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Standing Committee on Environment and Sustainable Development
Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
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Re: Initiatives to Encourage Zero Emission Vehicles Adoption

I. INTRODUCTION

I am pleased to submit this brief to the Standing Committee on Environment and Sustainable Development (the Committee). Briefly, I am an associate professor at the University of Calgary Faculty of Law, where my current research agenda includes climate change law and policy and the role and contributions of Canada's transportation sector in particular. My faculty profile can be found at: <https://law.ucalgary.ca/profiles/olszynski>

By way of this brief, I hope to convince the Committee of the merit of adopting several low cost (to the government) courses of action to increase public awareness about the benefits of Zero Emission Vehicles (ZEVs) as well as of the climate change risks associated with internal combustion engines (ICEs). These include **requiring visible and unambiguous climate change warning labels on ICE vehicles** (especially high-emitting passenger trucks and SUVs), as well as **restrictions on the public advertising of such vehicles**. These recommendations flow from the surprisingly strong similarities between the current challenge of tackling climate change and the previous challenge of tackling tobacco use and tobacco-related disease, as further set out below. They also flow from the inescapable conclusion that, in embarking on their campaigns to produce and market high-emission vehicles without warning consumers about their associated climate risks, **automobile manufacturers appear to have been, and continue to be, in breach of their applicable standard of care**.

My brief is organized as follows. The next part (II) sets out a brief history of tobacco regulation and litigation. Part III draws parallels to the growing wave of climate litigation against the fossil fuel sector and explores the potential liability of the automobile industry.¹ Part IV sets out my recommendations and the studies that support them.

II. A BRIEF HISTORY OF TOBACCO REGULATION AND LITIGATION

¹ This part borrows liberally from Martin Olszynski, Sharon Mascher and Meinhard Doelle, "From Smokes to Smokestacks: Lessons from Tobacco for the Future of Climate Change Liability" (2018) 30:1 Georgetown Env. L. Rev. 1: <https://www.law.georgetown.edu/environmental-law-review/wp-content/uploads/sites/18/2018/05/30-1-From-Smokes-to-Smokestacks-Lessons-from-Tobacco-for-the-Future-of-Climate-Change-Liability.pdf>

At first glance, comparing tobacco products and fossil-fuel products strikes many people as jarring. As an editorial in the Calgary Herald put it a couple of years ago: “[The comparison] doesn’t stand up to even cursory examination. One is a product that is always hazardous to human health when consumed, the other is a staple of the modern world.”²

The reality, of course, is that smoking wasn’t always regarded as hazardous (and is in fact still regarded as having *some* utility by some individuals, as evidenced by continued smoking). Back in the 1950s, cigarettes were ubiquitous, with nearly half of all Americans smoking.³ In stark contrast to current standards and norms, smoking was acceptable in virtually every context and place: in homes and in cars, in schools and in universities, at restaurants and bars, and at places of work (including legislatures).⁴

All of this began to change in 1952. That year, *Readers Digest* published “Cancer by the Carton,” which summarized in plain language the alarming scientific findings of that time: smoking cigarettes increases the risk of cancer. The next two years saw consumption rates drop for the first time, but also brought about the genesis of the tobacco industry’s decades-long campaign to manufacture doubt about the growing scientific evidence linking tobacco consumption to disease.⁵ The Surgeon General of the United States released his first definitive warning in 1964.⁶ **The United States’ Federal Cigarette Labeling and Advertising Act was passed the following year, requiring cigarette packages to have a label saying “Caution: Cigarette Smoking May Be Hazardous to Your Health”, as well as preventing other health warnings on the packages. This warning was updated in the 1969 Public Health Cigarette Smoking Act, which also prohibited advertising on TV and radio.** By the 1970s, several states began to impose restrictions on smoking in public places. Similar bans would be opposed by the tobacco industry as well as ancillary industries (e.g. the service industry) but inevitably followed throughout the United States and the rest of the western world, including in Canada.⁷

Running parallel to these developments were several waves of private litigation by persons suffering from tobacco-related disease – almost all of which were unsuccessful. **The direction and viability of tobacco litigation did not change until the early 1990s when several U.S. states sought to recover not the *private* but rather the *public* healthcare costs associated with tobacco-related disease.** This strategy allowed the

² “Environmental Groups Forget Where Their Pleadings Would Take Us” The Calgary Herald (Editorial) (May 30, 2014), online: <http://calgaryherald.com/opinion/editorials/editorial-environmental-groups-forget-where-their-pleadings-would-take-us>

³ Rabin, Robert L., “A Sociological History of the Tobacco Tort Litigation” (1992) 44 Stanford Law Review 853 at 855 [emphasis added].

