

NORWAY

2021

TOBACCO
INDUSTRY
INTERFERENCE
INDEX

Acknowledgements

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Input: This report is a civil society shadow report on the implementation of WHO FCTC Article 5.3 to document tobacco industry interference and activities in Norway, the first of its kind. We are grateful to Helena Wilson, Rita Lindback and others at the Norwegian Ministry of Health and Care Services (MOHCS) and the Norwegian Directorate of Health (NDH) for their feedback, comments and responses to questions we raised through the drafting process of the report. We are also indebted to Mary Assunta from the Global Centre for Good Governance In Tobacco Control (GGTC) for her useful advice and guidance in the preparation of this report.

Context: The 2021 Norway Tobacco Industry Interference Index (NOTIII) forms part of the Global Tobacco Industry Interference Index (GTI), a global survey of how public-health policies are protected from the industry's subversive efforts, and how governments have pushed back against this influence. The Tobacco Industry Interference Index (TIII) was initiated by SEATCA as a regional report with support from the Bill and Melinda Gates Foundation and is part of a global publication of the Global Centre for Good Governance in Tobacco Control (GGTC) at the School of Global Studies in Thammasat University, Thailand. The GTI is supported by the Bloomberg Philanthropies.

Background and Introduction

In April 2010, a National Capacity Assessment for Tobacco Control¹ was conducted in Norway. Among its recommendations, the team of experts from the World Health Organisation's Tobacco Free Initiative (WHO TFI) emphasised the necessity for the Ministry of Health and Care Services (MOHCS), in close collaboration with the Directorate of Health, the Parliament and other competent authorities, to "monitor the activities of the tobacco industry that influence the internal market nationally and internationally and implement the WHO FCTC Article 5.3 guidelines".

More than a decade later, no noticeable and significant steps have been taken to make good on this specific and key recommendation in order to uncover and address the challenges that tobacco industry interference poses to Norwegian tobacco control policy making. This may be because the Norwegian authorities are operating under the illusion that the tobacco Industry does not constitute a threat to our national tobacco control efforts, considering that Norway is not a tobacco producing or cigarette manufacturing country.

However, events of the past recent years tell the story of a very active tobacco industry. The TI took Norway to court twice to prevent the implementation of stricter tobacco control laws - like the ban on display of tobacco products at points of sale and standardised packaging (specially of snus). In addition, lobbyists for PR and communication bureaus joined the City Council and later the higher echelons of government (the PM's office) without disclosing their client lists (including tobacco Industry clients): the biggest Norwegian tabloid newspaper described the situation as follows: she worked for tobacco giant - asked to be a health politician. During the day, she worked for the tobacco industry without anyone knowing. In the evening, she was a health politician in the capital.² - The group wanted me to apply for leave because JKL will avoid all speculation about double roles and mention of the company in such cases, she explained. Nobody knew which double roles she was referring to. She was not granted leave but continued in the city council until she became state secretary in October 2013³. In 2010, when Philip Morris sued Norway to stop the ban on visible display of tobacco products and lost, E24 (one of Norway's largest online newspaper for economics and business) wrote at the time that JKL / MSL assisted the tobacco giant in the work around this⁴. The trial took place in June 2012. At that time, she was Head of the PR agency.

An MP from a political party (the Progress Party) invited representatives of the Tobacco Industry to the chambers of Parliament⁵ because for them, the tobacco Industry is a stakeholder like any other and should have their seat at the table during policy discussions. MPs from other parties (except the Progressive Party) turned down the offer to meet with the industry. Furthermore, a Public Health Minister (from May to December 2019) representing the Progress Party was good friends with the Communications Director of

¹ <https://www.regjeringen.no/globalassets/upload/hod/capacityassessmreportnorway.pdf>

² <https://www.vg.no/nyheter/innenriks/i/o5Kk0/jobbet-for-tobakks-gigant-ba-om-aa-faa-vaere-helsepolitiker>

³ <https://www.vg.no/nyheter/innenriks/i/o5Kk0/jobbet-for-tobakks-gigant-ba-om-aa-faa-vaere-helsepolitiker>

