



Model Conflict of Interest Policy Framework to Protect Scientific Integrity in Tobacco Use Prevention and Control Science

This document provides a framework for creating thoughtful and effective conflict-of-interest (COI) policies to protect scientific integrity for tobacco reduction and prevention by ensuring work is free from tobacco industry influence. It presents recommendations, questions and model language for organizations to consider as they create or revise their conflict-of-interest policies. The elements in this framework are meant to be flexible and used within the context of an organization's specific mission, culture, legal parameters, operations and goals without dictating exact approaches.

Background

For decades tobacco companies have used strategies to influence science for their own gain and to cast doubt on the risks of their products. (1) The industry (including the nicotine and vape industry) have created “foundations,” distributed grants, published papers, joined scientific organizations and presented at conferences. Much of the content and results of these scientific forays have been shown to be biased, flawed and dishonest (2,3) yet are often repeatedly cited (intentionally or unintentionally) to advance the interests of the tobacco industry. (3)

To address the erosion of tobacco-related public health science, a Scientific Integrity Steering Committee was formed in 2021 with prominent public health scientists and experts to identify ways to advance science free from tobacco industry influence. Because of the varied and relentless attempts by the industry to influence science for their own gain, the Steering Committee focused on helping organizations create or strengthen their COI policies to prevent industry influence in scientific journals and organizations.

To accomplish this, the Steering Committee took the following steps.

1. Defined the problem

Eroding integrity in tobacco-related science caused by tobacco industry involvement and insufficient COIs, management and resolution of conflicts to prevent tobacco industry involvement.

2. Identified a solution

Adopt and enforce stronger COI policies at key public health journals and organizations to prevent the tobacco industry and its agents from eroding and influencing science for their own gain.

3. **Created and promoted a model framework**

Develop a model COI framework to help organizations create effective policies that prevent the tobacco industry and its agents from publishing, presenting or joining scientific organizations. Share the framework with key scientific organizations and stakeholders.

Creating a Strong COI Policy

Organizations should consider these steps and questions when creating and managing a COI policy to ensure work is free from tobacco industry influence.

1. **Set up the team and process.** Who should be involved in creating this policy for your organization? For example, leadership, board members, staff, counsel, stakeholders outside of the organization, others? What steps should be taken in the process? What is the timeline?
2. **Determine the goal of the policy.** What is the goal of the policy? What do you want it to accomplish? Be specific. For example: *Adopt and implement a strong COI policy to prevent the tobacco industry and its agents from publishing, presenting and becoming members of our organization to advance their own interests.*
3. **Define key terms in the policy.** For example, define the term “tobacco industry.” See the model policy in the example below for a definition.
4. **Develop communication and implementation plans for the policy.** When will the policy go into effect? How will it be communicated to staff and stakeholders? Are staff members clear about what role they have in implementing, communicating or enforcing the policy? Does leadership and the board know what their role is in operationalizing the policy and resolving appeals or conflicts about the policy? Who is responsible for the consistent management and resolution of conflicts in adherence to the policy? Are all departments aware of the policy and how they need to incorporate it?
5. **Prepare for concerns and questions.** Anticipate questions from internal and external stakeholders and prepare responses accordingly. Examples of questions include: Tobacco industry data may be valuable – why shouldn’t the field have access to it? Vapes may help some people quit – we need to study that. If we exclude the tobacco industry, aren’t other industries next? You are practicing censorship – shouldn’t readers be allowed to judge these publications? Historically journals have relied on transparency of authors - isn’t being transparent through disclosure sufficient?
6. **Consider other factors.**
 - Consider solutions that work globally, not just for the U.S. market.
 - Consider what to do about related areas – such as cannabis.
 - Clearly distinguish between recreational/commercial and sacred/ceremonial use.
 - Define a timeframe for disclosure – e.g. have you received money or personal remuneration from the tobacco/nicotine industry or its consultants, agents or related organizations in the past 5 years?