⁴ See Luca Paoletti, Bianca Jardin, Matthew Carpenter, Michael K Cummings, & Gerard Silvestri, “Current Status of Tobacco Policy and Control” (2012) 27:4 Journal of Thoracic Imaging 213, online: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3409436/>

⁵ This campaign is well detailed in Oreskes, Naomi & Conway, Erik, *Merchants of Doubt: How a Handful of Scientists Obscured the Truth on Issues from Tobacco Smoke to Climate Warming* (New York: Bloomsbury Press, 2010)

⁶ See United States Department of Health, Education, and Welfare. “Smoking and Health: Report of the Advisory Committee to the Surgeon General of the Public Health Service.” Washington: U.S. Department of Health, Education, and Welfare, Public Health Service, Center for Disease Control; 1964. PHS Publication No. 1103.

⁷ See Neil Collishaw, “History of tobacco control in Canada” (November 2009) Physicians for a Smoke-Free Canada, available online: http://www.smoke-free.ca/pdf_1/2009/history%20of%20tobacco%20control%20in%20canada.pdf,

state plaintiffs to avoid many of the pitfalls encountered by individual plaintiffs, including limited financial resources and difficulties with the applicable legal doctrines. Some states, such as Florida, passed laws to make such actions easier. In the U.S., this legal battle culminated in what is now known as the 1998 Master Settlement Agreement, the terms of which included:

- Approximately US **\$240 billion for the recovery of Medicaid expenses incurred by its nearly fifty signatory States**;
- Significant **restrictions on the advertising of cigarettes**;
- **Creation of a tobacco prevention foundation** and the disbandment of various tobacco-industry initiatives;⁸

In Canada, British Columbia was the first province to follow the states' lead, passing the *Tobacco Damages and Health Care Costs Recovery Act*⁹ in 1997 – legislation which has now been adopted by almost every province. In contrast to the settlement reached in the U.S., however, litigation in Canada is ongoing. The United States federal government also brought its own lawsuit against nine cigarette manufacturers and two tobacco-related trade organizations, alleging that the defendants had and were continuing to violate the *Racketeer Influenced and Corrupt Organizations Act*. Seven years later, in *United States v. Philip Morris USA, Inc et al.*,¹⁰ the government was largely successful in a case that the United States District Court for the District of Columbia described as follows:

[This case] is about an industry, and in particular these Defendants, that survives, and profits, from selling a highly addictive product which causes...an immeasurable amount of human suffering and economic loss, and a profound burden on our national health care system. Defendants have known many of these facts for at least 50 years or more... In short, Defendants have marketed and sold their lethal product with zeal, with deception, with a single-minded focus on their financial success, and without regard for the human tragedy or social costs that success exacted.

As the next part sets out, this framing of knowledge and denial – with supporting evidence – has now been explicitly adopted in the growing wave of climate litigation.

III. FROM SMOKES TO SMOKESTACKS (AND TAILPIPES)

A. The Current Wave of Climate Litigation

In 2017, five California municipalities (San Mateo County, Marin County, and the City of Imperial Beach as a first group, San Francisco and Oakland as a second) filed statements of claim against many of the world's largest oil and gas companies – including Exxon Mobil, Chevron, BP, Shell, and Canada's own Encana – claiming that these companies should be liable for their share of the current and future costs incurred by these municipalities as a result of climate change, and especially those associated with rising

⁸ For more information on the Master Settlement Agreement, see <http://www.publichealthlawcenter.org/topics/tobacco-control/tobacco-control-litigation/master-settlement-agreement>

⁹ SBC 1997, c 41.

