CHAPTER

11

Tobacco Control in Comparative Perspective: Eight Nations in Search of an Explanation

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Since the 1960s, governments in economically advanced democratic nations have significantly increased their regulatory control over tobacco. The prevalence of cigarette smoking, as the chapters in this book demonstrate, has diminished in these countries. Factors other than government policy—especially shifts in social norms—have influenced that decline, but those norms have themselves been directly and indirectly influenced by government policies. In short, tobacco consumption has become, in part, a political outcome. Governments have been sites of great conflict over the use of tobacco.

Reflecting on the experience of these eight nations, we are struck by important similarities and differences in the politics of tobacco control. Given the rich national histories presented in this volume, what value do we hope to add by our comparative analysis? Identifying the variation in government control policies is our starting point. Doing so requires us to clarify how we characterize the tobacco policies of particular countries and how we explain why they vary. Government policy is a relatively large and unwieldy subject of analysis, difficult to measure and to compare. In this respect, comparative tobacco-policy analysis is analogous to other forms of cross-national research on public policy, raising a number of long-standing debates within political science and sociology about the advantages and disadvantages of case study, structured comparison, and statistical methods.[1]

There are solid grounds for believing that the contemporary efforts of industrial democracies to control smoking reflect some common

causes and, as a consequence, similar control policies. After all, the scientific evidence about the effects of smoking has substantiated long-standing, widespread health concerns about tobacco. Moreover, the international dissemination of scientific knowledge has undeniably helped to legitimate reform efforts across the nations whose experiences constitute the focus of this book. In addition, the chapters of this book show that by the end of the twentieth century, diverse modern democracies had come to use very similar instruments in the effort to discourage smoking in their populations. Available to the advanced industrialized democracies at least from the late 1950s, widely published information emerged in summary form in the U.S. surgeon general's report of 1964 (British and Canadian counterparts were published earlier). By the 1960s, elites in all the industrial democracies had substantial information about, and overwhelming scientific support for, claims that tobacco use harmed their citizens generally and was a major contributor to lung cancer and heart disease. Moreover, since health expenditures claimed a large share of the national budgets of all the countries considered in this book, the costs of treating tobacco-related diseases were (and are) plain to informed health policy actors. Concerns about the costs of smoking-related illness thus provided another common source of pressure to reduce tobacco consumption. Of course, state revenues from taxation on tobacco have provided a countervailing force—since budget officials gained revenues from the consumption of tobacco.[2]

Policymakers from this set of countries, these chapters demonstrate, have faced a relatively common and well-understood menu of possible control policies. In Australia, Canada, Denmark, France, Germany, Japan, the United Kingdom, and the United States, tobacco products are taxed above and beyond ordinary taxation on most goods. In every one of these countries, government policy makes some effort to limit tobacco-company advertising, to control tobacco sales and distribution, and to apply warning labels on cigarettes and other tobacco products in order to prevent or limit the use of tobacco. In all of these countries, paternalistic constraints on sales to nonadults have long been regarded as consistent with liberal democratic values. Moreover, certain public places came to be protected by every government as smoke-free zones. Airlines are now the most commonly restricted site, as Allan Brandt's chapter emphasizes. But the range of restricted sites varies from hospitals (common) to workplaces (increasingly common) to public parks (rare). The last two decades of the twentieth century, as these chapters illustrate, were years of convergence in the tobacco-control agendas not only of these eight nations but of all the industrial democracies.

The chapters of this book illustrate these similarities, and this convergence of policy calls for explanation. Indeed, one of the most important

findings of this comparative study is the active and successful dissemination of evidence, argument, and program examples across the borders of quite different nations. Identifying the reasons for convergence in these respects is a task that we address in parts. Our central goal, however, is to address differences in the pace and paths taken in the tobacco-control efforts of the eight countries investigated.

It is much less clear exactly how to represent and interpret the magnitude of those comparative differences. Each of the eight countries, from the perspective of detailed policies and practices, employs what could be considered a unique configuration of tobacco controls. The "thick descriptions" of the individual country portraits well illustrate the varied approaches. They provide illuminating accounts of who did what to whom and when, with no two countries following precisely the same "script." So, for instance, it is obvious that Denmark came to rely on heavy tobacco taxes long before Canada and the United States, and did so less in order to control use than to increase tax revenues. Likewise, the modest French efforts to control where smoking is permitted show how much more vigorous such constraints now are in Australia, Canada, and the United States. When we turn to the intensity of implementation, the differences appear to be matters more of degree than of kind. Nonetheless, there is a serious problem in characterizing the level of implemented controls, and explaining why varied patterns of control may have emerged across the advanced, industrialized countries.

