Turning off the 'TAPS'

Strategies to control tobacco advertising, promotion and sponsorship in Kenya

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Executive Summary

The World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) defines Tobacco Advertising and Promotion as “any form of commercial communication, recommendation or action with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly”. It defines tobacco sponsorship as “any form of contribution to any event, activity or individual with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly”. The Kenya Tobacco Control Act further defines “advertisement” as:

a. Any statement, communication, representation or reference aimed at the public and designed to promote or publicize a tobacco product or encourage its use, or draw attention to the nature, properties, advantages or uses of the product;

b. The use in any advertisement or promotion aimed at the public, of a tobacco product manufacturer’s company name where the name or any part of the name is used as, or is included in a tobacco product trade mark;

c. Product stacking and product displays of any kind.

It further defines “promotion” as “a representation, including an advertisement, whether direct or indirect, including any communication of information about a product or service and its price and distribution, that is likely to influence and shape attitudes, beliefs and behavior about the product or service, or that is intended to or has the effect of inducing consumers to use tobacco products, underestimate the dangers of tobacco consumption, or create recognition of or goodwill for the tobacco manufacturer”

Companies use Advertising, promotion and Sponsorship to market their products and increase sales. This paper identifies and discusses the legal Framework (international and National) on Tobacco Advertising, Promotion and Sponsorship (TAPS). It analyses the implementation of the laws governing TAPS and identifies the TAPS strategies used by the industry both prior and post enactment of the Tobacco Control Act, 2007 such as the use of Outdoor and Point of sale Advertising, Branding, Corporate Social Responsibility and use of the media.

In its introduction, this paper provides a background of TAPS in Kenya, and gives a summary of the evolution of TAPS from the mainstream mass media (Direct) to more subtle/indirect ways currently being employed as bans on direct TAPS are enforced. It also discusses the importance of TAPS for the Industry and gives examples of how this has been carried out, including the disguising of harmful
products as less harmful, targeting of certain vulnerable groups such as the Youth and use of Corporate Social Responsibility (CSR) to win political favour. The paper also provides for the legal status of TAPS and argues that countries, including Kenya should be able to use the legal provisions to support Total and Comprehensive Bans on TAPS, with broad scope in the interest of protection of the citizens from inappropriate use of unsafe products and in Public interest. This first section of the paper finally argues that the media is critical in Tobacco- both as a friend of Tobacco Control- through for instance provision of pro- tobacco control messages to the public, as well as a foe, due to close relationships they may have with the Tobacco Industry for instance through Advertising revenues paid to the media by the Industry.

Section two of this paper gives a summary of the current situation in the enforcement of the TAPS bans in Kenya. It provides a brief report of Monitoring work that has been done in Kenya on violations of TAPS bans. It also acknowledges that the Government is making an effort towards ensuring adherence to existing bans and controls. It provides a few scenarios of what the Government has done in this regard.

Section three identifies and enumerates some challenges that exist in the enforcement of TAPS bans. Some of the identified challenges include Tobacco Industry Interference in enforcement work, the over- reliance by the media on advertising revenues, lack of awareness (by the Public and enforcement Officers) of TAPS strategies, legal provisions and bans as well as their effect on Tobacco consumption. New avenues for TAPS are also emerging at a very fast pace as the Tobacco Industry circumvents already existing bans, making enforcement difficult. Some of these avenues include internet and Cross Border Advertising.

Section four proposes strategies that could be used to deal with TAPS in Kenya; including building the capacity of Tobacco Control Advocates to use the media for Tobacco Control, building capacity of media practitioners to report of Tobacco Control, strengthening of laws governing TAPS e.g. through development and enforcement of regulations. Research on TAPS in Kenya and its effects on, for instance, Consumption of Tobacco products would also be a useful strategy for building a case for comprehensive bans on TAPS in Kenya.

This Strategy paper has been developed as part of the Kenya Tobacco Situational Analysis Consortium (KTSA) project. It is informed by Media and Ground Monitoring of TAPS conducted under the same project. The main objective of this paper was to ensure successful implementation of the relevant provisions of the Tobacco Control Act and subsidiary legislation relevant to TAPS in Kenya. It is hoped that the strategies identified will go a long way in ensuring comprehensive bans on TAPS in Kenya; based on sound legal framework and effective implementation.
1.0 Introduction

Advertising is the attempt by owners of goods and services to persuade current and potential consumers to continue or start purchasing. The intention of advertisers is, therefore, to portray products in ways that will maximize their desirability to potential consumers.