¹⁰ 449 F.Supp.2d 1 (D.D.C. 2006).

sea levels.¹¹ Several additional state-based lawsuits have followed suit and are at various stages.¹² Increasingly, and as in the tobacco context, these lawsuits allege knowledge of the risks of climate change and a failure to warn consumers:

Defendants, major corporate members of the fossil fuel industry, have known for nearly a half century that unrestricted production and use of their fossil fuel products create greenhouse gas pollution that warms the planet and changes our climate... They have nevertheless engaged in a coordinated, multi-front effort to conceal and deny their own knowledge of those threats, discredit the growing body of publicly available scientific evidence, and persistently create doubt in the minds of customers, consumers, regulators, the media, journalists, teachers, and the public about the reality and consequences of the impacts of their fossil fuel pollution. At the same time, Defendants have promoted and profited from a massive increase in the extraction and consumption of oil...¹³

Based on recent media reports, this same narrative appears to be equally applicable to the automotive sector:

Scientists at two of America's biggest automakers knew as early as the 1960s that car emissions caused climate change... But in the following decades, both manufacturers largely failed to act on the knowledge that their products were heating the planet. **Instead of shifting their business models away from fossil fuels, the companies invested heavily in gas-guzzling trucks and SUVs.** At the same time, the two carmakers privately donated hundreds of thousands of dollars to groups that cast doubt on the scientific consensus on global warming.¹⁴

B. The Automotive Sector's Contribution to Canada's Emissions

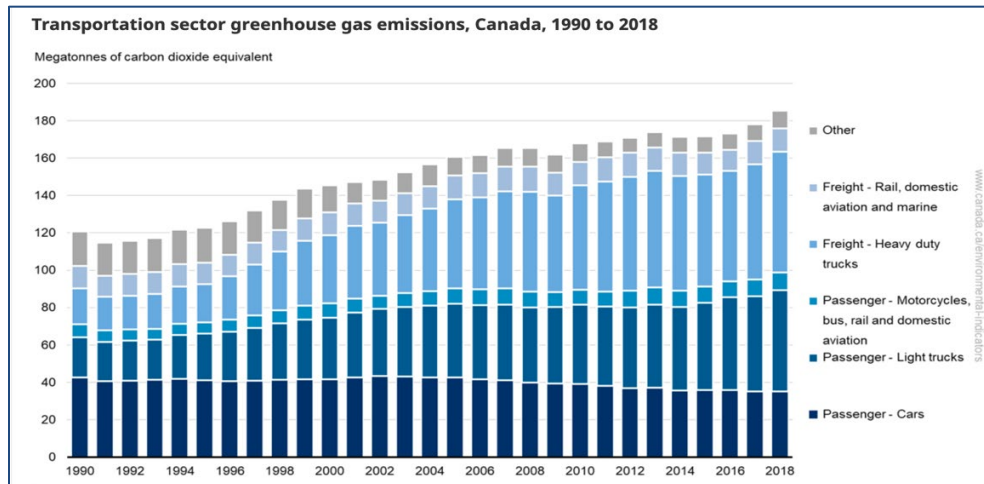
According to Environment and Climate Change Canada's (ECCC) [most recent assessment \(2020\)](#), the transportation sector is responsible for 25% of Canada's emissions. Of course, the sector is not homogenous but rather consists of freight (air and truck), personal travel (aviation, bus, and rail) and personal vehicles, which are further divided between passenger light trucks and passenger cars:

¹¹ For more details on this litigation, see Martin Olszynski "In the Growing Wave of Climate Litigation, Could the Automobile Industry be Next?" (13 October, 2017), online: ABLawg, http://ablawg.ca/wp-content/uploads/2017/10/Blog_MO_Climate_Litigation.pdf

¹² The Sabin Centre for Climate Change Law at Columbia University tracks all climate change litigation in the United States and internationally: <http://climatecasechart.com/>

