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TOBACCO
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INTERFERENCE
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Report

Acknowledgements

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Key acronyms used in this document

ACS	Association of Convenience Stores
ANDS	Alternative Nicotine Delivery Systems
APPG	All-Party Parliamentary Group (Westminster Parliament)
ASI	Adam Smith Institute
BAT	British American Tobacco
Big Four	Philip Morris International, British American Tobacco, Japan Tobacco International, Imperial Brands
CCC	Consumer Choice Center
COP	Conference of the Parties (to the WHO FCTC)
CSR	Corporate social responsibility
CT Group	Crosby Textor Group
DEFRA	Department for Environment, Food and Rural Affairs
DHSC	Department of Health and Social Care (England)
FCDO	Foreign, Commonwealth and Development Office
FCTC	Framework Convention on Tobacco Control
FOI	Freedom of Information
FSFW	Foundation for a Smoke-Free World
GTNF	Global Tobacco and Nicotine Forum
HMRC	His/Her Majesty's Revenue and Customs
IEA	Institute of Economic Affairs
JTI	Japan Tobacco International
MHRA	Medicines and Healthcare products Regulatory Agency
MP	Member of Parliament
MS	Member of the Senedd
MSP	Member of the Scottish Parliament

Key acronyms used in this document

NFRN National Federation of Retail Newsagents

NHS National Health Service

OHID Office for Health Improvement and Disparities

PHE Public Health England

PMI Philip Morris International

SGF Scottish Grocers' Federation

SNP Scottish National Party

TMA Tobacco Manufacturers' Association

UKVIA UK Vaping Industry Association

WHO World Health Organization

Background and Introduction

This report measures the intensity, frequency, and severity of incidents of tobacco industry interference identified in the UK over the two-year period, April 2021 and March 2023. However, for the sake of completeness, it also includes information on incidents which took place in the five years prior (April 2017 - March 2021) but which emerged only recently and were not covered in previous reports. Previous editions of the report, published in 2019, 2020, and 2021, can be accessed on the [Tobacco Control Research Group website](#).

The UK Tobacco Industry Interference Index (UKTI) forms part of the Global Tobacco Industry Interference Index (GTI) published by the Global Center for Good Governance in Tobacco Control (GGTC) at the School of Global Studies in Thammasat University, Thailand and based on a methodology developed by the Southeast Asia Tobacco Control Alliance (SEATCA) and GGTC. It surveys how national governments protect public health policies from the industry's subversive efforts in line with Article 5.3 of the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC). It is part of a global publication. The UKTI was prepared by the Tobacco Control Research Group at the University of Bath following the methodology and scoring prescribed by GGTC.

This report, the method, and the scoring therein, are based on SEATCA's TI and scoring guidelines. The scoring range for the questions is from 1 to 5. The lower the score, the better the compliance with Article 5.3 of the WHO FCTC. For details on scoring, please see: Assunta M. Dorotheo E.U., SEATCA Tobacco Industry Interference Index: a tool for measuring implementation of WHO Framework Convention on Tobacco Control Article 5.3. *Tobacco Control* 2016; 25:313–318.

To complete the index of 20 indicators under seven key themes for the UK, a scoping review was conducted of the academic literature and publicly available evidence, including UK media websites, UK government websites, and the TobaccoTactics knowledge exchange platform. Freedom of Information (FOI) requests were used to identify additional incidents and further investigate others. These efforts were supplemented by a consultation with several of the UK's leading public health and tobacco control specialists to identify any additional incidents.

Compiled evidence was detailed in relevant sections of the report and the research team jointly agreed scoring. To minimise subjectivity, regular communication was maintained with the GTI team to ensure that each indicator was well understood by the authors and the scoring was consistent with that used across the GTI. This coordinated approach also aims to allow comparisons between the countries included in the GTI.

Note on the use of “government”: in line with the GTI protocol, this document applies the term “government” widely to cover not only the UK governments (including devolved administrations) and public officials, but also backbench politicians and political parties. Although these are not technically part of government, they are included because of the important role they play in policy development and lawmaking in the UK's parliamentary system. Moreover, [the implementation Guidelines of Article 5.3](#) are applicable to “government officials, representatives and employees of any national, state, provincial, municipal, local or other public or semi/quasi-public institution or body within the jurisdiction of a Party, and to any person acting on their behalf. Any government branch (executive, legislative and judiciary) responsible for setting and implementing tobacco control policies and for protecting those policies against tobacco industry interests should be accountable.”

As in previous years, the UKTI covers tobacco companies and associated organizations, while identifying some relevant incidents relating to e-cigarette companies.

The period covered in the UKTI 2023 is from April 2021 to March 2023. Events which occurred after the designated timeframe of this report have been recorded and will provide content for the next edition of the UKTI. Finally, the UK government also published new guidance for government engagement with the tobacco industry in June 2023, including detailed guidelines on implementation of Article 5.3 of the WHO FCTC. These guidelines may be found on the [UK government website](#).

Summary Findings

Industry participation in policy development

The tobacco industry and associated organisations are permitted to submit responses to public consultations and officially commissioned policy reviews, including on issues of tobacco control. These included Javed Khan’s review of the government’s smokefree 2030 objective in England and the Scottish Government’s consultation on advertising rules for vaping products. These consultations usually require responses to include a declaration of interest to help establish tobacco industry links and industry responses are usually published with the consultation outcome. Only one consultation – on the tobacco control strategy for Wales – clearly stated that industry responses would not be taken into consideration in policy development.

There was also significant interaction between parliamentarians and the tobacco industry, on issues of policy development. For example, the Scottish Parliament lobbying register shows that many of the recorded lobbying meetings related to the consultation on advertising rules for vaping products. This included the lobbying of one parliamentarian who was a government minister at the time. Also in Scotland, three groups with direct tobacco industry connections are represented in departmental and parliamentary groups concerned with tobacco control.

Industry corporate social responsibility (CSR) activities

Tobacco industry activities described as “socially responsible” are not banned in the UK. There were several incidents where members of the All-Party Parliamentary Group (APPG) for Vaping appeared at industry-sponsored or organised events, and endorsed industry positions. There were also incidents of legislators in Westminster, the Scottish Parliament and the Welsh Senedd hosting or sponsoring events on the illicit tobacco trade for Japan Tobacco International (JTI). In Northern Ireland, the Gallaher Trust, a charity with links to JTI, continues to contribute to various causes. JTI also continues to be listed as a corporate supporter of the British Museum. Finally, two members of the House of Lords were identified as directors of an industry-funded company set up to tackle the problem of smoking-related litter. Cigarette filters are the most commonly littered item worldwide, and this initiative comes at a time when many countries are implementing “polluter pays” approaches, charging tobacco companies for the cost of cleaning up smoking-related litter or imposing environmental taxes on packs of cigarettes.¹

Benefits to the industry

There is no evidence that the UK government or devolved administrations granted specific benefits or exemptions to the tobacco industry. However, there are still no clear rules in place to prevent this from happening.

The major tobacco companies continued to pay very low levels of corporation tax in the UK. Post-Brexit, EU restrictions on single-use plastics have been added to the Northern Ireland Protocol, meaning these regulations now apply in Northern Ireland. The tobacco industry expressed concerns that they may be unable to comply with this change and met with DEFRA to discuss the matter. Northern Ireland failed to meet its deadline of 1 January 2022 to comply with EU regulation – though there is no evidence a specific exemption was granted to the tobacco industry. Finally, though the government has extended the WHO FCTC to the territory of the Cayman Islands,² it has not done the same for the Protocol to Eliminate Illicit Trade in Tobacco Products.

¹ A. Kassam, [Cigarette butts: how the no. 1 most littered objects are choking our coasts](#), The Guardian, 18 August 2022, accessed October 2023

² The [Cayman Islands](#) is a British overseas territory of the United Kingdom.

Unnecessary interactions

A wide range of unnecessary interactions with the tobacco industry and associated organisations were recorded. These involved senior ministers, both in the UK Government and the Scottish Government; diplomatic staff, including the British Ambassador to Yemen; and political parties, mostly in the form of industry participation at fringe/side events at party conferences. British American Tobacco (BAT) received government-approved awards and certifications on issues such as disability support and diversity and inclusion, which it publicised in its promotional materials. Some local authorities, particularly trading standards departments, continue to rely on the tobacco industry to tackle illicit trade. Many of these interactions are not proactively made public. Furthermore, in 2021, the UK's new track and trace system was outsourced by HMRC to a company with links to the tobacco industry. Evidence was also found of several local council pension funds investing in the tobacco industry, principally in BAT.

Transparency

There are still no comprehensive rules on full disclosure of interactions with the tobacco industry and no requirement for the industry and its associates to register with the government. Though a 2015 law requires registration of consultant lobbyists, this only applies to professional lobbyists who are VAT registered. Only in Scotland is there is an official Lobbying Register in which all regulated (i.e. face-to-face) lobbying must be recorded. FOI requests made during the preparation of this report revealed interactions between public officials and the tobacco industry which had not been made public. DHSC confirmed to the authors of this report that when the government opens consultations that may involve tobacco industry input, a reference to Article 5.3 is included and respondents are formally asked to declare any ties with the tobacco industry.

Conflict of interest

There are general rules in the UK regulating political contributions and the disclosure of such contributions, including a requirement to declare any donation worth over £7,500 to a national political party. However, there is no legislation preventing the tobacco industry from donating to political parties, candidates or campaigns. Several MPs received money or gifts from the tobacco industry and/or its associates, either during or prior to the timeframe under analysis. These include some who occupied senior ministerial posts during the timeframe. While no evidence was found of government officials simultaneously holding positions in the tobacco industry, extensive evidence was found of past involvement of senior government officials with the industry and associated organisations, both directly and indirectly. These include cabinet ministers in the governments of Boris Johnson (December 2019-September 2022), Liz Truss (September 2022-October 2022) and Rishi Sunak (October 2022-present). Similar incidents were recorded involving local councillors and civil servants.

Preventive measures

There are a number of policies across several different government departments which aim to regulate government interactions with the tobacco industry. The 2011 Tobacco Control Plan for England stated that to “ensure further transparency, the Government commits to publishing the details of all policy-related meetings between the tobacco industry and government departments.” This commitment was reinforced in 2017. Likewise, Public Health England (since replaced by the Office for Health Improvement and Disparities and the UK Health Security Agency) issued guidance (Protocol for engagement with stakeholders with links to the tobacco industry).

However, in state agencies and departments other than those concerned with health, such preventive measures are weaker. For example, although HMRC guidance on interaction with the tobacco industry states that meetings on matters related to tobacco control should be accountable and transparent, it grants exemptions for meetings on consumer compliance issues and illicit tobacco. There are also issues around compliance with preventive measures. For instance, although a code of conduct exists for overseas civil servants dealing with the tobacco industry, breaches of this code were identified.

Finally, this report provides multiple examples which highlight the need to raise awareness of Article 5.3 of the WHO FCTC across governments.

Results and Findings

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Level of Industry Participation in Policy-Development						
1. The government ³ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry or any entity or person working to further its interests. ⁴ in setting or implementing public health policies in relation to tobacco control ⁵ (Rec 3.4)		1				
<p>Executive branch allowing the industry to participate in public health policies development and / or implementation.</p> <p>Through consultations</p> <p>The UK runs public consultations for inputs to policies and regulations. All such consultations accept submissions from the tobacco industry and its allies. Some consultations require a declaration of interest to identify links to the tobacco industry. The tobacco industry’s opinions are generally included in the consultation summary and in the outcome (see below and #2). The Welsh consultation on “tobacco control strategy for Wales and delivery plan” between November 2021 and January 2022 is the only consultation so far that clearly stated that “In line with Article 5.3 of the World Health Organisation (WHO) Framework Convention on Tobacco Control (FCTC), [tobacco industry] comments have been documented as part of this analysis. However, they will not be taken into consideration as the strategy and delivery plan are further developed.”⁶</p> <ul style="list-style-type: none"> • Between January and March 2021, the Department of Health and Social Care (DHSC) carried out a consultation as part of a legal duty to conduct a post-implementation review of the Tobacco and Related Products Regulations 2016 and the Standardised Packaging of Tobacco Products Regulations 2015.⁷ <ul style="list-style-type: none"> - The consultation description stated that “We expect a wide range of industry, charities, academic researchers and members of the public to respond to this consultation”. - Responses from business included arguments that the appearance of cigarettes had no impact on quitting, that proposed regulations should only apply to cigarettes and hand-rolling tobacco (rather than all tobacco products), that regulations should not be extended to cigars and that health warnings should only apply to cigarettes and hand-rolling tobacco.⁸ 						

³ The term “government” refers to any public official whether or not acting within the scope of authority as long as cloaked with such authority or holding out to another as having such authority

⁴ The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

⁵ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

⁶ Welsh Government, [Tobacco Control Strategy for Wales and Delivery Plan](#), July 2022

⁷ DHSC, Tobacco and related products legislation introduced between 2015 to 2016: reviewing effectiveness, 2021

⁸ DHSC, [The Standardised Packaging of Tobacco Products Regulations 2015: post-implementation review](#), 2022

- The Scottish Government ran a consultation on “Vaping products - tightening rules on advertising and promoting” between February and April 2022.^{9 10 11} Respondents were asked to declare any links to the tobacco industry.
 - The consultation methodology stated that: “Equal weighting has been given to all responses.”¹² Of the responses included 15 had direct tobacco industry links, and nine had indirect links.
 - Submissions to the consultation included those from the Big Four tobacco companies ([Philip Morris International](#), [British American Tobacco](#), [Japan Tobacco International](#), [Imperial Brands](#)); [JUUL Labs](#) (then part owned by U.S. tobacco giant Altria; Altria exchanged its stake in JUUL for heated tobacco intellectual property rights in March 2023);¹³ vape shops and e-liquid producers; vape trade and consumer organisations; and organisations with longstanding links to the tobacco industry, such as the [Scottish Grocers’ Federation](#) (SGF), the [Association of Convenience Stores](#) (ACS), and the [Consumer Choice Center](#) (CCC).
 - The SGF (see #3), of which all four transnational tobacco companies are members, held a meeting to discuss the consultation with Maree Todd, Minister for Public Health, Women’s Health and Sport (see #8).¹⁴
 - In February 2021 and July 2022, the SGF commissioned Diffley Partnership to conduct two surveys. These surveys, which found positive perceptions of vaping amongst consumers, were subsequently used by the SGF in its campaigning activities, particularly around the consultation. The SGF urged the Scottish government to embrace vaping as a means of achieving its 2034 smoke-free target.^{15 16}
 - While local government and health organisations were generally supportive of the government’s proposals, “the vaping sector, tobacco industry, and other organisations with a financial interest in the sale and distribution of vaping product (e.g. those that sell tobacco and vaping related products) were less likely to be supportive.” Individuals were almost equally opposed as in favour.¹⁷
 - The Scottish Government published a report summarising the consultation responses in September 2022 which acknowledged “polarising views” and stated that they would “inform and shape the final Vaping restriction regulations.”¹⁸
- As of March 2023, there were three other completed, potentially relevant, consultations, but no responses or summaries had been published:
 - 10-Year Cancer Plan (<https://www.gov.uk/government/consultations/10-year-cancer-plan-call-for-evidence>), closed 8 April 2022.

