

'Friends with benefits': how tobacco companies influence sales through the provision of incentives and benefits to retailers

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ABSTRACT

Background In countries banning advertising and display of tobacco at point-of-sale, little is known about tobacco companies' continuing promotion of products through incentives and benefits to retailers.

Method A telephone survey of 4527 randomly selected Australian retailers was conducted in August 2018, and identified 800 current tobacco retailers (response rate: 72.4%) who were asked a series of questions about benefits offered to them by tobacco companies and what retailers agreed to in return.

Results 41.1% of retailers reported being provided with a tobacco cabinet and 38.3% reported having a price list supplied by a tobacco company. One-third (33.3%) reported being offered at least one benefit from a tobacco company for doing something in return. Price discounts were the most frequently reported benefit (19.0%), followed by rebates (8.4%) and gifts (3.0%). Retailers also reported offers of prizes and incentives for increasing sales or demonstrating product knowledge. In return, retailers reported giving companies benefits such as prominence on the price list and/or in the tobacco cabinet and/or influence over the product range and stock levels.

Conclusion Tobacco companies are continuing to market tobacco and influence sales through provision of incentives and benefits to retailers. Laws that ban the supply of benefits to consumers should be extended to also prohibit the provision of benefits to tobacco retailers.

INTRODUCTION

The promotion and sale of tobacco in Australia is highly restricted, with all forms of consumer advertising and promotion and point-of-sale displays prohibited.¹ The tobacco industry describes Australia as, 'one of the darkest markets in the world', with 'one of the best organised, best financed and politically savvy and well connected anti-smoking movements'.² With increasing restrictions on tobacco companies directly marketing to consumers, the retail environment has become a primary avenue of communication to customers. Several international investigations have reported tobacco marketing strategies and competitive incentive programmes aimed at retailers.^{3–5}

Retail marketing efforts by tobacco companies appear to be aimed at building positive relationships with retailers in order to influence the pricing and merchandising of tobacco in-store.^{3–7} Retailers have reported allowing tobacco companies to

influence pricing, brand display and the positioning of products in cabinets ('tobacco cabinets' hereon) or the positioning of products on physical price lists ('price lists' hereon), often in exchange for receiving benefits such as free tobacco cabinets, gifts, free stock, volume discounts and cash payments.^{3–8} Given that the tobacco industry has a history of innovating in response to legislative restrictions on tobacco,⁹ it is important to monitor the ways that incentives and benefits are being used by tobacco companies to influence the sale and promotion of tobacco products in an environment where advertising and display of tobacco products is banned at point-of-sale.

One study following the implementation of a point-of-sale display ban has suggested that such retailer incentive programmes have remained a focus for tobacco companies within jurisdictions with such a legislative environment,¹⁰ however, the issue has so far not been the subject of a more systematic analysis. Through a survey of retailers in Australia, this study explores the types of benefits and incentives offered to retailers by tobacco companies, and what tobacco retailers agreed to in return. The study also investigates what factors predict retailers having a benefit offered by a tobacco company.

METHODS

Study design and sample

The study is part of a larger study of current and former tobacco retailers' attitudes and experiences selling tobacco in a declining market. A telephone survey of randomly selected retailers located in the Australian states of New South Wales (NSW), Victoria and Western Australia (WA) was conducted in August 2018. The sample was designed to reflect different types of tobacco retailers in Australia in both metropolitan and regional areas, as well as those with and without alcohol licences, with two exceptions. First, retailers where the decision to sell is likely to be made at a head office level (ie, large supermarkets, chained 7-Eleven type stores and petrol (gas) stations and any stores located within those petrol stations) were excluded. Second, alcohol licensed outlets were excluded in NSW, since they had previously been surveyed in a comparable study.¹¹ The sampling method has been published elsewhere,¹² but is summarised here.

