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The Creation of Industry Front Groups: The Tobacco Industry and “Get Government Off Our Back”

| Dorie E. Apollonio, PhD, and Lisa A. Bero, PhD

We investigated how industries use front groups to combat public health measures by analyzing tobacco industry documents, contemporaneous media reports, journal articles, and press releases regarding “Get Government Off Our Back,” a coalition created by the tobacco industry.

RJ Reynolds created Get Government Off Our Back in 1994 to fight federal regulation of tobacco. By keeping its involvement secret, RJ Reynolds was able to draw public and legislative support and to avoid the tobacco industry reputation for misrepresenting evidence.

The tobacco industry is not unique in its creation of such groups. Research on organizational background and funding could identify other industry front groups. Those who seek to establish measures to protect public health should be prepared to counter the argument that government should not regulate private behavior. (*Am J Public Health*. 2007;97:419–427. doi:10.2105/AJPH.2005.081117)

THE TOBACCO INDUSTRY HAS a history of misrepresenting scientific evidence,^{1–4} attempting to directly influence government through the use of lobbying and campaign contributions,^{5–8} and is responsible for more than 440 000 deaths annually in the United States.⁹ Over time, these factors have compromised the tobacco industry’s reputation with the general public and made political association with its interests a liability.^{10–14}

The creation of a seemingly independent organization advantaged the tobacco industry by presenting its antiregulation agenda as an expression of popular will, and allowed industry lobbyists access to policymakers who were otherwise unwilling to work with them. We describe the formation and activities of a tobacco industry front group that was created to fight proposed tobacco regulation by the US Food and Drug Administration (FDA) and the Occupational Health and Safety Administration (OSHA) in 1994 and 1995.

The tobacco industry recruits potential allies from all ideological backgrounds. These include historically disenfranchised groups such as African Americans and gays and lesbians, as well as other industry associations, civil rights organizations, service providers such as homeless shelters, and strongly ideological groups, including libertarians.^{7,15–19} Frequently, these organizations are financially compensated in exchange for advocating on behalf of tobacco

industry political goals.^{16,20} Tobacco companies have also created “smokers’ rights” front groups, such as the National Smokers Alliance, in the hope of generating political pressure on behalf of tobacco issues.^{7,21–23} Researchers and the media have been justifiably suspicious of such protobacco advocacy groups²⁴ and have quickly exposed their tobacco industry financial support.

Unlike the goals of other front groups exposed by tobacco industry document research, the goals of the front group created by RJ Reynolds in 1994, Get Government Off Our Back (referred to in RJ Reynolds’s documents as “GGOOB”),^{25,26} were not overtly tobacco-related. Research in economics and political science has noted that political decisionmakers discount the activities of organizations that are obviously self-interested,^{27–32} such as “smokers’ rights” groups. The prevailing assumption is that these groups will protest whether or not their position reflects popular support, unlike more nonextremist groups.^{29,31} Many firms have an incentive to deceive policymakers, especially about their sponsorship of lobbying activities,^{32,33} and creation of a front group that appears to be broad-based makes this possible.^{29,34}

Organizations learn from each other,^{35,36} in part because they sometimes use the same legal or public relations firms to organize political activities, and RJ Reynolds’s success with GGOOB is consistent with the activities of

other industries. Although there is limited research on the use of non-tobacco industry front groups, evidence suggests that pharmaceutical manufacturers, telecommunications firms, and credit unions have engaged in similar efforts.^{37,38} The history of GGOOB provides insight for researchers and policymakers that may help forestall future misrepresentation by industry interest groups and limit the use of front groups through the identification of their creators.

METHODS

In conjunction with legal settlements between 46 state attorneys general and the major tobacco companies in the United States, more than 40 million pages of internal tobacco industry documents have been made publicly available. These documents are Web-accessible at the Legacy Tobacco Documents Library (<http://legacy.library.ucsf.edu>) and Tobacco Documents Online (<http://tobaccodocuments.org>), as well as from major US tobacco companies. Documents used for this paper were retrieved between September 2003 and December 2004, primarily from the Legacy Tobacco Documents Library and Tobacco Documents Online.