⁴ <https://www.vg.no/nyheter/innenriks/i/Gkejx/profilert-lege-raser-mot-hoeyre-julie-hun-har-bidratt-til-aa-pafoere-folk-sykdom-og-doed>

⁵ <https://www.dagbladet.no/nyheter/frp-ville-invitere-tobakksbransjen-til-stortinget---ble-nektet/71102130>

Philip Morris Norway (PM)⁶. She even accepted accommodation from PM⁷ at an event that took place in August 2018 when she was health policy spokesperson for the Progress Party in the Norwegian parliament. Earlier that day she had participated in various events during an annual political and policy fair called Arendalsuka. Besides, they socialise and visit each other at their cabins during their spare time. It's Impossible to know which Issues were raised or not during such private encounters.

With the COVID-19 pandemic, mapping the activities of the tobacco Industry (both covert and overt) became a matter of urgency. In fact, the Norwegian Institute of Public Health is one of a handful of Institutes In the world to have removed tobacco from the list of risk factors to severe COVID⁸ despite protests from public health civil society⁹ actors and health professionals¹⁰.

This is a civil society report on the tobacco industry's activities in Norway. It marks the first participation of Norway to the Global Tobacco Industry Interference Index. It measures the government's response to the intensity, frequency, and severity of incidents of tobacco industry interference (TII) reported in Norway. It is based on SEATCA's TIII questionnaire and scoring guidelines.¹¹ The scoring range for most questions is from 1 to 5. The lower the score, the better the compliance with the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) Article 5.3.

There are 20 indicators under seven key themes. Evidence was sought from tobacco control experts from the Norwegian Cancer Society who reviewed literature, publicly available evidence, including Norwegian media websites, and government websites. Input was also sought from the Ministry of Health and Care Services and the Directorate of Health's tobacco control teams. Mails were also exchanged with GGTC to ensure that the review and scoring are correctly and accurately done.

Tobacco control in Norway

Since the adoption of the Tobacco Act in 1973, Norway has achieved significant milestones with its tobacco control efforts¹². The daily smoking prevalence has decreased from 51% for men and 32% for women (aged 16-74) in 1970 to 9% for both genders in 2020¹³. Among young people aged between 16–24, achieving a smoke-free generation seems within reach with daily smoking rates having decreased from 12% to 1% the last ten years¹⁴.

However, these encouraging trends hide another reality. Fourteen percent (14%) of young people aged 16-24 still smoked occasionally in 2020¹⁵. In addition, the use of smokeless tobacco (snus) has been strongly increasing, especially among young women and men. For

⁶ <https://www.dn.no/magasinet/dokumentar/frp/tobakk/helse/tobakkspartiet/2-1-735559>

⁷ <https://www.dn.no/magasinet/dokumentar/frp/tobakk/helse/tobakkspartiet/2-1-735559>

⁸ <https://www.dagensmedisin.no/artikler/2020/04/15/roykerne-fjernet-fra-risikoliste--mener-alder-er-den-viktigste-risikofaktoren/>

⁹ <https://www.dagbladet.no/nyheter/ny-kunnskap-fhi-revurderer-roykeradene/72432712>

¹⁰ <https://www.dagensmedisin.no/artikler/2020/04/17/etterlyser-grunnlag-for-snuoperasjon-om-royking-og-covid-19/>

¹¹ Assunta M, Dorotheo EU. 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.

¹² <https://www.helsedirektoratet.no/english/tobacco-control-in-norway>

¹³ <https://www.helsedirektoratet.no/english/tobacco-control-in-norway>

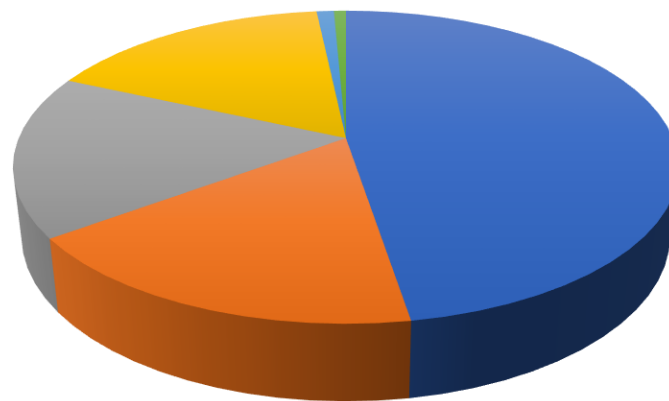
¹⁴ <https://www.helsedirektoratet.no/english/tobacco-control-in-norway>