¹³ *County of San Mateo v Chevron Corp.*, Docket number(s): 3:17-cv-04929-MEJ

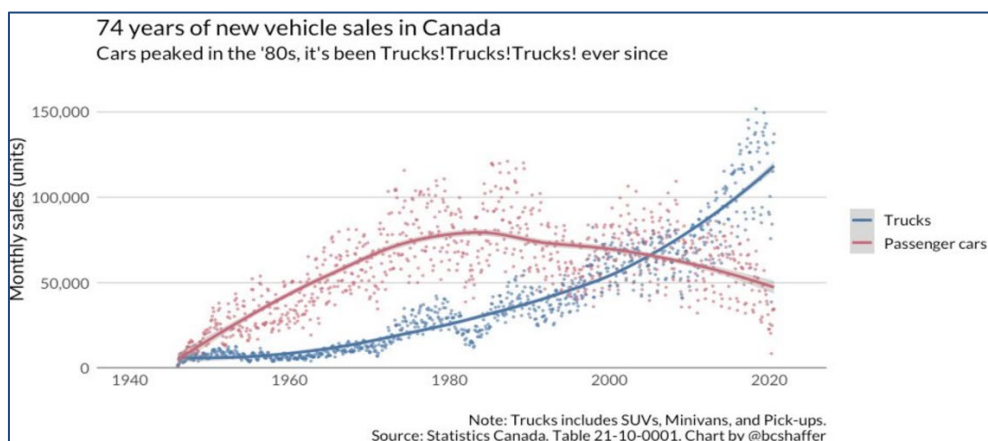
¹⁴ Maxine Joselow, "GM, Ford knew about climate change 50 years ago" (October 26, 2020) <https://www.eenews.net/stories/1063717035>



Setting aside for the time being the significant increase in emissions from freight trucks, the surprising reality is that emissions from passenger cars have actually decreased but emissions from passenger light trucks have significantly increased. According to ECCC,

Between 1990 and 2018, part of the GHG emissions increase was due to a higher number of vehicles on the road and to changes in vehicle type used. Although total emissions from passenger transportation grew by 39%, emissions from cars declined by 17%, while emissions from light trucks (including trucks, vans and sport utility vehicles) more than doubled.

University of Calgary economics professor Blake Shaffer has recently compiled the data for new vehicle sales in Canada over the past 70 years (figure below).¹⁵ While passenger car class vehicles appear to have peaked in the 1980s, sales of SUVs and trucks began to accelerate in the past decade. Between 2000-10, truck sales accounted for less than 50% of all vehicle sales (hovering around 47%), overtaking passenger car sales in 2014 and now accounting for 56% of all sales (2019). **Assuming that passenger truck sales had remained at 47% and assuming average emissions of 8L/100km for passenger cars and 12L/100km for passenger trucks, Canada's automotive sector would have emitted roughly 18 MT less GHG emissions over the past decade.**



¹⁵ Available online: <https://twitter.com/bcshaffer/status/1321187067796221952?s=20>

In other words, in **the decades during which scientific understanding of climate change advanced significantly, Canadian automobile manufacturers embarked on a campaign to produce and sell more and more emissions-intensive vehicles.** It is untenable, in this context, for the sector to claim that it was merely satisfying consumer demand and that it “can’t control consumer tastes.”¹⁶ The top five manufacturers (General Motors, Ford, Toyota, Fiat Chrysler and Honda) spent roughly \$10 billion on advertising in 2019.¹⁷ That is an inordinate amount of money to spend on something that the industry claims to not be able to control.

C. Did Automobile Manufacturers Breach their Standard of Care?

Canadian automobile manufacturers’ behavior appears to be negligent, amounting to a breach of the standard of care applicable to automobile manufacturers. Under Canadian tort law, that standard is informed first and foremost by an assessment of “reasonably foreseeable risks.” **It was entirely foreseeable, by at least the turn of the 21st century (and likely earlier), that the increased production and marketing of passenger trucks and SUVs would lead to higher cumulative emissions and a consequent increased risk of anthropogenic climate change.** At the very least, automobile manufacturers had a **duty to warn** consumers about these risks at the point of sale.¹⁸

It is not sufficient for the industry to fall back on compliance with applicable regulatory standards, e.g. the *Passenger Automobile and Light Truck Greenhouse Gas Emission Regulations*, [SOR/2010-201](#). While relevant, mere compliance with regulatory standards is not determinative of the sector’s standard of care and potential liability in negligence. The most authoritative statement on this front is the Supreme Court of Canada’s decision in *Ryan v Victoria (City)*, [1999] 1 SCR 201, [1999 CanLII 706 \(SCC\)](#) at paras 28-9:

[28] Conduct is negligent if it creates an objectively unreasonable risk of harm. To avoid liability, a person must exercise the standard of care that would be expected of an ordinary, reasonable and prudent person in the same circumstances. The measure of what is reasonable depends on the facts of each case, including the likelihood of a known or foreseeable harm, the gravity of that harm, and the burden or cost which would be incurred to prevent the injury. In addition, one may look to external indicators of reasonable conduct, such as custom, industry practice, and statutory or regulatory standards.