⁹ Scottish Government, [Vaping products - tightening rules on advertising and promoting: consultation analysis](#), 27 September 2022

¹⁰ Scottish Government, [Vaping products - tightening rules on advertising and promoting: consultation analysis: 1 Executive Summary](#), 2022

¹¹ Scottish Government, [Vaping products - tightening rules on advertising and promoting: consultation analysis. Appendix B: Organisation Respondents](#), 2022

¹² Scottish Government, [Vaping products - tightening rules on advertising and promoting: consultation analysis: 3 Consultation Methodology](#), 2022

¹³ Altria Group, Inc., [Altria Exchanges Minority Stake in JUUL Labs for Heated Tobacco Intellectual Property Rights](#), 2023

¹⁴ TobaccoTactics, [Scottish Grocers’ Federation](#), 2023

¹⁵ Vape to Quit, [What Scotland Thinks About Vaping](#), archived March 2023

¹⁶ D. Barker and J. Hebditch, [Scots smokers should be encouraged to switch to vaping according to new survey](#), AberdeenLive, 2022

¹⁷ Scottish Government, [Feedback - Tightening rules on advertising and promoting vaping products](#), 28 September 2022

¹⁸ Scottish Government, [Tightening rules on advertising and promoting vaping products](#), 28 September 2022

- Online Advertising (<https://www.gov.uk/government/consultations/online-advertising-programme-consultation>), closed 8 June 2022.
- Equity in medical devices (<https://www.gov.uk/government/consultations/equity-in-medical-devices-independent-review-call-for-evidence>), closed Oct 2022.

Through policy discussion meetings

- HM Revenue and Customs (HMRC) regularly holds meetings with tobacco stakeholders including JTI, Imperial Brands, BAT, PMI, the [Tobacco Manufacturers' Association](#) (TMA), and the Imported Tobacco Products Advisory Council. Information about attendees and issues discussed is updated quarterly but no meeting minutes or outcomes are publicly available.¹⁹ Topics regularly discussed include tobacco control related policies such as track and trace (see #11).
- The secretariat of the Regulatory Policy Committee (RPC) had contact with the TMA, including representatives of BAT, Imperial Brands and JTI on 29/11/21. This was in relation to the RPC's assessment of the Post Implementation Reviews on the Tobacco and Related Products Regulations and the Standardised Packaging of Tobacco Products Regulations 2015.²⁰

Legislative branch allowing the industry to participate in public health policies development and / or implementation.

Regarding the consultations

- Philip Morris Limited met with Members of the Scottish Parliament (MSPs) from the Scottish National Party (SNP) and Conservative Party on 17 occasions to discuss the Scottish consultation on “Vaping products - tightening rules on advertising and promoting”. The MSPs lobbied were Fergus Ewing (SNP), John Mason (SNP), Maurice Golden (Conservative), Kevin Stewart (SNP), Emma Harper (SNP), Gordon MacDonald (SNP), Fulton MacGregor (SNP), Paul McLennan (SNP), Stuart McMillan (SNP), Colin Beattie (SNP), Sandesh Gulhane (Conservative), Willie Coffey (SNP), David Torrance (SNP) and Annie Wells (Conservative). PML also lobbied MSPs Siobhian Brown and George Adam (both SNP) at the SNP Conference in October 2022, At the time, Brown was Convenor of the Scottish Parliament's COVID-19 Recovery Committee, while Adam was Minister for Cabinet and Parliamentary Business.²¹
- The [UK Vaping Industry Association](#) (UKVIA), of which all four transnational tobacco companies were at the time members, held two meetings with MSPs from the SNP (arranged by the PR firm JPB Associates) where reducing tobacco harm and/ or the Scottish consultation on “Vaping products - tightening rules on advertising and promoting” were discussed.²¹ The first was with Siobhian Brown, the second with Gillian Martin and Emma Harper. UKVIA announced in September 2023 that it had ended its relationship with the Big Four tobacco companies, and committed to rejecting tobacco industry funding in future. It still lists VPZ – an e-cigarette company which received a loan from Philip Morris Limited – as a full member.²²

¹⁹ HMRC, HMRC officials' meetings with tobacco stakeholders, 2021 & 2022

²⁰ Regulatory Policy Committee, Email dated 2 March 2023, (no subject) Emailed response released under Freedom of Information Act

²¹ TobaccoTactics, [UK Vaping Industry Association](#), 2023

²² TobaccoTactics, [UK Vaping Industry Association](#), 2023

Regarding public health policies development and implementation

Industry interaction with the APPG for Vaping

- In March 2022, at a Westminster parliamentary debate on “Smoke-free England”, Adam Afriyie, Conservative MP for Windsor and vice-chair of the [All-Party Parliamentary Group \(APPG\) for Vaping](#), referred to a meeting with the thinktank DEMOS where the “healthcare professionals” present had urged him to promote vaping as a cessation tool amongst pregnant women.²³ Earlier that month, DEMOS had published a report entitled “Regulating the Future of Vaping” funded by JUUL Labs, an e-cigarette company then part-owned by Altria.²⁴ Afriyie did not mention this industry connection during the debate.²⁵ Afriyie has repeatedly promoted e-cigarettes, but did not declare that his wife holds shares in Elite Growth, a medical cannabis firm that also sells disposable e-cigarettes.²⁶ (see #5 and #15). Afriyie is also chair of the advisory board of Elite Growth.²⁷
- In July 2021, the APPG for Vaping (also see #15) published a report entitled “Inquiry into UK Tobacco Harm Reduction Opportunities Post-Brexit: Achieving a Smoke-Free 2030”. It accepted written submissions from BAT, PMI, JTI, [Swedish Match](#) and JUUL Labs, as well as oral evidence, including from UKVIA and [We Vape](#). While the report recognised the UK’s commitment to the WHO FCTC and specifically Article 5.3, it stated that “it is also evident that industry players need to be part of the solution [...] to reach our Smoke-Free 2030 ambitions.”²⁸ The report’s recommendations included the following:
 - The UK government should “diverge from, and improve on, the transposed EU regulations” and “fully embrace the concept of tobacco harm reduction”;
 - Nicotine pouches, heated tobacco products and snus should be integrated into the same regulatory system as vapes (e-cigarettes);
 - Nicotine levels in e-liquids should be increased and limits on the size of tanks and refill containers should be removed;
 - Rules on advertising for non-combustible tobacco products should be relaxed.²⁹

Industry lobbying of MSPs

- JTI was present at the Holyrood Garden Party and Political Awards in both 2021 and 2022. It reported lobbying MSPs Gordon MacDonald³⁰ and Jackson Carlaw³¹, discussing illicit trade, Brexit, and youth access to e-cigarettes.

²³ UK Parliament, [Smoke-Free England – Hansard](#), 2022

²⁴ P. Mackenzie, [Regulating the Future of Vaping](#), DEMOS, 2022

²⁵ UK Parliament, [Smoke-free England, debate](#), Hansard, 29 March 2022, accessed March 2022

²⁶ P. Wood, [Tory MP Adam Afriyie who repeatedly promoted vaping didn’t declare wife’s shares in vape retailer](#), inews, May 2023

²⁷ *Ibid.*

²⁸ All-Party Parliamentary Group for Vaping, [Inquiry into UK Tobacco Harm Reduction Opportunities Post-Brexit: Achieving a Smoke-Free 2030](#), 2021. In line with the status of an APPG, the report stated: It stated that, “This is not an official publication of the House of Commons or the House of Lords. It has not been approved by either House or its committees. All-Party Parliamentary Groups are informal groups of Members of both Houses with a common interest in particular issues. The views expressed in this report are those of the inquiry panel only, acting in a personal capacity, based on the evidence they received and heard during the inquiry.”

²⁹ *Ibid.*

³⁰ [The Scottish Parliament lobbying register](#), Gordon MacDonald, September 2022.

³¹ [The Scottish Parliament lobbying register](#), Jackson Carlaw, September 2022.

- JTI reported meeting with MSP Maurice Golden in October 2022 to discuss illicit tobacco and “the growth of disposable vaping products”. There was also a discussion of Golden’s sponsorship of JTI’s event “Tackling Illegal Tobacco Sales”³², which took place in the Scottish Parliament in November 2022. JTI reported lobbying 8 MSPs at this event: Maurice Golden, Douglas Lumsden, Foyso Choudhury, Murdo Fraser, Oliver Mundell, Pam Gosal, Sharon Dowey and Sue Webber, discussing illicit trade and e-cigarettes, stating that “With the UK Government confirming that tougher sanctions and a new penalty of up to –£10 000 will be introduced in 2023 we [JTI] called for certainty that the same powers will be extended to Scotland. In addition, we also showed samples of illegal vaping products and devices with youth appeal and called for stronger regulation in this area.”³³
- UKVIA reported lobbying four MSPs Gillian Martin³⁴, Emma Harper³⁵, Siobhian Brown³⁶, and Sandesh Gulhane³⁷ through the Bristol-based agency JBP Associates of which it was a registered client between April 2021 and December 2022.³⁸ In two of these meetings, between March and April 2022, UKVIA reported discussing the “recently published consultation on tightening the restrictions on advertising and promotion of vaping products”.³⁹
- According to the lobbying register, dozens of lobbying meetings took place between MSPs and tobacco companies as well as e-cigarette trade organisations, or affiliated organisations between April 2021 and March 2023:
 - BAT UK reported 4 meetings which took place in June 2021 and December 2022. All were face-to-face and no purpose was declared.^{40,41,42,43}
 - Imperial Brands reported 4 meetings which took place in June and November of 2021, and in May and November of 2022. All were face-to-face and no purpose was declared.^{44,45,46,47}
 - JTI reported 13 interactions, covering meetings with at least 10 MSPs. Most of these incidents took place at its “Tackling illicit tobacco sales” event, held at the Scottish Parliament in November 2022 (see above). Discussions covered illicit tobacco trade and e-cigarettes but in two cases, no purpose was declared.⁴⁸
 - PMI reported lobbying MSPs between April 2021 and March 2023 on 18 occasions. 13 of these meetings were brokered by the PR consultancy [Halogen Communications](#), which has worked for PMI since at least 2018.

³² [The Scottish Parliament lobbying register](#), Japan Tobacco International, October 2022

³³ [The Scottish Parliament lobbying register](#), Japan Tobacco International, November 2022

³⁴ [The Scottish Parliament lobbying register](#), Gillian Martin, April 2022

³⁵ [The Scottish Parliament lobbying register](#), Emma Harper, April 2022

³⁶ [The Scottish Parliament lobbying register](#), Siobhian Brown, March 2022.

³⁷ [The Scottish Parliament lobbying register](#), Sandesh Gulhane, January 2022

³⁸ Office of the Registrar of Consultant Lobbyists, [UK Vaping Industry Association client profile](#).

³⁹ [The Scottish Parliament lobbying register](#), Siobhian Brown, March 2022, accessed March 2023.

⁴⁰ [The Scottish Parliament lobbying register](#), British American Tobacco UK, June 2021

⁴¹ [The Scottish Parliament lobbying register](#), British American Tobacco UK, December 2021

⁴² [The Scottish Parliament lobbying register](#), British American Tobacco UK, June 2022

⁴³ [The Scottish Parliament lobbying register](#), British American Tobacco UK, June 2022

⁴⁴ [The Scottish Parliament lobbying register](#), Imperial Brands plc, June 2021

⁴⁵ [The Scottish Parliament lobbying register](#), Imperial Brands plc, November 2021

⁴⁶ [The Scottish Parliament lobbying register](#), Imperial Brands plc, May 2022

⁴⁷ [The Scottish Parliament lobbying register](#), Imperial Brands plc, November 2022

⁴⁸ The Scottish Parliament Lobbying Register, 2023. [Maurice Golden \(October 2022\)](#); [Foyso Choudhury](#); [Sharon Dowey](#); [Murdo Fraser](#); [Pam Gosal](#); [Douglas Lumsden](#); [Oliver Mundell](#); [Sue Webber](#); [Maurice Golden \(November 2022\)](#); [Gordon MacDonald](#); [No purpose declared \(April 2022\)](#); [Jackson Carlaw](#); [No purpose declared \(April 2021\)](#).

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<p>Most of this lobbying related to the Scottish government’s consultation on advertising and promotion of vaping products (see above), though other stated purposes include PMI’s approach to tobacco harm reduction and the transformation of its business towards newer nicotine and tobacco products. In one case, no purpose was declared.⁴⁹</p> <ul style="list-style-type: none"> - UKVIA registered a meeting with Sandesh Gulhane MSP (Conservative), via the PR firm JBP Associates.⁵⁰ - The SGF registered a meeting with Stuart McMillan MSP (SNP) to discuss “vaping products: retailers, policy and smoking cessation.”⁵¹ 						
<p>2. The government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. (Rec 3.4)</p>		1				
<ul style="list-style-type: none"> • In June 2022, the Office for Health Improvement and Disparities (OHID) published the results of Javed Khan’s review. This work was commissioned by the OHID to review “into the government’s current tobacco control policies [...]” and “[...] whether government will achieve its ambition to make England smokefree by 2030.”⁵² <ul style="list-style-type: none"> - The review received submissions from the Big Four tobacco companies, as well as several other industry-linked actors such as the JUUL Labs (then part owned by U.S. tobacco giant Altria); the smokers’ rights group Forest; tobacco industry trade association ITPAC; and the TMA. A large proportion of these submissions urged Khan to endorse “less harmful” nicotine and tobacco products – not just e-cigarettes, but also nicotine pouches, heated tobacco products and snus.⁵³ OHID published these submissions, as per Article 5.3 of the WHO FCTC.⁵⁴ - The Khan review did not meet face-to-face with the tobacco industry within the context of the consultation.⁵⁵ However, he did meet with the Association for Convenience Stores (ACS), which has longstanding links to the tobacco industry. As of August 2023, BAT, PMI, JTI and JUUL Labs are all listed as “Premier Club” members of the ACS.⁵⁶ - Khan’s contract with the Department of Health and Social Care ended following publication of the review in June 2022. Subsequently, in September of the same year, Khan delivered the keynote address at an event called “New Approaches to Tobacco Control” at the Harvard Club in New York. Several other speakers had industry links, particularly to PMI. These included Derek Yach, founder and former president of the PMI-financed Foundation for a Smoke-Free World (FSFW);⁵⁷ and Nataliya Toropova, head of Healthy Initiatives, a Ukrainian NGO which receives grant funding from FSFW.⁵⁸ 						

⁴⁹ The Scottish Parliament Lobbying Register, 2023. [Fergus Ewing](#); [John Mason](#); [Maurice Golden](#); [David Torrance \(October 2022\)](#); [Kevin Stewart](#); [George Adam](#); [Emma Harper](#); [Siobhian Brown](#); [Gordon MacDonald](#); [Fulton MacGregor](#); [Paul McLennan](#); [Stuart McMillan](#); [Colin Beattie](#); [Sandesh Gulhane](#); [Willie Coffey](#); [David Torrance \(April 2022\)](#); [Annie Wells](#); [No purpose declared](#). Halogen Communications has filed corresponding entries in the register for the meetings with [Fergus Ewing](#); [John Mason](#); [Maurice Golden](#); [Emma Harper](#); [George Adam](#); [David Torrance \(October 2022\)](#); [Kevin Stewart](#); [David Torrance \(April 2022\)](#); [Fulton MacGregor](#); [Paul McLennan](#); [Colin Beattie](#); [Willie Coffey](#); [Annie Wells](#).