¹⁵ <https://www.ssb.no/en/royk/>

the age group 16–24 years, 22% of the men and 14% of the women are daily snus users¹⁶. The snus industry is currently promoting harm-reduction through the media and describes itself as the hero of the decreasing smoking rates; it argues that it plays a significant role in saving lives and contributing to achieve the sustainable development goals (SDGs)¹⁷. This argument is far from the truth, but it carries with it a huge potential to set back tobacco control in Norway.

The main tobacco companies operating in Norway are transnational companies. Five dominate the Norwegian market. They are Philip Morris Norway AS/PM Tobakk Norge AS^{18 19 20}(47,40% of the market share), British American Tobacco Norway AS^{21 22} (17,50%), the snus producer Swedish Match Distribution AS/Swedish Match Norge AS^{23 24}(16,80%), Imperial Tobacco AS^{25 26}(16,60%) and Conrad Langaard AS^{27 28}(1%).

Main Tobacco Companies in Norway - Market Shares



- Philip Morris Norway AS, PM Tobakk Norge AS
- British American Tobacco Norway AS
- Swedish Match Distribution AS Swedish Match Norge AS
- Imperial Tobacco Norway AS
- Conrad Langaard AS
- Others

16 <https://www.helsedirektoratet.no/english/tobacco-control-in-norway>

17 <https://www.dagensmedisin.no/artikler/2021/05/22/vi-trenger-barekraftig-tobakkspolitikk/>

18 <https://www.regnskapstall.no/informasjon-om-philip-morris-norway-as-10111881054>

19 Informasjon om PM tobakk Norge AS - Regnskapstall

20 <https://www.pmi.com/markets/norway/nb>

21 <https://www.regnskapstall.no/informasjon-om-british-american-tobacco-norway-as-10065208451>

22 <https://www.bloomberg.com/profile/company/4513107Z:NO>

23 <https://www.regnskapstall.no/informasjon-om-swedish-match-distribution-as-10013714050>

24 <https://www.snuslageret.no>

25 <https://www.regnskapstall.no/informasjon-om-imperial-tobacco-norway-as-10012959151>

26 https://no.wikipedia.org/wiki/Imperial_Tobacco

27 <https://www.regnskapstall.no/informasjon-om-conrad-langaard-as-10012758251>

28 <https://www.conrad-langaard.no/>

Summary Findings

1. **INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT**

The Ministry of Finance had contacts with the tobacco industry to obtain information and figures relating to illicit tobacco sales/smuggling etc. as part of assessing the tax level. (This seems to be an annual practice). The Norwegian government did not invite industry representatives to attend policy meetings. The Norwegian delegation to the WHO FCTC Conference of the Parties (COP) excluded industry representatives. However, there were instances of industry representatives participating in informal parliamentary meetings. The tobacco industry was allowed to provide responses to public regulatory consultations.

2. **INDUSTRY CSR ACTIVITIES**

The Norwegian government and devolved administrations' agencies and their officials did not endorse, support, form partnerships with, or participate in, industry CSR activities.

3. **BENEFITS TO THE INDUSTRY**

The government did not accommodate requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. However, there are no rules against the government providing preferential treatment to the industry. Norway has not increased prices/taxes of cigarettes and other tobacco products for a long time. Prices are only adjusted in accordance with inflation. The COVID pandemic and subsequent travel restrictions made it plainly evident that Norwegians purchase much of their tobacco products in neighbouring Sweden (generous quotas). Extreme pressure from the Progress Party, a coalition member of the ruling alliance in parliament, compelled the government to accept price cuts of snus (smokeless tobacco) with 25% in 2021 to reduce the price differences between Norway and Sweden. The tobacco industry is also given preferential treatment at points of entry to Norway where tobacco products, including cigarettes, are available at duty-free shops.

