UCSF
Tobacco Control Policy Making: International

Title

JUUL's "smoking switching" initiative in Ghana: Market expansion through global health

Permalink

https://escholarship.org/uc/item/4456h9xg

Authors

Logo, Divine Darlington, PhD
Chaffee, Benjamin W, DDS, PhD, MPH
Ling, Pamela M, MD, MPH
et al.

Publication Date

2026-10-29

Peer reviewed

eScholarship.org Powered by the California Digital Library
University of California

Title: JUUL's "smoking switching" initiative in Ghana: Market expansion through global health

Divine Darlington Logo[1,2], Benjamin W. Chaffee[2], Pamela M. Ling[2], Stella A. Bialous[2]

1. Research and Development Division, Ghana Health Service
2. Center for Tobacco Control Research and Education, University of California, San Francisco, California, United States.

Electronic cigarette companies' expansion in low- and middle-income countries (LMICs) includes creating new pathways for market entry through policies, health systems, and development systems.[1] We conducted a focused, purposive search of the University of California, San Francisco Truth Tobacco Industry Documents Library in May 2026 to identify documents containing substantive information on tobacco-industry activities and commercial strategies relevant to Ghana, without document-date restrictions. Eighteen potentially relevant document records were retrieved and reviewed. Five JUUL documents describing a proposed "smoking switching" initiative in Ghana directly informed this report.

In 2018, JUUL established a Government Services function under Chief Operating Officer Bob Robbins. Led by Roger Stull, Senior Director of Government Services, the unit engaged government agencies and public sector institutions to develop partnerships and business opportunities for JUUL products.[2–4] Within this framework, the Ghana "smoking switching" initiative emerged through engagement with Ghana's Ambassador to the United States, who expressed interest in a country-wide pilot using JUUL products to reduce smoking.[5] Subsequent communications described a proposed national program framed around "smoking switching," **"cessation,"** and improved population health outcomes, with anticipated support from global health and development channels. [2,6]

eScholarship: https://escholarship.org/uc/item/4456h9xg

JUUL's engagement through diplomatic channels may have provided opportunities to advance the initiative outside traditional tobacco-control and regulatory settings.[7] Despite its public health framing, Stull described Ghana as a "modest economic opportunity"[5] but emphasized its "significant positive strategic benefit."[5] JUUL executives outlined plans to expand the program "throughout Western Africa"[5] using Ghana as a platform for regional market development.[5]

JUUL sought to align its commercial objectives with development financing mechanisms. In internal communications, Stull identified United States Agency for International Development (USAID) as a "potential funding path" for a joint government–industry pilot program.[3,5] The initiative progressed beyond conceptual planning, with preparations to develop funding proposals for USAID, the U.S State Department, the U.S Department of Defense, and the World Health Organization.[3] These activities were coordinated with JUUL's political strategist and former U.S Department of Health and Human Services official Tevi Troy, indicating senior-level involvement. However, available documents do not provide evidence that proposals were ultimately submitted or funded.

In parallel, internal communications among JUUL Government Services and senior leadership reflect a focus on product adaptation for low-income settings, including the development of low-cost products. Stull proposed "lower cost cartridge product[s]… for Ghana / Africa and other poor countries"[2,6] and "lower cost cartridges for poor people in countries like Ghana." [2,6] He framed these efforts as population-level interventions, describing a "stop smoking cigarettes solution offering"[6] for entire countries. This positioning framed product development as a public health intervention while aligning it with broader market expansion into LMICs.[2] JUUL's senior leadership recognized regulatory constraints. While cessation-oriented language was used

eScholarship: https://escholarship.org/uc/item/4456h9xg

internally, leadership avoided such claims in public-facing communications.[4] Daniel Cruise, Vice President of Government Affairs, flagged Stull's public reference to a "smoking switching and cessation opportunity" in Ghana as a "regulatory no no,"[4] after which Robbins instructed the team: "No cessation claims."[4] The documents do not indicate whether cessation-related framing was communicated to Ghanaian officials or remained internal.