Internal corporate documents such as those provided by the 1998 Master Settlement Agreement^{39,40} make it possible to determine which “public interest” groups are front groups and which represent genuine public

sentiment. We used these documents to determine RJ Reynolds's motivation for creating GGOOB and its goals for the organization's activities. Using previously established techniques for systematically searching tobacco document archives,⁴¹ we began our online search with initial search terms such as organizational and individual names and references to the FDA and OSHA regulations proposed.

Searches were expanded with a "snowball" strategy, wherein contextual information from initial searches to identify additional search terms and relevant documents, including names of individuals and organizations, date ranges, places, and reference (Bates) numbers. More than 3000 internal tobacco industry documents that pertained to FDA and OSHA regulation, GGOOB, and the organizations that claimed to sponsor it (other than RJ Reynolds) were identified and screened for relevance. We also reviewed secondary data sources for corroborating information about funding and organizational activities including newspaper and journal articles, accessed using Lexis-Nexis, JSTOR, and Internet searches using Google.

We drew from approximately 200 documents, dated from 1993 to 1997, to prepare this article. Many of the initial documents we found were copies of contemporaneous public information such as press releases and advertising for the organization; these were frequently duplicative or irrelevant to our analysis. Our interpretative data analysis was iterative and involved review of the documents to identify recurring themes and organizational strategies and to establish a timeline until the process yielded no new information.

We relied on expectations about organizational lobbying behavior to guide the analysis.²⁶⁻³⁵

RESULTS

Organizational Creation and Development

The inspiration for GGOOB appears to have been drawn from a print advertisement run by RJ Reynolds shortly after the OSHA and FDA announcements that proposed new regulations on

tobacco (Table 1). The ad appeared in June 1994 in newspapers around the United States and showed a man standing in front of a pickup truck and looking out at the reader (Figure 1). The text read, "I'm one of America's 45 million smokers. I'm not a moaner or a whiner. But I'm getting fed up. I'd like to get the government off my back."^{42,43} The advertisement claimed that smoking restrictions were a smokescreen by a government

determined to control individual behavior by banning cigarettes, followed by "liquor and fast food and buttermilk."^{42,43} Ultimately, this advertisement and those in the same series drew attention both from other tobacco companies⁴⁴⁻⁴⁶ and from a number of individuals who wrote to the company.⁴⁷⁻⁵¹

In October 1994, the public relations firm Mongoven, Biscoe and Duchin proposed the creation of an ad hoc coalition to "Get Government Off Our Back."²⁵ The firm has developed initiatives for RJ Reynolds that advocate protobacco goals through outside organizations²⁶; among other projects, the firm organized veterans organizations to oppose the workplace smoking regulation proposed by OSHA.^{25,26} GGOOB was intended to have popular support as well as backing from outside organizations.^{25,26} As a result, it relied on existing groups recruited by RJ Reynolds⁵² as well as on voluntary efforts from the general population. Thus, GGOOB was created to combat increasing numbers of proposed federal and state regulations on the use and sale of tobacco products.

Although the creation and development of GGOOB was funded by RJ Reynolds through Mongoven, Biscoe and Duchin, the company itself was not identified as a sponsor in the public communications or press coverage that we found.⁵³⁻⁵⁵ The first identified press release for the organization appeared in October 1994 and noted that a number of North Carolina groups had decided to join the GGOOB coalition (Table 2). These included obvious tobacco industry affiliates such as the Tobacco Growers Information Committee

TABLE 1—Timeline of Events From Food and Drug Administration (FDA) and Occupational Health and Safety Administration (OSHA) Proposed Regulation to "Get Government Off Our Back" (GGOOB) Mobilization to Legislative Activity: 1994–2001