4. **UNNECESSARY INTERACTION**

There was no evidence that top-level Norwegian officials attended tobacco industry events, nor that the government accepted, supported, endorsed, or entered into partnerships or agreements with the tobacco industry. However, there was evidence that the Ministry of Finance accepted assistance from the industry for their tobacco-control activities. There was a case of an inquiry (assessment from the Legal Department) over a Minister's friendly relationship with the Director Corporate Affairs Nordics of Philip Morris, the tobacco company with the largest market share in Norway. The Legal Department concluded that she was likely to be incompetent in matters directly related to PM. However, she was deemed, in principle, not incompetent in decisions of a general character which concerned the tobacco area in general. A year earlier the same politician (health policy spokesperson in Parliament at the time) accepted accommodation from the tobacco industry during a political and policy fair event.

5. **TRANSPARENCY**

There was no general requirement for the industry and affiliated entities to register with the government. This makes it difficult to track and trace the industry and its third parties to understand how they work in partnership to subvert and influence tobacco control policies in Norway. The Ministry of Finance does not publicly disclose their interactions with the tobacco industry.

6. **CONFLICT OF INTEREST**

No legislation prohibited 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. No retired senior government officials or current government officials was identified as holding positions in the tobacco business.

7. **PREVENTIVE MEASURES**

The government had not put in place a procedure for disclosing the records of the interaction with the tobacco industry and its representatives. There was no code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry, with one exception: The Ministry of Health and Care Services (MOH) and its agencies had a clear policy on Art. 5.3. The political leaders of the Ministry do not meet with the industry. The administrative and policy staff only meet with the industry when it is necessary for regulatory purposes.

To our knowledge the government did not require 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. There was no specific policy to disallow political contributions from the tobacco industry.

Recommendations

Recommendations

1. Require, collect and publish in useable format tobacco industry data on profits, taxes, prices, spending on marketing, research, and local data on sales of all products.
2. Publish details of all meetings with the tobacco industry and its representatives across all government departments.
3. Regularly raise and maintain awareness of Article 5.3 and how to comply with it across the whole of government.
4. Require the Ministry of Health and Care Services to develop and disseminate, in partnership with devolved administrations, a comprehensive set of rules for public officials, prescribing standards with which public officials should comply in dealings with the tobacco industry and vested interests.
5. Create and ensure publicly accessible, comprehensive and legally binding lobbying and policy influence transparency register across Norwegian administrations and make it a legal requirement for organisations involved in policy discussions to register and disclose their

funding before lobbying. Ensure that organisations failing to register or fully declare funding are excluded from policy discussions.

6. Avoid conflicts of interest by prohibiting the tobacco industry and vested interests from making contributions (monetary or otherwise) to political parties and government officials at all levels. The latter would include offers of assistance, policy drafts, study visit invitations, hospitality and funding. Prohibit public officials from holding positions in, or being seconded to, the industry, or taking up posts with the industry within a defined number of years after leaving public positions (and vice versa). Such policy exists for government officials who want to join PR firms.

8. Give no preferential treatment to the tobacco industry and remove all tobacco products from duty-free shops.

2021 Tobacco Industry Interference Index Results and Findings

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ²⁹ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry ³⁰ in setting or implementing public health policies in relation to tobacco control ³¹ (Rec 3.1)	0					
No evidence was found to show the government accepts or endorses any offer of assistance when setting or implementing tobacco control policy.						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)	0					
No evidence was found to show the government accepts or endorses policies or legislation drafted by or in collaboration with the tobacco industry.						
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)	0					
The government does not allow/invite the tobacco industry to sit in government multi-sectoral committee that sets public health policy.						
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) ³² (Rec 4.9 & 8.3)		1				
Tobacco industry representative do not form part of the government delegation to the COP or its related meetings.						
INDICATOR 2: Industry CSR activities						
5. A. The government agencies or its officials endorses, supports, forms partnerships with or participates in so-called CSR activities organized by the tobacco industry. (Rec 6.2)	0					