Advertising, Promotion and Sponsorship is one of the key marketing strategies that Companies employ in order to increase consumer awareness of their products, create goodwill from their consumers and the public in general, increase sales and eventually make more profits. The Tobacco Industry (TI) is no exception. However for a product that kills millions of its consumers globally just by using it as it is supposed to be used, then Advertising, promotion and Sponsorship of Tobacco Products has to be controlled. This is especially so because majority of tobacco users pick up the habit when they are too young to understand the real implications of their decision and before they can make the informed decision to quit, they are already hooked for life. Studies done in the US confirmed that Tobacco advertising and promotion are causally related to increased tobacco use. The study also found that Mass media campaigns designed to discourage tobacco use can change youth attitudes about tobacco use, curb smoking initiation, and encourage adult cessation.

The TI denies that advertising plays a role in encouraging people to smoke, and claims that its advertising is mainly for the purpose of promoting brand loyalty. However it has been very aggressive and innovative in promotion of tobacco products, by creating an appeal for more non-smokers to start the habit by associating smoking with dreamlike promises of prestige, power, freedom and luxury. This is especially dangerous for the Youth, who are at a very impressionable period of their lives.

Tobacco Advertising Promotion and Sponsorship covers a wide range of strategies done at various levels i.e. from a personalized, specific and direct activity to a broader, more indirect marketing activity as summarized below:

Level 1: Mass media advertising: Television, Radio, bill boards, press, cinema

Level 2: Other Marketing Communications: Merchandising, Point of Sale, sponsorship, internet, packaging, product placement, brand stretching, loyalty schemes, free samples
In the 70s and 80s tobacco advertising by British American Tobacco –Kenya (BATK) was the fourth largest of any product category with mobile cinema units being extensively used. The Industry also liberally used Outdoor media and Point of Sale Advertising through colourful billboards and posters respectively. Other ways that the TI has used to Advertise and promote its products include:

- Disguising harmful products as less harmful by using terms such as “organic”, “natural” and “additive free”, “lights”, “mild”, “low tar” to imply harm reduction. In Kenya “menthol” cigarettes are more popular with girls and young women as the bitter tobacco taste is masked by the flavor and the false impression created that they are mild and therefore less harmful.

- Targeting Women and the youth. Tobacco use amongst the youth in Kenya...
is rising and so is the number of women/girls who are picking up the habit. This can be hugely be attributed to advertising and Promotion targeting these two groups using seductive but false images of vitality, slimness, modernity, emancipation, sophistication and sex allure.

• Sponsorship of social activities—“...We use sports as an avenue for advertising our products...” In Kenya for many years the famous Safari Rally was sponsored by the Marlboro cigarette brand. BATK has also been aggressive in sponsorship of schools’ music and drama festivals as well as in participation at agricultural and trade fairs.

• Corporate Social Responsibility through Development of business programmes for small business development, Educational sponsorships in terms of grants, scholarships, professorship and even creation of entire schools. The tobacco industry is also involved in community level development projects and donating to famine relief funds. Recently BAT-Kenya sponsored Crop Insurance cover for some of its tobacco growers; and used the opportunity to get media coverage.

Even though Tobacco Companies have always been at the forefront of demanding that they be allowed to self regulate as an Industry, this has never been done effectively. Also the Industry responds to partial Advertising bans in ways that undermine the bans effectiveness, including shifting from ‘banned’ media to ‘permitted’ media which may include new and emerging media. As cigarette advertising is being curtailed in some traditional media, cigarette companies are exploring the use of new or nontraditional media for distributing pro-tobacco messages and images. It is therefore critical that Kenya enforces its existing ban on Tobacco Advertising, Promotion and Sponsorship and regularly reviews it to ensure that new forms of TAPS are identified and regulated.