7. **Evaluate the policy.** How will you know the policy is working? Can you test the policy? When will you review the policy with your team and determine if revisions are needed?

The following pages highlight BMJ's policy as a model for other organizations to consider. Some of BMJ's journals such as *Tobacco Control* have had policies excluding the tobacco industry from publishing since 2013. However, BMJ recently updated this policy and expanded it to all its publications. The language and the accompanying materials on their website, serves as an excellent model for others to follow.

Model Policy from BMJ

[Tobacco industry funding policy - BMJ Author Hub](#)

BMJ journals publish content which is free from financial ties to the tobacco industry. The principle of excluding content funded by the tobacco industry applies to all content. This is to avoid our journals being used in the service of industry to downplay the harms of tobacco and related products such as vapes.

Consequently, BMJ Journals exclude work funded wholly or partly by the tobacco industry. They also exclude work where the authors have personal financial ties with the tobacco industry. On occasion, editors may decide to make an exception such as to publish an opinion article from an individual who has worked in the tobacco industry. Judgement in some cases will be difficult.

The tobacco industry

Broadly the tobacco industry includes those organisations that are engaged in the growth, preparation for sale, shipment, advertisement, distribution and sales of tobacco and tobacco-related products such as e-cigarettes, vapes or smokeless tobacco. It includes any subsidiary, holding company or affiliate of the same and organisations supported by industry. An exception is general retail outlets, such as supermarkets.

There is variation in definition of the tobacco industry, the industry and its products change over time, and some products such as nicotine vapes may be used for harm minimisation. If in doubt about whether an organisation or product is part of the tobacco industry, or related to it, it should be declared for the editor to consider whether it is relevant for the purposes of BMJ's policy.

How industry support is determined in journal content

Project funding

When uploading their content for consideration, the submitting author is asked to indicate whether their work was funded wholly or in part by the tobacco industry or tobacco-related subsidiary companies or organisations. Authors should also include information about funding for the work in the funding statement embedded in the content.

Personal financial interests

When uploading their content for consideration, submitting authors are also asked whether one or more authors had/has financial interests with tobacco companies or tobacco-related subsidiary companies or organisations, in line with ICMJE declarations of personal interests. In

addition, editors inspect ICMJE forms of authors for work that investigates or discusses smoking-related behaviours or diseases or harms of products produced by the tobacco industry.

If in doubt about whether an interest is or could be perceived to be related to the tobacco industry, it should be declared for the editor to consider.

Other considerations

Where post-publication concerns are raised about undeclared, partly declared, or unclear ties to the tobacco industry, and these are sufficiently substantiated, the journal will consider retracting the content because pre-publication knowledge of this project or personal funding would likely have led us to decline to publish the content.

For content linked to research projects, the policy applies to all publications from the project such as protocols as well as to full research manuscripts.

In the event that an organisation becomes supported by the industry during the course of the work, this policy will typically apply to content which has not yet been accepted for publication at the time that the acquisition or support begins.

This policy was created in 2013. In 2024, it was revised to develop and broaden the content included in the policy, include personal financial interests and to include more BMJ journals to adopt the policy.

Citations

1. Legg T, Hatchard J, Gilmore AB. The Science for Profit Model— How and why corporations influence science and the use of science in policy and practice. *PLOS ONE*. 2021;16:e0253272. doi: [10.1371/journal.pone.0253272](https://doi.org/10.1371/journal.pone.0253272)
2. Legg T, Legendre M, Gilmore AB. Paying lip service to publication ethics: scientific publishing practices and the Foundation for a Smoke-Free World. *Tobacco Control*. 2021;30:e65–72. doi: [10.1136/tobaccocontrol-2020-056003](https://doi.org/10.1136/tobaccocontrol-2020-056003)
3. Soule EK, Rossheim ME, Livingston MD, *et al*. Hidden flaws in e-cigarette industry-funded studies. *Tobacco Control*. Published Online First: 11 June 2024. doi: [10.1136/tc-2024-058609](https://doi.org/10.1136/tc-2024-058609)