²⁹ 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

³⁰ The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

³¹ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

³² Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

	0	1	2	3	4	5
B. The government (its agencies and officials) receives contributions ³³ (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)						
There were no tobacco related CSR activities conducted in Norway that involved any government official.						
INDICATOR 3: Benefits to the Tobacco Industry						
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)	0					
No such incidents were identified.						
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)					4	
<p>Norway applies duty-free allowances on tobacco products for personal use with an upper limit of 200 cigarettes or 250 grams of other tobacco products (snus/snuff, cigars and cigarillos are counted in grams) and 200 sheets of cigarette paper³⁴. Norway also applies quotas for cross-border purchases with the same limits as listed above.</p> <p>Since 2011 the real tax rates on tobacco products was kept virtually unchanged in Norway³⁵.</p> <p>In 2020 Norway decided to reduce the tax on snus by 25 per cent in real terms effective from 1 January 2021³⁶.</p>						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ³⁷) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)				3		
<p>In November 2019 the Ministry of Health and Care Services requested an assessment from the Legal Department of the competence of Minister of the Elderly and Public Health (May - Dec 2019) representing the Progressive Party. The background for the inquiry was the Minister's friendly relationship with the public relations / communications director in PMI Norway. The Legal Department concluded that the Minister was likely to</p>						

³³ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

³⁴ Norwegian Customs <https://www.toll.no/en/goods/alcohol-and-tobacco/quotas/>

³⁵ Government.no [Prop. 1 LS \(2020–2021\) - regjeringen.no](https://www.regjeringen.no) (See part 2 chapter 10.3)

³⁶ [Government.no News 17.12.2020 Ministry of Finance](https://www.regjeringen.no)

³⁷ Includes immediate members of the families of the high-level officials

	0	1	2	3	4	5
<p>be incompetent in matters more directly related to PMI, but in principle not incompetent in decisions of a general nature which concerned the tobacco area in general³⁸. The same politician accepted accommodation from PM Norway at an event that took place in August 2018³⁹ when she was health policy spokesperson for the Progress Party in Parliament (Stortinget). Earlier that day she had participated in various events during the political mass rally "Arendalsuka".</p>						
<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>	0					
No evidence found.						
<p>10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</p>	0					
There was no evidence found that the government accepts or endorses or enter into partnership with the tobacco industry.						
INDICATOR 5: Transparency						
<p>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)</p>						5
<p>The Ministry of Finance does not publicly disclose their interactions with the tobacco industry. Every year the Ministry of Finance receives information from the Tobacco Industry's Joint Office about their annual survey where they measure the proportion of cigarettes that originate from places other than Norwegian trade. The survey is published on the website of the Tobacco Industry's Joint Office: The Tobacco Industry's Joint Office (tobakkif.no). The Ministry is still in contact to obtain information about this survey, they confirmed this in a letter dated 29.04.2021.</p>						
<p>12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)</p>						5

³⁸ Government.no Assessment of the Minister for the Elderly and Public Health's competence § 6 - [Vurdering av eldre- og folkehelseministerens habilitet - regjeringen.no](https://www.regjeringen.no)

³⁹ [A documentary in The Norwegian leading business newspaper «Dagens Næringsliv» online \(dn.no\)](https://www.dagensnaeringsliv.no)

	0	1	2	3	4	5
<p>Although the information used in this country report is older than the survey period, according to government officials the answers in the report concerning article 5.3 still apply.⁴⁰</p>						
INDICATOR 6: Conflict of Interest						
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)						5
<p>According to the 2014 country report additional questionnaire submitted by the government to the COP, the government does not prohibit such contributions as mentioned above.⁴¹</p> <p>However, the Norwegian Government Pension Fund stopped investing in tobacco in 2010 based on the fund's ethical guidelines.⁴²</p>						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					
<p>No retired senior government officials have been identified as holding positions in the tobacco business.</p>						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	0					
<p>No current government officials have been identified as holding positions in the tobacco business.</p>						
INDICATOR 7: 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)						5
<p>There is no procedure for disclosing records of any interaction with the tobacco industry.</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)			2			

⁴⁰ https://untobaccocontrol.org/impldb/wp-content/uploads/reports/norway_2014_aq.pdf

⁴¹ https://untobaccocontrol.org/impldb/wp-content/uploads/reports/norway_2014_aq.pdf

