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Title

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Permalink https://escholarship.org/uc/item/0nf1v8bd

Journal Tobacco Control, 28(3)

ISSN 0964-4563

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Publication Date

2019-05-01

DOI

10.1136/tobaccocontrol-2018-054279

Peer reviewed

Marketing with tobacco pack onserts: a qualitative analysis of tobacco industry documents

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Received 29 January 2018 Revised 17 April 2018 Accepted 6 June 2018

ABSTRACT

Background Cigarette packs are a form of advertising that distributes brand information wherever smokers go. In the 21st century, tobacco companies began using onserts on cigarette packs to communicate new advertising messages to smokers.

Methods We reviewed tobacco industry documents dated 1926 to 2017 to identify how the tobacco industry developed and used onserts in marketing and to serve the industry's political and legal objectives.

Results Onserts added to cigarette packs became a more cost-effective way for brands to market in the year 2000. Manufacturers then began studying them, finding that new messages were appealing, while repeated messages were ignored. By 2005, tobacco companies were using onserts to effectively communicate about new tobacco products and packaging changes. They also used repeated 'corporate responsibility' messages that were, according to the industry's own research, likely to be ignored.

Conclusions Tobacco companies have expanded on cigarette pack-based advertising. Twenty-first century onserts simultaneously seek to increase sales using materials that are novel, attractive and provide independent value, while undercutting public health messages about the risks of tobacco use using materials that repeat over time and are comparatively unattractive. Health authorities can use this industry research to mandate onserts to communicate effective health messages.

BACKGROUND

Cigarette packs are a form of advertising^{1 2} because branded packs allow 'subtle promotion' of smoking even when print advertising, television advertising and sponsorship are prohibited.³ In the late 1990s in the USA, the Master Settlement Agreement restricted existing advertising channels⁴ and in 2009 the US Food and Drug Administration (FDA) began regulating tobacco. As a result, 'dark market' advertising has become increasingly important. Internal tobacco industry documents reveal how cigarette packs are designed as a form of marketing,^{3 6-17} including how pack design and colour influence perceived taste.^{6 7} Onserts, or outserts,¹⁸ are communications attached to but separable from a cigarette package, including miniature brochures placed beneath a pack's plastic wrap or glued to the exterior of the pack^{19 20} (figure 1). Similarly, tear tabs and tape, parts of package overwraps, may contain brief messages. Existing studies have not addressed the tobacco companies' twenty-first century innovations in the use of onserts.²¹

Beginning in the 1990s, tobacco companies, particularly Philip Morris and RJ Reynolds (RJR), used onserts to market new tobacco products and distribute ineffectual 'health warnings'. They developed some onserts to effectively market products by using attractive designs and large type, and others to ineffectively distribute 'health warnings' in ways that were uninteresting to smokers and difficult to read. A better understanding of this method of advertising could help public health agencies to both address potential tobacco industry efforts to undercut health messages, and design more effective warnings to promote public health.

METHODS

We searched the Truth Tobacco Industry Documents Library between January 2017 and April 2018 using established snowball methods,^{22–27} beginning with the keywords 'onsert' and 'outsert', combined with 'marketing', 'research' and 'focus groups'. We then refined search terms and dates using named individuals, products, marketing campaigns and adjacent (by Bates numbers) documents. We scanned the documents we identified for content, including those that dealt with uses of onserts and excluding duplicates. We analysed approximately 100 documents dated between 1926 and 2010. We also searched online archives²⁸ for examples of product packaging.

RESULTS

Tobacco onserts appeared in the 1920s but were too expensive to change rapidly, except at the local level,²⁹ until packaging technology changed in 2000. Early manufacturer use of onserts (1950s–1990s) focused on coupon distribution, however once onserts could be rotated on and off packs quickly at low cost, their use expanded. Philip Morris developed a mix of packaging advertisements and 'health warnings' and RJ Reynolds offered information on new products.

