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# Industry Front Groups: A Tobacco Case Study

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*Key words:* Front groups, government regulation, public health, tobacco industry.

Abbreviations: GGOOB = Get Government Off Our Back

Abstract: We consider how industries use front groups to combat public health measures by relating the history of "Get Government Off Our Back", a coalition created by the tobacco industry to fight government regulation. Using tobacco industry documents, contemporaneous media reports, journal articles, and press releases, we review the establishment by RJ Reynolds of an industry front group, Get Government Off Our Back (GGOOB) in 1994. The group's goal was to advocate against U.S. federal regulation of tobacco. By keeping its involvement secret, RJ Reynolds was able to draw public and legislative support toward limiting government regulation of tobacco without having to address the tobacco industry's reputation for misrepresenting evidence. Unfortunately, the tobacco industry's use of front groups is not unique; other industries use front groups to fight measures designed to protect public health. Research on the background and funding of advocacy organizations could help identify industry front groups and make them less useful to their creators.

#### 1. Introduction

This paper describes the formation of a tobacco industry front group Get Government Off Our Back (GGOOB) created to fight proposed tobacco regulation by the US Food and Drug Administration (FDA) and the Occupational Health and Safety Administration (OSHA) in 1994–1995. The tobacco industry has a history of misrepresenting scientific evidence (Bero et al., 1994a, 1994b, 1995, 2001), attempting to influence government through lobbying (Givel and Glantz, 2001; Glantz and Begay, 1994; Glantz et al., 1996; Monardi and Glantz, 1998), and is responsible for over 440,000 deaths annually in the United States (U.S. Department of Health and Human Services, 2004). These factors have compromised the tobacco industry's reputation and made association with its interests a political liability (Burson-Marstellar, 1986; Harris Poll, 1999; Roper Center, 1999, 2000a and 2000b). The creation of a seemingly independent organization advantaged the tobacco industry by presenting its anti-regulation agenda as an expression of popular will.

The goals of the front group created by RJ Reynolds in 1994 were not overtly tobacco-related. Political decision makers discount the activities of organizations that are obviously self-interested (Bodensteiner, 1997; Calvert, 1985; Lohmann, 1993; Lyon and Maxwell, 2004; Potters and van Winden, 1992; Sanchez, 1996), such as "smokers' rights" groups (Lohmann, 1993; Potters and van Winden, 1992). Many firms have an incentive to deceive policymakers, especially about their sponsorship of lobbying activities (Lyon and Maxwell, 2004; Wright, 1996), and creating a front group that appears to be broad-based makes this possible (Becker, 1983; Lohmann, 1993).

Organizations learn from each other (Apollonio and La Raja, 2004; March and Olson, 1984), and RJ Reynolds' success with GGOOB is consistent with the activities of other industries: pharmaceutical manufacturers, telecommunications firms, and credit unions have engaged in similar efforts (Mitchell, 2002; Public Citizen, 2001). The history of GGOOB provides insight for researchers and policymakers that may help forestall future misrepresentation by industry interest groups.

#### 2. Data and methods

In conjunction with legal settlements between 46 state Attorneys General and the major tobacco companies in the United States, over 40 million pages of internal tobacco industry documents have been made publicly available (Bero, 2003; Kelder, 1999; TDO, 2005; UCSF Library, 2005). We used these documents to determine RJ Reynolds' motivation for creating Get Government Off Our Back (GGOOB). Using established techniques for systematically searching tobacco documents archives (Malone and Balbach, 2000), we identified over 3000 internal tobacco industry documents pertaining to FDA and OSHA regulation, Get Government Off Our Back, and the organizations that claimed to sponsor it (other than RJ Reynolds). We also reviewed secondary data sources for corroborating information. We drew on approximately 200 documents, dated from 1993 to 1997, to prepare this paper.

#### 3. Results

#### 3.1 Organizational creation and development

The inspiration for GGOOB appears to have been drawn from a print advertisement run by RJ Reynolds (see Tab. 1 for timeline). The ad appeared in June of 1994 in newspapers around the United States and showed a man standing in front of a pickup truck and looking out at the reader (Fig. 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 government off my back." 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" (RJ Reynolds, 1994 and 1995).

In October of 1994, the public relations firm Mongoven, Biscoe and Duchin (MBD) proposed the creation of an *ad hoc* coalition to "Get Government Off Our Back" (Duchin and Blumel, 1994). Get Government Off Our Back (referred to in industry documents as GGOOB) (Carter et al., 2002; Duchin and Blumel, 1994) was created to combat increasing numbers of proposed federal and state regulations on the use and sale of tobacco products. The coalition was intended to have popular support and as a result it relied on existing groups recruited by RJ Reynolds (Philip Morris, 1993).