Tobacco advertising has for long fallen across some major themes and targeted some specific groups. Identified themes include providing satisfaction (taste, freshness, mildness, etc.), reducing anxieties about the dangers of tobacco use, and creating associations between smoking and desirable outcomes (independence, social success, sexual attraction, thinness, etc.); while targeted groups include women and youth. In addition Corporate Sponsorship of events is also key public relations strategy for Tobacco Companies; and has been used to influence opinion leaders who benefit from the sponsorships. Corporate image campaigns have also been used to highlight the Companies’ ‘charitable’ work and influence public perceptions.
The studies of tobacco advertising bans in various countries show that comprehensive bans reduce tobacco consumption. Non-comprehensive restrictions generally induce an increase in expenditures for advertising in “non-banned” media and for other marketing activities, which offset the effect of the partial ban so that any net change in consumption is minimal or undetectable. Similar studies should be done in Kenya.

This paper has been developed through the Kenya Tobacco Situational Analysis (KTSA) project through the support of the International Development and Research Centre (IDRC). The Policy objectives of this project were:

I. Enforcement of Smoke Free Legislation within Nairobi, Kenya.

II. To monitor and counter indirect advertising, promotion and sponsorship through mapping and understanding the context in which advertising, promotion and sponsorship is taking place in Kenya; and coming up with strategies to counter advertising, promotion and sponsorship in Kenya.

Under the second objective of the project, media monitoring of Tobacco Activities; including TAPS was done. In addition, a survey was conducted within the media circles with the objective of identifying gaps in media personnel’s understanding and attitudes on tobacco and Tobacco control and pro-tobacco control reporting. Civil Society Organizations from around the country also participated in Ground Monitoring exercise of the same which was supported by a grant from the Campaign from the Tobacco Free Kids (CTFK). The results of these activities identified various factors that prevented the media from taking its rightful place in Tobacco control, including lack of technical knowledge of TC issues and influence of the Tobacco Industry. It is also clear that there are still blatant violations of the TAPS bans provisions in the Tobacco Control Law. These results have greatly informed this paper, which aims at providing strategies for dealing with TAPS in Kenya.

1.1 Role of the Media in Tobacco Advertising, Promotion and Sponsorship

The news media represent a key source of health information for the general public and a framing mechanism for issues surrounding Tobacco Control. However organized pro-Tobacco Control media advocacy is underutilized as opposed to Tobacco Industry which has been successful in gaining positive coverage on a
number of issues, and therefore has been used as a tool for Advertising and Promotion. In addition, paid tobacco advertising tends to reduce space for tobacco Control messages; especially when the later are unpaid for. Portrayal of tobacco products and tobacco use in entertainment media also has an influence on tobacco use, as well as social attitudes and behaviors related to smoking.

1.2 Legal Status

The banning of all forms of tobacco advertising and promotion has long been regarded as a central platform of comprehensive tobacco control policy. The preamble of the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) expresses serious concern about the impact of all forms of Tobacco Advertising, Promotion and Sponsorship (TAPS) aimed at encouraging the use of tobacco products; while Article 13 recognizes that a comprehensive ban on Tobacco Advertising Promotion and Sponsorship is one of the best strategies for reducing tobacco consumption. The FCTC calls on each party to the treaty to “undertake a comprehensive ban of all tobacco advertising, promotion and sponsorship ... in accordance with its constitution or constitutional principles.” Guidelines for Article 13 and Article 5.3 of the FCTC provide guidance to countries on how to deal with all kinds of Advertising Promotion and Sponsorship within their territory. For instance Guidelines to Art.5.3 amongst other things call on Governments to “Denormalize and, to the extent possible, regulate activities described as ‘socially responsible’ by the Tobacco Industry, including but not limited to activities described as ‘corporate social responsibility’”. It also recommends that “Parties should not accept, support or endorse the tobacco industry organizing, promoting, participating in, or performing, youth, public education or any initiatives”. In addition, guidelines to Art 13 provide guidance for applying restriction on TAPS. They call for effective bans that are recognized by the FCTC and are applicable to all tobacco advertising, promotion and sponsorship; including all forms of commercial communication, recommendation or action and all forms of contribution to any event, activity or individual cross-border advertising, promotion and sponsorship and addressing all persons or entities involved in the production, placement and/or dissemination of tobacco advertising, promotion and sponsorship. The Guidelines also call for Effective monitoring, enforcement and sanctions supported and facilitated by strong public education and community awareness programmes.