One way of thinking about such national differences is to raise the following hypothetical question. If a foreign visitor, innocent of the prevailing national norms and customs, were to travel to each of these countries and wanted to smoke, how would that person's experiences vary in terms of government prohibitions and controls? If we had a common measure of restriction, we would be better able to arrange the nations on a spectrum of tobacco-control intensity. With a more refined comparative measure of control, we would be able to more precisely analyze similarities and differences in the regulation of smoking in particular settings, whether bars, hospital waiting rooms, public parks, or public libraries. We have earnestly grappled, however, with how to understand the individual country portraits—accounts that embrace both idiosyncratic and common features. Crafting credible generalizations from the national portraits requires some simplification. With broad strokes, we seek to describe *tobacco-control regimes*, by which we mean the aggregated set of policies and practices that governments use to control tobacco.

Our further aim is to identify the extent to which these differences in tobacco-control regimes are predictable or unexpected from the perspective of well-known political, economic, and institutional features of these coun-

tries. For our purposes, the historical characterizations of tobacco control introduce more complexity than we can handle for our cross-national comparison. We therefore focus on explaining patterns of cross-national variation in tobacco-control regimes at the end of the twentieth century, and do not attempt to account for patterns of continuity and change within the respective country histories. Even this more modest task is neither straightforward nor easy. Detailed, "thick" descriptions of national control policies are not easily compared or explained.[3] Precisely because these country histories avoid simplistic characterizations of national policies, grouping countries into clusters that suggest explanatory patterns is a significant challenge. So, for example, legal traditions (common law versus civil code) do not seem to illuminate these policy histories. Nor does an easy division between Catholic and Protestant nations—and our sample was suitable for testing that hypothesis. Taking into account the structure and dynamics of states with unitary, rather than federal, political institutions proved a more promising approach, as Constance Nathanson has argued in a probing essay on comparative tobacco politics.[4] The respective tobacco-control regimes emerge as largely consistent with broader public attitudes about the importance of health and "well-being," but we have less confidence about whether such attitudes influence the development of control legislation, or if the direction of causation is reversed.

Variation in Tobacco-Control Regimes

We can begin to understand the range of variation in tobacco-control regimes by considering five logically possible outcomes:

Hands-off tobacco regimes. Governments in these countries have no policies restricting tobacco use or distribution, and any taxation associated with tobacco is indistinguishable from taxes on other products.

Low-control regimes. Such countries are defined by minimal efforts to control the use of tobacco. Policies to make the public aware of the dangers of smoking and to prevent minors from having easy access to cigarettes characterize such regimes. Tobacco taxes are low in these regimes.

Moderate-control regimes. These countries are defined by a significant set of tobacco-control policies across the broad spectrum of policy targets, including the promotion, distribution, and consumption of tobacco. What differentiates moderate- from high-control regimes is the degree of restrictiveness: the enforcement of some or all of the control policies may be more lax in the moderate regimes; taxation

may not be particularly high; and restrictions on tobacco may be more measured.

High-control regimes. These countries are characterized by high levels of taxation on tobacco products and by across-the-board policies that tightly restrict the promotion and consumption of tobacco.

Prohibitionist regimes. Tobacco use is banned completely, and people are seriously punished for selling or consuming tobacco.

In practice, none of the countries investigated in this book is an example of either of the two extremes. The eight nations vary across the range of what we have described as low to high control. To classify the countries by degree of policy restraint, we distinguish sharply between taxation and other forms of tobacco control. One reason for doing so concerns the countervailing fiscal imperative of tobacco taxation. After all, for much of the history of tobacco use, governments regarded tobacco taxation exclusively as a means of generating revenue, not as an instrument of health promotion. It makes sense, then, to separate taxation levels from the other types of restrictions placed on the tobacco industry and cigarette consumers. The problem is not that taxation levels are less important in influencing smoking behavior. In fact, the scientific consensus is that the price elasticity of tobacco consumption is relatively high.[5] Rather, the problem is that taxation is a more complex policy matter than, for example, regulating where smoking is permitted. With taxation, finance and health ministries can agree on higher prices for opposite reasons: increasing revenues in the first instance and reducing smoking in the second. Whether this tax measure correlates well with regulatory restrictions is something to be discovered rather than assumed. And as we have discovered, there is room for doubt.