Internal dissent regarding the Ghana initiative also emerged. Cruise described the proposal and associated government and development partnerships as "smells like a disaster,"[6] reflecting internal concern about regulatory and reputational risks.[6] Communications further highlighted concerns about the use of cessation-related language and a perceived "lack of boundaries"[4] in the unit's activities. These concerns indicate that some company officials recognized regulatory risks, including unauthorized cessation claims and blurred lines between commercial and governmental engagement. Although we found no evidence that the Ghana initiative was implemented, the planning phase reveals a coordinated strategy combining harm-reduction narratives and diplomatic engagement to position commercial nicotine products within public health, while seeking engagement with development agencies in support of product introduction and potential regional expansion. These strategies resemble previously documented tobacco-industry use of corporate social responsibility and other approaches to facilitate access to policymakers.[7–9] This suggests that established industry practices were adapted to a "harm reduction" framing in the Ghana initiative, combining diplomatic engagement and proposed development-agency financing with product introduction and regional market-expansion objectives.

These findings underscore the importance of comprehensive implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control across diplomatic and development-related

eScholarship: https://escholarship.org/uc/item/4456h9xg

settings.[10] This case also highlights the need for governments and international agencies to strengthen monitoring of state-to-state and development-based interactions to prevent industry actors from leveraging public health and development systems to advance commercial interests.

References:

1. Kalan ME, Mejia R, Egbe CO, et al. E-cigarette use in low-income and middle-income countries: opportunity or challenge for global tobacco control. The Lancet Global Health. 2023 Dec 1;11(12):e1855-6. https://doi.org/10.1016/S2214-109X(23)00450-3
2. Stull R. Re: Pictures With Ambassador of Ghana. UCSF Industry Documents Library, JUUL Labs Collection, University Libraries, University of North Carolina at Chapel Hill , 2018 August 01 [cited:May 24, 2026] Available: https://www.industrydocuments.ucsf.edu/docs/stgf0303/.
3. Stull R. Re: Ghana Opportunity Talker. UCSF Industry Documents Library, JUUL Labs Collection, University Libraries, University of North Carolina at Chapel Hill, 2018 July 11 [cited: May 24, 2026]. Available: https://www.industrydocuments.ucsf.edu/docs/kmjl0311/.
4. Stull R. Re: Gov. Services. UCSF Industry Documents Library, JUUL Labs Collection, University Libraries, University of North Carolina at Chapel Hill, 2018 October 10 [cited: May 24, 2026]. Available: https://www.industrydocuments.ucsf.edu/docs/kzcm0298/.

eScholarship: https://escholarship.org/uc/item/4456h9xg

5. Cruise D. Fwd: Pictures With Ambassador of Ghana. UCSF Industry Documents Library, JUUL Labs Collection, University Libraries, University of North Carolina at Chapel Hill, 2018 August 08 [cited: May 24, 2026]. Available: https://www.industrydocuments.ucsf.edu/docs/pldc0302/.
6. Stull R. Juul_GovSvcs_Ghana Initiative_final 11July18.docx. UCSF Industry Documents Library, JUUL Labs Collection, University Libraries, University of North Carolina at Chapel Hill, 2018 July 11 [cited: May 24, 2026]. Available: https://www.industrydocuments.ucsf.edu/docs/pmjl0311/.
7. Fooks GJ, Gilmore AB, Smith KE, et al. Corporate social responsibility and access to policy élites: an analysis of tobacco industry documents. PLoS Medicine. 2011 Aug 23;8(8):e1001076. https://doi.org/10.1371/journal.pmed.1001076
8. Cohen JE, Eissenberg T, Zeller M. PMI-funded foundation for a smoke-free world: application of criteria to assess funding models that include financial support from the tobacco industry. Tob Control. 2025;34(2):248-250. https://doi.org/10.1136/tc-2023-058474
9. Lencucha RA, Vichit-Vadakan N, Patanavanich R, Ralston R. Addressing tobacco industry influence in tobacco-growing countries. Bull World Health Organ. 2024;102(1):58-64. https://doi.org/10.2471/BLT.23.290219
10. World Health Organization. Guidelines for implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control [Internet]. Geneva: World Health Organization; 2013 [cited 2026 May 23]. Available from: https://fctc.who.int/publications/m/item/guidelines-for-implementation-of-article-5.3

eScholarship: https://escholarship.org/uc/item/4456h9xg