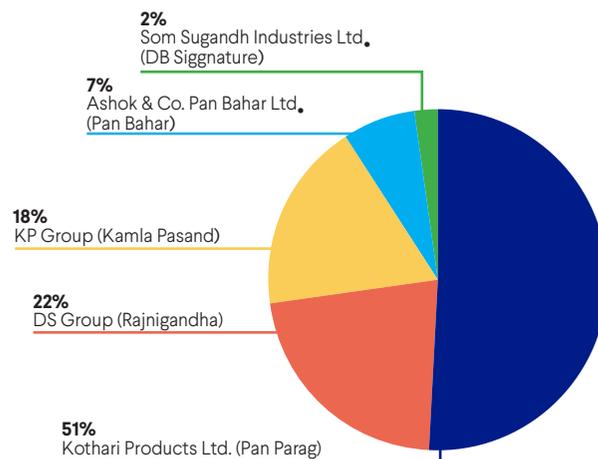
#### Surrogate Product



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The surrogate product most actively observed being marketed on social media was Kothari Products Ltd.'s pan masala brand Pan Parag (51%). This was followed by DS Group's brand Rajnigandha (22%); KP Group's brand Kamla Pasand (18%); Ashok & Co.'s brand Pan Bahar (7%); and Som Sugandh Industries Limited's brand DB Signature (2%).

**Figure 4.**  
**The Surrogate Products Observed Most Actively Being Marketed**



n = 243

Most of the companies whose surrogate products were observed being actively promoted online were headquartered in Uttar Pradesh state. One company, Som Sugandh Industries Limited, was headquartered in New Delhi.

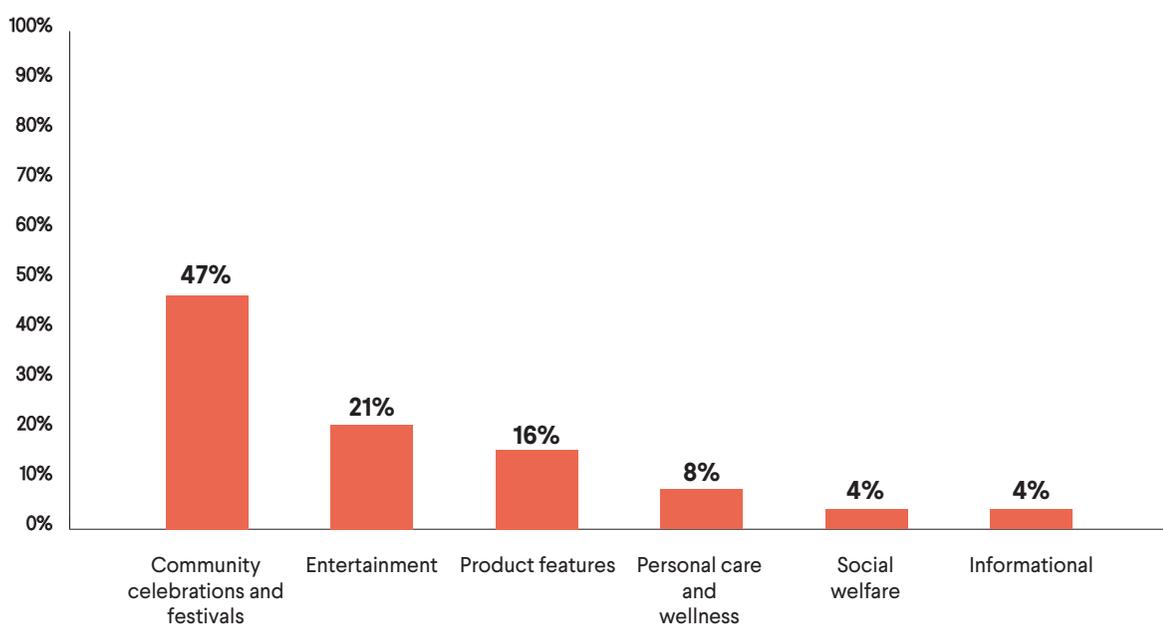
**Map 1.**  
**Headquarters Location for Tobacco Companies Whose Surrogate Products Were Observed Being Actively Marketed**



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**Most online surrogate marketing leveraged cultural festivities and celebrations.** Almost half (47%) of all the observed surrogate marketing used messages connected to community celebrations and festivals, likely to build brand loyalty and recognition, followed by entertainment (21%) and product features (16%).