Date	Event
February 1994	The FDA announces its intention to regulate tobacco as a drug; It begins an investigation into whether cigarette manufacturers designed their products to take advantage of the pharmacological effects of nicotine.
April 1994	OSHA announces a proposed rule that would regulate indoor air quality in workplaces that allow smoking.
June 1994	RJ Reynolds runs "I'd like to get government off my back" advertisement in national print media.
September 1994	OSHA begins hearings on its proposed rule, which eventually draw more than 115 000 comments, most of which were solicited by the tobacco industry.
October 1994	Mongoven, Biscoe and Duchin proposes the creation of an ad hoc GGOOB coalition. First identified press release for GGOOB (in North Carolina); introduces "GGOOB resolution."
Beginning of 1995	Roster of organizations that sponsor GGOOB modified to suggest a national focus; tobacco organizations no longer listed.
February 1995	US House of Representatives passes a moratorium on new federal regulation as part of the Republican Contract With America.
March 1995	GGOOB designates March as "Regulatory Revolt Month" and organizes rallies in 12 states. US Senate debates moratorium on new federal regulation (comparable to US House bill). OSHA hearings closed.
April 1995	Mongoven, Biscoe and Duchin writes follow-up memo regarding GGOOB to RJ Reynolds and proposes additional mobilization.
August 1995	Draft FDA rule announced; proposes restrictions on advertising to minors. OSHA follow-up hearings closed.
January 1996	OSHA comment period closed.
December 2001	OSHA withdraws proposed rule.



Archie Anderson is a Minnesotan, born and bred. In the past he tolerated the attacks made against smokers. But now he wants to speak up.

**“I’M ONE OF AMERICA’S 45 MILLION SMOKERS.
I’M NOT A MOANER OR A WHINER.
BUT I’M GETTING FED UP.
I’D LIKE TO GET THE GOVERNMENT OFF MY BACK.”**

“If you’re a smoker you’ll know exactly what I’m talking about. If you’re a non-smoker you may think the current attempts to ban smoking in America have nothing to do with you. But if you give me two minutes, I’ll tell you why I think it’s important that you know what’s going on and how it’s going to affect you.

I choose to smoke. It’s my decision. As an adult in a free country, it’s my right. That doesn’t mean that I believe I have the right to blow smoke in your face. I think smoking and no-smoking sections in restaurants and public places are a good way of keeping everybody happy.

But when it comes to smoking in other places, in my own home, in my car or truck, and with my friends, that’s a different story. That’s my right.

You’ve probably now heard about the proposed workplace ban. They want smoking to be banned anywhere where ten or more people visit in a one-week period. This means that smoking will be illegal in almost every workplace in the country unless an incredibly expensive, specially ventilated room is provided. And who can afford that?

Did you know the government also intends for the ban to extend to trucks, vans and even private cars if they’re used by workers? Did you know that your right to smoke at home will be threatened every time a repairman visits, or any other worker?

You may also have heard about the proposed 800% tax increase on cigarettes some congressmen are talking about. That’s discrimination against smokers, nothing less. And it will affect non-smokers too when the bootleggers start to get involved.

There is no question in my mind that the government is seeking an all-out prohibition on cigarettes. And once we’ve let them achieve their goal they’ll be free to pursue other targets. They’ll go for liquor and fast food and buttermilk and who knows what else. There’s a line of dominoes a mile long.

We can work these issues out together without the government telling us how to do it. If we let it become law then we’ve got a serious problem. Because then people are no longer allowed to work it out themselves. We have to talk.”

This opinion is brought to you in the interests of an informed debate by the R.J. Reynolds Tobacco Company. We believe that the solution to most smoking issues can be found in accommodation, in finding ways in which smokers and non-smokers can co-exist peacefully. And we encourage dialogue and discussion that will help solve the issues without government intervention. For further information please call 1-800-366 8441.

TOGETHER, WE CAN WORK IT OUT

Source: RJ Reynolds.⁴²

FIGURE 1—RJ Reynolds’s “Get the Government Off My Back” Advertisement, June 1994.

and Tobacco Growers Association of North Carolina. The press release claimed that these organizations had all joined the coalition as part of a “grass roots movement responding to the belief of many Americans that our government, at all levels, is growing out of control.”⁵⁶ In addition, it introduced the GGOOB resolution, which demanded that elected officials “reduce the size of government and the number of needless regulations at all levels of government.”⁵⁶

Although the initial coalition was made up largely of tobacco growers and distributors,⁵⁶ by 1995 the roster of supporting organizations was changed. The new “sponsors” appeared to consist only of ideologically motivated groups who sought to limit government regulation,⁵⁷ and the roster no longer mentioned organizations that had obvious tobacco connections. The list included groups such as the US Chamber of Commerce and Citizens for a Sound Economy, as well as a range of property rights groups.⁵⁷ There is limited information on tobacco industry contributions to these organizations, but at least 18 of the 39 organizations listed (46%) received financial support from the tobacco industry, and 3 more organizations (8%) were spun off from tobacco-funded groups.^{20,58–111} Citizens for a Sound Economy, for example, received millions of dollars in contributions from the tobacco industry in the 1990s, including an estimated \$400,000 in 1994 alone,⁵⁹ which it used to fight FDA regulation independently as well as in concert with GGOOB.^{52,112} Some groups were supported indirectly; US Term Limits was an organization created by Citizens for a Sound Economy in 1991 under the