[29] **Legislative standards are relevant to the common law standard of care, but the two are not necessarily co-extensive.** The fact that a statute prescribes or prohibits certain activities may constitute evidence of reasonable conduct in a given situation, but it does not extinguish the underlying obligation of reasonableness... **By the same token, mere**

¹⁶ Greg Keenan, Shawn McCarthy, “Ottawa crafting plan to boost use of zero-emission vehicles” *The Globe and Mail* (May 26, 2017), online: <https://www.theglobeandmail.com/report-on-business/ottawa-crafting-plan-to-boost-use-of-zero-emission-vehicles/article35121541/>

¹⁷ See <https://www.statista.com/statistics/261767/advertising-spending-of-selected-automobile-manufacturers-in-the-us/#statisticContainer>.

¹⁸ Linden, Klar, Feldthusen, *Canadian Tort Law: Cases and Materials*, 14th ed, at 499.

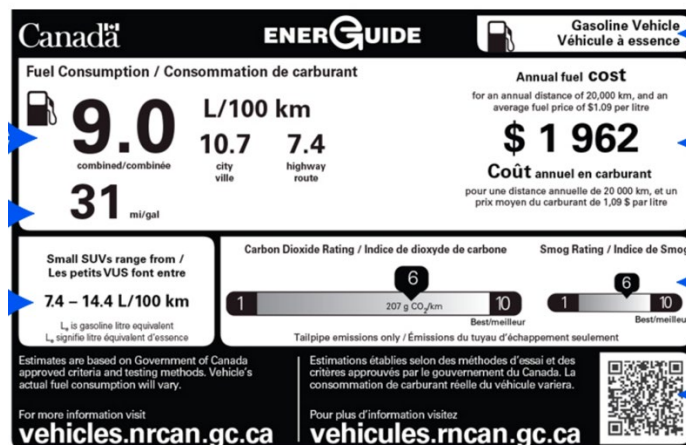
compliance with a statute does not, in and of itself, preclude a finding of civil liability...

This Committee hearing is obviously not the venue for determining matters of civil liability – these are very likely to eventually be settled in a court of law.¹⁹ Rather, the foregoing discussion is intended first and foremost to provide the context necessary to understand my recommendations to the Committee.

IV. RECOMMENDATIONS

1. Adoption of climate change warning labels on ICE vehicles

Canada is a laggard when it comes to emissions labels.²⁰ Of eighteen jurisdictions surveyed in 2015, Canada was one of just three (bottom 20%) whose emission labelling program was voluntary²¹ and adherence to which has been cast in doubt.²² In addition, at this juncture in time, mere emissions labelling is likely a much too nuanced way of conveying the climate implications of purchasing high-emitting ICE vehicles.



Labelling should immediately become mandatory pursuant to Canada's [Energy Efficiency Regulations](#), which are administered by Natural Resources Canada (NRCan). **Labels should also be made clearer in terms of the associated climate risks.** Labels could vary based on categories of emissions vehicles (e.g. red for high emission, yellow for medium emission, and green for low emission vehicles) and could be applied to all vehicles or only new vehicles. The key would be to move beyond bland statements about

¹⁹ California has already once initiated a climate change lawsuit against automobile manufacturers, but it was discontinued with the passage of the Obama-era tailpipe regulations; see *California v. General Motors Corp* (2006), Docket No. 07-16908, 9th Cir.

²⁰ Canada's *Energy Efficiency Act* and [Energy Efficiency Regulations](#), administered by Natural Resources Canada (NRCan), do not require emissions labelling for new vehicles.

²¹ Asia-Pacific Economic Cooperation Energy Working Group, "A Review and Evaluation of Vehicle Fuel Efficiency Labeling and Consumer Information Programs" (2015): <http://www.theicct.org/sites/default/files/publications/VFEL%20paper%20ICCT%20for%20APEC%20-%202012%20Nov%202015%20FINAL.pdf>

²² See <https://www.theglobeandmail.com/report-on-business/many-car-dealers-not-using-fuel-efficiency-labels-report-says/article12023150/>

fuel efficiency and link emissions to climate change impacts. This recommendation is based on a review of the research on the effectiveness of warning labels in the tobacco and vehicle emissions context (see Appendix A to this brief).