In the case of taxation, it is relatively easy to compare the tax that each country levied per pack of cigarettes during any given time period. We gathered data from the World Bank Economics of Tobacco Control Project, which reported cigarette taxes per pack for 1995 in U.S. dollars. In 1995, the average taxes for the eight countries were $2.43 per pack, and ranged from a low of $.58 per pack in the United States to a high of $4.38 per pack in Denmark.[6]

In examining the results in Figure 11.1, we found ourselves wondering whether in trying to control tobacco consumption, countries use tax and nontax policy instruments in tandem. As it turns out, there is clearly some correlation between these two components of tobacco-control regimes as we have defined them. But the connection is quite mixed, with Canada and the United States providing contradictory evidence. Tax competition under federalism may well be part of the explanation for the low level of tobacco

taxation in the United States; the fear is that wide variations in tax levels among states would encourage smuggling. But Canada's federal regime provides evidence of high national levels of taxation along with significant variations in provincial taxes. The instability of the high-tax Canadian regime may well make the North American experience less problematic, but we are still left with the puzzle of the Australian federal example of very high tax levels as shown in Figure 11.1.

There is clearly a strong relationship between levels of tobacco taxation and overall levels of taxation in the countries studied. Although a cohort of eight countries is not a powerful sample for statistical analysis, the correlation coefficient estimating the relationship between tobacco taxes per pack and the ratio of central state taxation to gross domestic product is .67—implying that almost 50 percent of the variance in tobacco taxes can be explained by the country's tax regime. (If taxes from all levels of government are included, the statistical relationship is weaker.) Of course, there are several possible causal explanations for this correlation. One hypothesis is that in high-tax countries, it is easier to pass high taxes of any kind. A second is that levels of taxation reflect the size and authority of the state

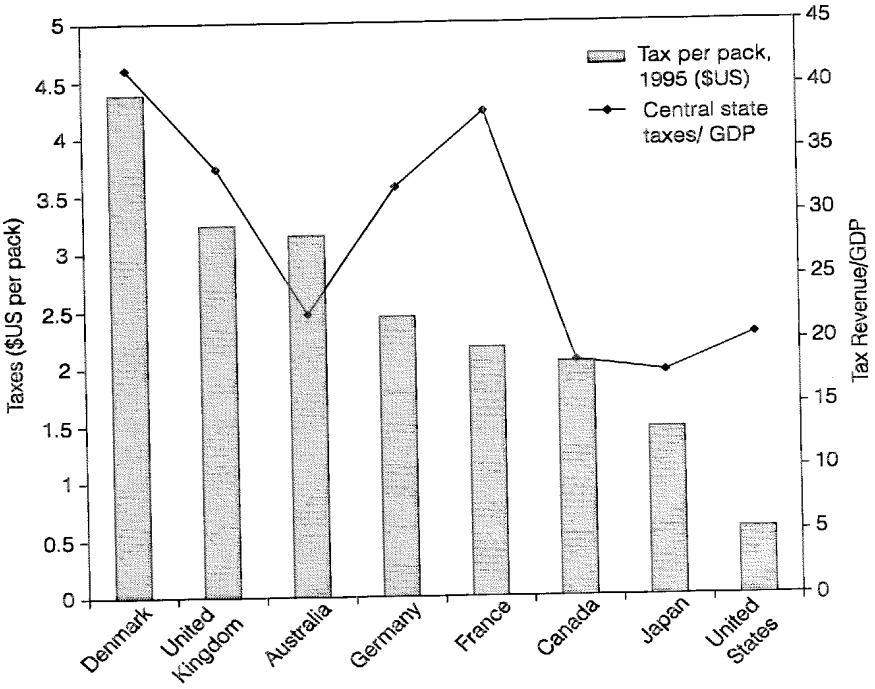

Figure 11.1 General and tobacco taxation in eight countries

within society, and that in countries with higher levels of taxation, we should expect higher levels of tobacco control, of which tobacco taxation is one component. Where substantial welfare states are involved, any substantial luxury tax that is legitimate commands attention.

Regarding nontax policies designed to restrict smoking, it was necessary to aggregate the instruments used to change smoking behavior and those used to limit the available options for where people may smoke. Given the difficulties of measuring such policies comparatively with any precision, we opted for a rough-and-ready three-point scale, ranging from low (1), to medium (2), to high (3). Applying this scale required that we categorize countries in terms of both the scope and the (apparent) intensity of their tobacco-control policies. (We could not confidently categorize the enforcement of those policies, for which reliable data are much harder to obtain.) That is to say, we considered both the sheer quantity of restrictions on tobacco use, as well as the degree to which they appear to have been implemented through voluntary agreements, legal guidelines, or bans on smoking in particular places.