1920s-1990s: early development of onserts

Technology to add coupons to cigarette packs under the wrapper was patented in 1928.³⁰ Coupon onserts followed. Brown and Williamson's Raleighs cigarettes, for example, contained coupons that smokers could redeem for household goods³¹ on every pack³² (figure 1). Retailers could also attach store-specific coupons to the outside of packs they sold.²⁹ RJ Reynolds pioneered modifications of onserts in 1988 to market its Premier brand heat not burn cigarette alternative.^{33 34} The 1998 corporate marketing plan detailed that 'pack onserts and carton inserts will be used during the

To cite: Apollonio DE, Glantz SA. *Tob Control* Epub ahead of print: [*please include* Day Month Year]. doi:10.1136/ tobaccocontrol-2018-054279



Figure 1 A 1953 Raleigh coupon onsert. (Source: Aiken M Raleigh 1953 King-Size Tipped Cigarettes – vintage American Cigarette Pack. Cigarette Collector 2016; http://cigarettecollector.net/2016/09/06/ raleigh-1953-king-size-tipped-cigarettes-vintage-american-cigarette-pack/#content-container. Accessed April 13, 2018).

initial 4 months after launch to reinforce the benefit message (of using Premier over conventional cigarettes). Pack onserts will also provide conditioning copy to help acclimate smokers to SPA's [Premier's] unique characteristics.'.³⁵ RJR believed that the product, which 'does not burn tobacco' would address negative perceptions of smoking using claims that 'there is virtually no sidestream smoke, (it is) chemically simple... dissipates quickly in the air... and because it doesn't burn down, there is no burnt tobacco ash and no staining... while delivering acceptable taste and satisfaction'.³⁴ The marketing timetable noted that 'hand application of pack onserts may still be required'³³ suggesting difficulties developing onserts that were not coupons.

RJR considered other possible uses of onserts in the late 1980s. A conversation about Premier advertising between RJR's Business Information Department and marketing team considered whether onserts could be used to complete 'research among young adult smokers', on marketing related to flavours, brand loyalty and sensitivity to promotions.^{36–38} The surveys included a cash offer for those who completed a 10–15 min phone interview; RJR's survey researchers explained that 'This approach... will be significantly less expensive than other methodologically acceptable options... (but still need to determine) the legal

acceptability of the onsert approach for conducting research among younger smokers'.³⁹ The proposed studies were ultimately used to determine brand switching behaviour.⁴⁰

In the 1990s Philip Morris also considered using onserts for marketing, but had difficulty with implementation. In September 1994, Carl Cohen, the US brand manager for Marlboro, wrote to the Philip Morris sales management group about an early onsert-based campaign to test market a possible new brand, 'Dave's Lights'⁴¹ using an advertising onsert that detailed the 'legend of Dave's'.⁴² Dave's was marketed as an 'independent' brand with onserts reading 'In 1994, people started buying these new, cheap smokes that didn't burn fast and tasted great. They told their friends... who told their friends. Now Dave works for nobody but himself. And it all started with a few tobacco seeds and a dream'.⁴³ Cohen wrote to '(share) concern with the inability to open the pack with this outsert on it... The smoker should not need to butcher the outsert if they don't remove it'.⁴⁴ The sales management groups responded that, '(we) have spoken with all parties involved and we are in agreement that there is nothing that can be done with the current outsert other than leaving it off or postponing the test market... The decision was made to use the existing [Dave's] outsert and proceed with the original schedule'.45

2000: onsert technology allows inexpensive application of new messages

In 2000, companies began developing new wrapping technology and onserts that would not interfere with opening packs to allow modified advertising on the packs. By 2002 Philip Morris had prototype packaging ready for some brands, was using onserts to promote potentially reduced exposure products (PREPs) in the face of 'regulation of cigarettes^{r46 47} and exploring onsert marketing uses in Asia.⁴⁸ By 2003, Philip Morris could place onserts on any of its products and was adding them to over 100 million packs per quarter.^{49 50} The company expanded its use of onserts in 2004, developing materials that mixed 'corporate and marketing communications'.⁵¹ RJR's development and use of onserts followed a similar timeline, with onserts also used for new product education.^{29 52-54}