⁵⁰ [The Scottish Parliament lobbying register](#), JBP Associates, January 2022.

⁵¹ [The Scottish Parliament lobbying register](#), Scottish Grocers Federation, December 2022.

⁵² Dr Jhaved Khan, [The Khan review: making smoking obsolete](#), 9 June 2022

⁵³ UK Health Security Agency, [Public library, Independent review into smokefree 2030 policies](#), 2022

⁵⁴ UKHSA national, [Independent review into smokefree 2030 policies](#), 2022

⁵⁵ *Ibid.*

⁵⁶ Association of Convenience Stores, Premier Club, 2023

⁵⁷ [New Approaches to Tobacco Control](#), 2022

⁵⁸ Foundation for a Smoke-Free World, [Awarded Grants](#), 2022

- In April 2023, the UK government unveiled a new “swap to stop” scheme, under which one million smokers would be provided with a free vaping starter kit, alongside behavioural support, in order to help them quit smoking. In the press release announcing the scheme, the government stated that the Khan review had “informed the measures set out today.”⁵⁹
- In November 2021, the Department for Environment, Food and Rural Affairs (DEFRA) launched a call for evidence on proposals to ban commonly littered and problematic plastic items in England.⁶⁰ The call stated that the government was “conducting research to robustly examine the relative merits of options such as material bans and extended producer responsibility.”⁶¹
 - Though the document acknowledged that the call might be of particular interest for “businesses involved in the manufacture or provision of ... tobacco filters”, it permitted the submission of confidential responses.⁶²
 - In January 2023, DEFRA published the response to its call for evidence,⁶³ in which it mentioned industry submissions, though without identifying those companies responsible. The report states: “Most tobacco manufacturers were not supportive of regulation, suggesting that an ongoing voluntary programme on tackling the issue should be evaluated before considering regulatory action. One tobacco manufacturer did support regulation, noting that the industry should pay a proportionate share of costs associated with tackling tobacco filter littering.”
- In December 2020, HMRC conducted a consultation into “Sanctions to tackle tobacco duty evasion”.⁶⁴ Consultation responses and outcome were published in July 2021.⁶⁵
 - Out of 37 responses, 11 were from tobacco manufacturers and their representative bodies including PMI, JTI UK, Imperial Tobacco, BAT UK and [TMA](#), in addition to 4 responses from the retail sector including [ACS](#) and the [National Federation of Retail Newsagents](#) (NFRN).⁶⁶
 - Alongside the consultation responses and outcome, HMRC also published its draft legislation and invited further comments.⁶⁷ It is unclear to what, if any, extent tobacco industry responses to the consultation influenced the draft legislation.
- In August 2021, the Medicines and Healthcare products Regulatory Agency (MHRA) updated its guidance on the sale of vaping products.⁶⁸ This came following discussions with trading standards and UKVIA.^{69,70}

⁵⁷ Department of Health and Social Care and Neil O’Brien MP, [Smokers urged to swap cigarettes for vapes in world first scheme](#), 2023.

⁶⁰ Department for Environment, Food & Rural Affairs, [Call for evidence on commonly littered and problematic plastic items](#), 2021

⁶¹ Department for Environment, Food & Rural Affairs, [Call for evidence on commonly littered and problematic plastic items](#), 2021

⁶² *Ibid.*

⁶³ DEFRA, Summary of responses and government response, January 2023

⁶⁴ HM Revenue and Customs, Sanctions to tackle tobacco duty evasion, December 2020

⁶⁵ HM Revenue and Customs, Consultation Outcome, July 2021

⁶⁶ *Ibid.*

⁶⁷ *Ibid.*

⁶⁸ Medicines and Healthcare products Regulatory Agency, [E-cigarettes: regulations for consumer products](#), 2021

⁶⁹ UK Vaping Industry Association, [MHRA closes “vaping loophole” with latest revision and clarifications](#), archived 2021

⁷⁰ UKVIA, [New advice following our discussions with MHRA](#), tweet, 2021

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<p>Shortly afterwards, it emerged that an investigation by UKVIA had revealed that up to £3 million in illegal vaping devices are sold in the UK every week. UKVIA urged the MHRA to address the problem, offering to help train agency staff and pay the salaries of dedicated enforcement officers.⁷¹ There is no evidence that MHRA accepted this offer.”</p>						
<p>3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8)</p>		1				
<ul style="list-style-type: none"> • In Scotland, three organisations with direct tobacco industry connections – the Scottish Grocers’ Federation (SGF), the Scottish Wholesale Association (SWA) and the National Federation of Retail Newsagents (NFRN) – have representation in departmental and parliamentary groups concerned with tobacco control. These include the Ministerial Working Group on Tobacco Control, which provides advice to the Scottish government on tobacco control, acts as a forum for policy development and monitors implementation.⁷² <ul style="list-style-type: none"> - As of March 2023, two representatives from the SGF are listed as members of the Scottish Ministerial Working Group on Tobacco Control.⁷³ (see #1 & 8) The SGF has an ongoing relationship with the tobacco industry. All Big Four transnational tobacco companies are corporate members,⁷⁴ while as of March 2023, JUUL Labs, UKVIA and Republic Technologies (RYO accessories) were also members.⁷⁵ It has a long history of opposition to tobacco control measures, including plain packaging and the tobacco display ban.⁷⁶ - As of March 2023, a representative from the NFRN is also listed as a member of the Scottish Ministerial Working Group on Tobacco Control.⁷⁷ The NFRN has a history of tobacco industry links, having campaigned – funded by BAT – against plain packaging and the display ban on tobacco products, and collaborated with Imperial Brands on illicit trade work in 2017.⁷⁸ - The SGF continues to act as the secretariat for the Parliamentary Group on Independent Convenience Stores, which in 2023 listed ten MSPs as members.⁷⁹ Likewise, the SWA – another member of the parliamentary group – also has tobacco industry members.⁸⁰ The group’s website states that it invites “guest speakers to participate, including Scottish Government Ministers and officials.”⁸¹ • As of February 2023, Gallaher Ltd (JTI) and Imperial Brands were listed as “Associate members” of the UK APPG on Corporate Responsibility.⁸² No financial contributions from these companies appear 						

⁷¹ G. Nott, [Over-strength vape products openly sold online and in stores, finds UKVIA investigation](#), The Grocer (paywall), 2021

⁷² Scottish Government, [Scottish Ministerial Working Group on Tobacco Control](#), undated

⁷³ *Ibid.*

⁷⁴ Scottish Grocers’ Federation, [Corporate Members](#), archived 2023

⁷⁵ Scottish Grocers Federation, [Corporate Members](#), SGF website, undated, accessed May

⁷⁶ TobaccoTactics, [Scottish Grocers’ Federation](#), 2023

⁷⁷ Scottish Government, [Scottish Ministerial Working Group on Tobacco Control](#), undated

⁷⁸ TobaccoTactics, [Federation of Independent Retailers \(NFRN\)](#), 2020

⁷⁹ TobaccoTactics, [Scottish Grocers’ Federation](#), 2023

⁸⁰ Scottish Wholesale Association, [Members](#), 2022

⁸¹ Scottish Government, [Independent Convenience Stores](#), 2023, accessed May

⁸² All-Party Parliamentary Corporate Responsibility Group, [Associate members of the APCRG](#), archived February 2023

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in the group’s register during the period under analysis but its website states that “Group membership subscriptions fund the services provided by the [group].” ⁸³						
4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ⁸⁴ (Rec 4.9 & 8.3)		1				
<ul style="list-style-type: none"> No such incidents were identified. 						
Industry CSR activities						
5. A. Government agencies or their officials endorse, support, form partnerships with or participates in activities of the tobacco industry described as “socially responsible” or “sustainable”. For example, environmental programs. (Rec 6.2) B. The government (its agencies and officials) receives CSR contributions ⁸⁵ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests during the pandemic. (Rec 6.4)			2			
Incidents involving members of the APPG for Vaping						
<ul style="list-style-type: none"> In September 2021, Viscount Ridley, a Conservative member of the House of Lords and then a member of the APPG for Vaping, gave a presentation at the Global Tobacco and Nicotine Forum (GTNF), an event sponsored by PMI, BAT, Reynolds American Inc. (BAT’s American subsidiary), Imperial Brands, Altria and JUUL Labs.⁸⁶ Ridley used his keynote to urge the UK government to embrace harm reduction, including at the COP to the WHO FCTC.⁸⁷ Ridley retired from politics in December 2021.⁸⁸ Several instances were identified involving Mark Pawsey, Conservative MP for Rugby and chair of the APPG for Vaping and/or the APPG’s vice chair Adam Afriyie, Conservative MP for Windsor, as well as other vice chairs. <ul style="list-style-type: none"> In July 2021 Pawsey appeared at the UKVIA Forum. UKVIA’s membership includes all four transnational tobacco companies.⁸⁹ It also lists as members JUUL Labs, part-owned by Altria until March 2023;⁹⁰ and the e-cigarette retailer VPZ, which received a loan from PMI.^{91,92} 						

⁸³ All-Party Parliamentary Corporate Responsibility Group, [Welcome](#), 2023

⁸⁴ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

⁸⁵ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

⁸⁶ Global Tobacco and Nicotine Forum, [Sponsors](#), archived 2022

⁸⁷ Tobacco Reporter, [The Fork in the Road](#), 2021

⁸⁸ UK Parliament, [Viscount Ridley, Parliamentary career](#), 2023

⁸⁹ UKVIA, [Our Members](#), 2022

⁹⁰ O. Barnes, [Altria exits vaping group Juul after stake plummets in value](#), Financial Times, 2023

⁹¹ TobaccoTactics, [VPZ](#), 2023

⁹² UKVIA, [Our Members](#), 2022

Pawsey spoke on a panel entitled “COP9: the way forward for vaping”, together with [Chris Snowden](#) of the [Institute of Economic Affairs](#) (IEA), a “free-market” think tank with a history of close collaboration with the tobacco industry, and Jeannie Cameron of consultancy [JCIC International](#), and at the time employed by JUUL Labs.^{93, 94}

- In October 2021, Pawsey hosted a roundtable with trade and consumer harm reduction groups alongside John Dunne of UKVIA. According to a UKVIA press release, the purpose of the event was “to discuss the threat to tobacco harm reduction if the WHO’s Conference of the Parties (COP9) continues in its current trajectory.”⁹⁵ Pawsey openly criticised the WHO, claiming: “It’s extremely worrying to hear this rhetoric coming from the WHO regarding the harm reduction alternatives to cigarettes.”⁹⁶
- In June 2022, Pawsey (incorrectly billed as Mark Dewsey) appeared on a panel at the World Vape Show in Dubai. His fellow panellists included John Dunne from UKVIA, Ignacio Gonzalez Suarez from PMI, and Hugo Tan from BAT.⁹⁷
- In April 2022, Pawsey sponsored a reception event on behalf of UKVIA, titled “VApril Campaign Month”, which took place in the House of Commons Churchill Room.⁹⁸ Likewise, in April 2023, UKVIA’s ‘VApril’ campaign was again launched at the Churchill Room, with Adam Afriyie MP delivering the keynote.⁹⁹
- In November 2022, Pawsey and Afriyie appeared at the UKVIA Vaping Industry Forum, held in London. Other participants included representatives of vaping retailers such as VPZ; and trade associations and consumer organisations with tobacco industry links such as the CCC, the ACS and the NFRN.^{100, 101, 102, 103}
 - > Pawsey contributed the opening remarks to the forum via recorded video message in which he said that the APPG for Vaping “would continue to convey to government, the need to embrace vaping so that its potential health benefits could be fully achieved.”¹⁰⁴
 - > Pawsey won the award for “Most Supportive Parliamentarian” at the Vaping Celebration Dinner and Industry Recognition Awards.¹⁰⁵
 - > Afriyie delivered a keynote presentation, stating. “You are not in the tobacco industry, you’re in the healthcare industry.”¹⁰⁶
 - > Other public officials who attended included a senior trading standards officer from Buckinghamshire and Surrey trading standards, and a senior policy advisor from DEFRA.¹⁰⁷

⁹³ TobaccoTactics, [Institute of Economic Affairs](#), 2023

⁹⁴ UKVIA (@Vaping_Industry). ‘Our first panellists have been announced for the UKVIA Summer Forum!’, tweet, 16 July 2021

⁹⁵ UKVIA, [Trade and consumer groups from around the world call on World Health Organisation \(WHO\) to support harm reduction](#), 2021

⁹⁶ *Ibid.*

⁹⁷ World Vape Show, [Sessions for Dubai 2022](#), archived September 2022

⁹⁸ [House of Commons Sponsored events booking data, 01 August 2021 to 31 July 2022](#)

⁹⁹ O. Smith, [UKVIA EVENT, HOUSES OF PARLIAMENT, LONDON](#), Vapouround Magazine, 2023

¹⁰⁰ UKVIA, [Highlights from the UKVIA Forum 2022](#)

¹⁰¹ TobaccoTactics, [Consumer Choice Center](#), 2022

¹⁰² TobaccoTactics, [Association of Convenience Stores](#), 2021

¹⁰³ TobaccoTactics, [Federation of Independent Retailers \(NFRN\)](#), 2020

¹⁰⁴ UKVIA, [Highlights from the UKVIA Forum 2022](#)

¹⁰⁵ *Ibid.*

¹⁰⁶ *Ibid.*

¹⁰⁷ *Ibid.*

- In September 2022, Afriyie appeared at the industry-sponsored GTNF in Washington D.C.¹⁰⁸ Other attendees included representatives of tobacco companies, vaping technology manufacturers and distributors and organisations with current or former financial connections to the tobacco industry.^{109, 110, 111, 112}
 - > For his participation, he received, from the GTNF Trust, donations of transport, visa, food and accommodation estimated to be worth £10,388.¹¹³
 - > In his presentation, Afriyie criticised the WHO, arguing that its stance on tobacco harm reduction lacks transparency and appears to be subject to influences outside public health.¹¹⁴ “My message to investors: Britain is open for business ... The U.K. regulatory imprimatur on your documentation is a sign of quality and an aid to marketing and acceptance around the globe,” he said, adding: “My message to industry: Be good. Conduct open, honest research. If the answers aren’t exactly what you want, don’t hide the results. Every bit of extra information and knowledge that we gain through research is useful.”¹¹⁵
- In March 2023, Afriyie appeared at a virtual summit organised by UKVIA entitled “A Greenprint for Sustainable Vaping”. Other speakers included John Dunne, UKVIA director; Doug Mutter, director of VPZ; Edward Woodall, government relations director at the ACS; Mark Oates of We Vape; and Fadi Maayta (formerly of JUUL Labs and PMI) of Alternative Nicotine Delivery Solutions (ANDS), a distributor of international brands of newer nicotine and tobacco products in the Middle East.
 - > Becci Owen, a civil servant at the Environment Agency, was also listed as a speaker.¹¹⁶
 - > In a UKVIA press release, Afriyie was quoted as saying “Vaping has already saved so many lives in the UK that it has become part of the healthcare industry and now it must come together to find a sustainable solution for disposing of these vape products and prevent the naysayers from undermining an industry that has probably saved more lives than any other modern innovation in the history of our country.”¹¹⁷
 - > In April 2023, Mary Glindon, Labour MP for North Tyneside and vice-chair of the APPG for Vaping, delivered a keynote speech at the IN FOCUS half-day online conference organised by the GTNF.¹¹⁸ Other keynote speakers included Delon Human, a South African doctor with a historical relationship with BAT relating to tobacco harm reduction;¹¹⁹ James Murphy, director of research and science at BAT; and Derek Yach, former president of the PMI-funded FSFW.¹²⁰

¹⁰⁸ Global Tobacco and Nicotine Forum, [Sponsors](#), archived 2022

¹⁰⁹ Global Tobacco and Nicotine Forum, [2022 SPEAKERS: Fresh voices and viewpoints](#), 2022

¹¹⁰ Tobacco Tactics, [Foundation for a Smoke-Free World](#), 2022

¹¹¹ Tobacco Tactics, [Consumer Choice Center](#), 2022

¹¹² Tobacco Tactics, [Institute of Economic Affairs](#), 2023

¹¹³ UK Parliament, [Register of Interests: Adam Afriyie](#), accessed April 2023.