Without a shared standard for measuring nontax policies for restricting smoking, we deployed two main sources of data and several alternative specifications for interpreting those data. First, we used the country chapters as the initial source of data. Based on our reading of those chapters, we initially scored each country on the three-point scale. Second, we surveyed the authors of those chapters and asked them to reduce their detailed characterizations of the contemporary tobacco-control regimes and provide us with answers using the same metric. We received responses from all of the authors and found that our readings were somewhat at odds with how the authors themselves characterized their respective national portraits. In the cases of Canada and Japan, there was agreement that the evidence pointed to cases of high and low control, respectively. Denmark, the United Kingdom, and the United States produced only small discrepancies, with all three countries scoring as high or medium-high for at least the contemporary period.[7] But in France and Germany, important differences in interpretation emerged. Both of us interpreted Germany as an instance of low control, while the author scored it as one of medium control. The two of us initially interpreted the chapter on France differently—one as involving high control, and the other, low control—while the author scored it as a case of high control. How strongly the antismoking policies were implemented and/or enforced proved to be the source of our different interpretations. Ultimately, we concluded that France was best classified as a case of "low-medium" control. Legal rules and their enforcement are separable dimensions of such restrictions. Simply knowing what the "law" is does not enable us to say which particular practices dominate.

Table 11.1 Comparing country scorings of national tobacco control

	Tobacco control scores			Tax/pack
	Readers	Author	American Cancer Society	World Bank
Australia	3 (3,3)	3	3	$3.15
Canada	3 (3,3)	3	3	$2.04
Denmark	2.5 (3,2)	2.5	3	$4.38
France	2 (3,1)	3	3	$2.17
Germany	1 (1,1)	2	2	$2.44
Japan	1 (1,1)	1	1	$1.46
United Kingdom	2.5 (3,2)	3	3	$3.24
United States	2.75 (2.5, 3)	3	2	$0.58

Sources: Country chapters, World Bank Economics of Tobacco Control Web site

Finally, we considered the very extensive American Cancer Society report on tobacco control around the world, which included country profiles of national policies.[8] In investigating four of the report's policy categories (advertising and sponsorship, sales and distribution restrictions, tobacco product regulations, and smoke-free indoor air restrictions), we developed a numerical index for the state of legislation in each area, assigning more weight to policies that involved outright bans, and less weight to policies encouraging voluntary cooperation. We then took a straight average of the scores of those four policy areas, each of which had been assigned a numerical score of 1 for low control, 2 for medium control, and 3 for high control, in order to arrive at an overall index of the extent of nontax tobacco control in each country.

The results of the above exercise largely confirmed the findings from the interpretations set forth in the country chapters—with modest, but not trivial, discrepancies. The American Cancer Society's data suggested, for example, that the United States had a less intensive control regime than what is reported in this book's country chapter. The society's score for Denmark was slightly higher, and its scores for France and Germany were a full point higher than ours (as were the scores by the respective authors). These differences illustrate the general problem in cross-national studies of identifying which phenomena are equivalent and therefore need to be similarly explained. With these qualifications in mind, we compare the eight cases in an exploratory mode.

In Figure 11.2, we plotted each of the eight countries by what we take to be their tax and nontax control policies during the late 1990s. We found several interesting patterns of convergence and divergence in the scoring of national policies. These patterns bring into clearer relief some of the more interesting puzzles apparent in the countries' distinctive trajectories of tobacco control. No country is a more obvious example of a low-control tobacco regime than Japan, where both tax and nontax control policies are slack. But that does not mean that Japan is free of antismoking influences. Indeed, there have been important changes in the world of Japanese smoking; for example, as Eric Feldman notes, the level of smoking has fallen substantially in recent decades, and the range of places where it is thought appropriate to smoke has become much more restricted. What is especially noteworthy, however, is that Japanese public policy does not appear to have been the main instrument of these changes.[9] The Japanese case study illustrates, moreover, the cross-national transfer of tobacco-control strategies; witness the recent efforts to use litigation as a means of circumventing the inaction of the executive and legislative branches of government.