2. Restrictions on the public advertising of ICE automobiles

This Committee should consider bans on “lifestyle” advertising of passenger trucks and SUVs, as well as restrictions on sponsorship advertising.²³ Such restrictions would fall under the federal government’s jurisdiction on the same basis that restrictions on tobacco advertising do.²⁴

Under Canada’s *Tobacco Act*, “Lifestyle advertising” is defined in subsection 22(4) as “advertising that associates a product with, or evokes a positive or negative emotion about or image of, a way of life such as one that includes glamour, recreation, excitement, vitality, risk or daring”. Much of the advertising associated with trucks and SUVs appears to fall within this category, the message being that the purchase of such vehicles will transform the consumer into an active, outdoor-type of person, with no accompanying indication of the climate change impacts that are likely to result from their widespread adoption. I am currently undertaking research into automobile advertising trends in Canada over the past twenty years and would be pleased to share the results with the Committee upon completion.

V. CONCLUSION

As alluded to at the outset of Part II, some parts of this brief may strike members of this Committee as jarring. In my view, however, it is more jarring that in 2020 Canada still does not require emissions labels on ICE vehicles. It is also more jarring, in my view, that the automotive sector embarked on a campaign of mass production and promotion of passenger trucks and SUVs at precisely the time when scientific knowledge and understanding of the risks of anthropogenic climate change became conclusive.²⁵ The consequences of this decision are not trivial: they amount to **almost 20 MT of additional GHG emissions in the past decade** from the automotive sector alone – roughly equivalent to **all of Prince Edward Islands’ emissions over the same period**.²⁶

Thank you for your time and consideration,

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²³ Such restrictions have already been proposed by some groups in the UK; see https://www.theguardian.com/environment/2020/aug/03/ban-suv-adverts-to-meet-uk-climate-goals-report-urges?CMP=Share_AndroidApp_Other

²⁴ *Canada (Attorney General) v. JTI-Macdonald Corp.*, [2007] 2 S.C.R. 610).

²⁵ See e.g. IPCC, 2007: *Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Core Writing Team, Pachauri, R.K and Reisinger, A. (eds.)]. IPCC, Geneva, Switzerland, 104 pp, online: <https://www.ipcc.ch/report/ar4/syr/>

²⁶ See <https://www.canada.ca/en/environment-climate-change/services/climate-change/greenhouse-gas-emissions/sources-sinks-executive-summary-2020.html#toc3>

APPENDIX A: RESEARCH ON THE EFFECTIVENESS OF WARNING LABELS

Overall, research suggests that **graphic labels are more effective than text-only warnings, and larger and more comprehensive warnings are also more effective.**

1) David Hammond et al., “Graphic Canadian Cigarette Warning Labels and Adverse Outcomes: Evidence from Canadian Smokers”, (2004) 94:8 Am J Public Health 1442 (online: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1448469/?tool=pmcentrez>)

- Focused on the relatively graphic Canadian warning labels on cigarette packages;
- Found such labels to be effective in that they created negative emotional responses, which lead smokers to be more likely to quit or reduce smoking later.

2) Xioquan Zhao et al., “Cigarette warning labels: graphics, framing, and identity” (2014) 114:2 Health Education 101 (online: <https://doi.org/10.1108/HE-06-2013-0024>)

- Examined the effects of warning labels (both text-only or text and graphic labels);
- Labels were set up to highlight either the negative consequences of smoking or the positive benefits from not smoking;
- Most effective labels are graphic warnings that focus on negative health effects;

3) Marc C Willemsen, “The new EU cigarette health warnings benefit smokers who want to quit the habit: results from the Dutch Continuous Survey of Smoking Habits” (2005) 15:4 Eur J Public Health 389 (online: <https://doi.org/10.1093/eurpub/cki061>)

- Concluded that new warnings made cigarettes less attractive and were especially beneficial to smokers who intended to stop smoking already;
- Smokers became less inclined to purchase cigarettes, preferred to purchase a pack without the warnings, smoked less, and increased their motivation to quit;
- Smokers who didn’t intend to quit reacted defensively and claimed to be less motivated