¹¹⁴ Tobacco Reporter, [Accessing Innovation](#), 2022

¹¹⁵ Tobacco Reporter, [Adam Afriyie](#), 2022

¹¹⁶ UKVIA, [‘A Greenprint for Sustainable Vaping’ – A Virtual Summit organised by the UKVIA](#), Microsoft Teams event page, archived March 2023

¹¹⁷ UKVIA, [VAPING INDUSTRY DEVELOPS ‘GREENPRINT’ FOR ENVIRONMENTAL ACTION](#), archived March 2023

¹¹⁸ Tobacco Reporter, [Focus on Harm Reduction](#), 2023

¹¹⁹ Tobacco Tactics, [Delon Human](#), 2020

¹²⁰ Global Tobacco and Nicotine Forum, [IN FOCUS: THR](#), archived March 2023

Amongst the panellists were a representative from FSFW; current and former employees of Altria; and a Romanian dentist who received a scholarship from the Tobacco Harm Reduction Scholarship Programme, run by Knowledge Action Change, which is funded by FSFW.^{121,122} Before the webinar, Andrew Lewer, Conservative MP for Northampton South – another vice chair of the APPG for Vaping – spoke at a breakfast event alongside Human.¹²³

Other incidents

- In December 2021, UKVIA stated that it had partnered with homeless shelter in Ipswich, providing residents with e-cigarette products supplied by three of its members^{124, 125} The Selig (Suffolk) Trust, which runs the shelter, is part of a local homelessness partnership which also includes Job Centre Plus (part of the Department for Work and Pensions), the Ipswich and East Suffolk NHS Clinical Commissioning Group, and the Norfolk and Suffolk NHS Foundation Trust¹²⁶ and works with local government.¹²⁷
- In August 2022, staff from Kensington & Chelsea council attended a Microsoft Teams meeting with JBP Associates Ltd which at the time was working on behalf of UKVIA (see above). The meeting was to discuss resources and support that UKVIA can offer in relation to e-cigarettes.¹²⁸
- [Ian Paisley](#), MP for North Antrim,¹²⁹ is chairman of the Gallaher Trust, a charitable trust started by a £5 million donation from JTI in 2017, following the closure of a local JTI factory (Gallaher has been a subsidiary of JTI since 2007).^{130, 131} The trust continues to contribute to various Northern Irish charitable causes and is currently partnered with The Northern Ireland Hospitality School of Excellence, The Northern Regional College, Habitat for Humanity NI, Ballymena Business Centre, Triangle Housing, Women's Aid, The Prince's Trust and Age NI.¹³² Separate to this incident, Paisley has been a speaker at JTI events, accepted gifts from JTI, and hosted JTI events at Parliament. He previously opposed plain packaging regulations.¹³³

¹²¹ *Ibid.*

¹²² Tobacco Harm Reduction Scholarship Programme, [Prof. Dr. Mihaela Răescu](#), archived September 2022

¹²³ Vapor Voice, [FEELM Commends UK Vapor Outlook During GTNE Event](#), 2023

¹²⁴ UKVIA, [UKVIA partners with Ipswich Night Shelter to support homeless to quit smoking](#), archived December 2021

¹²⁵ UKVIA, [Apply for membership](#), archived December 2022

¹²⁶ Ipswich Locality Homelessness Partnership, [Find out about the ILHP](#), archived February 2022

¹²⁷ Suffolk InfoLink, [Ipswich Locality Homelessness Partnership](#), 2022

¹²⁸ Royal Borough of Kensington and Chelsea. Email dated 17 March 2023, subject: Information request, reference: 9621403. Email response released under Freedom of Information Act.

¹²⁹ MPs and Lords, [Ian Paisley](#), 2022

¹³⁰ The Gallaher Trust, [About Us](#), 2022

¹³¹ Japan Tobacco International, [Our UK History](#), 2023

¹³² The Gallaher Trust, [Our Work](#), 2022

¹³³ Tobacco Tactics, [Ian Paisley](#), 2020

- In November 2021, Conservative MS for Clwyd West Darren Millar hosted an event for JTI at the Welsh Senedd.¹³⁴ Prior to the event, Millar said it would focus on the problem of cheap, illegal tobacco available in Wales.¹³⁵
- On 26 October 2021, Jack Lopresti, Conservative MP for Filton and Bradley Stoke, sponsored a dinner for FTI Consulting in Terrace Dining Room C at the House of Commons.¹³⁶ FTI Consulting is a large U.S. public relations firm, with a long history of working with the tobacco industry. In the UK alone, it has worked with BAT, and Imperial Brands and its subsidiary Fontem Ventures.¹³⁷
- On 23 February 2022, Mark Menzies, Conservative MP for Fylde, sponsored an event on behalf of JTI entitled “£49 Billion and Counting: The Black Market in Tobacco Products”. The reception was held at the Churchill Room, Houses of Parliament.¹³⁸ On 23 November 2022, he sponsored an almost identical event entitled “£51 billion and Counting: the Black Market in Tobacco Products” – again hosted by JTI.¹³⁹
- Two members of the House of Lords serve as directors of the community interest company CleanStreets CIC, which was set up to tackle smoking-related litter in the UK. It appears to be directly and wholly funded by the TMA and/or its members.¹⁴⁰
 - One of them is David Maclean, Baron Blencathra,¹⁴¹ who is member of the Joint Nature Conservation Committee and Deputy Chair of Natural England (the nature conservation agency for England).¹⁴² He is also a board member of the Food Standards Agency, DHSC.¹⁴³ Around the same time CleanStreets was established, he declared that he had previously accepted hospitality from the TMA.^{144, 145}
 - The other Member who is a director is Lord Porter (Gary Andrew Porter), who holds various roles in local and central government, including Non-executive Director of the Ministry of Housing, Communities and Local Government Departmental Board. He does not declare any interests in relation to the TMA.¹⁴⁶
- As of June 2023, the British Museum (BM) – non-departmental public body sponsored by the Department for Digital, Culture, Media & Sport – lists JTI as a corporate supporter on its website.¹⁴⁷ During the timeframe, the BM had repeated contact with JTI, as well as two companies working on JTI’s behalf (Carnstone, a management consultancy specialising in ESG; and Word on the Street, an events company).¹⁴⁸

¹³⁴ ASH Wales, [ASH Wales urges Senedd members to boycott tobacco industry event](#), 16 November 2021

¹³⁵ W. Hayward, [Welsh Conservative MS criticised for hosting tobacco company event at the Senedd](#), WalesOnline, November 2021

¹³⁶ House of Commons, [Sponsored event bookings, 01 August 2021 to 31 July 2022](#)

¹³⁷ TobaccoTactics, [FTI Consulting](#), 2021

¹³⁸ [House of Commons Sponsored events booking data, 01 August 2021 to 31 July 2022](#)

¹³⁹ Lord Bethell, [Twitter](#), 2022

¹⁴⁰ Clean Streets CIC, [Who we are](#), accessed June 2023 -

¹⁴¹ UK Parliament, [Lord Blencathra, Registered Interests](#), 2023

¹⁴² Joint Nature Conservation Committee, [Joint Committee](#), 2023

¹⁴³ Lord Blencathra, Registered Interests, [UK Parliament website](#), accessed June 2023

¹⁴⁴ Joint Nature Conservancy Committee, Email dated 20 March 2023, (no subject). Email response released under Freedom of Information Act

¹⁴⁵ Joint Nature Conservancy Committee, [Register of Interests](#), JNCC website, accessed June 2023 -

¹⁴⁶ UK Parliament, [Lord Porter of Spalding, Registered Interests](#), 2023

¹⁴⁷ The British Museum, [Current Corporate supporters](#), 2023

¹⁴⁸ The British Museum, E-mail and letter dated 23 March 2023, request-952484-96635a4e@whatdotheyknow.com, Emailed response released under Freedom of Information Act

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<p>However, in eight calls between the BM, JTI and Carnstone, the purpose was not recorded. Furthermore, details of the content and outcomes of these communications were not reported, with the outcome withheld under FOIA exemptions in 41 cases.¹⁴⁹</p> <ul style="list-style-type: none"> Stirling Castle, owned by Historic Environment Scotland, was booked for events by JTI (16/08/22) and a cigar company (Ritmeister, 22/03/22).¹⁵⁰ 						
Benefits to the Tobacco Industry						
<p>6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)</p>			2			
<ul style="list-style-type: none"> In November 2021, DEFRA held a meeting with the TMA, JTI, BAT & Imperial Brands regarding tobacco packaging, the EU Single-Use Plastics Directive and the Northern Ireland Protocol.¹⁵¹ The published meeting minutes note that the TMA had “expressed their concern that they will not be able to comply with the Article 7 [of the Directive] requirements due to the existing Standardised Packaging of Tobacco Products Regulations 2015. Therefore, officials met with industry representatives to discuss this issue.” Article 7 of the Directive requires manufacturers of certain single-use plastics (including tobacco products) to print information regarding waste management options for the product and the negative impact of plastic pollution.¹⁵² The DEFRA representative “noted the challenge in meeting the 1 January 2022 deadline for these changes to be implemented” and “thanked all for attending and said any information would be helpful”.¹⁵³ Ultimately, Northern Ireland failed to meet the 1 January 2022 deadline.¹⁵⁴ 						

¹⁴⁹ The British Museum, E-mail and letter dated 23 March 2023, request-952484-96635a4e@whatdotheyknow.com, Emailed response released under Freedom of Information Act

¹⁵⁰ Historic Environment Scotland, Email and letter dated 17 March 2023, request-951634-e6a586ec@whatdotheyknow.com. Emailed response released under Freedom of Information Act

¹⁵¹ Department for Environment, Farming and Rural Affairs, [Defra tobacco labelling meeting with Tobacco Manufacturers' Association \(TMA\)](#), 2021

¹⁵² EUR Lex, [DIRECTIVE \(EU\) 2019/904 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL](#), 2019

¹⁵³ Department for Environment, Farming and Rural Affairs, [Defra tobacco labelling meeting with Tobacco Manufacturers' Association \(TMA\)](#), 2021

¹⁵⁴ L. Smith, [Single use plastic: How do bans differ across the UK and EU?](#), House of Commons Library, February 2022

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7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)			2			
<ul style="list-style-type: none"> The major tobacco companies continued to pay very low levels of corporation tax in the UK, although low levels of corporation tax payments are not unique to the tobacco industry and/or the UK.^{155, 156, 157} Calls in the previous three UKTI reports for an audit of HMRC conduct on this matter have not been heeded. In March 2023, the UK extended the ratification of WHO FCTC to the territory of the Cayman Islands.¹⁵⁸ As of 20/05/2023, no such extension has made regarding the Protocol to Eliminate Illicit Trade in Tobacco Products.¹⁵⁹ 						
Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ¹⁶⁰) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organised by the tobacco companies or those furthering its interests. (Rec 2.1)						5
<p>Concerning government ministers</p> <ul style="list-style-type: none"> In March 2021, Kwasi Kwarteng, then Secretary of State for Business, Energy and Industrial Strategy, attended a meeting with companies including BAT to discuss business policy.¹⁶¹ Previously, Kwarteng had been a member of the APPG for Corporate Governance, which has received donations from BAT (see #13).¹⁶² He also attended a dinner paid for by BAT in 2018.¹⁶³ In May 2021, DEFRA replied to a letter from the TMA regarding tobacco-related litter, which had been sent the previous month. The reply was signed by Rebecca Pow MP, then Parliamentary Under-Secretary of State at DEFRA. It stated that department officials would contact the TMA to arrange a meeting “as the findings of this research are established”. Pow also thanked the TMA and signed off “Please let me know if I can be of any further assistance with this or any other matters in the future.”¹⁶⁴ On 28 June 2021, the then Secretary of State for International Trade Liz Truss met with BAT and Imperial Brands, amongst other corporations, to discuss business support and international trade policy.¹⁶⁵ 						

¹⁵⁵ Branston, J.R., & Gilmore, A. (2019). The Failure of the UK to Tax Adequately Tobacco Company Profits, *Journal of Public Health*

¹⁵⁶ Tax Justice Network *Ashes to Ashes: How British American Tobacco avoids taxes in low and middle income countries*, April 2019, accessed May 2020

¹⁵⁷ Big Tobacco, Big Avoidance: [Big_Tobacco_Big_Avoidance.pdf \(bath.ac.uk\)](#)

¹⁵⁸ United Nations, *Status of Treaties - WHO Framework Convention on Tobacco Control*, May 2023

¹⁵⁹ United Nations, *Status of Treaties – 4.a Protocol to Eliminate Illicit Trade in Tobacco Products*, May 2023

¹⁶⁰ Includes immediate members of the families of the high-level officials

¹⁶¹ Department for Business, Energy and Industrial Strategy, [BEIS ministerial meetings, January to March 2021](#), July 2021

¹⁶² Tobacco Tactics, [Kwasi Kwarteng](#), 2022

¹⁶³ *Ibid.*

¹⁶⁴ Department for Environment, Food and Rural Affairs, [letter to Rupert Lewis of the Tobacco Manufacturers' Association](#), 5 May 2021

¹⁶⁵ UK Department for International Trade, [DIT ministers' meetings: April to June 2021, March 2023](#), accessed March 2023.