We have classified as high-control regimes Australia, Canada, Denmark, and the United Kingdom. Although in Canada, taxes per pack are lower than in the other high-control cases,[10] and most of the intensity of Canada's tobacco control arose fairly late, in the mid-1980s, ultimately, Canada's

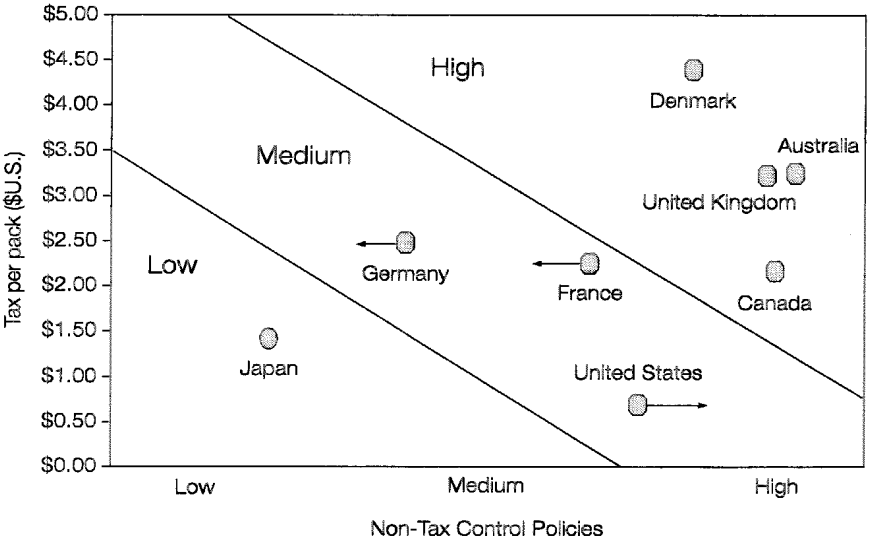

Figure 11.2 Tobacco control regimes in eight countries

extensive nontax controls during the period under investigation justify its classification as a case of high control.

In the middle of our grouping are France, Germany, and the United States, all of which are more difficult to classify. Both France and Germany have medium-level taxes between $2.00 and $3.00 per pack, and the United States has extremely low tobacco taxes (on average). Our interpretation of nontax control policies suggests that France and Germany may be closer to the low-control regimes and that the United States may be closer to the high-control regimes based on levels of implementation in practice. Nathanson's overall portrait of French law and practice supports our interpretation, by emphasizing the gap between strict legal controls and restrained enforcement, especially on the issue of where one might smoke in public. Likewise, Günter Frankenberg's detailed discussion of tobacco policy in Germany does not support an interpretation of vigorous control. Indeed, what is striking about both the French and German cases is the degree to which the enforcement of nontax tobacco controls remains relatively lenient. Moreover, in the United States there are wide differences in how particular states regulate and control tobacco. The interpretation of policy in these federal countries is, as a consequence, strongly mediated by how subnational variation is taken into account.

Discussion and Analysis

As noted earlier, we began our investigation with a variety of hypotheses about what might explain variations in tobacco-control policies. In practice, we have mostly sought to understand the shape of those policies and to suggest, more than provide, explanations. For example, in reflecting on our scores for the eight countries' tax and non-tax control policies, we ended up highlighting puzzles for which no easy answers are immediately apparent. Some aspects of the cross-national variation seem readily explainable from what we already know about these countries. Other aspects appear explainable only in terms of historically contingent political contexts or the countries' idiosyncratic configurations of the tobacco industry, political organization, and policy responses—that is, through the "thick" descriptive accounts set forth in each country's case study. In this section, we want to describe our admittedly tentative interpretation of some of the leading explanatory claims about tobacco control.

There is now a moderately large literature that purports to describe and explain tobacco politics and policies.[11] Our purpose here is not, however, to provide a definitive statement about the merits of different explanatory approaches, but simply to highlight what seem to be promising ways to

make sense of the complex portraits presented in this book. In particular, we attempt to explore hypotheses elaborated within the country chapters, and we address three classes of explanatory approaches—policy diffusion, political culture, and political institutions.

The *policy diffusion* literature in comparative political analysis provides accounts that link national experience through the various means by which policy-reform ideas move across borders. This approach is undoubtedly helpful in making sense of the increased control of smoking that we observe in all the national portraits (if not all of the advanced industrialized nations). It is surely the case that cross-border diffusion helps to explain the similar menu of programmatic interventions in tobacco control. As is plain from the national case studies in this volume, the scientific information about tobacco's effects has been widely diffused. Moreover, there was also surely diffusion of information about tobacco-control modes. These approaches to control—whether tax increases, education campaigns, limits on where smoking could take place, or restrictions on advertising or sports sponsorship—were first diffused by networks of scientific and public health actors, and later by what amounted to internationally linked social movements and pressure groups.