Defenders of tobacco advertising tend to assume a free marketing philosophy where any restrictions on advertising are seen as ethically offensive to the
sovereignty of business interests. However, governments intervene in marketplaces in many ways, ranging from the outright banning of products already in a market place, through restrictions on sales, packaging and advertising information requirements, to restrictions and bans on advertising as is the case for Tobacco Advertising in many countries around the world. Its common practice for Governments to protect its citizens from unsafe products; through various levels of restriction including restriction to their availability as well as restrictions to their advertising if there are real concerns that such advertising would promote inappropriate use. Therefore any claims of right to advertise must be seen in light of broader considerations of Public benefit, welfare and safety, irrespective of the legal status of the product.

Prior to the enactment of the Tobacco Control Act 2007, there existed prohibition on radio and television advertising and limitation on certain types of outdoor advertising and sponsorship. However, tobacco companies could still promote their corporate social responsibility activities so long as they did not seek to persuade people to smoke. Partial bans/restrictions to advertising and promotion only work to shift capital used in one form of advertising/promotion to another without any effective results. On the other hand, Comprehensive bans have been known to be effective in reducing tobacco use.

The Tobacco Control Act 2007 introduced a comprehensive ban on Tobacco Advertising, Promotion and Sponsorship. Part v (section 22-31) bans:

- Advertising through Print and electronic media or any other form of communication
- Lifestyle advertising
- Advertising through sponsorship of and/or at events, programmes or activities
- False Promotion- misleading packaging
- Sales promotions
- Promotion through testimonials and endorsements
- Outdoor advertising- including bill boards, posters and Branding of facilities.

The TCA 2007 provides for a wide range of measures to curb TAPS. However, there are a few gaps. For instance the law is vague on internet and cross border Advertising and does not expressly ban all forms of CSR activities.
2.0 Current Situation

Monitoring work; comprising of media monitoring and Ground monitoring carried out by Tobacco Control Civil Society Organizations (CSOs) between January 2009 and June 2010 revealed that while the TI is abandoning the mainstream Advertising methods, they are now using more subtle and indirect techniques to circumvent the existing bans and achieve their goal. The following are examples of tobacco Advertising bans violations in Kenya based on the reports from the monitoring work:

- Product placement in TV movies and programmes most of which are watched by the Youth. Whether or not this is a deliberate act on the part of the Tobacco Companies, it still works in their favour and is in contravention of the Tobacco Control Act 2007.

- Outdoor advertising- Including bill boards, branded signposts, branded buildings- this is more common in rural and semi-rural areas.

The picture on the left is of a building branded with tobacco Product Brand Name, the one on the right is of the same building repainted several months later...possibly in compliance with the law.

Branded sign boards
• Brand stretching including printed T-shirts, Plastic carrier bags

On the left is a poster at a retail store, the middle picture is of branded umbrella shade and table, while on the left is a branded display box. In all the pictures tobacco Products are sold alongside sweets whose main market are children. This then presents an opportunity for passive marketing of tobacco products to them.
This type of kiosks branded with specific product brandname is very common all over the country. However, with the enactment of the Act, the brand name has been removed as in the middle picture. However on comparison with the specific package in the last picture, it is obvious which brand and company is being advertised!

- Sponsorship of interactive radio shows in grassroot FM stations
- Sales promotions in Bars
- Print media- TI favourable stories, paid up adverts announcing prices of tobacco products

The print media has been used by Tobacco Companies for paid adverts of tobacco products. The media has also covered Tobacco stories that have portrayed the Industry in a positive light and thus defeating Tobacco Control objectives.
2.1 Enforcement Actions against Tobacco Advertising Promotion and Sponsorship

With the enactment of the Tobacco Control Act 2007, there has been some effort towards ensuring adherence with the Advertising bans provided in law. Already, possibly due to increased awareness of the requirements of the Act by stakeholders and enforcement of the law, bill boards have been removed especially in major cities and towns. In addition many branded buildings have been repainted.