After exclusion of retailer types that would not be expected to sell tobacco to consumers (eg, importers, service businesses and wholesalers) and

uncontactable businesses were removed from the sample, 4527 retailers were contacted and 3279 (72.4%) agreed to participate in the survey. Further exclusions were applied after cigarette selling status could not be determined for 24 retailers, and 327 retailers were also found to be a business not expected to sell tobacco. The final sample included 2928 retailers, including 800 current-sellers, 390 ex-sellers and 1738 never-sellers. This study focuses on the subsample of 800 current tobacco retailers only.

Participants (ie, current tobacco retailers) were asked whether they had been offered a benefit by a tobacco company in return for a range of specified actions (buying more tobacco products, listing particular brands at the top of price list, stocking one or some brands more than others, supporting tobacco company campaigns or something else), followed by an open-ended question asking what the benefit was. Participants were also asked if their price list or tobacco cabinet was supplied by a tobacco company and if so, whether they had agreed to anything in return. See online supplementary file for a full list of the questions asked of participants.

Analysis

We used an inductive approach to develop a thematic analysis of the type of benefits described as offered to tobacco retailers and the agreements in place for having a price list or tobacco cabinet supplied by a tobacco company.¹³ Responses to open-ended questions were initially reviewed for basic themes and subsequently coded manually using coding categories that were developed inductively by one researcher (CW). Coding categories were reviewed by a second researcher (SB), and a sample of responses for each question were dual coded. Differences were discussed and coding categories were further refined before all remaining responses were coded by author CW. An adjusted multivariable analysis predicting a benefit being offered (no/yes) in return for a range of specified actions (buying more tobacco products, listing particular brands at the top of the price list, stocking one or some brands more than others, supporting tobacco company campaigns or something else) was conducted.

RESULTS

Benefits offered to tobacco retailers

Across the three states, 41.1% of retailers reported having a tobacco cabinet supplied by a tobacco company (or 47.6% of the retailers that had a tobacco cabinet), and 38.3% reported tobacco company supply of a price list (or 45.3% of the retailers that had a price list). When separately asked if they had been offered a benefit from a tobacco company in exchange for doing something, a lower percentage (33.3%, n=266) of sellers reported being offered at least one benefit from a tobacco company in exchange for doing something. Benefits were most commonly offered if retailers bought more tobacco products (21.1%, n=169), followed by placing a particular brand at the top of their price list (12.4%, n=99). (The survey did not ask if the retailer accepted a benefit offered, but no retailer reported being offered a benefit and refusing it.)

Types of benefits offered

Despite the high proportion of retailers reporting being provided a price list or tobacco cabinet, when asked separately what benefit was offered to them by a tobacco company in exchange for doing something, the most frequently reported benefit offered was price discounts (a price reduction offered by a seller to a buyer¹⁴), with 19.0% (n=152) of all sellers reporting having received this benefit. Rebates (a refund after purchase¹⁵) were

the second most frequent benefit reported as received (8.4% of sellers, n=67), followed by gifts (3.0%, n=24). A range of gift types was reported, including gift cards, football tickets, chocolates, coupons, movie tickets and tickets to conferences and events such as the MotoGP. Tobacco retailers also reported receiving free stock and accessories (eg, matches and lighters), as well as cash payments, which were sometimes given in return for additional space in the tobacco cabinet or on the price board for the tobacco company's brands. One retailer described receiving an allowance from a tobacco company to be spent on a staff party at a chosen venue:

In essence, they've given us an allowance for the venue for the staff party at a different venue – contra-deal. The other venue also sells cigarettes. We go to theirs and we have \$1000 on the bar to spend, and they do the same at ours. (Victorian Bar)

Retailers also reported the use of prizes and incentives for increasing sales or demonstrating product knowledge. One retailer described receiving a gift card as a reward for correctly answering a product questionnaire, and another described being entered into a prize pool in return for purchasing certain quantities of stock. In-store promotions and brand promotions were also mentioned, which often carried a benefit to the retailer. For example, one retailer described receiving money from a tobacco company to put towards prizes for an in-store promotion.