2002-2003: research on the most effective uses of onserts

By 2002, Philip Morris began considering how onserts could be used for communicating messages that might increase corporate credibility. Philip Morris' 2002 shareholder annual report stated that, 'PM has identified and is procuring the equipment needed to place onserts on a certain volume of its cigarette packs to communicate information about cigarettes and the health risks of smoking... PMI will, starting in 2003, implement onserts on a rolling basis as this onsert capacity comes on line.'.⁵⁵ These onserts were used to post 'health warnings' including messages that 'low tar' cigarettes were not lower risk (figure 2). The new onserts referred to research conducted by the US government and non-profit organisations such as the American Cancer Society as part of Philip Morris' efforts to promote its 'Quit Assist' programme.⁵⁶

Philip Morris' 2002–2003 internal corporate mission statement suggested that onserts could be used to promote 'light' brands, market new products and discuss anticipated changes in packaging such as replacing the term 'light', with colourcoded packages.^{7 57} It explained that, 'In 2002 Philip Morris USA placed an 'onsert' or 'insert' for a limited time on medium, mild, light and ultra-light packings for all of its brands, approximately 130 million packs. The *onsert* contained information



Figure 2 Philip Morris 'Low Tar' onsert, 2004. Image text: Panel 1 (top left): If you are concerned about the health effects of smoking, you should quit. For more information about the numbers, brand descriptors or quitting smoking, please go to www.philipmorrisusa.com or call 1-800-343-0975. Panel 2: There is no such thing as a safe cigarette, including this one. Panel 3: (redacted by author). Panel 4: Information for Smokers. (logo) Philip Morris USA. Panel 5 (bottom left): There is no such thing as a safe cigarette, including this one. The terms 'Ultra Light', 'Light', 'Medium' and 'Mild' are used as descriptors of the strength of taste and flavour. These terms also serve as a relative indication of the average tar and nicotine yield per cigarette, as measured by a standard government test method. Panel 6: The tar and nicotine yield numbers are not meant to communicate the amount of tar or nicotine actually inhaled by any smoker, as individuals do not smoke like the machine used in the government test method. The amount of tar and nicotine you inhale will be higher than the stated tar and nicotine yield numbers, if, for example, you block ventilation holes, inhale more deeply, take more puffs or smoke more cigarettes. Panel 7: Similarly, if you smoke brands with descriptors such as 'Ultra Light', 'Light', 'Medium' or 'Mild' you may not inhale less tar and nicotine than you would from other brands. It depends on how you smoke. Panel 8: You should not assume that cigarette brands using descriptors like 'Ultra Light', 'Light', 'Medium' or 'Mild' are less harmful than full-flavour cigarette brands or that smoking such cigarette brands will help you quit smoking. See other side. (Source: Philip Morris USA, Thrift S Marl Ultsmth Low Tar Onsert GD/FK D-409046-C. December 01 2004. Philip Morris Records. https://www.industrydocumentslibrary.ucsf.edu/tobacco/docs/hfdk0184. Accessed January 18, 2018).

about machine generated average per-cigarette tar and nicotine yields and the use of brand descriptors. The company indicates that there is no safe cigarette and that to reduce the health risks of smoking, the best thing to do is quit. It is estimated that this effort reached approximately 86% of the adult smokers who purchase these styles of Philip Morris USA cigarettes¹²⁰ (figure 2). In a 2003 conference call with investors, the company's Associate General Counsel referred to the 2002 fraud lawsuit the company lost for failing to inform consumers about the risks of 'light' cigarettes,⁵⁸ claiming that the new onserts offered legal defence against such claims.⁵⁹ In the same year, the corporate

management used the presence of these onsert messages to resist shareholder initiatives that would have required the company to include health warnings on all products sold worldwide.^{55 60}