In 2008, one of the leading Tobacco Companies in Kenya sponsored the annual Agricultural Society of Kenya (ASK) show/trade fair. A bill board announcing the event contained the tag line “sponsored by Mastermind- Kenya”. The Ministry of Health, with the support of Tobacco Control advocates made an attempt to sue the company for contravening the requirements of the law. Later, In May 2009, when the British American Tobacco – Kenya (BAT-K) staff participated at the annual labour day celebration parade complete with branded T-shirts, caps, bags and umbrellas, a monitoring team comprising of civil society organizations and the enforcement team from the Ministry of Public Health were present and took pictures as evidence of this violation of the law. The Ministry thereafter warned BAT against any similar action in future. In 2010, BAT did not participate at this event. Finally in April 2010, BAT-K in partnership with an insurance company launched a crop cover for some tobacco farmers in Western Kenya, and used this opportunity to solicit some positive media coverage for themselves. The Kenya Tobacco Control Board, through its chair condemned this coverage through a press conference, arguing that it constituted promotion of the company’s activities intended to create a positive image in the eyes of the public and therefore a contravention of the law.
3.0 Challenges with Dealing with TAPS

1. The media, which is a major channel for Advertising Promotion and Sponsorship, is highly dependent on advertising revenues, to which the Tobacco Industry has contributed greatly over the years. It is a big challenge to move away from this.

2. There is a general lack of awareness especially by the enforcement officers and the public on the extent of the Advertising bans and therefore lack of Action.

3. There is a thin line between advertising and provision of objective, factual, adequate and timely information to consumers to allow them to make informed choices. The Tobacco Industry always argues that they are not advertising, but providing information to their existing customers, which can be convincing, to non-Public health actors.

4. The Tobacco Industry has a lot of resources, both financial and human, to support development of advertising, promotion and sponsorship strategies and to challenge any subsequent bans. The Industry is also powerful and very influential in developing countries like Kenya, which derives some revenue for it.

5. Emerging media. New media available for Tobacco Advertising, Promotion and Sponsorship is coming up at an alarming rate e.g. internet advertising, making it difficult to capture every foreseeable media.

6. Cross-border advertising by its very nature is difficult to control, yet the world is becoming a Global village where people in Kenya are exposed to media from the rest of the world.

This strategy paper clearly shows that Tobacco Advertising Promotion and Sponsorship (TAPS) is a big problem that has to be addressed if demand for tobacco and tobacco products is to be reduced. It also shows that while the legal instruments provide a clear framework for a comprehensive ban on TAPS in Kenya, in compliance with the requirements of the Framework Convention on Tobacco Control (FCTC), violations are still ongoing. The entire paper provides some key thinking points around which specific strategies can be derived. However, a few selected actions are outlined below as a guide on what role different stakeholders can play in controlling Tobacco Advertising Promotion and Sponsorship in Kenya.
### 4.0 Proposed strategies for dealing with TAPS in Kenya

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<th>PROBLEM</th>
<th>STRATEGY</th>
<th>JUSTIFICATION</th>
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<tbody>
<tr>
<td>1. Tobacco Advertising Promotion and Sponsorship in the mass media</td>
<td>a. Building capacity both of civil society to use the media and of getting the media to pass across positive TC messages and increase TC coverage</td>
<td>Research on tobacco control media Interventions, shows that mass media is regarded as the most powerful medium. Evidence from these research shows that anti-tobacco mass media campaigns can reduce tobacco use.</td>
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<td></td>
<td>Activities:</td>
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<td>• Media sensitization of their role and responsibilities with regards to Tobacco Advertising, Promotion and Sponsorship (TAPS)</td>
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<td></td>
<td>• Working with Journalists interested in Tobacco Control through the Journalists against Tobacco (JAT) forum to get informed reporting on TC</td>
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<td></td>
<td>b. Public awareness of Tobacco Industry Activities that counteract Public Health Campaigns</td>
<td>Increasing consumer awareness of Tobacco Industry activities to counteract public-health sponsored campaigns designed to reduce tobacco use is an important component of effective media interventions. The public needs to be able to</td>
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<td>Activities:</td>
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<td></td>
<td>• Anti- Tobacco Public Health</td>
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<td>messages in the print and electronic media especially targeting the Youth</td>
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<td>Billboards and posters</td>
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| Continuous monitoring of the domestication of the FCTC and the implementation of TCA 2007 is important to support compliance. Proper reporting of violations of Bans on TAPS is critical in order to ensure that action is taken against the violators. Reporting can be done at two levels. First to Local policy and law enforcers; who will then be able to take action to rectify the situation. Reporting can also be done at Global level in ongoing processes such as the Conference of the Parties (CoP) to Tobacco Control to determine the country’s compliance status with the FCTC. |