Indeed, from a global perspective, the diffusion of these pressures has led to some degree of convergence in tobacco-control regimes. Smoking has been transformed from an accepted (and romanticized) habit in the middle of the twentieth century to a challenged, if not reviled, practice by the opening of the twenty-first century. Donley Studlar's work demonstrates the increased salience in contemporary control regimes of "denormalizing" smoking.[12] That has involved making smoking itself sinful, stupid, or both. And it can also involve demonizing those who produce, sell, or use tobacco products. By contrast, the harm-reduction principle of traditional public health is perfectly consistent with educational campaigns, but not vilification. There is considerable evidence in this volume that by the beginning of the twenty-first century, the effort to turn tobacco smokers and producers into pariahs had become crucial elements in anti-tobacco movements.[13]

However, the diffusion argument is less useful for explaining patterns of variation. Typically, diffusion arguments suggest the importance of physical proximity as a basis for policy adoption, but the comparative portrait we present in Figure 11.1 contradicts this view: the neighboring pairs of Germany and Denmark and the United States and Canada appear more different than similar in the overall characterizations of tobacco control. Moreover, the clustering of the United Kingdom, Australia, and Canada as largely similar types of tobacco-control regimes, despite the fact that these countries are located at different corners of the globe, suggests the need to

consider other approaches. Even in the face of European Union (EU) efforts to gain supranational control over tobacco use, the codification and implementation of policies have remained nationally distinct within Europe.

What is termed *political culture* in comparative politics is another plausible approach to explaining variation in the control measures adopted or rejected.[14] We reject the notion of a "smoking" culture as a determinant of tobacco-control regime-type, because smoking has been popular in all of the countries under examination in this volume, and norms and patterns of tobacco use have changed in response to new information and especially to changes in government policy. An alternative view of the possible influence of culture would relate more general norms and customs regarding the paternalistic nature of the state and authority, and the value of liberal individualism to the propensity of a given country to adopt more or less aggressive control measures.

A classic statement of how such cultural patterns can shape other types of political and economic outcomes is Max Weber's *Protestant Ethic*,[15] which is perhaps the most well-known example of how religious orientations can shape institutions and outcomes as profound as the functioning of modern capitalism. For the more focused problem considered here, one might imagine that the more Catholic the nation, the more accepting its political culture would be of alleged "sins" like smoking, and the less onerous would be the implemented forms of control. Alternatively, one could imagine higher levels of paternalism in Catholic approaches. Yet neither the country portraits in this book nor our own interpretations provide a solid basis for this way of explaining tobacco-control policies. For instance, the varying policies over time within each country argue against using religious or cultural orientations as a cross-national explanation. As Brandt has argued, basic cultural foundations change less rapidly than smoking habits. The United States, where prohibitionist zeal was vividly expressed in alcohol control, went from a nation that broadly celebrated smoking during the World War II era to one that, a few decades later, was home to some of the globe's most zealous critics of smoking behavior and of tobacco companies. Similarly, Canada's widespread acceptance of smoking as late as the early 1980s gave way to an equally zealous condemnation by both public authorities and anti-smoking figures a decade later.

A more promising approach to culture is contained in the investigation carried out by Ronald Inglehart and Marita Carballo of the World Values Survey.[16] Although their view of culture is not infinitely malleable, it explicitly allows for changing norms and values over time. Reporting results from their 1990–1991 surveys, they provide a mapping of countries in terms of the values emphasized by different societies—both in terms of the emphasis on "survival" versus "well-being,"[17] and "traditional authority"

versus "secular-rational authority." Along these dimensions, the United States clusters with Canada as a "North American group," and Denmark with Germany as a "Northern Europe group." France clusters with "Catholic Europe," Japan with China and Korea (labeled by Inglehart and Carballo as the "Confucian countries"), and the United Kingdom straddles both the "Northern Europe group" and a larger cluster of "English-speaking countries," which includes Canada and the United States. Although the survey was not conducted in Australia, one would assume that it would cluster with this last group. This ordering of countries in terms of culture does a better job of predicting tobacco-control regimes than would a more narrow focus on religious orientations, particularly given the high degree of religious heterogeneity in many of the countries studied.