There has also been some research on the effectiveness of car labels:

1) Gary Haq & Martin Weiss, “CO2 labelling of passenger cars in Europe: Status, challenges, and future prospects” (2016) 95 Energy Policy 324. <https://doi.org/10.1016/j.enpol.2016.04.043>

- Focuses on the European Union directive that requires labels on vehicles;

Area	Recommendation
Implementation	<ul style="list-style-type: none"> • Member States should be obliged to implement a graphic and coloured label (complementing information on fuel consumption and CO₂ emissions). • The feasibility to extend car labelling to second-hand cars should be investigated.
Design	<ul style="list-style-type: none"> • One standardized label design should be introduced, mirroring the EU energy label. • The dimensions of the graphic label and the font size of the information displayed should be increased.
Placement	<ul style="list-style-type: none"> • Labels should be placed at prominent and pre-defined places on the car, in the car show room, and in any online or printed materials should be considered.
Labelling metric	<ul style="list-style-type: none"> • The distance-specific fuel consumption and CO₂ emissions presented on the label should match those experienced by the average consumer; the introduction of the WLTC marks an important step towards achieving this objective. • If applicable, the introduction of generic correction factors or the use of on-road emissions data obtained from RDE testing could be considered for the purpose of car labelling. • A pre-defined schedule for redefining the labelling classification to differentiate vehicles that emit between zero and 100 g CO₂/km should be agreed upon. To do so would accommodate novel powertrain technologies in the car label. • If vehicle utility is to be considered by the labeling metric, the actual utility parameter should be chosen with care to avoid perverse incentives; additional analyses are warranted.
Labelling scale	<ul style="list-style-type: none"> • A 7-scale labelling denoted by the letters A-G should be implemented uniformly. • The rating of cars should be updated regularly. • The introduction of ‘A+’ or ‘A++’ categories denoting high efficiency should be avoided.
Auxiliary information	<ul style="list-style-type: none"> • Fuel costs should be presented based on a well-known and easily scalable metric (e.g., EUR per 10,000 km). • The presentation of distance-specific electricity consumption, information on well-to-wheel emissions, and emissions of pollutants should be considered.
Monitoring	<ul style="list-style-type: none"> • Mandatory and regular monitoring of the effectiveness of car labelling and exchange of information among Member States should be supported.

There is also research on the effectiveness of restrictions on the marketing of various products, including tobacco. Overall, this research suggests that restrictions can be helpful. However, partial restrictions such as restrictions in place only at limited times or on certain types of media were not effective.

1) Karin A Kasza et al, "The Effectiveness of Tobacco Marketing Regulations on Reducing Smokers' Exposure to Advertising and Promotion: Findings from the International Tobacco Control (ITC) Four Country Survey" (2011) 8:2 Int J Environ Res Public Health 321. (online: doi:[10.3390/ijerph8020321](https://doi.org/10.3390/ijerph8020321))

- Marketing regulations (i.e. restrictions) for tobacco products results in reductions in participants' awareness of tobacco marketing.
- However, in store advertisements and special prices were shown to be problematic in bringing smokers' attention to the tobacco products, which restrictions did not cover;

2) Henry Saffer & Frank Chaloupka, "The effect of tobacco advertising bans on tobacco consumption". (2000) 19:6 Journal of Health Economics 1117.

[https://doi.org/10.1016/S0167-6296\(00\)00054-0](https://doi.org/10.1016/S0167-6296(00)00054-0)

- "The primary conclusion of this research is that tobacco advertising increases tobacco consumption. The empirical evidence also shows that comprehensive advertising bans can reduce tobacco consumption, but that a limited set of advertising bans will have little or no effect." (at p. 1134)

3) F Harris et al., "Effects of the 2003 advertising/promotion ban in the United Kingdom on awareness of tobacco marketing: findings from the International Tobacco Control (ITC) Four Country Survey". (2006) 15:iii Tobacco Control 26.

http://tobaccocontrol.bmj.com/content/15/suppl_3/iii26

- This study compared the awareness of adult smokers in the UK to Canada, the US, and Australia. The survey found that tobacco promotion awareness decreased substantially after the advertising ban was put into effect. The authors suggest that the findings of this survey support the idea that comprehensive bans on advertising and promotion of tobacco products are effective in reducing smoking.