Philip Morris promoted these onserts as a way of communicating health risks even though the company had already conducted internal research suggesting that these messages were not understood by consumers, regardless of how many people read them. An April 2003 advertising test campaign Lombardo Consulting ran for Philip Morris found that onserts were ineffective for communicating health messages, explaining that:

- ► The 'Tar and Nicotine' ad (figure 2) that included information on the onsert (was not understood by consumers).
- ► The onsert does not provide the... credibility expected; while people rationally understand the importance of communicating ingredients on packaging, it is not relevant [(to them].⁶¹

Throughout 2003 Philip Morris continued to use these ineffective onserts to 'communicate' what the company referred to as 'corporate responsibility' messages.⁶² ⁶³ The Altria Corporate Affairs and Regulation department reported to corporate leadership that onsert 'health warnings' were being used in 11 countries and had been translated into 21 languages.⁶⁴ The 2003 Corporate Responsibility Communications Update planned to continue using onserts for these same 'health warnings' in 2004 and through at least 2006.⁴⁹ ⁶⁵ ⁶⁶

By 2003, both Philip Morris and RJR had expanded their use of onserts to multiple tobacco products, including promotions for existing brands using sweepstakes, marketing of new brands and marketing of new types of tobacco products (figure 3). Marketing strategy documents in 2003 reported that Philip Morris 'continued to communicate about brand descriptors via onsert',²⁰ referring to its low tar onsert (figure 2).⁶² These rollouts quickly expanded across brands; the director of new products stated that, "We will have two new packing innovations ready for 2003... Low tar/Lights outsert/onsert communication on all below-full flavour Philip Morris packages, November 2003-January 2004".⁶⁷ In an October 2003 presentation to state attorney generals intended to advertise its 'continuing efforts to reduce the harm caused by cigarette smoking' Philip Morris revealed it was using onserts as a way to develop new advertising strategies, specifically through studies conducted based on 'individual communication pieces' for study recruitment and message testing.^{68 69}

Additional Philip Morris 2003 marketing documents detailed that onserts were used specifically to recruit young smokers (age 21-29 years) into corporate smoker databases, based on earlier expectations that this would be a less expensive way to reach them. Equipment installation was expected to make this possible for all US Philip Morris products by 2004.⁶⁷ These strategies reflected a larger shift by Philip Morris and RJR towards direct marketing rather than traditional advertising in response to increased tobacco regulation.⁷⁰ An internal Philip Morris report discussing new products explained that there was corporate 'interest in a non-brand-specific onsert that can be used for testing and sold, with a corporate or 'smoker sign-up' (for marketing databases) message.⁷¹ A 2003 Performance Summary letter from Philip Morris CEO Mike Szymanczyk to Altria CEO Louis Camilleri explained that 'PM USA has further strengthened its brand portfolio with the test-marketing of premium Chesterfield... New onsert technology has allowed us to initially



Figure 3 Example onserts, used for marketing and packaging changes. (Sources: Sweeties Sweeps. Newport Pleasure Payday Everyday Instant Win Game (Cash Prizes) 6/14/17 1PPD21+. 2017; http://sweetiessweeps.com/2017/03/newport-pleasure-payday-everyday-instant-win-game. html. Accessed January 18, 2018. Schwartz A. FDA calls Marlboro out on creative marketing of 'light' cigarettes. 2010; https://www.fastcompany. com/1661585/fda-calls-marlboro-out-creative-marketing-light-cigarettes. Accessed April 13, 2018).

deliver Chesterfield's entire (branding campaign) exclusively on the pack... Other consumer communications efforts can be seen in new pack changes that include the addition of a PM USA toll free number and website address to Marlboro packs (to continue to recruit smokers for direct marketing).⁷²