**Figure 5.**  
**Message Framing Used in Surrogate Marketing**



n = 243

**Community celebrations and festivals framing:**



Community events/festivals such as Chaitra Navratri were used to promote Ashok & Co.'s Pan Bahar, which is a brand of pan masala. The advertisement uses popular actors and the tagline refers to the product as the "identification of success." Image source: Pan Bahar Facebook

**Entertainment framing:**

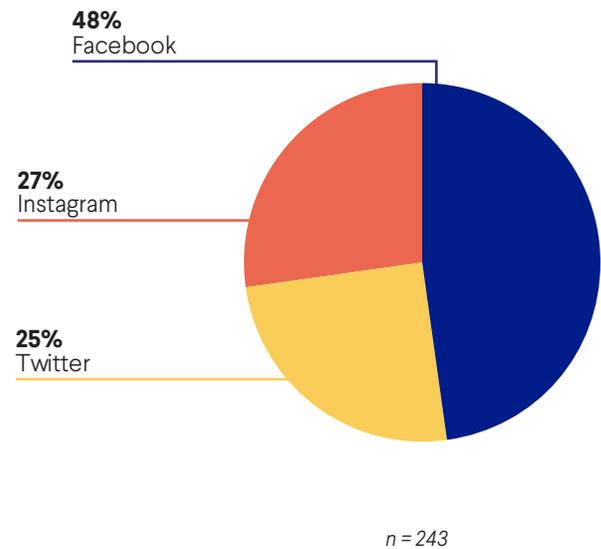


Popular memes such as this one taken from the movie "Spiderman" were used to promote Kothari Product Ltd.'s pan masala brand Pan Parag. The tagline calls for including the product in any kind of event to make it more celebratory. Image source: Pan Bahar Facebook

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**Three-fourths of online surrogate marketing was observed on Meta platforms (Facebook and Instagram).** Nearly half (48%) of the surrogate marketing was observed on Facebook, while the other half was divided almost equally between Instagram (27%) and Twitter (25%).

**Figure 6.**  
**Social Media Platforms Where Surrogate Marketing Was Observed**



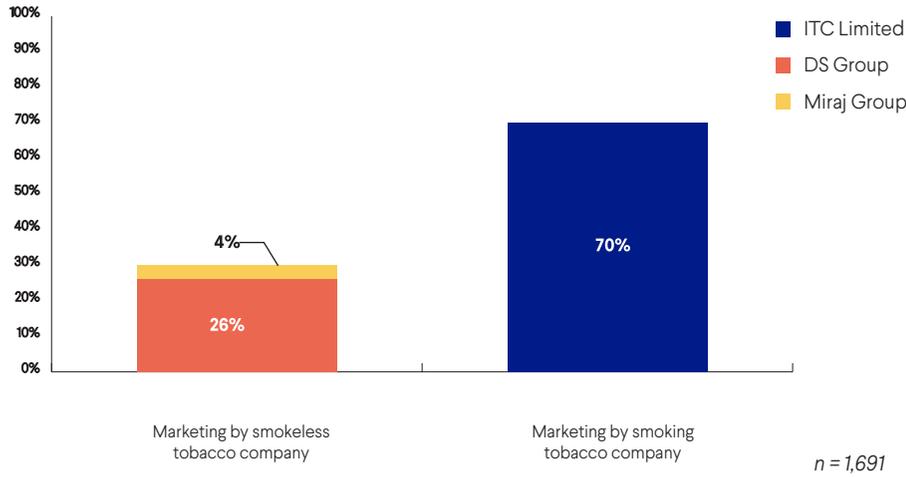
In this report, company brand extension marketing is the marketing of non-tobacco products that use the established brand name or trademark of a tobacco company, but do not have the same visual identity as the company's tobacco products. The following were the observed instances of company brand extension marketing.

### The Companies Whose Extended Products Were Observed Being Most Actively Marketed

**Most extended products that were observed being actively marketed are under the portfolio of ITC Limited, which sells smoking tobacco products.** Out of the 1,691 instances of marketing for brand-extended products, 70% was for ITC Limited's fast-moving consumer goods brands including Aashirvaad staple foods and kitchen ingredients, Sunfeast biscuits, and Candyman candies. The other 30% of marketing was for extended products within the smokeless tobacco companies DS Group and Miraj Group's portfolios.