Although the creation and development of GGOOB was funded by RJ Reynolds through MBD, the company itself was never publicly identified as a sponsor (Newsradio, 1994; PR Newswire, 1995a and 1995b). The first 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 (Tab. 2). It claimed that these groups 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". 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" (Get Government Off Our Back, 1994).

Tab. 1 Timeline of events: FDA and OSHA proposed regulation, GGOOB mobilization, and legislative activity.

Date	Event		
February 1994	<ul> <li>The Food and Drug Administration (FDA) announces its intention to regulate tobacco as a drug, begins inv tion into whether cigarette manufacturers designed their products to take advantage of the pharmacologic fects of nicotine (FDA Tobacco Rules, 1997; Kessler et al., 1996).</li> </ul>		
April 1994	<ul> <li>The Occupational Health and Safety Administration (OSHA) announces a proposed rule regulating indoor air quality in workplaces that allow smoking (Jeffress, 1988).</li> </ul>		
June 1994	<ul> <li>– RJ Reynolds runs "I'd like to get government off my back" advertisement in national print media (RJ Reynolds, 199 and 1995a).</li> </ul>		
September 1994	<ul> <li>- OSHA begins hearings on its proposed rule, which eventually draw over 115,000 comments (Jeffress, 1988), mos which were solicited by the tobacco industry (SCARC, 1995).</li> </ul>		
October 1994	<ul> <li>Mongoven, Biscoe and Duchin (MBD) proposes the creation of an ad hoc "Get Government Off Our Back" coalition (Duchin and Blumel, 1994).</li> <li>First identified press release for "Get Government Off Our Back" (North Carolina); introduces "GGOOB resolut (Get Government Off Our Back, 1994).</li> </ul>		
Beginning of 1995	<ul> <li>– GGOOB sponsoring organizations modified to suggest a national focus; tobacco organizations no longer listed (Get Government Off Our Back, 1995a).</li> </ul>		
February 1995	<ul> <li>– US House passes a moratorium on new federal regulation as part of the Republican "Contract with America" (Associated Press, 1995a and 1995b; News, 1995; News 4 Texas, 1995).</li> </ul>		
March 1995	<ul> <li>- GGOOB designates March as "Regulatory Revolt Month" and organizes rallies in 12 states (Get Government Off Our Back, 1995c).</li> <li>- US Senate debates moratorium on new federal regulation (comparable to US House bill)</li> <li>- OSHA hearings closed</li> </ul>		
April 1995	- MBD writes followup memo regarding GGOOB to RJ Reynolds and proposes additional mobilization (Duchin, 199		
August 1995	– Draft <b>FDA</b> rule announced; proposes restrictions on advertising to minors (Kessler et al., 1996; Jeffress, 1988). – <b>OSHA</b> followup hearings closed		
anuary 1996	– OSHA comment period closed		
December 2001	– <b>OSHA</b> withdraws proposed rule (Roy, 2001).		



Archis Anderson is a Minnesotan, born and bred. In the past he colerated the attacks made against amokars. 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 innow exactly what I'm talking about. If you're a non-smoker you may think the current attempts to ban smoking in Amorica have nothing to do with you. But, if you give me two minutes, I'll tel you why I think it's important that you show 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 doen't mean that I believe I have the night to blow smoke in your face. I thin smaking and no-moking 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 baaned anywhere where ten or more people wisit in a one-week period. This means that smoking will be lengt in almost every workplace in the country unless an incredibly expensive, specially ventilated room is provided. And who can allord 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 snoke at home will be threatened every line a repairman rights or any other worker? You may also have heard about the proposed 800% tax increase on digerettes some congressione and taking about. That's discrimination against smokers, nothing less. And it will affect non-smokers too when the booleggers start to get increded. There is outgettion in my mind that the govern-

ment 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 domines a mile long.

We can work these issues out together without the government telling us how to do it. If we let it become faw than we've got a seriour policitum. Because then people are no longer allowed to work it out themselves. We have to tak." 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 smeking issues can be found in <u>accommodular</u>, in finding ways in which smakers and non-smokers can co-exist peacefully. And we encourage dialogue and discussion that will help solve the issues thotolog government intervention. For further information please call 1-800-365 8411.