2004 forward: onserts mix advertising, 'corporate responsibility' and 'health warnings'

By 2004, onserts were used for both marketing and 'health warnings'. An 'Onsert Proposal' written by the Philip Morris Director of New Products proposed to 'develop onsert communications that deliver relevant information directly to smokers', focusing on corporate advertising of efforts to 'reduce youth smoking' and 'reduce environmental impact' with an overview of different sample marketing messages for Chesterfield, Marlboro and Parliament. The roll-out of these onsert campaigns would affect 56 billion cigarettes in 2004^{73–77} at a cost of \$0.004/pack.⁷⁵ The overall goal was to 'develop onserts that enhance brand equity'⁷⁴ by increasing sales of the advertised brands and new products because onserts allowed the company to display longer messages and to include both coupons and samples of new products that targeted specific market demographics.

Test marketing primarily involved focus groups. In September 2004, Philip Morris asked consumers about their perceptions and expectations for onserts, including whether they were aware of the onserts and what kinds of information or coupons they anticipated receiving through onserts. The consumers' answers were validated with specific questions about how many packs had onserts, allowing the researchers to determine what kinds of messages were memorable and whether coupons and samples were used.⁷³ The focus groups revealed that consumers expected onserts to provide a promotion and perceived the new products advertised on onserts to be 'safer' and 'healthier'.⁷⁸ Focus group results from a study of Marlboro Lights smokers in October 2004 suggested that onserts were ineffective at changing consumer behaviour and that the risks of boredom were high: 'getting to the onserts takes some effort... and involves intrusion on personal rituals⁷⁹ and 'continuous distribution risks fairly quick saturation and boredom level'.⁸⁰ These findings, taken together, suggested that to effectively communicate, onserts needed to provide new information and a link to the anticipated change in behaviour, such as using a coupon to purchase a new product at a discount, or calling a telephone number for information.

Contemporaneous independent research suggests that later onserts reflected these findings. $^{\rm 81\,82}$

In a response to an interview request about onserts in November 2004, Philip Morris communications responded in an internal privileged document that its onserts provided 'information about machine-generated average per-cigarette tar and nicotine yields and the use of brand descriptors... We estimate that this effort reached approximately [86 percent] (substantiation) of the adult smokers who purchased these styles of Philip Morris USA cigarettes (brackets in original)'.⁸³

Two contrasting onsert strategies: 'health warnings' and product promotion

Philip Morris and 'health warnings'

Philip Morris' marketing department concluded in 2005 that onserts containing repetitive messages were ignored and thrown away due to boredom, while those containing coupons or samples were read and used.⁸⁴ Consistent with this understanding, the Corporate Responsibility group explained in its 2005 Philip Morris Onsert Plan how to make packs with onserts more appealing that those without them.¹⁸ The plan proposed to alternate (A) repeated 'corporate responsibility' messages (meaning health information, links to external research and corporate 'smoking cessation' programmes) with (B) novel advertisements,⁸⁵ explaining that consumer research indicates that adult smokers are more likely to look at, engage with and look forward to seeing packs with onserts when:

- ► A wider *variety* of onserts is present with 'breaks' (in time) between messaging (to avoid wear out and 'seen one, seen them all' impressions).
- ► The *cover* is captivating, intriguing or *piques curiosity* (for example, a call to action or teaser).
- ► They *provide something of value*, extending from monetary to intrinsic value, including conversation value.
- ▶ They are considered *'interesting*'.¹⁸(emphases in original)

Reflecting this knowledge, from 2004 onwards Philip Morris changed its onsert advertising for tobacco products repeatedly to address changes in pack design, encourage smokers to visit company websites, offer coupons or pilot new products.^{86 87} These marketing onserts typically appeared for only 1–4 weeks, maximising their novelty and consumer interest.^{88 89}

In contrast, Philip Morris repeated the same 'health warnings' onserts every year from at least 2003 to 2006. The warnings