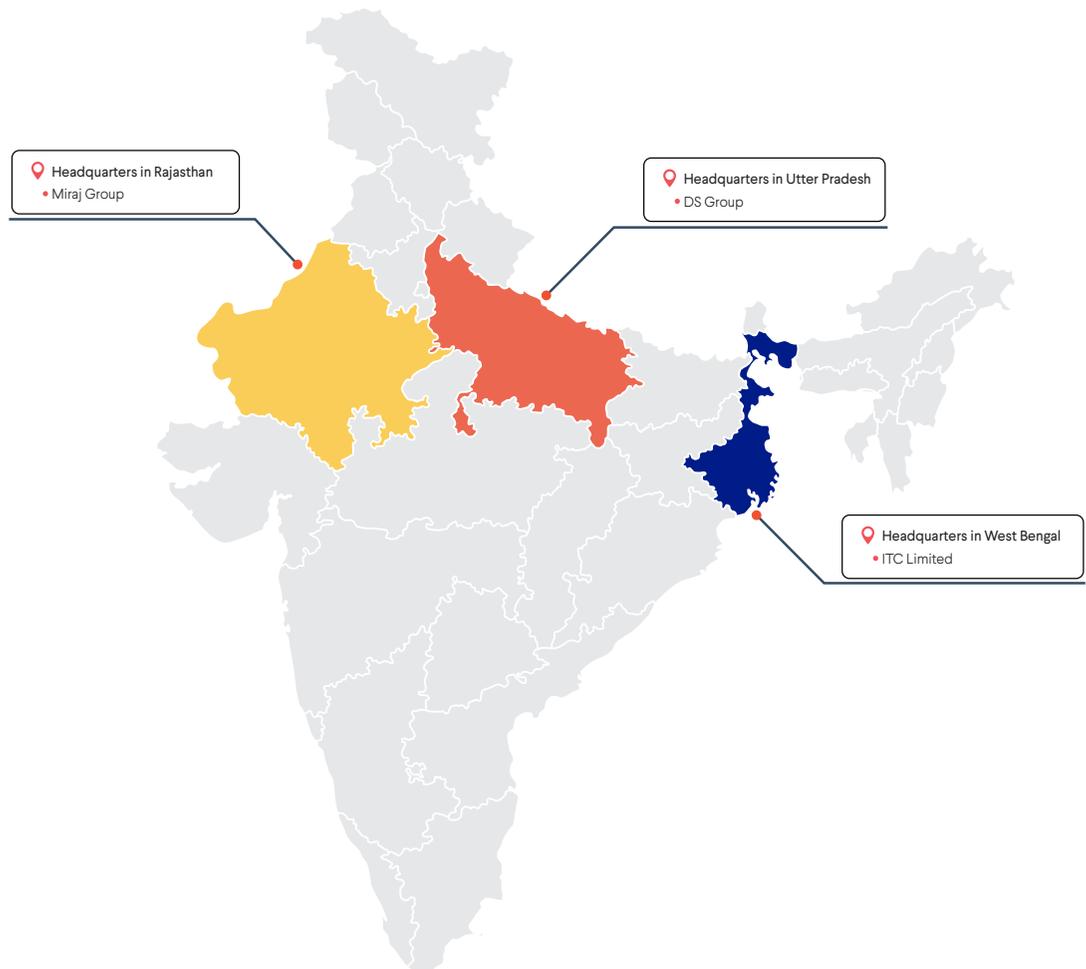
**HIDDEN IN PLAIN SIGHT:**  
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**Figure 7.**  
**The Companies Whose Extended Products**  
**Were Observed Being Most Actively Marketed**