TABLE 2—Get Government Off Our Back (GGOOB) Listed Members, 1994 and 1995

1994 ⁵⁸ GGOOB Listed Members (North Carolina)	1995 ⁵⁹ GGOOB Listed Members (National)
Bright Belt Warehouse Association ^a	Alliance for America
Jerry Williams, NC Restaurant Association	American Legislative Exchange Council ^b
John Locke Foundation ^b	American Rental Association
NC Convenience Store Association	Americans for Tax Reform ^b
NC Grange Mutual Insurance Company	Association of Concerned Taxpayers
NC State Grange ^a	Center for the Defense of Free Enterprise
NC Taxpayers United ^b	Christian Voters League
NC Wholesalers Association ^a	Citizens for a Sound Economy ^b
Southern Association of Wholesale Distributors ^a	Competitive Enterprise Institute ^b
Tobacco Growers Association of NC ^a	Concerned Women for America Legislative Action Committee
Tobacco Growers Information Committee ^a	Consumer Alert ^b
	Council for Citizens Against Government Waste ^b
	Council for Government Reform
	Defenders of Property Rights ^b
	Environmental Policy Task Force ^c
	Heartland Institute ^b
	Home School Legal Defense Association
	Institute for Justice ^b
	International Foodservice Distributors Association
	Law Enforcement Alliance of America ^c
	National American Wholesale Grocers ^a Association
	National Association of Convenience Stores ^b
	National Association of Wholesale Distributors
	National Center for Public Policy Research ^b
	National Grange ^a
	National Rifle Association ^b
	National Tax Limitation Committee ^b
	National Wilderness Institute Project 21 ^b
	The Seniors Coalition ^b
	Small Business of America
	Small Business Survival Committee ^b
	Square One
	Stewards of Family Farms, Ranches, and Forests
	Traditional Values Coalition
	US Business and Industrial Council
	US Chamber of Commerce ^b
	US Term Limits ^c
	Western Forest Industries Association

^aOrganization in which the tobacco industry was a member.

^bOrganization funded by the tobacco industry.^{20,58-111}

^cOrganization spun off from a group funded by the tobacco industry.^{20,58-111}

name Citizens for Congressional Reform.²⁰ These groups also received support from other industries.^{20,60-66}

Throughout the creation and development of GGOOB, the decision of RJ Reynolds and Mongoven, Biscoe and Duchin to create the lobbying coalition was never mentioned by the coalition, and we were unable to find any mention of this in the popular press. Instead, organizers claimed the group was created to protect small business, because larger firms “often welcome new regulations because they know the regulations will help consolidate their market share and wipe out small business competitors.”¹¹³ The GGOOB literature and Web site posed the question, “How did Get Government Off Our Back get started?” The answer provided was, “Because of the growing number of cases of government waste and abuse nationwide, civic groups and other organizations have already been forming all over the country to respond to the problem. So the strength of this movement is, and will remain, at the grass-roots level. It’s only because the problem is becoming so prevalent that it is pushing its way into the national spotlight.”¹¹⁴

GGOOB claimed that government should leave individuals and businesses to make their own accommodation, a position that drew extensive public support. Its apparent focus on a broad ideological issue deflected attention from its underlying tobacco industry agenda.