- In November 2021, Maree Todd, SNP MSP for Caithness, Sutherland and Ross and Minister for Public Health, Women’s Health and Sport had a video conference with the SGF, of which all four transnational tobacco companies are members. The meeting was to discuss the Scottish consultation on “Vaping products – tightening rules on advertising and promoting”.¹⁶⁶
- On 14 April 2022, Kwasi Kwarteng received a lunch from Kekst CNC, a PR company that has PMI as a client.^{167,168}
- In September 2022, Felicity Buchan, Parliamentary Under Secretary of State for Housing and Homelessness, along other members of the APPG for Poland, on a visit to Warsaw, attended a reception hosted by the British-Polish Chamber of Commerce, and met representatives from BAT Poland amongst other businesspeople. Other members of the APPG attended the event included: Lord Anderson of Swansea, Baroness Blackstone, Caroline Ansell MP, Dan Carden MP, Nia Griffith MP, and Damien Moore MP.¹⁶⁹

Concerning diplomatic staff

- In 2019, the then British Ambassador to Yemen, Michael Aron, attended the opening of a BAT factory in Yemen.¹⁷⁰ When interviewed by local media, he highlighted the benefit the investment would bring to BAT and Yemen. The Embassy did not keep a record of the event as it was not seen as a “formal meeting”. The incident was revealed in a paper published in 2023.¹⁷¹
- In December 2022, Ben Llewellyn-Jones, the British Deputy High Commissioner in Nigeria, and Lucy Pearson, Country Director for Nigeria at the British Council, appeared at the Nigeria-Britain Association’s gala in Lagos. Llewellyn-Jones also gave a speech at the event, which “was organised in partnership” with several private sector actors including BAT. In the photos of the event the BAT logo features prominently.¹⁷²
- In February 2023, a representative of the British Embassy in Lebanon attended the inauguration of a new production line of the Regie, the Lebanese state-owned tobacco monopoly. The ceremony was also attended by representatives of international tobacco companies.¹⁷³

Concerning political parties

- On 4 October 2021, a fringe event was held at the Conservative Party Conference in Manchester entitled “The Golden Opportunity: How Britain can embrace tobacco harm reduction”.¹⁷⁴ It was organised by the [Adam Smith Institute](#) (ASI) – a think tank with a history of tobacco industry funding – in partnership with JTI.¹⁷⁵ It was chaired by Daniel Pryor of the ASI, while panellists included representatives from JTI, We Vape, and the IEA, another thinktank with direct financial links to the tobacco industry.¹⁷⁶

¹⁶⁶ TobaccoTactics, [Scottish Grocers’ Federation](#), 2023

¹⁶⁷ Department for Business, Energy and Industrial Strategy, [BEIS ministerial hospitality, April to June 2022](#)

¹⁶⁸ TobaccoTactics, [Kekst CNC](#), 2021

¹⁶⁹ BritishPoles.uk, [British Parliamentarians visited Poland to strengthen ties between the two countries](#), undated. Accessed March 2023

¹⁷⁰ R. Alebshehy et al., [A “willingness to be orchestrated”: Why are UK diplomats working with tobacco companies?](#) *Frontiers*, 2023.

¹⁷¹ M. Safi, [UK ambassador to Yemen took part in opening of Jordanian cigarette factory](#), March 2023.

¹⁷² BellaNaija, [The Nigeria-Britain Association’s Gala to Celebrate the relationship between Nigeria & Britain](#), archived December 2022

¹⁷³ RLTT, [Mikati sponsored the inauguration of the Regie’s production line and the launching of “application of barcoded stamps”](#), February 2023

¹⁷⁴ Adam Smith Institute, [The Golden Opportunity: How Britain can embrace tobacco harm reduction](#), archived December 2022

¹⁷⁵ TobaccoTactics, [Adam Smith Institute](#), 2022

¹⁷⁶ TobaccoTactics, [Institute of Economic Affairs](#), 2023

- On 3 October 2022, a “ThinkTent” fringe event was held at the Conservative Party Conference in Birmingham entitled “Politics and prohibition: should smoking be banned for good?”,¹⁷⁷ hosted by the industry-funded¹⁷⁸ smokers’ rights group Forest and chaired by Forest director [Simon Clark](#). The speakers were [Claire Fox](#), who worked with Forest on its “Free Society” campaign;¹⁷⁹ Lord Moylan (Daniel Moylan), who has made pro-tobacco statements in parliament, such as during the debate on the Health and Care Bill in February 2022;¹⁸⁰ and Chris Snowdon of the IEA. ThinkTent – a series of events which has been a fixture of the conference in recent years – is organised by the [Taxpayers’ Alliance](#) and the IEA.¹⁸¹
- The MSPs David Torrance and Siobhian Brown were due to appear at a side event of the SNP conference in Aberdeen in October 2022 entitled “Embracing Alternatives to Smoking in Scotland”. It was sponsored by JTI, co-sponsored by Dods, and was due to be chaired by Daniel Pryor of the ASI. Speakers included representatives from the IEA and the SGF – both of which have financial links to the industry – as well as Jamie Sanders from JTI.^{182, 183, 184, 185}
 - ASH Scotland contacted the SNP’s Chief Executive, Holyrood Events and the two MSPs to highlight that the industry and its allies are not public health stakeholders and that the event contravened WHO FCTC Article 5.3. Both MSPs withdrew, and the event was cancelled by the organisers.¹⁸⁶
- On the 12 of February 2021, the SGF attended “a video conference round table meeting organised by Holyrood Magazine about the role e-cigarettes could play in meeting Scotland’s target of a tobacco free generation by 2034”. The meeting was also attended by MSPs Donald Cameron (Conservatives), Emma Harper (SNP), [Richard Lyle](#) (SNP) and Brian Whittle (Conservatives).¹⁸⁷ Speakers at the conference roundtable meeting also included Professor Neil McKeganey, co-director of the industry-linked consultancy [Centre for Substance Use Research, \(which has also received funding from FSFW\)](#) and Mark Oates, the director of campaign organisation We Vape.¹⁸⁸

¹⁷⁷ ThinkTent, [Politics and prohibition – should smoking be banned for good?](#), 2022

¹⁷⁸ Forest, [About Forest](#), archived 2021

¹⁷⁹ TobaccoTactics, [Claire Fox](#), 2020

¹⁸⁰ UK Parliament, [Health and Care Bill - Hansard](#), 2022

¹⁸¹ ThinkTent, [ThinkTent 2022 Schedule](#), archived December 2022

¹⁸² TobaccoTactics, [Scottish Grocers’ Federation](#), 2023

¹⁸³ TobaccoTactics, [Institute of Economic Affairs](#), 2023

¹⁸⁴ T. Gordon, [SNP axe fringe meeting on ‘embracing’ vaping as MSPs pull out amid health concerns](#), The Herald, 2022

¹⁸⁵ S. Duffy, [Japan Tobacco International sponsored event cancelled at Scottish Nationalist Party conference but Coca Cola obesity event goes ahead](#), Tobacco Control blog, 2022

¹⁸⁶ *Ibid.*

¹⁸⁷ [The Scottish Parliament lobbying register](#), Scottish Grocers Federation, February 2021

¹⁸⁸ Jack Thomson, [Associate feature: Changing direction: vaping’s role in achieving Scotland’s 2034 smoke-free target](#), Holyrood, 6 April 2021, accessed March 2023.

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<ul style="list-style-type: none"> BAT utilises award recognition or government equality-based certification in its promotional material.¹⁸⁹ <ul style="list-style-type: none"> It was recognised by UK Government for disability support in 2022¹⁹⁰ It received National Equality Standard and Global Equality Standard awards for diversity and inclusion. The award assessment was carried out by accountancy firm EY and the National Equality Standard. The UK Government is a partner in the National Equality Standard award programme.¹⁹¹ BAT stated in 2022 it has been “ranked in the top 10% of 141 responding companies by the Workforce Disclosure Initiative (WDI) for the third consecutive year. The WDI is an annual investor rating, run by the investor group ShareAction and part funded by the UK Government’s Foreign, Commonwealth and Development Office.”¹⁹² <p>Other</p> <ul style="list-style-type: none"> British International Investment, the government’s development finance institution, held a “substantial amount of e-mail correspondence” with tobacco companies.¹⁹³ 						
<p>9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)</p>				3		
<ul style="list-style-type: none"> Trading Standards, local authority departments enforcing consumer protection regulations, publish a list of annual outputs for tackling tobacco smuggling.¹⁹⁴ Its webpage does not mention WHO FCTC Article 5.3 or working with the tobacco industry, although it documents its “successes” and notes that it works with industry partners including the Anti-Counterfeiting Group¹⁹⁵ of which Imperial Brands (Imperial Tobacco) and Philip Morris UK are full members.¹⁹⁶ Some local authorities across the UK still rely on the tobacco industry to determine the authenticity of seized products. Also, the tobacco industry is frequently the provider of intelligence on illegal products. Most of the interactions between local authorities and the tobacco industry were not made public.¹⁹⁷ 						

¹⁸⁹ BAT, [Sustainability recognition](#), 2022

¹⁹⁰ BAT, [Recognition for disability support](#), 2022

¹⁹¹ BAT, [BAT lands industry-first diversity recognition](#), 2022

¹⁹² BAT, [BAT recognised as an ESG leader for workforce transparency](#), 2022

¹⁹³ British International Investment plc, Email and letter dated 20 March 2023, Ref: FOI2023/006, request-951563-36cc3154@whatdotheyknow.com, Emailed response released under Freedom of Information Act

¹⁹⁴ Trading Standards, [Annual outputs for tackling tobacco smuggling](#), government website, updated 3 March 2023, accessed March 2023

¹⁹⁵ Trading Standards, [Trading standards successes 2021-22](#), government website, date, accessed March 2023

¹⁹⁶ Anti-counterfeiting Group, [Full Members](#), website, undated, accessed March 2023

¹⁹⁷ Responses released under Freedom of Information Act from UK local authorities: Aberdeenshire, Blaenau Gwent, Caerphilly, Brent, Dorset, East Ayrshire, Essex, Falkirk, Cyngor Gwynedd, Hammersmith & Fulham, Islington, Kingston upon Thames, Knowsley, Merthyr Tydfil, Middlesbrough, North Ayrshire, North East Lincolnshire, North Tyneside, North Yorkshire, Oldham, Redcar & Cleveland, Salford, Sandwell, Slough-on-Sea, Southend, Suffolk, Swansea, Trafford, Westminster, Windsor & Maidenhead, Wolverhampton. 28 February 2023 – 6 April 2023.

- The following incidents of engagement with tobacco industry regarding anti-counterfeiting were identified:
 - In November 2022, Hammersmith & Fulham Trading Standards Team spoke with various tobacco company representatives at the Anti-Counterfeiting Group Roadshow at Hilton Olympia Hotel, Kensington.¹⁹⁸
 - Also in November 2022, Bournemouth, Christchurch & Poole Trading Standards Team attended an Anti-counterfeiting Conference, at which tobacco industry representatives were present.¹⁹⁹
- In responses to FOI requests, 17 local authorities confirmed they had received two emails from BAT (addressed to Trading Standards teams) in February 2022 in relation to ‘non-compliant’ or “illegal” e-cigarettes. After receiving the e-mails from BAT, Trafford Metropolitan Borough Council reported that it had sent an advice note to an importer in the borough.²⁰⁰
- A response to an FOI request showed that Hammersmith and Fulham Trading Standards met with PMI on 25/08/22, at PMI’s request, to discuss improvements to PMI’s test purchasing and the “receptiveness of Trading Standards departments to the results of PMI-commissioned test purchases”. Ideas were discussed but there were no resulting actions by H&F Trading Standards.²⁰¹
- In November 2021, HMRC selected Dentsu Tracking (part of Dentsu International; previously Dentsu Aegis Network) as provider of the UK’s tobacco track and trace system, with the two parties signing a five-year contract worth £5 million.²⁰² The system became operational on 1 July 2022.²⁰³
 - Dentsu has had clear links with the tobacco industry. In 2017, Dentsu acquired the digital services firm blue-infinity, which, prior to the acquisition, had worked on development of Codentify, an ineffective and inefficient track and trace system developed by the tobacco industry.^{204, 205} Indeed, in a 2015 press release, blue-infinity stated that it had “integrated Codentify® solutions for all major players in the tobacco industry, including PMI, JTI and ITG [an Imperial Brands subsidiary]” since 2003.²⁰⁶ Dentsu also has a relationship with PMI going back to at least the mid-1990s.^{207, 208}

¹⁹⁸ Hammersmith and Fulham Borough Council, Email dated 13 March 2023, subject: Information request, reference: 7402965. Email response and summary document released under Freedom of Information Act

¹⁹⁹ Bournemouth, Christchurch & Poole Council, Email dated 20 March 2023, subject: Freedom of Information Request. Email response released under Freedom of Information Act

²⁰⁰ Trafford Metropolitan Borough Council, Email dated 6 April 2023, (no subject), Emailed response released under Freedom of Information Act

²⁰¹ Hammersmith and Fulham Borough Council, Email dated 13 March 2023, subject: Information request, reference: 7402965. Email response and summary document released under Freedom of Information Act

²⁰² UK Government, [Provision of the UK Tobacco Track and Trace System](#), Contracts Finder, 2021

²⁰³ Dentsu Tracking Resource Centre, [UK Tobacco Track & Trace System](#), 2022

²⁰⁴ A. Down, [The EU’s Track & Trace Smokescreen](#), *Organized Crime and Corruption Reporting Project*, 2020

²⁰⁵ See [Appendix III](#) of B. Gomis, A.W.A. Gallagher, A. Rowell et al, [Turning a threat into an opportunity: British American Tobacco’s weakening of the Protocol to Eliminate Illicit Trade in Tobacco Products](#), Tobacco Control, 2022

²⁰⁶ blue-infinity, [Recent Press Release](#), Videojet, 2015

²⁰⁷ Philip Morris, [DENTSU Japan visitors](#), 1995

²⁰⁸ Balgley A. [Email to Eric Ostern dated 26 January 2001](#).