Most importantly, Denmark and Japan are described in Inglehart and Carballo's study as extreme cases in terms of the degree to which societies value "well-being" (Denmark) versus "survival" (Japan), and this maps perfectly onto our scoring of the tobacco regimes, as depicted in Figure 11.2. France and Germany appear as "intermediate" cases along the cultural continuum; they are intermediate cases of tobacco control. However, the cultural framework is less useful for explaining differences in tobacco-control regimes among the United Kingdom, the United States, and Canada, which are depicted as having highly similar cultures. Nonetheless, Inglehart and Carballo's view of culture provides a reasonable degree of explanatory power, as the basic emphasis on "well-being" within societies appears to correlate, if not perfectly, with the extent of tobacco control. We still cannot be sure, however, if tobacco and other forms of social control influence these cultural attitudes or if the reverse is true.

A third explanatory framework can be drawn from a literature on *political institutions,* which relates variations in institutional rules to cross-national differences in policy outcomes.[18] The notion here is that policy outcomes depend not merely on the underlying preferences of actors within society, but on how those preferences get aggregated and adjudicated. Among the economic interests with influential concerns are tobacco farmers, those media that are dependent on tobacco advertisements, the manufacturers and distributors of tobacco products, and most importantly, local and multinational tobacco companies. They compete with ministries of health, finance, and various political groups that may desire both tax and nontax controls. All of the countries studied in this book face all these constituency pressures (with the exception of tobacco farmers in countries where this crop is not a significant industry). What differs from country to country is the particular configuration of the institutional channels through which these interests seek expression.

In particular, many of the chapters suggest that the impact of a polity

being organized along federal or unitary principles should be considered as an important explanatory principle. However, there are again conflicting views about how to interpret the influence of such institutional differences. One hypothesis is that unitary states, if they have the political will, have the institutional structure to implement control policies more quickly and effectively because they enjoy a more uniform sphere of influence. Holding reform pressures constant, it is plausible that unitary regimes would be able to implement more extensive controls earlier and more concertedly than nonunitary regimes. On the other hand, it appears quite plausible from the country chapters that the location and influence of reform pressures actually vary across countries according to institutional differences. In federal polities, political pressures for control are more likely to be pressed in those subnational units where they are most likely to meet success, providing greater opportunities for innovation. In unitary regimes, there is arguably only one key arena in which political conflict over tobacco control is likely to take place, and opponents of control can focus their power and influence at the national level. The implications for tobacco control appear to be important.

For example, Constance Nathanson argues that different types of actors will emerge as influential within different types of institutional settings. She has noted that where hierarchical and centralized political arrangements provide access for elites—especially scientific ones in the case of tobacco—a distinctive mode of tobacco-control policymaking emerges. The cases of unitary states in our sample—Denmark, France, Japan, and the United Kingdom—illustrate that claim. By contrast, the less centralized, federal states—Australia, Canada, the United States, and, to a lesser extent, Germany—illustrate the greater impact of outsiders, of nonscientific advocates willing to be more provocative in their challenge to smoking and the tobacco firms. The federal states included in this volume provide ample evidence of diffusion—of evidence, argument, and tactics—across the subnational units.

In all regimes, institutional arrangements shape the strategies of the actors, as the country portraits fully document. In every case, the tobacco industry spends substantial sums defending its interests; that is no surprise. But which groups take up the banner of tobacco control does vary considerably among the cases. In federal regimes with ideological heterogeneity, one would expect control advocates to shop for venues to pursue antismoking policy reforms. Elite accommodation of organized interests is more likely to be found in the unitary states. We would expect extreme political actors to be more powerful in federal systems, and indeed, with the exception of Germany, that is precisely what we found in the country portraits.[19]

This perspective makes sense of the commonality in the high level of

nontax control policies that emerged by the end of the twentieth century in Australia, Canada, and the United States. We are not suggesting that federalism itself is the explanation. Indeed, it is surely true that federal regimes make national leadership over subnational units generally more difficult, as the case of Canada suggests. (Canada represents an instance where national institutions came to play a major role in advocating tobacco controls.) Instead, we believe that there is a crucial interaction of federalism, pressure-group strategies, and social movements in liberal regimes. That interaction makes it more likely that the most vigorous attacks on tobacco interests will arise first at the local level rather than at the level of national politics.[20]