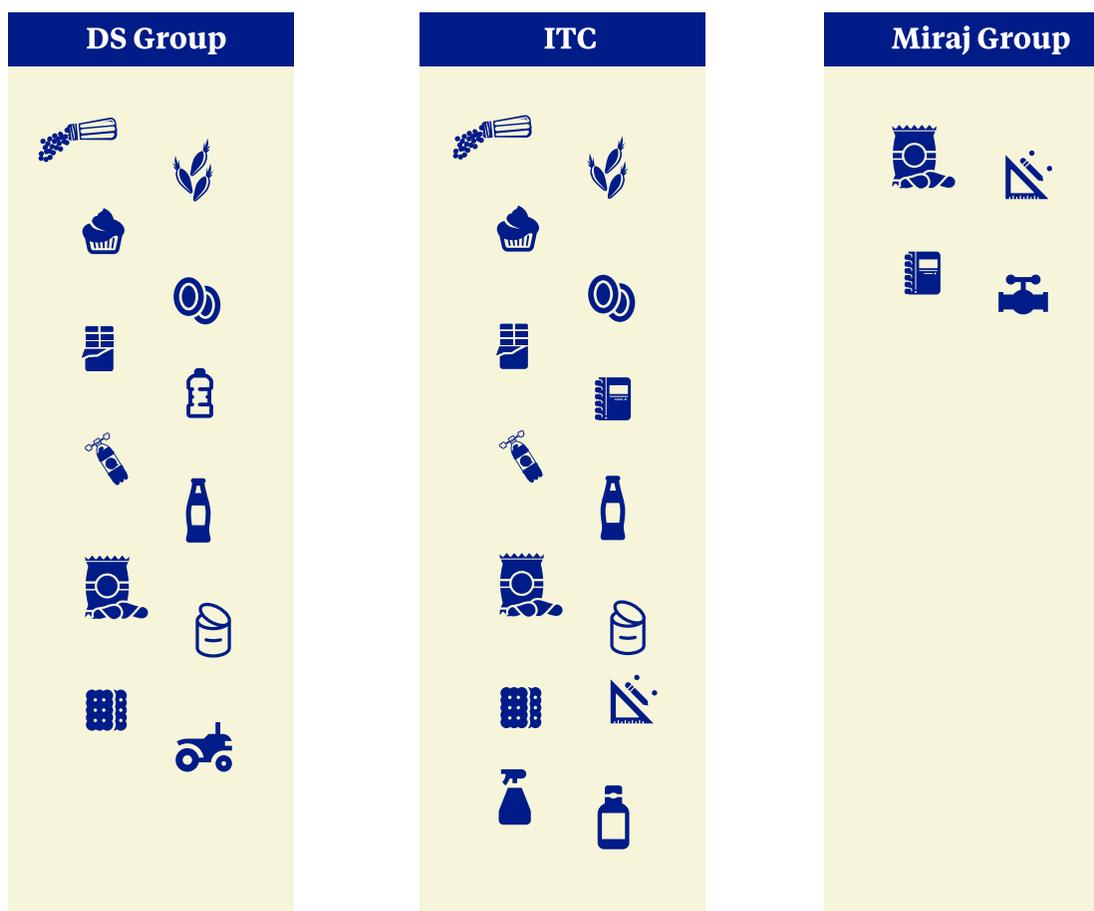
**Most of the companies whose extended products were observed being actively promoted online were headquartered in northern India.** Companies were headquartered in Rajasthan (Miraj Group), Uttar Pradesh (DS Group) and West Bengal (ITC Limited).

**Map 2.**  
**Headquarter Location for Tobacco Companies Using Brand Extensions**



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**Table 2.**  
**Tobacco Companies Observed by TERM and Their Portfolios of Extended Brands**



Spice



Food staples



Confectionaries



Candies



Chocolates



Bottled water



Packaged meals



Snacks



Paper products



School supplies



Household items



Personal care products



Carbonated beverages



Sugar-sweetened beverages



Ultra-processed foods



Agriculture



Construction products

## Key Recommendations

- **Monitor and report all forms of tobacco marketing,** including surrogate advertising and company brand extensions, for their influence on tobacco promotion and use.
- **Work to enhance coordination and cooperation between government departments.** Coordination between regulatory bodies is essential to ensure that the spirit and intent of health policies, such as the comprehensive ban on tobacco advertising, promotion and sponsorship, is truly met.
- **Work towards better coordination between various stakeholders vis-à-vis marketing restrictions across health-harming products.** As reported here, company brand extensions frequently occur across health-harming products, such as ultra-processed foods. A coordinated effort at implementation of policies is essential in view of the health burdens and risks.
- **Hold stakeholders accountable.** Eschewing conflict of interest between stated policies and revenues from tobacco marketing is vital. Social media companies must watch for the exploitation of targeted algorithm-based marketing that may be harder to track, and close down tobacco marketing and sales on their platforms, in line with their own policies. Accountability between multiple actors, including media, advertisers and civil society, is essential to address the continued presence of tobacco marketing online.
- **Invest in tobacco control strategic communication campaigns to counter marketing messages.** Disseminate accurate health information on digital platforms where young people gather, to counter tobacco marketing.