TOGETHER, WE CAN WORK IT OUT

Bates Number 512696084

*Fig. 1* RJ Reynolds "Get Government Off My Back" Advertisement, June 1994.

Although the initial coalition was made up largely of tobacco growers and distributors (Get Government Off Our Back, 1995a), by 1995 the roster of supporting organizations had changed. The new "sponsors" appeared to consist only of ideologically motivated groups without obvious tobacco connections (Get Government Off Our Back, 1995a). There is limited information on tobacco industry contributions to these organizations, but at least 18 (46%) received financial support from the tobacco industry, and three more (8%) were spun off from tobacco-funded groups (Allen, 1962; American Tobacco Company, 1988, 1991; Brady Center to Prevent Gun Violence, 2005; Brown and Williamson, 1985; Caldwell, 1969; Center for

Media and Democracy, 2004 and 2005a–2005h; Cherry, 1985; Covington and Burling, 1990; Eply Associates, 1995; Hyde, 1994, 1995r; Kornegay, 1977; Lai, 1995; Lorillard, 1990a, 1990b, 1999, 2001; Marden, 1998; Masks of Deception, 1991; Mozingo, 1989; Nicoli, 1998; North Carolina Department of Revenue, 1999; North Carolina Tobacco Foundation, 1982; Oglesby, 1993; Oliver and Grange, 1985; Payne, 2000; Payne and Walker, 1998; Philip Morris, 1995, 1997, 1998a, 1998b, 1999, 1999b; Proactive Communications, 1999; RJ Reynolds, 1995c; Ridenour, 1998; Tobacco Institute, ---, 1991, 1992, 1997, 1999; Tobacco Tax Council, 1981; Violence Policy Center, 1997; Weber, 1997; Wells, 1983). These groups also received support from other industries (Center for Media and Democracy, 2005a–2005h).

Throughout the creation and development of GGOOB, the decision of RJ Reynolds and MBD to create the group was never mentioned. 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" (Kerrigan, 1994). GGOOB literature claimed the group was formed, "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" (Get Government Off Our Back, 1995b).

#### 3.2 Organizational activities

By 1995, GGOOB began to organize events designed to draw popular support. The organization designated March 1995 as "Regulatory Revolt Month" and organized anti-regulation rallies in twelve states (Get Government Off Our Back, 1995c). Using these rallies, lobbyists for RJ Reynolds were able to contact state legislators without their necessarily realizing that they were speaking to tobacco industry representatives (Gallant, 1995a; Gomez, 1995; Terry, 1995). Contemporaneous media reports claimed several of these legislators signed the GGOOB resolution suggesting a moratorium on all new government regulation (Hyde, 1995a-1995d). 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 (Associated Press, 1995a and 1995b; News, 1995; News 4 Texas, 1995).

In April of 1995, Mongoven, Biscoe and Duchin wrote a follow-up memo regarding 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 RJR's interests ... most important at this time is to expand on and use more effectively the elements that are already in place, specifically GGOOB" (Duchin, 1995). They noted plans to continue recruitment of outside organizations to oppose regulations through the coalition (Duchin, 1995; Gallant, 1995; Miller, 1995a and 1995b; Walton and Kenneth, 1994). Although GGOOB advocated for reduced regulation of all busi-

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*Tab. 2* Get Government Off Our Back listed members, 1994 and 1995 [Notes: (a) Tobacco industry; (b) Organization funded by the tobacco industry; (c) Organization spun off from a group funded by the tobacco industry (Allen, 1962; American Tobacco Company, 1988, 1991; Brady Center to Prevent Gun Violence, 2005; Brown and Williamson, 1985; Caldwell, 1969; Center for Media and Democracy, 2004 and 2005a–2005h; Cherry, 1985; Covington and Burling, 1990; Eply Associates, 1995; Hyde, 1994, 1995r; Kornegay, 1977; Lai, 1995; Lorillard, 1990a, 1990b, 1999, 2001; Marden, 1998; Masks of Deception, 1991; Mozingo, 1989; Nicoli, 1998; North Carolina Department of Revenue, 1999; North Carolina Tobacco Foundation, 1982; Oglesby, 1993; Oliver and Grange, 1985; Payne, 2000; Payne and Walker, 1998; Philip Morris, 1995, 1997, 1998a, 1998b, 1999, 1999b; Proactive Communications, 1999; RJ Reynolds, 1995c; Ridenour, 1998; Tobacco Institute, ---, 1991, 1992, 1997, 1999; Tobacco Tax Council, 1981; Violence Policy Center, 1997; Wells, 1983). These groups also received support from other industries (Center for Media and Democracy, 2005a–2005h)].