Although most of the federal cases tend toward high-control, nontax policies, the unitary states are more varied in their approach to tobacco control. Again, Japan and Denmark represent the important extremes along the control continuum while simultaneously being cases of unitary states. Within our small sample, this suggests that the presence of federalism provides a more consistent influence on outcomes than does the absence of this institutional feature. Although we have not systematically compared the extent of tobacco control at the subnational level, the evidence available to us indicates that some of the most extreme forms of tobacco control are enacted within particular subnational units in the federal countries. For example, California and Minnesota are antismoking leaders, even while states such as Alabama and Georgia maintain more minimal controls. Similarly, British Columbia is far more restrictive than Alberta, and New South Wales than Queensland. We believe that federalism provides more opportunities for policy innovation, and in turn, that policy diffusion tends to be easier across subnational units than across countries (as discussed earlier in this chapter). In unitary states, antismoking radicals are less likely to be influential if they do not have a strong, national constituency. This may explain why the unitary states demonstrate very high- or very low-control regimes, whereas the federal polities tend toward medium and high control. In federal countries, just a few important pockets of tobacco-control advocacy can be successful in pushing for at least a modicum of legislation.

Germany is an exception to the claim that federalism will lead to more tobacco control. As it turns out, the potential impact of "competitive federalism" has been counterbalanced by resistance to aggressive health promotion policies. Günter Frankenberg's chapter on Germany identifies several factors that he hypothesizes as having contributed to relatively low levels of tobacco control, including the revenue imperative, skillful tobacco and media industries, the popularity of smoking, a limited group of enlightened experts, and the absence of a successful social movement, in the wake of resistance to state paternalism. Frankenburg argues that such resistance rests, in part, on the legacy of coercive, morally objectionable,

Nazi-era policies directed at improving the health of the German nation. Of the plausible explanations for German exceptionalism, only the last withstands comparative scrutiny. The first three are present in cases of both low- and high-control regimes, and the absence of experts seems to be more a product of potential political impact than lack of information, given the widespread availability of common scientific knowledge about the effects of smoking. This is not to say that the other factors he identifies do *not* matter. Rather it is that the task of explaining the German case requires that we identify why these forces were *more* powerful as checks on efforts to control tobacco than in the other countries.

While cross-national variation in the presence or absence of federalism helps to explain some of the important differences in tobacco-control regimes, clearly the relationship is not perfectly linear, nor does it trump all nationally specific political histories and legacies. If we had characterized countries in an alternative manner—for example, comparing countries in terms of the most extreme local examples of control, rather than using broad national portraits that incorporate "typical" subnational policies, the relationship between federalism and the extent of tobacco control might have appeared stronger. Other types of institutional variation, including the nature of political party systems, or the presence/absence of plebiscitary mechanisms for adopting policies could be explored in future research about the political determinants of tobacco policy.

Conclusions

Understanding the determinants of contemporary tobacco regimes requires that we understand the factors and pressures that simultaneously influenced convergence and divergence across countries. A mix of generalizable and historically contingent factors must be taken into account.

Our comparative analysis, though more modest in historical scope than what is presented in the single-country studies in the previous chapters, has attempted to provide a coherent synthesis of contemporary tobacco-control regimes in eight advanced, industrialized democracies. It prompted us to ask some general questions about the determinants of policy and practice. We do not pretend to provide any simple conclusions about why tobacco-control regimes vary across these countries—our analyses are admittedly rudimentary. However, we have attempted to demonstrate some of the analytic value added by an expressly comparative approach, in which the possibilities for reaching general conclusions are far greater than in single-country studies.

One of the lessons from this collective exercise is simple, but important. In comparative policy analysis, the twin problems of conceptualization and measurement are, to say the least, challenging. State authority comes in many forms, and it is not always easy to describe the differences as simply "more" or "less." We believe that our attempts to simplify—when combined with this book's country chapters—constitute a contribution that gains analytical insights without loss of historical specificity and context.

Our overall conclusion is that certain factors predictably constrain the development of tobacco-control regimes, and political institutions provide an important starting point for explaining patterns of cross-national variation, even if they do not determine the control policies of a given country or the role of the state in tobacco more generally. More general cultural orientations toward "well-being" do appear to be associated with the extent of control policies, but the exact direction of causality cannot be inferred from our analysis. Because these countries are all wealthy democracies, levels of income and political regime type cannot be said to explain differences among these countries, but such factors would likely be influential in a broader comparative study.

Although we do not take a normative approach in this investigation of tobacco control, we believe that this restricted comparative analysis shall be useful to others trying to understand the national histories of tobacco control in order to design and to reform policy. Simply put, it is not possible to draw lessons about tobacco reform from other countries without a baseline understanding of how countries compare, particularly in the contemporary era. The complexity of national context and national histories is important, as the chapters in this book reveal. But given the welter of experience, there is value to simplification as well.

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