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<ul style="list-style-type: none"> In October 2021, the MHRA published updated guidance which may lead to the prescription of e-cigarettes to smokers as a cessation tool.²⁰⁹ <ul style="list-style-type: none"> In December 2021, the National Centre for Smoking Cessation and Training – part-funded by Public Health England (PHE) – published a set of guidelines for smoking cessation services interested in providing e-cigarettes to their clients.²¹⁰ These guidelines were produced alongside the OHID, which is part of the DHSC. In a section on WHO FCTC Article 5.3, the guidelines state: “Binding contracts to provide goods are unlikely to be considered prohibited by Article 5.3; however, national and local government bodies including NHS providers should take steps to ensure that Article 5.3 is not breached. Any project requiring non-binding partnerships or implying corporate social responsibility would not be appropriate under Article 5.3”.²¹¹ In October 2022, it was reported that pregnant women were to be given free vaping devices by Lambeth Council in an effort to stop them from smoking. According to Ben Kind, a Labour councillor, the scheme “is aimed at improving the health of the family and saving money in the process of approximately £2,000 per year per family.” However, the NHS urged caution, stressing that little research had been done on the effects of vaping during pregnancy.²¹² By January 2023, the scheme was being implemented.²¹³ In 2019, it was reported that VPZ, a British e-cigarette company which received a loan from PMI, had struck a deal with The Ladywell Unit at University Hospital Lewisham, one of the UK’s largest mental health hospitals, to provide free e-cigarettes to those trying to quit smoking.” VPZ also sent petitions to British and Scottish parliaments to encourage switching to vaping.²¹⁴ 						
<p>10. The government accepts, supports, endorses, or enters into partnerships or non-binding agreements with the tobacco industry or any entity working to further its interests. (Rec 3.1)</p> <p><i>NOTE: This does not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i></p>				3		
<ul style="list-style-type: none"> On 28 June 2021, the then Secretary of State for International Trade Liz Truss met with BAT and Imperial Brands, amongst other corporations, to discuss business support and international trade policy.²¹⁵ 						

²⁰⁹ Department of Health and Social Care and Office for Health Improvement and Disparities, [E-cigarettes could be prescribed on the NHS in world first](#), 2021

²¹⁰ NCSCCT, [Incorporating e-cigarettes into your Stop Smoking Service: Making the case and addressing concerns](#), 2021

²¹¹ *Ibid.*

²¹² A. France, [Pregnant women to be given free vapes by Lambeth council](#), Evening Standard, 2022

²¹³ EDGE Vaping, [FREE VAPES FOR PREGNANT WOMEN](#), 2023

²¹⁴ TobaccoTactics, [VPZ](#), 2023

²¹⁵ UK Department for International Trade, [DIT ministers’ meetings: April to June 2021, March 2023](#), accessed March 2023

- In May 2021 DEFRA wrote to the TMA to inform tobacco companies of DEFRA’s decision to explore regulatory options to tackle smoking-related litter, as opposed to a previously discussed voluntary “non-regulatory producer responsibility scheme”.²¹⁶ This letter followed a “smoking-related litter roundtable” meeting between DEFRA and tobacco companies in September 2020 (reported in previous index).²¹⁷
- In 2021, PMI donated US\$554,343 to the anti-litter organisation [Clean Up Britain](#), as part of a multiyear agreement.^{218, 219} Clean Up Britain partnered with Warwick District Council in 2021²²⁰ on a five-year “Now or Never” campaign that tackles litter in Warwickshire and hands out Green Business Champion environmental awards to local businesses.²²¹
- In April 2022, the World Vape Show, a major vaping industry event, announced a partnership with the MHRA, the UK government agency responsible for ensuring the safety of medicines and medical devices. The MHRA was due to work with World Vape Show to ensure that the products being exhibited were compliant with UK regulations.^{222, 223}
 - MHRA was warned that attending World Vape Show events would constitute a violation of Article 5.3 of the WHO FCTC, and the MHRA representative withdrew from the World Vape Show event in Dubai.
- Local council pension funds investing in the tobacco industry:
 - As of 31 March 2021, the London Borough of Hounslow Pension Fund had a £12 million investment in BAT – equivalent to 1% of its total portfolio and the Fund’s tenth largest equity holding.²²⁴ However, in the report published the following year, this investment does not feature.²²⁵
 - As of 31 March 2021, the Rhondda Cynon Taf Pension Fund had £9,160,527 invested in BAT via its fund manager Baillie Gifford. This was its eighth largest holding.²²⁶ In the report published the following year, this investment does not feature and it is unclear whether the Fund retains it.²²⁷
 - As of July 2022, the Derbyshire Pension Fund had £984,241 invested in PMI.²²⁸
 - In January 2023, it was revealed that the Lothian Pension Fund, which administers the Local Government Pension Scheme in Edinburgh and the Lothians, continued to invest in BAT, as well as other companies which continued to operate in Russia despite the invasion of Ukraine.²²⁹

²¹⁶ DEFRA, [Letter to the Tobacco Manufacturers Association](#), 5 May 2021

²¹⁷ DEFRA, [Correspondence: Smoking related litter roundtable meeting](#), 2 Sep 2020

²¹⁸ PMI, [2021 Social Contributions at a glance](#), 2021

²¹⁹ Tobacco Tactics, [Clean Up Britain](#), 2022

²²⁰ Clean Up Britain, [homepage](#), 2022

²²¹ Now or Never, [homepage](#), 2022

²²² VapeBusiness, [World Vape Show to become ‘most compliant’ after teaming up with MHRA](#), archived April 2022

²²³ *Ibid.*

²²⁴ London Borough of Hounslow Pension Fund, [Report and Accounts for the year ended 31 March 2021](#)

²²⁵ London Borough of Hounslow, [Hounslow Pension Fund Annual Report 2022](#)

²²⁶ Rhondda Cynon Taf, [Pensions Annual Report](#), 2021

²²⁷ Rhondda Cynon Taf, [Pensions Annual Report](#), 2022

²²⁸ Derbyshire Pension Fund, [Appendix 3. Investment Portfolio Valuation, July 2022](#)

²²⁹ B. Briggs, [Scotland’s largest council pension funds have £230m invested in firms operating in Russia](#), The Ferret, 2023

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<ul style="list-style-type: none"> For the period 2020-21, the Royal United Services Institute (RUSI), an independent thinktank with a focus on defence and security, received funding from both PMI and JTI, as well as several UK government departments and agencies.²³⁰ RUSI has received funding from both government sources and the tobacco industry since at least 2015-16.²³¹ It has been involved with extensive research on the illicit tobacco trade, including a 2017 study it commissioned to KPMG,²³² an accountancy firm with strong ties to the tobacco industry dating back decades.²³³ 						
Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)			2			
<ul style="list-style-type: none"> HMRC regularly holds meetings with a wide range of tobacco industry stakeholders including JTI, Imperial Brands, BAT, PMI, and the TMA. Information about attendees and issues discussed is updated quarterly. No meeting minutes or outcomes are publicly available²³⁴ <ul style="list-style-type: none"> Between April 2021 and December 2022, HMRC reported that it met with the following companies and organisations: the ACS; BAT; Chancellor Tobacco Ltd.; Davidoff; Dentsu; Gawith & Hoggarth; De La Rue; Imperial Tobacco Ltd.; Hunters & Frankau Ltd.; Imported Tobacco Products Advisory Council; JTI; Karelia UK; McChrystal’s Snuff; PMI; Ritmeester Cigars UK Ltd.; Tor Imports Ltd.; the TMA; and Representatives from Tobacco Manufacturers/Importers in the UK tobacco supply chain²³⁵ At these meetings, the issues discussed were reported variously as: Track and trace; issues following the end of the transition period; parcel simplification for Northern Ireland; validation controls; tender exercise update; EU system changes affecting Northern Ireland; mobilisation of future UK system; reimbursement review; other tobacco products; business readiness for the end of the transition period; Regular Joint Alcohol and Tobacco Consultative Group meeting to discuss stakeholder issues, and provide updates on excise projects.²³⁶ The Foreign, Commonwealth and Development Office (FCDO) replied to an investigation carried out by the Information Commissioner’s Office regarding non-disclosure of information of an ambassador attending a tobacco factory opening (see #8) stating that the FCDO “would only record details of more formal meetings and not receptions/launch events such as this.”²³⁷ Since March 2013, the Treasury has not published a list of its officials’ meetings with the tobacco industry and topics of discussion.²³⁸ Instead, it publishes a list of all ministers’ meetings with 						

²³⁰ Royal United Services Institute, [Funding](#), 2023

²³¹ Royal United Services Institute, [Supporters of RUSI](#), archived 2016

²³² RUSI, [The Illicit Cigarette Trade](#), 2017

²³³ Tobacco Tactics, [KPMG](#), 2023

²³⁴ HMRC, [HMRC officials’ meetings with tobacco stakeholders](#), 2021 & 2022

²³⁵ *Ibid.*

²³⁶ *Ibid.*

²³⁷ Decision number is IC-167611-D5S9

²³⁸ HM Treasury, [Treasury officials’ meetings with tobacco stakeholders](#), UK government website, 19 April 2013

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<p>external organisations.²³⁹ Responses to FOI requests revealed that between April 2021 and February 2023, HM Treasury officials had 11 meetings and one phone call, as well as 8 email exchanges, with tobacco company representatives from BAT, Imperial Brands, JTI and PMI. No further details were supplied.²⁴⁰</p> <ul style="list-style-type: none"> • Consultations allow tobacco industry submissions and allow confidential submissions²⁴¹ (see #1 re Scottish consultation). Other consultation didn't publish any submissions (see #2 re DEFRA consultation). • As of March 2023, parliamentary data on functions and hospitality covered only the period to 31 July 2022.²⁴² • MHRA has an FOI disclosure log, but it only runs to December 2020. No FOI requests relating to tobacco or nicotine products were found.²⁴³ • The Scottish Parliament lobbying register shows multiple meetings between MPs and the tobacco industry without details.(see #1) • For many government departments and agencies, information on meetings with the tobacco industry and its representatives is not readily available online. • Responses to FOIs showed regular interactions between local authorities and the tobacco industry that are not published (see #9). 						
<p>12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organisations, and individuals acting on their behalf including lobbyists (Rec 5.3)</p>					4	
<ul style="list-style-type: none"> • The government does not set out comprehensive rules on full disclosure or registration of tobacco industry entities. • The 2011 Tobacco Control Plan for England stated that “in the future, organisations engaging with the DHSC on tobacco control, for example by responding to consultation exercises, will be asked to disclose any links with, or funding received from, the tobacco industry.”²⁴⁴ DHSC confirmed to the authors of this report that when the government opens consultations that may involve tobacco industry input, a reference to Article 5.3 is included and respondents are formally asked to declare any ties with the tobacco industry. 						

²³⁹ HM Treasury, [HMT ministers' meetings, hospitality, gifts and overseas travel](#), September 2022

²⁴⁰ HM Treasury, Email and letter dated 20 March 2023, Ref: FOI2023/03455, Emailed response released under Freedom of Information Act

²⁴¹ The Scottish Government, [Tightening rules on advertising and promoting vaping products Consultation Paper 2022](#), Page 24

²⁴² UK Parliament, [Commercial Events Booking Data](#), 31 July 2022

²⁴³ Medicines and Health Regulatory Authority, [MHRA FOIA disclosure log](#), government website, accessed March 2023.

²⁴⁴ UK Government, [A Tobacco Control Plan for England](#), 2011

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<ul style="list-style-type: none"> • However, there continues to be no requirement for the tobacco industry and affiliated entities to register with the government. A voluntary lobbying register has existed in the UK since 2011.²⁴⁵ The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act, which came into force on 1 April 2015, requires any person (corporate or natural) who carries out “the business of consultant lobbying” to be entered in the Register of Consultant Lobbyists.²⁴⁶ The act only requires the registration of consultant (professional) lobbyists who are VAT registered.²⁴⁷ • However, since 2018 Scotland has required regulated lobbying to be recorded in an official Lobbying Register. Regulated lobbying is defined as “lobbying which takes place face-to-face with MSPs, members of the Scottish Government, Special Advisers or Permanent Secretary and which relates to Scottish Government or Parliamentary functions.”²⁴⁸ 						
Conflict of Interest						
<p>13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) 1 Yes 5 No</p>						5
<ul style="list-style-type: none"> • There is no legislation prohibiting the tobacco industry from donating to political parties, candidates, or campaigns. In addition, it has been noted that several politicians who are senior government officials have a history of receiving money from the tobacco industry (see below and answers to # 5, #14 & #15 for more details). There are general rules regulating political contributions and the disclosure of such contributions. Donations worth over £7,500 to national political parties must be declared.²⁴⁹ Although such payments are permitted under UK legislation, WHO FCTC Article 5.3 implementation guidelines state that “Payments, gifts and services, monetary or in-kind, and research funding offered by the tobacco industry to government institutions, officials or employees can create conflicts of interest”.²⁵⁰ • The APPG on Corporate Governance has a recent history of accepting money from the tobacco industry and its allies, going back to at least 2016.²⁵¹ <ul style="list-style-type: none"> - In November 2021, BAT donated £5,000²⁵² and in May 2022, Deloitte, a professional services firm with longstanding relationships with the tobacco industry, donated £10,000 to the APPG. • In June 2022, Craig Mackinlay, Conservative MP for South Thanet, and David Morris, Conservative MP for Morecambe and Lunesdale, accepted two tickets each for the Queen and Adam Lambert concert at the O2 Arena, at a total value of £360. The donor was JTI.^{253, 254} 						

²⁴⁵ [UK Lobbying Register](#)

²⁴⁶ [Office of the Registrar of Consultant Lobbyists](#)

²⁴⁷ UK Government, [Transparency of lobbying, non-party campaigning and trade union administration act 2014](#)

²⁴⁸ The Scottish Parliament, [Lobbying Register - Information Leaflet](#), undated

²⁴⁹ [Donations and loans reported every quarter by political parties](#), the Electoral Commission website

²⁵⁰ WHO FCTC Secretariat, [Guidelines for implementation of Article 5.3](#), 2013

²⁵¹ UK Parliament, [Register Of All-Party Parliamentary Groups \[as at 21 July 2016\] – Corporate Governance](#)

²⁵² UK Parliament, [Register Of All-Party Parliamentary Groups \[as at 9 February 2022\] – Corporate Governance](#)

²⁵³ UK Parliament, [Register of Interests for Craig Mackinlay](#), 2023

²⁵⁴ UK Parliament, [Register of Interests for David Morris](#), 2023

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14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Attorney General)(Rec 4.4.)				3		
<ul style="list-style-type: none"> As of April 2023, Richard Lyle, a former SNP MSP with previous industry connections who stepped down in 2021, was listed as a consultant to Halogen Communications on the PR firm’s website.²⁵⁵ Twelve of the 17 meetings that Halogen is registered as having facilitated between April 2021 and April 2023 were for Philip Morris Limited.²⁵⁶ In April 2022, Lyle was present at one of these meetings, a video conference with David Torrance MSP – a former SNP colleague.²⁵⁷ While an MSP, Lyle accepted over £800 from PMI to cover his travel, accommodation and food on a visit to its factory in Switzerland.²⁵⁸ He was also lobbied by BAT, JTI and Imperial Brands.²⁵⁹ The former British Ambassador, Michael Aron (see #8), started working as Chief International Affairs Officer for HSA Group, Yemen region, in October 2022. He is listed in the leadership team of HAS and his profile on the company website refers to his experience “serving as UK Ambassador to Kuwait, Iraq, Libya, Sudan and, most recently, Yemen”.²⁶⁰ HSA is a large business corporate that manufactures products including cigarettes.²⁶¹ The PR firm JPB Associates facilitated three meetings between UKVIA and MSPs from 01/04/2021 to 03/04/2023.²⁶² Two JPB employees have current or recent public sector links: <ul style="list-style-type: none"> Chris Hayward, JBP director, was Sheriff of the City of London from 2019-20²⁶³ and is currently Policy Chairman of the City of London Corporation.²⁶⁴ Kieran Bergholcs, JBP’s account director, worked in the Houses of Parliament for Lord Goldsmith of Richmond Park (Conservatives) from 2019-20 and then Mark Garnier, MP for Wyre Forest (Conservatives) from 2020-21.²⁶⁵ In May 2021, the think tank Future Health published a report entitled “Make Smoking History”. It was written by Richard Sloggett, Future Health founder and director and a special advisor to the Secretary of State for Health and Social Care from 2018-19.²⁶⁶ The first of two reports, it aims to study “how to eliminate smoking in England over the next decade.” The report was funded by JUUL Labs, which, at the time, was part-owned by U.S. tobacco giant Altria.²⁶⁷ 						

²⁵⁵ Halogen, [About Us](#), archived April 2023

²⁵⁶ The Scottish Parliament, [Lobbying Register](#), undated

²⁵⁷ The Scottish Parliament, [Lobbying Register](#), David Torrance, April 2022, accessed

²⁵⁸ A. Whitaker, [‘I let Big Tobacco pay for my jaunt to Switzerland because I want to quit smoking.’](#) says MSP, The Herald, 2017