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

ness, it chose to focus primarily on regulations restricting smoking indoors (Get Government Off Our Back, 1995d).

By this time, GGOOB itself had become well known enough that some organizations sought out membership in the coalition without being solicited (Hyde, 1995e and 1995f; Griscom, 1995). The GGOOB rallies drew substantial press attention at the national and state levels (Hyde, 1995b–1995i; Hoy, 1995; Padalino, 1995). Throughout late 1994 and 1995, internal RJ Reynolds documents listed developing GGOOB groups and encouraging them to communicate "grassroots" anti-regulatory positions to government as a continuing priority (RJ Reynolds, 1995a– 1995d). RJ Reynolds viewed GGOOB as a more politically palatable extension of company lobbying efforts, choosing to send GGOOB allies rather than its own lobbyists to advocate against excise taxes, clean indoor air, and tobacco control in general (Gallant, 1995a; Hyde, 1995i; Hyde, 1995j–1995p and 2002). By August of 1995, RJ Reynolds had nearly completely integrated its use of GGOOB in its political activities. Individuals affiliated with GGOOB signed op-eds written by RJ Reynolds under their own names, forwarded RJ Reynolds' position papers to other groups, and advocated independently against tobacco regulation (Carter, 1995; Hyde, 1995; RJ Reynolds, 1995g). 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" (RJ Reynolds, 1995h).

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 external relations documents no longer referred to it. It is not clear, however, whether there was any formal decision made to disband the coalition. RJ Reynolds may have decided that having GGOOB's history and funding exposed was a political risk. The relatively short time period during which GGOOB existed meant that there was little investigation that might have identified its character.

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 (Duchin and Blumel, 1994; Duchin, 1995; Hyde, 1995q). Many of the organizations involved were financially compensated for their participation (Center for Media and Democracy, 2005a–2000h). GGOOB drew popular support from the public and from legislators, gathered extensive press attention for tobacco industry political positions, and assisted in derailing two proposed regulations of workplace smoking and tobacco sales. These accomplishments were contingent on the fact that the media did not realize the organization was an industry front group (Bodensteiner, 1997).

#### 4. Discussion

RJ Reynolds' development of GGOOB suggests that industries may be successful in blocking legislation and regulation by developing allied organizations that are not obviously connected to their issues. During the two-year period that GGOOB was active, there was little discussion of how a new organization managed to fund multiple events, widely publicize them (in at least one case, with an airplane flying overhead trailing the coalition's logo) (Hyde, 1995), and make its agenda a top priority for a range of existing national advocacy groups. Asking these questions might have revealed RJ Reynolds' involvement in generating GGOOB from little more than a substantial lobbying budget.

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. Existing research on public relations notes that media investigation of organizational sponsors has limited the effectiveness of front groups (Bodensteiner, 1997; Sanchez, 1996), and notes that requiring industries to disclose all of their political activity would also reduce the value of front groups to industry (Lyon and Maxwell, 2004). The limited attention to organizational sponsorship is surprising given that nearly ninety percent of US advocacy groups admit that they are primarily dependent on outside patronage for their funding (Walker, 1991).

Advocates for public health should also consider the use of ideological arguments. 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 supporting measures to protect public health appear less important (Schattschneider, 1969). Research on the use of ideological arguments in policy making suggests that industries rely on such claims to maintain a profitable *status quo* (Bero et al., 2001), so public health advocates should be prepared to address these kinds of ideological claims directly (Cohen et al., 2000).

This research has certain limitations. The history of GGOOB is a single case study, and the tobacco industry in particular has an incentive to create front groups because it has historically been viewed as untrustworthy (Harris Poll, 1999; Roper Center, 1999, 2000a and 2000b). In addition, the reliance on internal industry documents raises questions about the true influence of the organization in affecting the outcome of the FDA and OSHA regulatory battles. However, the substantial commitment made by RJ Reynolds suggests that the coalition provided 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 questions of food policy and obesity, pharmaceutical regulation, limitations on the production of oil and gas, and attempts to control pollutants. Organizations learn from each other (Apollonio and La Raja, 2004; March and Olsen, 1984), other industries facing new restrictions have developed similar kinds of front groups to advocate on their behalf (Mitchell, 2002; Public Citizen, 2001). However, unlike the tobacco industry, few of these other industries have been required to release internal documents that would reveal the creation of front groups. 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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