Organizational Activities

By 1995, GGOOB had generated enough media attention that it began to organize events designed to draw popular support. The organization designated

March 1995 as “Regulatory Revolt Month” and organized anti-regulation rallies in 12 states.¹¹⁵ With the development of these rallies and other recruitment efforts, lobbyists for RJ Reynolds were able to contact state legislators without their necessarily realizing that they were speaking to tobacco industry representatives. In Florida, Senator Mario Diaz-Balart was recruited by RJ Reynolds to speak to the state GGOOB rally, but there was “no mention of tobacco” in the discussion.¹¹⁶ Letters were sent to legislators in other states requesting that they attend the GGOOB rallies and support the goal of reduced regulation, again without mentioning tobacco issues.^{117,118} Contemporaneous media reports claimed that in response to these solicitations and rallies, several state legislators signed the GGOOB resolution that suggested a moratorium on all new government regulation.¹¹⁹⁻¹²² The GGOOB resolution dovetailed with the goals of the newly Republican-led US House of Representatives and its Contract With America, and in 1995 the House passed a bill that froze new federal regulations, and demanded that in the future no “unnecessary” federal regulations be allowed. This text matched the GGOOB resolution nearly verbatim,¹²³⁻¹²⁶ although we found no evidence that indicated whether this was deliberate. The antiregulatory provisions of the Contract With America were written by lobbyists from regulated industries.²⁸

In April 1995, Mongoven, Biscoe and Duchin wrote a follow-up memo about GGOOB to RJ Reynolds executives. In it, they noted that their objective was “to mobilize national and state-level resources to oppose

regulations and legislation that is in opposition to RJ Reynolds's interests . . . Most important at this time is to expand on and use more effectively the elements that are already in place, specifically GGOOB.¹²⁷ They noted plans to organize, train, and guide "Action Corps" and "Truth Squads"¹²⁸ media tours on the state and local levels through GGOOB, and to continue to recruit outside organizations to oppose regulations through the coalition.^{127,129-132} Although GGOOB advocated reduced regulation of all business, it chose to focus on regulations that restricted smoking indoors,¹³³ unsurprising given the organizational and financial support provided by RJ Reynolds.

By this time, GGOOB itself had become well known enough that some organizations and individuals sought out membership in the coalition without being solicited.¹³⁴⁻¹³⁶ The GGOOB rallies drew substantial press attention at the national and state levels.^{120-122,134,135,137-141} Throughout late 1994 and 1995, internal RJ Reynolds documents from the company's external relations group listed developing GGOOB groups and encouraged them to communicate "grass roots" anti-regulatory positions to government as a continuing priority.¹⁴²⁻¹⁴⁵ These documents make it clear that RJ Reynolds viewed GGOOB as a more politically palatable extension of company lobbying efforts. The company chose to send GGOOB allies when possible, rather than its own lobbyists, to oppose excise taxes, clean indoor air, and tobacco control in general.^{118,139,146-152}

By August 1995, RJ Reynolds had nearly completely integrated its use of GGOOB and the organizations claiming to sponsor it in its political activities. Individuals

affiliated with these organizations signed op-eds written by RJ Reynolds under their own names, forwarded RJ Reynolds position papers to other groups under their own names, and advocated independently against tobacco regulation.¹⁵³⁻¹⁵⁵ In addition, tobacco industry lobbyists were sent to locations such as the Perot Convention to convince attendees to sign the GGOOB resolution and to send postcards that opposed regulation. In a media interview in Dallas, one tobacco industry lobbyist "wearing his GGOOB hat" cited the FDA regulation of tobacco as "a perfect example of excessive regulation and big, expensive government run amok."¹⁵⁶

As the threat of wide-reaching FDA and OSHA regulation receded, RJ Reynolds reduced its commitment to GGOOB. By the beginning of 1996, RJ Reynolds's external relations documents no longer referred to the organization, aside from mentioning that an industry ally was running for the Nevada legislature on the strength of his past GGOOB affiliation.¹⁵⁷ It is not clear from the available documents, however, whether there was any formal decision made to disband the coalition. RJ Reynolds may have decided that to continue to use the organization, and to have its history and funding exposed, was a political risk. In addition, the company may have wished to reduce its financial commitment to outside advocacy organizations, given that some of these groups (such as Citizens for a Sound Economy) received substantial contributions. The relatively short time period during which GGOOB existed meant that there was little investigation that might have identified its character. Although an academic

paper published in 2002 about the actions of Mongoven, Biscoe and Duchin noted that GGOOB was an industry front group,²⁶ we found no other mention of the tobacco industry connection to the organization.