Agreements with tobacco companies

Among retailers who reported having their price list or tobacco cabinet supplied by a tobacco company, 30.4% (n=110) said they had agreed to do something for the tobacco company in return. The most frequently reported agreement was to allow the tobacco company to have a greater proportion of space in the tobacco cabinet or on the price board (45.5%, n=50), followed by allowing the tobacco company to influence product range offering and stock levels (14.5%, n=16). Some retailers also agreed to let the tobacco company determine which of their brands were displayed on the price list, as well as the position of those brands (11.8%, n=13).

Predictors of benefits offered that required something in return

As discussed above, 33.3% of retailers reported being offered a benefit by a tobacco company for doing something in return, and [table 1](#) shows the predictors of supply of such benefits. Grocery stores (which have the highest market share of all the retailers included in this analysis¹⁶) were the most likely to be offered such a benefit (53.3%). Convenience and Grocery stores were both significantly more likely to be offered such a benefit than all other retailer types (see [table 1](#) for comparison with Convenience stores: separate analysis for comparison with Grocery stores not shown). Remoteness was also a significant predictor, with tobacco retailers in major cities significantly more likely to be offered such a benefit than retailers in inner regional, remote and very remote areas (p=0.041, p trend=0.005). Retailers in NSW were significantly less likely to be offered such a benefit than retailers in WA (p=<0.001).

DISCUSSION

The study provides the first evidence of the extent and types of benefits offered to Australian tobacco retailers by tobacco companies following the implementation of point-of-sale display bans. The study also reveals that prize incentives have been used to increase retailers' product knowledge and to promote brands

Table 1 Predictors of benefit offered that requires something in return

Characteristic	Benefit offered 'yes' - sellers/all-sellers n/N (%)	OR for benefit offered (vs no benefit offered)	
		Unadjusted OR (95% CI)	Adjusted OR* (95% CI)
All retailers with known selling status	266/800 (33.3)		
Retailer type			
Convenience store for example, lunch bar, deli, milk bar, corner shop/general store	69/180 (38.3)	ref.	ref.
Grocery stores for example, member of IGA, Foodland, Farmer Jacks/fruit and veg stores	138/259 (53.3)	1.83 (1.25 to 2.70)	1.44 (0.92 to 2.27)
Newsagent/post office	50/191 (26.2)	0.57 (0.37 to 0.89)	0.42 (0.25 to 0.69)
Bar/wine bar	2/24 (8.3)	0.15 (0.03 to 0.64)	0.06 (0.01 to 0.27)
Pub/brewery/tavern	4/76 (5.3)	0.09 (0.03 to 0.26)	0.04 (0.01 to 0.12)
Hotel	2/45 (4.4)	0.07 (0.02 to 0.32)	0.04 (0.01 to 0.17)
Club/night club	0/6 (0.0)	n/a	n/a
Accommodation	1/16 (6.3)	0.11 (0.01 to 0.83)	0.11 (0.01 to 0.86)
Sports club (golf, yacht, bowls, NRL club, etc)	0/3 (0.0)	n/a	n/a
P value		<0.001	<0.001
Socioeconomic status of location			
1 - lowest SES	53/161 (32.9)	ref.	ref.
2	65/199 (32.7)	0.99 (0.64 to 1.54)	1.05 (0.63 to 1.74)
3	54/143 (37.8)	1.24 (0.77 to 1.98)	1.36 (0.79 to 2.35)
4	40/129 (31.0)	0.92 (0.56 to 1.51)	0.99 (0.54 to 1.82)
5 - highest SES	54/168 (32.1)	0.97 (0.61 to 1.53)	1.02 (0.55 to 1.90)
P value		0.786	0.775
P trend		0.817	0.878
Remoteness			
Major cities of Australia	111/317 (35.0)	ref.	ref.
Inner regional Australia	92/281 (32.7)	0.90 (0.64 to 1.27)	0.88 (0.55 to 1.43)
Outer regional Australia	51/148 (34.5)	0.98 (0.65 to 1.47)	0.78 (0.44 to 1.38)
Remote Australia	11/39 (28.2)	0.73 (0.35 to 1.52)	0.37 (0.15 to 0.90)
Very remote Australia	1/15 (6.7)	0.13 (0.02 to 1.02)	0.07 (0.01 to 0.57)
P value		0.342	0.041
P trend		0.115	0.005
Number of staff			
1	31/118 (26.3)	ref.	ref.
2	69/221 (31.2)	1.27 (0.77 to 2.10)	1.35 (0.78 to 2.32)
3–4	106/258 (41.1)	1.96 (1.21 to 3.16)	2.04 (1.17 to 3.55)
5+	60/201 (29.9)	1.19 (0.72 to 1.99)	1.84 (0.96 to 3.54)
Don't know / can't say	0/2 (0.0)	n/a	n/a
P value		0.011	0.061
P trend		0.110	0.303
Distance to nearest cigarette retailer			
Less than 100 m	96/285 (33.7)	ref.	ref.
100–199 m	34/94 (36.2)	1.12 (0.69 to 1.82)	1.16 (0.66 to 2.02)
200–499 m	39/103 (37.9)	1.20 (0.75 to 1.92)	1.41 (0.82 to 2.43)
500–999 m	27/89 (30.3)	0.86 (0.51 to 1.43)	0.77 (0.42 to 1.41)
1000 m (1 km) or more	70/226 (31.0)	0.88 (0.61 to 1.28)	0.63 (0.39 to 0.99)
Don't know / can't say	0/3 (0.0)	n/a	n/a
P value		0.695	0.062
P trend		0.325	0.013
State			
WA	57/160 (35.6)	ref.	ref.
VIC	90/279 (32.3)	0.86 (0.57 to 1.30)	0.70 (0.40 to 1.20)
NSW	119/361 (33.0)	0.89 (0.60 to 1.31)	0.41 (0.24 to 0.69)
P value		0.762	<0.001