²⁵⁹ TobaccoTactics, [Richard Lyle](#), 2022

²⁶⁰ HSA, our leadership, <https://www.hsayemen.com/en/about-us/our-leadership/>

²⁶¹ HSA, Our companies, <https://hsagroup.com/explore-hsa-business/our-companies/commercial-companies/al-saeed-trading-company-ltd.aspx>

²⁶² The Scottish Parliament, [Lobbying Register](#), undated

²⁶³ Barts Guild, [Chris Hayward](#), 2017

²⁶⁴ City of London, [Policy Chairman](#), 2022

²⁶⁵ Kieran Bergholcs, [LinkedIn profile](#), 2023

²⁶⁶ Future Health, [People](#), undated

²⁶⁷ R. Sloggett, [Make Smoking History: Getting back on track to eliminate smoking after the pandemic](#), Future Health, 2021

	0	1	2	3	4	5
15. Current government officials and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)			2			
<p>Within the index timeframe, no evidence was found of government officials working directly for the tobacco industry while simultaneously working in government.</p> <p>However, there are various instances of involvement of senior government figures with the tobacco industry and its allies, both directly and indirectly. Most (though not all) occurred prior to the timeframe under analysis, and have involved cabinet ministers in the governments of Boris Johnson (December 2019-September 2022), Liz Truss (September 2022-October 2022) and Rishi Sunak (October 2022-present). There are also similar incidents involving Members of the House of Lords, local councillors and civil servants.</p> <p>The following list includes all public officials, in post during the index timeframe, for whom evidence was found of current or former connections with the tobacco industry and/or its allies.</p> <p>Johnson government (2019-2022)</p> <ul style="list-style-type: none"> • Prime Minister Boris Johnson received a £20,000 loan and £3,000 donation to his leadership campaign from CTF Partners (Crosby, Textor, Fullbrook), a company with long links and financial ties to the tobacco industry.²⁶⁸ One of the company's co-founders, Lynton Crosby, was at the centre of a controversy in 2013 over the government abandoning its plans to introduce plain packaging. At that time, Crosby was an election advisor for the ruling Conservative Party.²⁶⁹ • Crosby also helped Johnson with his London mayoral election campaigns in 2008 and 2012.²⁷⁰ ²⁷¹ Boris Johnson also received a payment for a speech of up to £10,000 from the Association of Tobacco in June 2007.²⁷² • In February 2022, Johnson appointed David Canzini as deputy chief of staff. Prior to this appointment, Canzini had been a director at the Crosby Textor Group (CT Group), a polling and research company founded by Lynton Crosby and Mark Textor²⁷³ which has in the past represented tobacco companies including PMI and BAT.²⁷⁴ <ul style="list-style-type: none"> - In June 2022, a report published by The Guardian revealed that Crosby had been attending regular meetings at No. 10 Downing Street. A No. 10 source insisted that these meetings were party political rather than dealing with official government business.²⁷⁵ 						

²⁶⁸ T. Colson and A. Bienkov, [Bankers, climate change sceptics, and Brexiteers: The donors funding Boris Johnson's campaign for prime minister](#), Business Insider, 1 July 2019, accessed May 2020

²⁶⁹ TobaccoTactics, [Lynton Crosby](#), 2020

²⁷⁰ TobaccoTactics, [Crosby Textor Group](#), accessed May 2020

²⁷¹ TobaccoTactics, [Lynton Crosby](#), accessed May 2020

²⁷² [Changes to the Register of Members' Interests Boris Johnson](#), They Work For You (www.theyworkforyou.com), last updated 12 August 2019, accessed May 2020

²⁷³ M. Weaver, [Boris Johnson appoints combative election strategist David Canzini](#), The Guardian, 2022

²⁷⁴ TobaccoTactics, [Crosby Textor Group](#), 2020

²⁷⁵ R. Mason and A. Allegretti, [Election guru Lynton Crosby attending PM's morning meetings](#), The Guardian, 2022

- In July 2022, a confidential document produced by the CT Group entitled “Project Homer” was leaked. It outlined a strategy to urgently create 39 new Conservative-supporting peers in the House of Lords, in order to allow the government to push through controversial legislation such as the Brexit Freedoms Bill, the Northern Ireland Protocol and the Public Order Bill.^{276, 277} The document also suggests that amendment 158 to the Health and Care Bill – which forced a consultation into tighter tobacco control regulations at the cost of importers and manufacturers – could be scrapped, in favour of a more “laissez-faire” approach.²⁷⁸
- In November 2022, The Guardian reported that CT Group documents revealed that one of Crosby’s companies had been lobbying ministers or senior civil servants on behalf of PMI. This was during 2022, when the government was considering its new tobacco control strategy, including raising the legal smoking age to 21. In the same article, a spokesperson for PMI denied that Crosby had been consulting on its behalf.²⁷⁹
- In February 2022, [Jan du Plessis](#) was appointed as Chair of the Financial Reporting Council, a government agency which regulates accountants, auditors and actuaries, and sets the UK’s Corporate Governance and Stewardship Codes.²⁸⁰ Du Plessis had been selected by Kwasi Kwarteng, then business secretary, as the government’s preferred candidate for the position.²⁸¹ (see #8) Du Plessis had a nearly 20-year career with the tobacco industry, including working as chairman at BAT from 2004 to 2009, during which time the company was accused of a number of illegal and unethical activities.²⁸²
- [Priti Patel](#), Home Secretary, was in 2000-2001 employed as a lobbyist by Weber Shandwick for its client BAT to help influence EU tobacco control regulation and improve its image in Burma.^{283, 284}
- Munira Mirza, head of the Number 10 Policy Unit, was co-founder of the Manifesto Club, an organisation which challenges the “hyper regulation of public spaces”. The Manifesto Club has produced reports in collaboration with the tobacco industry-funded front group Forest.^{285, 286, 287, 288}

²⁷⁶ R. Peston, [Revealed: Secret plan to pack Lords with Tory loyalists](#), ITV News, 2022

²⁷⁷ Sarawak Report, [‘Project Homer’ - How Sir Lynton Crosby Crafted a Plot For Boris Johnson To Pack The House of Lords](#), 2022

²⁷⁸ Sarawak Report, [Who Do Crosby’s Conservative Party Clients Work For, Voters Or Big Tobacco?](#), 2022

²⁷⁹ R. Mason, [Lynton Crosby firm lobbied ministers while advising Boris Johnson](#), The Guardian, 2022

²⁸⁰ Financial Reporting Council, [About the FRC](#), undated

²⁸¹ Department for Business, Energy & Industrial Strategy and The Rt Hon Kwasi Kwarteng MP, [Jan du Plessis named as Business Secretary’s candidate for Chair of Financial Reporting Council](#), 2021

²⁸² A. Gilmore, A. Rowell, letter to Kwasi Kwarteng, Secretary of State for Business, Energy and Industrial Strategy, dated 10 January 2022

²⁸³ Jamie Doward, [Minister worked as spin doctor for tobacco giant that paid workers £15 a month](#), the Observer, 31 May 2015, accessed May 2020

²⁸⁴ TobaccoTactics, [Priti Patel](#), accessed May 2020

²⁸⁵ Policy exchange, [Munira Mirza](#), accessed May 2020

²⁸⁶ Josie Appleton, [First They Came for the Smokers...](#), Spiked Online, 5 August 2019, accessed May 2020

²⁸⁷ TobaccoTactics, [Manifesto Club](#), accessed May 2020

²⁸⁸ TobaccoTactics, [Forest](#), accessed May 2020

- Jacob Rees-Mogg, the leader of the House of Commons, was in 2014 reported to Parliament's standards watchdog for potentially breaching the rules on declaring financial interests in the House of Commons. This was in relation to, amongst others, speaking in support of the tobacco industry in debates on the Finance Bill and against plain packaging, without declaring that he is a founder and director of a firm with investments in the tobacco industry.²⁸⁹
- Matt Hancock received £32,000 in donations from IEA trustee Neil Record before becoming Health Secretary.²⁹⁰ Hancock declined to confirm if he knew of the IEA's tobacco funding before he accepted the donation.²⁹¹

Other senior politicians in post in 2019, including Cabinet members, have previously spoken at events organised by, or received hospitality from, tobacco companies or think tanks (most notably the IEA) funded by the tobacco industry and which have promoted tobacco industry positions. These included Kwasi Kwarteng (Minister of State in the Department for Business, Energy and Industrial Strategy), Robert Buckland (Lord Chancellor and Secretary of State for Justice), [Simon Hart](#) (Secretary of State for Wales since December 2019) and Liz Truss (Secretary of State for International Trade).^{292, 293, 294, 295, 296, 297, 298, 299, 300, 301}

Truss government (2022)

- As in the case of Sunak (see below), former Prime Minister Liz Truss, as well as numerous ministers in her Cabinet, are listed as parliamentary supporters of the Free Market Forum, a “major initiative” from the tobacco-funded IEA. These include: Kwasi Kwarteng, [Thérèse Coffey](#), Simon Clarke, Brendan Clarke, Dehenna Davison, Richard Fuller, Jonathan Gullis, Alister Jack, Mark Jenkinson, Andrea Jenkyns, Gillian Keegan, Rachel Maclean, Greg Hands, Scott Mann, Damien Moore, Joy Morrissey, Lee Rowley and Jacob Young.³⁰²
- Rob Butler, Parliamentary Under-Secretary of State for Prisons and Probations, worked as Specialist Partner for the lobbying firm Pagefield until November 2019. BAT was listed as a client of Pagefield Communications Limited between July and September 2019,³⁰³ while Pagefield worked with PMI from 2014 to 2020.³⁰⁴

²⁸⁹ J. Merrick, [Leading Tory backbench MP Jacob Rees-Mogg 'failed to declare interests'](#), the Independent, 14 December 2014, accessed May 2020

²⁹⁰ J. Gornall, [Big Tobacco, the New Politics, and the Threat to Public Health](#), British Medical Journal, 15 May 2019, accessed May 2020

²⁹¹ J. Gornall, [Big Tobacco, the new politics, and the threat to public health](#), British Medical Journal, 15 May 2019, accessed May 2020

²⁹² D. Sabbagh, [Sajid Javid: combative capitalist and courtier of US neocons](#), the Guardian, 4 May 2018, accessed May 2020

²⁹³ Lisa O'Carroll, [IEA's Brexit Proposals: the Main Points](#), the Guardian, 24 September 2018, accessed May 2020

²⁹⁴ M. Townsend and R. Evans, [Watchdog Slams IEA over Pro-Brexit Report Backed by Jacob Rees-Mogg](#), The Guardian, 1 December 2018, accessed May 2020

²⁹⁵ TobaccoTactics, [Therese Coffey](#), accessed May 2020

²⁹⁶ [Transparency data, Ministerial hospitality](#), October to December 2018, UK government website, accessed May 2020

²⁹⁷ Robert Buckland, [Register of Members' Financial Interests](#), 23 November 2016, accessed May 2020

²⁹⁸ TobaccoTactics, [Alun Cairns](#), accessed May 2020

²⁹⁹ [Free Enterprise Group](#), undated, accessed May 2020

³⁰⁰ M. Savage, [New trade minister Liz Truss had private talks in US with libertarian groups](#), the Observer, 4 August 2019, accessed May 2020

³⁰¹ W. Hayward, [Who bankrolls your MP's election campaigns? The donations, extra income and free trips Wales' 40 MPs receive](#), WalesOnline, 13 September 2020, accessed September 2020

³⁰² Free Market Forum, [Parliamentary Supporters](#), accessed March 2023.

³⁰³ Office of the Registrar of Consultant Lobbyists, [British American Tobacco \(BAT\) client profile, 2023](#).

³⁰⁴ TobaccoTactics, [Pagefield](#), accessed March 2023.

- Mark Fullbrook, Truss's Downing St Chief of Staff, co-founded the British arm of the CT group and continued to own a 10% share of the company even after his appointment to a role in government.³⁰⁵ Originally founded by the Australian political strategist Lynton Crosby, the CT Group has worked for tobacco companies including PMI and BAT.³⁰⁶
 - Fullbrook was initially not employed by government but seconded to Downing Street by his lobbying firm, Fullbrook Strategies. Following criticism that the arrangement circumvented rules on transparency and created the potential for conflicts of interest, Downing Street said it would employ Fullbrook directly.³⁰⁷ However, two of Truss' senior aides, Alice Robinson and Mac Chapwell, were also subsequently revealed to have been employed through Fullbrook Strategies.³⁰⁸
 - On 16 October 2022, Fullbrook recused himself from discussions about changes to the government's smoking strategy due to his past as a tobacco industry lobbyist, having worked on behalf of BAT and PMI.³⁰⁹
 - He returned to lobbying for Fullbrook Strategies Limited in February 2023, though senior government officials leaving their posts are normally not permitted to lobby for two years.³¹⁰ As of April 2023, Lynton Crosby is listed as an "Advisory Board Member" to Fullbrook Strategies.³¹¹

Sunak government (2022 - present)

- Prime Minister Rishi Sunak became a partner at the Children's Investment Fund Management (TCI) in 2006. During his time at TCI, the firm held investment in PMI.³¹²
- Dominic Raab, deputy prime minister during the Johnson and Sunak governments, as well as a number of other cabinet ministers (Nadhim Zahawi, John Glen, Chris Heaton-Harris, Brandon Lewis, Jesse Norman, David Rutley) were original members of the [Free Enterprise Group](#) (later Free Market Foundation) which received "Administrative support" from the tobacco-funded IEA.³¹³ Raab has had a long association with the IEA, speaking at IEA events and even launching a book at the IEA offices in 2009.³¹⁴

³⁰⁵ J. Waterson, [Liz Truss's chief of staff still owns 10% of Lynton Crosby's lobbying firm](#), The Guardian, 2022

³⁰⁶ Tobacco Tactics, [Crosby Textor Group](#), 2020

³⁰⁷ G. Pogrand, [Two senior Truss aides were paid through Mark Fullbrook's lobbying firm](#), The Sunday Times, October 2022

³⁰⁸ *Ibid.*

³⁰⁹ Sky News, [Liz Truss's chief of staff recuses himself from government smoking strategy due to 'Big Tobacco' links](#), October 2022, accessed March 2023

³¹⁰ The Spectator, [Mark Fullbrook returns to lobbying](#), February 2023, accessed March 2023.

³¹¹ Fullbrook Strategies, [Home](#), archived April 2023

³¹² New York Times, [For Rishi Sunak, Family Wealth From Outsourcing Adds to a Secretive Fortune](#), October 2022, accessed March 2023.