- Capacity building and facilitating civil society (and other stakeholders) to monitor the activities of the Tobacco Industry and implementation of the TCA 2007
- Shadow reporting on the FCTC domestication and implementation with regards to TAPS
- Naming and shaming Tobacco Companies that violate TAPS bans

| Monitoring and Reporting on domestication of the FCTC and the implementation of the Tobacco Control Act 2007, with regards to Tobacco Advertising Promotion and Sponsorship (TAPS) provisions; and Countering the Advertising Promotion and Sponsorship Activities of the Tobacco Industry |

Activities:
- Capacity building and facilitating civil society (and other stakeholders) to monitor the activities of the Tobacco Industry and implementation of the TCA 2007
- Shadow reporting on the FCTC domestication and implementation with regards to TAPS
- Naming and shaming Tobacco Companies that violate TAPS bans

| spot and report on any of these Industry Activities |
| 2. Weak enforcement of the Tobacco Control Act in relation to Tobacco Advertising Promotion and sponsorship | a. Strengthening of the legal framework (TCA 2007) to encompass areas that are currently not well covered such as Corporate Social Responsibility (CSR) as a promotion tool for the industry. Activities:  
- Lobby and advocacy for the development and implementation of regulations and stricter enforcement of the Law  
- Development and implementation of Regulations that give detail to the general Bans provided in the Act.  
- Capacity building for enforcement of the TCA bans on TAPS through training | Non-compliance with the TCA provisions on TAPS is sometimes due to poor enforcement. The Enforcement of the law will be strengthened when the provisions of the law are clear. Stricter enforcement is required and there is need to advocate for the same |
|---|---|---|
| 3. Lack of data on Tobacco Advertising Promotion and Sponsorship in Kenya | a. Promote research Tobacco Advertising Promotion and Sponsorship in Kenya Activities:  
- Carry out research on different aspects of TAPS such as types common in Kenya, Public interpretations of the advertising/promotion and sponsorship impact of TAPS on consumption, Tobacco Industry expenditure on advertising, impact/effect of bans on TAPS on tobacco use | Research provides evidence on how TAPS promote tobacco use as customary and glamorous, are deceptive and misleading, weaken public health campaigns, target specific populations such as women, youth which can then be used for advocacy work on TAPS in Kenya. Some work has already been done such as the Media and Ground monitoring of TAPS to identify the situation on the ground and there is need for follow up research. |
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12. Simon Chapman, “the Ethics of Tobacco advertising and advertising bans”

13. Simon Chapman, “the Ethics of Tobacco advertising and advertising bans”

14. McKay & Erickson, 2002

15. The pictures are courtesy of the Ground Monitoring work conducted between January 2009- June 2010 by Tobacco Control Civil Society Organizations (CSO)
This Strategy Paper has been developed as part of the Kenya Tobacco Situational Analysis (KTSA) Project; which was implemented by a consortium comprising of Representatives from the Institute for Legislative Affairs (ILA), Ministry of Public Health and Sanitation (MoPHS), Kenya Medical Research Institute (KEMRI), Institute for Natural Resources and Technology (INRS), Ministry of Education (MoE), Consumer Information Network (CIN), Social Needs Network (SNN), Tobacco and Alcohol Free Initiative (TAFI), Kenya Tobacco Control Alliance (KETCA) and Uzima Foundation with Support from the International Development and Research Centre (IDRC). Additional support for the Ground Monitoring work undertaken by nine NGOs namely: TAFI (Eldoret), SNN (Kisumu), Kenya Anti-Tobacco Growing Association (KATOGA- Migori), Social Liberation and Health Promotion Group (SLAHP- Kakamega), Den of Hope Group (Nairobi), Woman Kind (Garissa), Vision Integrated Community Initiative (Embu), Citizens for Destiny (Nyeri) and the Reachout Centre Trust (Mombasa), whose results have informed this paper, was provided by the Campaign for Tobacco Free Kids (CTFK). We are grateful to all these organizations for their work. Support from the IDRC and the CTK is acknowledged with thanks.

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