Licensed premises such as bars, wine bars, pubs, breweries, taverns and hotels were not surveyed in NSW.

*Adjusted for all characteristics in the table.

NRL, National Rugby League; NSW, New South Wales; SES, socioeconomic status; VIC, Victoria; WA, Western Australia.

in-store via the tobacco retailer, which reinforces that in environments that heavily restrict direct-to-consumer promotions, the retailer remains a critical communication channel.¹⁰

In Australia, where tobacco excise is among the highest in the world,¹⁷ with rates increasing annually,¹⁸ it is not surprising that a majority of benefits offered to tobacco retailers are financial in nature. Such financial benefits are possibly designed to increase retailers' profits and/or reduce prices for customers. Such tactics strategically align with efforts by tobacco companies to make tobacco more affordable through pack size, volume discounting and value brand offerings.^{19–21} Although participants were not asked how they perceive the benefits received and their value to their business, the financial benefits received may indirectly help alleviate the economic burden currently faced by many Australian small retailers, amid the sustained downturn in retail sales.^{22 23} For retailers that may be considering stopping selling tobacco, the loss of such financial (or other) incentives may present an important barrier to stopping selling²⁴ despite not being explicitly reported as a primary motive for continuing to sell.¹²

Apart from the price discounts discussed above, different types of benefits are likely to influence retailer and/or consumer behaviour in different ways, though any benefit supplied to a retailer has the potential to encourage them to promote one brand over another. Such brand switching is not obviously a public health problem if it does not increase total tobacco sales. Company supplied price boards might fall into this category if their only effect were to make some brands more prominent by featuring them higher on the price list.⁹ However, in the absence of point-of-sale display of cigarettes, price lists have been shown to encourage impulse tobacco purchases, and so may be particularly problematic for people who are attempting to quit smoking (who are less likely to have a stock of cigarettes on hand and who are therefore more likely to be prompted to purchase when exposed to the trigger of a price list).²⁵