Figure 4 Image of RJ Reynolds onsert, which attached information about tobacco dissolvable products to Camel cigarette packs, 2008. (Source: Southern Graphic Systems. 20004119 Camel Sticks 5 Panel Pack Onsert. November 13 2008. RJ Reynolds Records. https://www.industrydocumentslibrary.ucsf.edu/tobacco/docs/rshd0152).

used tightly spaced text instead of a 'captivating' cover. For example, figure 2 shows the 'low tar' health warning placed on millions of packs from 2003 to 2006; the message is actual size and mostly illegible.⁹⁰

In 2007, the annual onsert plan prepared by the Philip Morris Corporate Responsibility group explained again that repeated messages were ineffective, then indicated the company would rotate the same two 'corporate responsibility' messages quarterly ('Low Tar' and 'QuitAssist').⁹¹ The 2007 plan⁹² also noted that that the company had reduced the number of 'corporate responsibility' messages to two by 2006 from a larger set used in 2003.⁹³ In 2008, Philip Morris cut its 'corporate responsibility' messaging again, to a single 'QuitAssist' onsert.⁹⁴ Given Philip Morris' knowledge at the time of how onserts were perceived by consumers, these 'health warnings' appeared designed to fail to actually promote quitting smoking.

RJ Reynolds and dissolvables

In 2008 RJ Reynolds used onserts on cigarette packs to begin marketing its then-new dissolvable flavoured tobacco products⁹⁵ (figure 4). In late 2008, RJ Reynolds hired a consultant to develop a revised marketing strategy for dissolvables in response to the company's expectation of an increased cigarette excise tax, new FDA regulations on packaging, and 'increasing smoking restrictions (that) will continue to emerge'.⁹⁶ The proposed strategy linked onserts to retail event giveaways at convenience stores (eg, free drinks) developed to market the new products.⁹⁶ In October 2008, the dissolvable marketing plan determined that it would need to develop 'onserts [for Sticks, Strips, and Orbs] with detailed instructions and illustrations',⁹⁷ containing specific information on 'how to use each product' and 'how to open each pack'.98 The marketing group investigated the rollout and concluded it was feasible to place these new onserts on all dissolvable packs by 2009.99 100 Åt the same time, RJ Reynolds commissioned three focus groups in Raleigh, North Carolina, USA, on dissolvables, which concluded that they should be marketed as 'distress products' to use when smoking was not allowed and that all current smokers tested would redeem onsert coupons for these products.¹⁰¹

In December 2008, RJ Reynolds commissioned a follow-up study¹⁰² which used a sample collected by placing instructions by consumers on package onserts.¹⁰³ By 2009 it identified a need to 'optimise current pack labels, onserts, and retail give-ones to be more explicit on product usage'.¹⁰⁴ In January 2009, RJ Reynolds concluded in an FDA Packaging Update memo that they would need to 'focus on pack insert capability and the ability to run reduced-size pack onserts (to not cover the pack health warning) on existing onsert equipment... our existing 3-panel pack onsert size may be acceptable'.¹⁰⁵ In April 2009, another buyer study (sample collected by onsert instructions using a \$20 incentive) considered Orbs (a dissolvable product) use, focusing on what products consumers bought, how they became aware of Orbs and whether they had used onsert coupons; both onsert promotion and coupons led consumers to try these products.¹⁰³

DISCUSSION

The history of tobacco pack onserts and internal research on their effectiveness offer new information on advertising in a changed regulatory environment. Technology allowing tobacco pack onserts was developed in the 1920s; over time, increasing regulation created new incentives for tobacco companies to expand 'dark' advertising, including onserts.^{4 106} Technological innovations made including pack onserts less expensive and allowed companies to add and remove different messages over time by 2003. In 2012 15%–32% of packs had such promotions.⁸¹ Tobacco companies' research on onserts found that like other advertising onserts were effective if novel and ineffective if reused. By 2003, these findings allowed them to maximise the effectiveness of onsert product promotion for tobacco products by refreshing them regularly, while minimising the impact of 'health warnings' by reusing the same warnings. Regulatory authorities should capitalise on this information to develop more effective promotion of public health.