⁴² Ward A. Norway fund shuns tobacco companies. Financial Times, 2010. Available from: <http://www.ft.com/intl/cms/s/0/9ef17b66-052a-11d1-af85e-00144feabdc0.html#axzz3bs04ZCpo>

	0	1	2	3	4	5
Yes, but only MOH. The Ministry of Health and its agencies have a clear policy on Art. 5.3. The political leaders of the Ministry do not meet with the industry. The administrative staff only meet with the industry when it is necessary for regulatory purposes ⁴³ .						
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)						5
To our knowledge the government does not require 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 ⁴⁴ . However, the government contacts the tobacco industry for information. The Ministry of Finance has contact with the tobacco industry every year to obtain information and figures relating to illicit tobacco sales/smuggling etc. as part of assessing the tax level.						
19. The government has a program / system/ plan to consistently ⁴⁵ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						4
MOH does. The political leaders of the MOH do not meet with the industry. The administrative staff only meet with the industry when it is necessary for regulatory purposes ⁴⁶ However, there is no program to consistently raise awareness with the various agencies about Article 5.3 guidelines.						
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)						5
No specific policy to disallow contributions from the tobacco industry exists.						
TOTAL						44

⁴³ https://untobaccocontrol.org/impldb/wp-content/uploads/Norway_2020_WHOFACTCreport.pdf

⁴⁴ https://untobaccocontrol.org/impldb/wp-content/uploads/reports/norway_2014_aq.pdf

⁴⁵ 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.

⁴⁶ https://untobaccocontrol.org/impldb/wp-content/uploads/Norway_2020_WHOFACTCreport.pdf

ANNEX A: SOURCES OF INFORMATION

TOBACCO INDUSTRY ACTIVITY

LOCAL TOBACCO COMPANIES

Top 5 Tobacco Companies/distributors	Market Share and Brands	Source
Philip Morris Norway AS PM tobakk Norge AS	47,4% Marlboro, Petterøes, Blue Master (main brands in Norway)	https://www.regnskapstall.no/informasjon-om-philip-morris-norway-as-101118810S4 https://www.regnskapstall.no/informasjon-om-pm-tobakk-norge-as-101522745S0 https://www.pmi.com/markets/norway/nb
British American Tobacco Norway AS	17,5% PRINCE, Lucky Strike, Dunhill, Kent, Skruf (snus)	https://www.regnskapstall.no/informasjon-om-british-american-tobacco-norway-as-100652084S1 https://www.bloomberg.com/profile/company/4513107Z:NO
Swedish Match Distribution AS Swedish Match Norge AS	16,8% General, G3 (General), G4 (General), Omni, Nick and Johnny, The LaB, Ettan, Onico (nikotine-free)	https://www.regnskapstall.no/informasjon-om-swedish-match-distribution-as-100137140S0 https://www.snuslageret.no
Imperial Tobacco Norway AS	16,6% Paramount, West, Smart, Davidoff, Skruf,	https://www.regnskapstall.no/informasjon-om-imperial-tobacco-norway-as-100129591S1 https://no.wikipedia.org/wiki/Imperial_Tobacco
Conrad Langaard AS	1,0% Camel, Salem, Benson & Hedges, Level, Nordic Icon (snus)	https://www.regnskapstall.no/informasjon-om-conrad-langaard-as-100127582S1 https://www.conrad-langaard.no/

NEWS SOURCES

Top 5 Newspaper/Dailies	Type (Print/Online)	URL
		(Source of all 5 newspapers/Dailies:) Figures from the National

		Association of Media Companies (MBL) presented in Journalisten 10 th March 2021 https://journalisten.no/hjemmet-kortnytt-mbl/korona-ga-opplagshopp-i-andre-halvar/452538
*VG 287.315 subscribers https://www.vg.no/	Print *The figure for VG includes VG+ (online articles behind a paywall)	
Aftenposten 257.316 https://www.aftenposten.no	Print	
*Dagbladet 115.364 https://www.dagbladet.no/	Print *The figure for Dagbladet includes Dagbladet Pluss (online articles behind a paywall)	
Dagens Næringsliv 92.647 https://www.dn.no/	Print	
Bergens Tidende 84.102 https://www.bt.no/	Print	