The provision of incentives and benefits connected to the sale of tobacco to consumers is prohibited within Australian legislation, however, such laws do not explicitly apply to the provision of benefits to tobacco retailers. For example, legislation in each of NSW, Victoria and WA states that 'a person must not, in connection with the sale of a tobacco product or for the purpose of promoting the sale of a tobacco product, supply to any person a prize, gift or other benefit'.^{26–28} However, while such laws could theoretically apply to tobacco retailers, this has not yet been tested in a court of law. To restrict the influence of tobacco companies in the retail environment, the provision of benefits directly to retailers should be explicitly regulated, alongside the current restrictions on the provision of benefits to consumers. Comprehensive provisions addressing these practices could be implemented in a similar way to legislation in the province of Quebec, Canada, which has banned gifts, rebates, gratuities or any other form of benefit to tobacco retailers.²⁹

Strengths and limitations

The study is the first to have analysed tobacco retail incentives from a large sample of retailers in a country with point-of-sale display bans. However, since retailers that sell higher volumes of tobacco would be more likely to receive incentives and benefits from tobacco companies, the exclusion of large volume tobacco retailers, including supermarkets, petrol stations and tobacconists, is likely to have resulted in an underrepresentation of the type and extent of incentives and benefits received by Australian tobacco retailers.

CONCLUSION

Australian tobacco retailers are offered various types of incentives and benefits from tobacco companies, however these benefits are not without strings attached. In exchange for the supply of price lists and cabinets, retailers report giving tobacco companies greater control of the stock and the listing and positioning of brands on the price list. In some cases, incentives and benefits are used to reward retailers for increasing their product knowledge, which, along with the supply of other types of benefits to retailers, is not explicitly prohibited in current Australian tobacco legislation. The retail environment therefore remains a key avenue of tobacco marketing and communication to consumers and merits greater legislative attention.

What this paper adds

- ▶ Little is known about how tobacco companies continue to promote tobacco and increase sales in countries with comprehensive restrictions on the advertising and display of tobacco.
- ▶ The study is the first large-scale systematic analysis of the types of incentives and benefits offered to tobacco retailers, and the reciprocal agreements in place with tobacco companies, following display bans in Australia.
- ▶ Tobacco companies are continuing to market tobacco and influence sales in the retail environment through offers of incentives and benefits to Australian retailers. Such marketing practices are not explicitly prohibited in current legislation in Australia, allowing tobacco companies to continue indirect promotion of brands.

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REFERENCES

- 1 Scollo M, Winstanley M. *Tobacco in Australia: facts and issues*. Melbourne: Cancer Council Victoria, 2018. <http://www.tobaccoinaustralia.org.au/>. (Accessed 15 Mar 2019).
- 2 Chapman S, Byrne F, Carter SM. "Australia is one of the darkest markets in the world": the global importance of Australian tobacco control. *Tob Control* 2003;12:1iii–3.
- 3 Feighery EC, Ribisl KM, Clark PI, et al. How tobacco companies ensure prime placement of their advertising and products in stores: interviews with retailers about tobacco company incentive programmes. *Tob Control* 2003;12:184–8.
- 4 Harper T. Why the tobacco industry fears point of sale display bans. *Tob Control* 2006;15:270–1.
- 5 Lavack AM, Toth G. Tobacco point-of-purchase promotion: examining tobacco industry documents. *Tob Control* 2006;15:377–84.
- 6 Carter SM. New frontier, new power: the retail environment in Australia's dark market. *Tob Control* 2003;12:95iii–101.
- 7 Rooke C, Cheeseman H, Dockrell M, et al. Tobacco point-of-sale displays in England: a snapshot survey of current practices. *Tob Control* 2010;19:279–84.