³¹³ Tobacco Tactics, [Free Enterprise Group](#), 2022

³¹⁴ A. Ramsay, P. Geoghegan, [Dominic Raab: is he the IEA's man in government?](#)fv, openDemocracy, 2018

- Penny Mordaunt, Lord President of the Council and Leader of the House of Commons, was director of Media Intelligence Partners (MIP) until her resignation in 2010. MIP worked for PMI on a campaign against Plain Packaging in 2014.³¹⁵
- Steve Baker, Minister of State (Northern Ireland Office), reportedly was a member of the Freedom Association,^{316, 317} a British libertarian group which has lobbied against plain packaging in the past. It's unclear whether it has received or receives industry funding. In 2012, the Tobacco Control Research Group contacted the Freedom Association and asked if it was receiving tobacco industry funding, or had received funding in the past, and didn't receive a response.³¹⁸
- Paul Scully, Parliamentary Under-Secretary of State for Tech and the Digital Economy, co-founded the Nudge Factory in 2011 before joining parliament. Scully became a non-executive partner of Nudge Factory when joining parliament in 2015 but continued to own shares.³¹⁹ The Nudge factory has had BAT and Imperial Brands as clients. Imperial Tobacco Ltd is listed as a client from October 2020 to at least March 2023; BAT is listed from July to December 2017, from April to June 2018, and then from January 2019 to March 2020.³²⁰ Scully resigned as director in October 2017.³²¹
- Oliver Dowden, Chancellor of the Duchy of Lancaster and Chair of the Conservative party, gave a speech on 15 February 2022 at the Heritage Foundation which receives funding from the tobacco industry.^{322, 323}
- Some Cabinet ministers in the Sunak government are listed as parliamentary supporters of the Free Market Forum, a “major initiative” from the tobacco-funded IEA.³²⁴ These include: Thérèse Coffey, Kemi Badenoch, Andrew Bowie, Dehenna Davison, Greg Hands, Alister Jack, Scott Mann, Lee Rowley, and Mark Harper (who also spoke at an event co-sponsored by the FME, IEA and ThinkTent).³²⁵
- Ian Paisley, MP for North Antrim, has been unpaid chair of charitable trust established by JTI/ Gallaher “to support job creation and skills development in Ballymena” since 19 July 2016.^{326, 327}

³¹⁵ TobaccoTactics, [Media Intelligence Partners](#), 2021

³¹⁶ OpenDemocracy, [The new Brexit minister, the arms industry, the American hard right... and Equatorial Guinea](#), 1 July 2017, accessed March 2023.

³¹⁷ Counter Fire, [TORY CRG: the crazed, the bad and the ugly](#), 11 February 2021, accessed March 2023.

³¹⁸ TobaccoTactics, [The Freedom Association](#), 2017

³¹⁹ Open Democracy, [Fresh lobbying row after minister fails to declare ownership of PR firm, April 2021, accessed March 2023](#)

³²⁰ Office of the Registrar of [Consultant Lobbyists, Consultant Lobbyist Profile – Nudge Factory Ltd, 2023](#), accessed September 2023.

³²¹ Open Democracy, [Fresh lobbying row after minister fails to declare ownership of PR firm, April 2021, accessed March 2023](#).

³²² The Independent, [Tory chair gave 'anti-woke' speech at think-tank funded by tobacco and oil companies](#), February 2022, accessed March 2023.

³²³ Heritage Foundation, [The Threat to Democracy: Defeating Cancel Culture by Defending the Values of the Free World](#), February 2022, accessed March 2023.

³²⁴ Free Market Forum, [Parliamentary Supporters](#), accessed March 2023.

³²⁵ Mark Harper, [twitter post](#), 4 October 2022, accessed March 2023.

³²⁶ House of Lords, [Register Of Members' Financial Interests As at 17 May 2021, May 2021](#), accessed March 2023.

³²⁷ Gallaher Trust, [Our Story](#), website, 2023, accessed March 2023.

Concerning members of the House of Lords

- [Earl Howe](#), Deputy Leader of the House of Lords, collaborated with PMI to oppose a Tobacco Display Ban in 2009.³²⁸
- In January 2022, Lord Wharton of Yarm was appointed as a Strategic Adviser to the CCC.³²⁹ The CCC has received funding from BAT, PMI, Altria and JTI and defended tobacco industry positions in the past.³³⁰ Lord Wharton became a member of the House of Lords in September 2020. Prior to that he was MP for Stockton South from 2010 to 2017, serving as Under Secretary of State for Local Growth and Northern Powerhouse, and then for International Development.³³¹ He was also Boris Johnson’s campaign manager for his bid to lead the Conservative Party in 2019.³³² He lists his directorship at CCC on his Register of Interests.³³³
- At least 7 members of the House of Lords are members of the House of Lords and Commons Cigar Club.³³⁴ Members include: Lord Dixon-Smith, Lord Eames, Lord Flight, Lord Geddes, the Earl of Lindsay, the Earl of Liverpool, and Lord Palmer. They receive “regular hospitality and invitations to events which during the course of the calendar year together amount to more than £300 in value and all of which are paid for by the Tobacco Manufacturers’ Association”.³³⁵
- According to the Register of Interests, eleven members of the House of Lords held current or recent tobacco industry shares as of 04/04/2023.
 - Lord Ashton of Hyde, Lord Brown of Eaton-under-Heywood, Viscount Camrose, Viscount Craigavon, Baroness Deech, Lord Donoughue, Lord Lupton, Lord Palmer, Lord Sassoon and Baroness Valentine all held shares in BAT.³³⁶
 - Baroness Valentine also held an interest in Imperial Brands which ceased on 31 January 2023.³³⁷
 - Lord Glendonbrook held shares in Altria, Imperial Tobacco and PMI. He also held an interest in Imperial Brands which ceased on 31 May 2022.³³⁸
- As of February 2023, the Conservative peer Baroness Brady declared the provision of “non-political consulting services to Philip Morris Limited in UK on their commercial and business strategy to deliver a smoke free future” as remunerated employment in her register of interests.³³⁹
- Lord Blencathra and Lord Porter are directors to the tobacco industry funded Clean Streets (see #5).

³²⁸ TobaccoTactics, [Earl Howe](#), 2023, accessed March 2023.

³²⁹ Consumer Choice Center, [THE CCC WELCOMES LORD WHARTON AND ALEXANDER KVITASHVILI AS ADVISERS](#), 2022

³³⁰ TobaccoTactics, [Consumer Choice Center](#), 2022

³³¹ UK Parliament, [Lord Wharton of Yarm, Parliamentary Career](#), 2023

³³² Consumer Choice Center, [THE CCC WELCOMES LORD WHARTON AND ALEXANDER KVITASHVILI AS ADVISERS](#), 2022

³³³ UK Parliament, [Lord Wharton of Yarm, Registered Interests](#), 2023

³³⁴ UK Parliament, [Register of Interests - Members of the House of Lords](#), accessed March 2023.

³³⁵ UK Parliament, [Register of Interests - Members of the House of Lords](#), 2023

³³⁶ UK Parliament, [Register of Interests – Members of the House of Lords](#), 2023

³³⁷ UK Parliament, [Register of Interests – Members of the House of Lords](#), 2023

³³⁸ UK Parliament, [Register of Interests – Members of the House of Lords](#), 2023

³³⁹ UK Parliament, [Register of Interests – Members of the House of Lords](#), 2023

Concerning local councils

- Adrian Pascu-Tulbure, Councillor for Parsons Green & Sandford ward of Hammersmith & Fulham borough since May 2022, is also a director at FTI Consulting³⁴⁰, which has had BAT as client since 2015.³⁴¹
- Tom Pridham, who has been a Councillor for Richmond and Wandsworth Councils since May 2022, is also Senior Director of Public Affairs at FTI consulting³⁴² (see above).
- The London Borough of Hammersmith & Fulham was paid for advice to supplier of shisha tobacco B M General Trading Ltd and linked companies. This included meetings and multiple e-mail exchanges as well as two formal advice letters.³⁴³

Other

- Sarah Tucker (FCDO) was appointed Governor of Montserrat in April 2022. She worked for Gallaher/JTI between 1994 and 2007 and has worked in various roles in the FCDO and its predecessor the Foreign & Commonwealth Office after joining in 2011.³⁴⁴
- Colin Day was appointed a Non-Executive Board member to DEFRA in August 2018 and remains in post.^{345, 346} He was a Director at Imperial Brands from 2005-2007.³⁴⁷
- In March 2022, Adam Afriyie, MP for Windsor (Conservative Party) and Vice-Chair of the [APPG for Vaping](#), [stated in parliament that](#) the UK government should work more closely with the tobacco industry.³⁴⁸ Afriyie, who has repeatedly promoted e-cigarettes (see #1 and #5), did not disclose that his wife is a shareholder in Elite Growth, a medical cannabis firm that sells disposable e-cigarettes.³⁴⁹ Since at least May 2022, she has held 5% of the shares, making her the third largest shareholder.

³⁴⁰ Hammersmith & Fulham council, [Councillor Adrian Pascu-Tulbure](#), accessed March 2023.

³⁴¹ Office of the Registrar of Consultant Lobbyists, [British American Tobacco client profile](#).

³⁴² Tom Pridham, LinkedIn Profile, undated, accessed March 2023.

³⁴³ Hammersmith and Fulham Borough Council, Email dated 13 March 2023, subject: Information request, reference: 7402965. Email response and summary document released under Freedom of Information Act

³⁴⁴ UK Government, [Sarah Tucker profile](#), government website, April 2022, accessed March 2023.

³⁴⁵ [Colin Day profile](#), UK government website, 2018, accessed August 2022, accessed March 2023

³⁴⁶ Department for Environment, Food and Rural Affairs, [Our governance](#), government website, undated, accessed March 2023

³⁴⁷ Companies House, [Colin Richard Day](#), companies register, accessed March 2023

³⁴⁸ UK Parliament, [Smoke-free England](#), debate transcript, Hansard, 29 March 2022, accessed March 2022

³⁴⁹ P. Wood, [Tory MP Adam Afriyie who repeatedly promoted vaping didn't declare wife's shares in vape retailer](#), inews, May 2023

	0	1	2	3	4	5
Preventive Measures						
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)			2			
<p>Some policies exist. However, outside of DHSC and other agencies concerned with public health, such policies are not fully followed (see #11).</p> <p>Policies:</p> <ul style="list-style-type: none"> • The 2011 Tobacco Control Plan for England stated that, to “ensure further transparency, the Government commits to publishing the details of all policy-related meetings between the tobacco industry and government departments”. Exceptions are made for meetings discussing operational matters to reduce illicit tobacco trade and bilateral meetings between tobacco manufacturers and HMRC.³⁵⁰ • In 2016, then updated in 2018, PHE issued a protocol for engagement with tobacco and nicotine producers, entitled “Protocol for engagement with stakeholders with links to the tobacco industry”. The protocol states that “Face-to-face meetings with stakeholders on policy issues related to the regulation of nicotine products should be as transparent as practicably possible”.³⁵¹ • In 2017, the Tobacco Control Plan for England committed to the continued publication of information on all meetings with the tobacco industry,³⁵² and in its Delivery Plan, a commitment was made to “routinely liaise with DH[SC] and cross-government officials to publish meetings with industry”.³⁵³ • The 2019 HMRC guidance document on responsibilities for interacting with the tobacco industry. Although the document advises that any interaction with the tobacco industry on matters related to tobacco control should be accountable and transparent, it stipulates that this “excludes meetings held for customer compliance issues and operational meetings on illicit tobacco”.³⁵⁴ • The 2022 Wales long-term tobacco control strategy stated that “The Welsh Government will continue to support the requirements of the FCTC in all areas of this strategy’s implementation, including taking proactive measures to protect health policy from the vested interests of the tobacco industry.”³⁵⁵ 						

³⁵⁰ UK Government, [Healthy Lives, healthy people: A tobacco control plan for England](#), UK government website, March 2011, accessed May 2020

³⁵¹ PHE, [Protocol for engagement with stakeholders with links to the tobacco industry](#), 2016, accessed May 2020

³⁵² DHSC, [Towards a smokefree generation: A tobacco control plan for England](#), UK government website, July 2017, accessed May 2020

³⁵³ DHSC, [Tobacco Control Plan Delivery Plan 2017–2022](#), UK government website, June 2018, accessed May 2020

³⁵⁴ HMRC, [The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019

³⁵⁵ Welsh Government, [A smoke-free Wales: Our long-term tobacco control strategy](#), 2022

	0	1	2	3	4	5
<p>17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Rec 4.2).</p>				3		
<ul style="list-style-type: none"> Some departments adopted guidance for dealing with the tobacco industry. However, no comprehensive set of rules exists for all public officials that regulate their interaction with the tobacco industry. <ul style="list-style-type: none"> A code of conduct, issued in 2013 by the DHSC and the FCDO, exists for overseas civil servants dealing with the tobacco industry.³⁵⁶ Even so, breaches to the code of conduct have been identified. (see #8). DHSC, in its 2017 Tobacco Control Plan for England, states the need to limit “direct contact with the tobacco industry to that necessary to discuss the implementation of regulatory provisions or operational matters”, and encourages tobacco companies to engage with government in writing rather than face to face.³⁵⁷ PHE’s 2016 protocol for engagement with stakeholders with links to the tobacco industry stipulates that meetings with stakeholders on tobacco policy issues should be in writing with a previously prepared agenda, and states that “PHE employees in an official capacity should not attend or speak at conferences that are organised entirely or largely by the tobacco industry or those with links to the tobacco industry other than to enable effective communication of regulation in accordance with FCTC Guidelines on Article 5.3 Recommendation 2.1”.³⁵⁸ The 2019 HMRC guidance document on responsibilities for interacting with the tobacco industry details HMRC’s responsibilities under WHO FCTC Article 5.3 and divides scenarios of interaction into green, red and amber with examples.³⁵⁹ 						
<p>18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)</p>			2			
<ul style="list-style-type: none"> The UK government requirements focus on tobacco industry obligations to report in detail the data on ingredients and emissions of tobacco products.³⁶⁰ HMRC and DHSC collect data from tobacco manufacturers on profits, taxes paid, and product prices.³⁶¹ While data on ingredients and emissions is made publicly available, sales and marketing data is not published. 						

³⁵⁶ [United Kingdom’s revised guidelines for overseas posts on support to the tobacco industry](#), DHSC and FCO, UK government website, December 2013, accessed May 2020

³⁵⁷ [DHSC, Healthy Lives, healthy people: A tobacco control plan for England](#), UK government website, July 2017, accessed May 2020

³⁵⁸ [PHE, Protocol for engagement with stakeholders with links to the tobacco industry](#), 2016, accessed May 2020

³⁵⁹ [HMRC, The Tobacco Industry and HMRC Article 5.3: the Framework Convention on Tobacco Control \(FCTC\)](#), 2019, accessed May 2020

³⁶⁰ [Explanatory memorandum to the Tobacco and Related Products regulations 2016](#), UK legislation website, accessed May 2020

³⁶¹ [Consumer Protection: The Tobacco and Related Products Regulations 2016](#), UK legislation website, accessed May 2020

	0	1	2	3	4	5
19. The government has a program / system/ plan to consistently ³⁶² raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)			2			
<ul style="list-style-type: none"> This report provides evidence that much needs to be done to raise awareness of Article 5.3 (See #1, 2, 5, 6, 8, 9, 10, 11, 14, & 15). 						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)			2			
<ul style="list-style-type: none"> No specific policy to prevent contributions from the tobacco industry exists (see #1, 5, 13, 15). However, such interactions are governed by the UK's broader anti-corruption regulation.³⁶³ 						
TOTAL SCORE	48					

Report edition	Score
First	26
Second	32
Third	32
Fourth	48

³⁶² For purposes of this question, "consistently" means: a. Each time the FCTC is discussed, 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

³⁶³ UK government, [United Kingdom Anti-Corruption Strategy 2017-2022](#), December 2017, accessed July 2023