## Conclusion

Surreptitious tobacco marketing, including surrogate marketing and company brand extension marketing, is prevalent on social media in India. This type of marketing undermines the effectiveness of existing restrictions to reduce and prevent tobacco use by promoting associations with tobacco product brands. This “hidden” marketing must be monitored and addressed to prevent it from undercutting tobacco control policies that restrict the advertising, promotion and sponsorship of tobacco products. Curbing tobacco marketing is vital to reducing tobacco initiation and use, particularly by children and youth.

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### References

1. Tata Institute of Social Sciences (TISS), Mumbai and Ministry of Health and Family Welfare, Government of India. Global Adult Tobacco Survey GATS 2 India 2016-17 [Internet] [cited 2022 Nov. 16]. Available from: <https://ntcp.nhp.gov.in/assets/document/surveys-reports-publications/Global-Adult-Tobacco-Survey-Second-Round-India-2016-2017.pdf>
2. Wakefield M, Flay B, Nichter M, Giovino G. Role of the media in influencing trajectories of youth smoking. *Addiction*. 2003 May;98 Suppl 1:79-103.
3. DiFranza JR, Wellman RJ, Sargent JD, Weitzman M, Hipple BJ, Winickoff JP, et al. Tobacco Promotion and the Initiation of Tobacco Use: Assessing the Evidence for Causality. *Pediatrics*. 2006;117(6):e1237-e48.
4. Government of India. The Cigarettes and Other Tobacco Products (Prohibition of Advertisement and regulation of Trade and Commerce, Production, Supply and Distribution) Act, 2003. <http://legislative.gov.in/sites/default/files/A2003-34.pdf>
5. Tewari S. India's digital ad market to touch \$35bn by 2030: Redseer [Internet]. *Mint*. 2021 July 19 [cited 2022 Nov. 16]. Available from: <https://www.livemint.com/industry/advertising/indias-digital-ad-market-to-touch-35-bn-by-2030-redseer-11626689554797.html>
6. Freeman B, Watts C, Astuti PAS. Global tobacco advertising, promotion and sponsorship regulation: what's old, what's new and where to next? *Tobacco Control* 2022;31:216-221.
7. Chandra S, Rinkoo AV, Kaur J, Prasad V. Tobacco Advertising, Promotion and Sponsorship in India and Indonesia: Present Regime and the Way Forward. *Asian Pacific Journal of Cancer Prevention*. 2021;22(S2):89-96.

### Methodology

The Tobacco Enforcement and Reporting Movement (TERM) is a digital media monitoring system that offers rapid, qualitative insights into online tobacco marketing. The primary purpose of TERM is to identify instances of tobacco marketing, a known public health risk. TERM does not allege or attempt to identify whether these tobacco marketing instances are in violation of local or international laws. This report summarizes information gathered from publicly available social media posts posted from Jan. 16 to May 15, 2022. Posts were gathered and analyzed using an artificial intelligence-driven monitoring tool from social media platforms including Facebook, Instagram, Twitter and YouTube. Data coding was first conducted automatically and was then reviewed by Vital Strategies researchers using a theory-driven codebook. The analysis was restricted to content in English and Hindi. Data restrictions and privacy laws followed by social media platforms may lead to undercounting of marketing activity. Our [methodology](#) and other reports can be accessed on our [website](#).

### For more information:

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Visit: [www.termcommunity.org](http://www.termcommunity.org)

### About TERM

Vital Strategies' Tobacco Enforcement and Reporting Movement (TERM) is a real-time digital media monitoring system that tracks tobacco marketing online on social media platforms and news sites. TERM is currently operating in India, Indonesia and Mexico.

### About Vital Strategies

Vital Strategies is a global health organization that believes every person should be protected by equitable and effective public health systems. We partner with governments, communities and organizations to reimagine public health, and the result is millions of people living longer, healthier lives. Our goal is to build a future where better health is supported across all facets of our lives, in our families, communities, in our environment and our governments.

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