GGOOB was clearly a pure industry front group throughout its history; RJ Reynolds and a public relations firm were entirely responsible for its creation, organization, activities, and maintenance.^{25,127,158} And although some individuals appear to have volunteered to join the group, many of the organizations involved were financially compensated for their participation.^{20,60-66} Overall, RJ Reynolds's decision to create GGOOB appears to have been an unqualified success. The organization drew popular support from the public and from legislators, gathered extensive press attention for tobacco industry political positions, and assisted in derailing 2 proposed regulations of workplace smoking and tobacco sales. Evidence from previous case studies of public relations efforts that used coalitions suggests that these accomplishments were partially or wholly contingent on the fact that some participants and the media did not realize the organization was an industry front group.²⁸

DISCUSSION

RJ Reynolds's development of GGOOB suggests that industries may successfully block legislation and regulation with the development of allied organizations that are not obviously connected to their issues. During the 2-year period that GGOOB was active, there was very little discussion of how a new and previously unknown organization managed to fund multiple rallies and events,

widely publicize them (in at least 1 case with an airplane flying overhead that trailed the coalition's logo),¹³⁷ and make its agenda a top priority for a range of existing national advocacy groups. Asking these questions might have revealed RJ Reynolds's involvement in generating GGOOB from little more than a substantial lobbying budget and an advertisement that drew popular attention. Even a review of the organization's early press releases, which specifically referenced support from tobacco growers and distributors, could have identified the tobacco industry connection.¹⁵⁹ However, neither the advocacy groups that supported regulation nor the media appear to have investigated the coalition contemporaneously.

The history of GGOOB suggests that policymakers, advocates, and the media should be cautious in accepting the claims of groups that purport to reflect popular disaffection, whether or not they appear to have an industry connection. Existing research on public relations notes that media investigation of organizational sponsors has frequently limited the effectiveness of front groups,^{28,30} and notes that to require industries to disclose all of their political activity would also limit the value of front groups to industry.³² To date, however, there are no rules requiring such disclosure, and media attention to the sponsorship of groups that are not obviously self-interested has been sporadic. The limited attention to organizational sponsorship is surprising given that nearly 90% of advocacy groups, when surveyed, admit that they are primarily dependent on outside patronage for their funding.¹⁶⁰

Advocates for public health in particular should also consider ideological arguments that have the potential to draw substantial public support against new measures to protect public health. The claim that government should leave individuals and businesses to make their own accommodations drew extensive public support, and if this argument is accepted, makes scientific evidence that supports measures to protect public health appear less important.¹⁶¹ In at least some cases, public and legislative support for this position appears to have developed without these supporters realizing that they were being solicited by the tobacco industry. Research on the use of ideological arguments in policymaking suggests that industries rely on such claims to maintain a profitable status quo.⁴ Public health advocates who seek new regulation or legislation should be prepared to address these kinds of ideological claims directly.¹⁶² The success of GGOOB relied largely on the appeal of the ideological position that dealing with tobacco issues should not be the province of government but the business of business.

This research has certain limitations. The history of GGOOB is a single case study, which gives the history of 1 organization at a time when the industry that created it faced immense political threat. The tobacco industry in particular has an incentive to create front groups because it has historically been viewed as untrustworthy.¹¹⁻¹⁴ In addition, the reliance on internal industry documents and press reports, rather than on contemporaneous interviews with policymakers, raises questions about the true influence of the organization in

affecting the outcome of the FDA and OSHA regulatory battles. However, the substantial organizational and financial commitment made by RJ Reynolds suggests that the coalition did provide some value to the tobacco industry.

The successful development of industry front groups such as GGOOB has implications beyond tobacco regulation. Similar public health issues arise in debates about food policy and obesity, pharmaceutical regulation, limitations on the production of oil and gas, and attempts to control pollutants. Organizations learn from each other^{35,36} and research on lobbying suggests that other industries (such as the pharmaceutical industry) that face new restrictions have developed similar kinds of front groups to advocate on their behalf.^{37,38} However, unlike the tobacco industry, few of these other industries have been required to release the kinds of internal documents that would make the creation of such groups evident to outside observers. Lacking this kind of information, policymakers and advocates should research newly formed coalitions, as well as extrapolate from evidence provided by descriptions of tobacco industry activity obtained by looking through the “keyhole” of internal industry documents. ■

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Contributors

D.E. Apollonio originated the study, conducted the analysis, and led the writing of the article. L.A. Bero supervised the study and edited the article.

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Human Participation Protection

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