- 8 Feighery EC, Ribisl KM, Achabal DD, *et al.* Retail trade incentives: how tobacco industry practices compare with those of other industries. *Am J Public Health* 1999;89:1564–6.
- 9 Wakefield M, Zacher M, Scollo M, *et al.* Brand placement on price boards after tobacco display bans: a point-of-sale audit in Melbourne, Australia. *Tob Control* 2012;21:589–92.
- 10 Stead M, Eadie D, Purves RI, *et al.* Tobacco companies' use of retailer incentives after a ban on point-of-sale tobacco displays in Scotland. *Tob Control* 2018;27:414–9.
- 11 Burton S, Ludbrooke M, Williams K, *et al.* To sell or not to sell: cigarette sales in alcohol-licenced premises. *Tob Control* 2018;27:614–21.
- 12 Watts C, Burton S, Phillips F, *et al.* Understanding why some Australian retailers have stopped selling tobacco, some might and some are unlikely. *Tob Control* 2020;28:e62–9. doi:10.1136/tobaccocontrol-2019-055142
- 13 Braun V, Clarke V. Using thematic analysis in psychology. *Qual Res Psychol* 2006;3:77–101.
- 14 Govoni NA. *Dictionary of Marketing communications*. California, USA: Sage Publications, 2004.
- 15 Kotler P, Keller KL. *Marketing management*. 15ed. Boston: Pearson, 2016.
- 16 Bayly M, Scollo M. *10.5 Retailing of tobacco products in Australia. tobacco in Australia: facts and issues*. Melbourne: Cancer Council Victoria, 2019. <https://www.tobaccoaustralia.org.au/chapter-10-tobacco-industry/10-5-retailing-of-tobacco-products-in-australia>. (Accessed 31 Jul 2019).
- 17 Scollo M, Bayly M. *13.2 tobacco taxes in Australia*. Melbourne: Cancer Council Victoria, 2018. <https://www.tobaccoaustralia.org.au/13-2-tobacco-taxes-in-australia>. (Accessed 14 June 2019).
- 18 Australian Taxation Office. Excise rates for tobacco, 2019. Available: <https://www.ato.gov.au/Business/Excise-and-excise-equivalent-goods/Tobacco-excise/Excise-rates-for-tobacco/> [Accessed 14 June 2019].
- 19 Dewhirst T. Price and tobacco marketing strategy: lessons from 'dark' markets and implications for the WHO Framework Convention on Tobacco Control. *Tob Control* 2012;21:519–23.
- 20 Greenland SJ, Johnson L, Seifi S. Tobacco manufacturer brand strategy following plain packaging in Australia: implications for social responsibility and policy. *Social Responsibility J* 2016;12:321–34.
- 21 Scollo M, Zacher M, Coomber K, *et al.* Changes in use of types of tobacco products by pack sizes and price segments, prices paid and consumption following the introduction of plain packaging in Australia. *Tob Control* 2015;24:ii66–75.
- 22 Scutt D. Australian retail sales fall unexpectedly, led by steep declines in NSW and Victoria. *business insider Australia*. Available: <https://www.businessinsider.com.au/australia-retail-sales-economy-gdp-rba-2019-6> [Accessed 31 Jul 2019].
- 23 Chau D. Business conditions fall to six-year low, with retail 'clearly in recession': NAB. ABC News. Available: <https://www.abc.net.au/news/2019-06-11/nab-business-confidence/11198426> [Accessed 31 Jul 2019].
- 24 Conference of the Parties (COP). Guidelines for implementation of article 13 of the who framework convention on tobacco control, 2008. Available: https://www.who.int/fctc/guidelines/article_13.pdf?ua=1 [Accessed 14 June 2019].
- 25 Burton S, Hoek J, Nesbit P, *et al.* "Smoking is bad, it's not cool...yet I'm still doing it": Cues for tobacco consumption in a 'dark' market. *J Bus Res* 2015;68:2067–74.
- 26 Government of New South Wales. Public health (tobacco) act 2008 no 94. Available: <https://www.legislation.nsw.gov.au/#/view/act/2008/94> [Accessed 29 Aug 2019].
- 27 Government of Victoria. Tobacco act, 1987. Available: http://www8.austlii.edu.au/cgi-bin/viewdb/au/legis/vic/consol_act/ta198773/ [Accessed 29 Aug 2019].
- 28 Government of Western Australia, Health Department of Western Australia. Tobacco products control act, 2006. Available: https://www.legislation.wa.gov.au/legislation/statutes.nsf/main_mrtitle_983_homepage.html [Accessed 15 Mar 2019].
- 29 Government of Quebec. Tobacco control act, 2015. Available: <http://legisquebec.gouv.qc.ca/en/showdoc/cs/L-6.2> [Accessed 14 June 2019].

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