Tobacco companies have used onserts to send different types of messages. In the 1920s–1970s, they were used for coupon distribution, with the same item in every pack. The 1980–1990s saw attempts to conduct customer research to successfully market new products with new messages. RJR's focus was a PREP, and Philip Morris focused on a new brand. From 2000 onwards, onserts were used for multiple purposes: Philip Morris mixed new product launches with corporate responsibility messages, while RJR used onserts to launch additional PREPs, some of which, like dissolvables, required educating consumers who did not know how to use them. In 2017 Philip Morris proposed to use onserts the same way as part of the packaging for a new PREP, iQOS.¹⁰⁷ The same mode can be used by tobacco companies to achieve dramatically different outcomes.

In 2012, an FDA rule that would have required graphic health warnings on tobacco products was struck down by a US federal appellate court on the grounds that the specific graphic warnings that the FDA specified—but not graphic warnings in general—violated First Amendment protections for commercial speech.¹⁰⁸ Legal scholars have suggested an alternative strategy in which the FDA mandates that tobacco companies use mandatory onserts and inserts to communicate additional health information beyond traditional text-based warnings on the pack.¹⁰⁹ Our findings suggest that this strategy could be more or less effective depending on the nature of the materials, their design, and how frequently they change. While our research does not directly assess tear tabs and tapes, these too could be required to include public health messages.

Limitations

Tobacco industry documents, by their nature, provide incomplete information about corporate activity. Some potentially relevant documents were marked as confidential or privileged communication; tobacco companies use these claims as a strategy to avoid making internal documents public.¹¹⁰ ¹¹¹ While our findings suggest that different tobacco companies may prefer to use onserts for different purposes (eg, marketing, public relations, customer research) we cannot verify that this is the case. There is little research on the extent of current onserts use; future studies that track and archive changes in product packaging could be useful to regulators and researchers.

CONCLUSIONS

Although there is limited public health research on tobacco product onserts, extensive internal tobacco industry research suggests that they can be used effectively to communicate with smokers. Tobacco companies found that more effective messages changed over time in response to consumers, used attractive images and text, and offered value (often a giveaway), while ineffective messages remained consistent over time, were not attractive and did not provide independent value. Regulators should use this knowledge to require replacing tobacco industry messages with public health messages presented in an effective way that will attract smokers' interest and communicate effectively with them.

What this paper adds

- Tobacco companies use cigarette packaging as a means of advertising to consumers.
- In response to increasing tobacco control restrictions, tobacco companies developed a range of 'on pack' messages, referred to as onserts or outserts.
- Little research has considered the ways that tobacco companies use these new onserts to communicate with consumers, shareholders and regulators.
- Tobacco companies developed different types of onserts to achieve two goals: (1) Market new tobacco products. (2) Undercut public health messages about the risks of tobacco use.
- Health authorities should regulate the tobacco industry's use of onserts to ensure that they present accurate health information in a way that smokers will notice.

Acknowledgements The authors thank Lauren Lempert for her assistance in finding the Philip Morris iQOS application materials.

Contributors All authors conceived and designed the paper, interpreted the results, reviewed and revised the manuscript in preparation for publication, and read and approved the final manuscript. DEA wrote the first draft.

Funding This work was supported by National Cancer Institute grants CA-087472, CA-140236 and TRDRP 26IR-0014. The funders played no role in the conduct of the research or preparation of the manuscript.

Competing interests None declared.

Patient consent Not required.

Provenance and peer review Not commissioned; externally peer reviewed.

Data sharing statement The data supporting the conclusions of this article are publicly available and cited in the references section. No further data are available.

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