



# TOBACCO INDUSTRY INTERFERENCE INDEX

Thailand Report on the Implementation  
of Article 5.3 of the WHO Framework  
Convention on Tobacco Control  
November 2020



มูลนิธิรณรงค์เพื่อการไม่สูบบุหรี่



# **Tobacco Industry Interference Index**

## **Thailand Report on the Implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control November 2020**

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The information from this report will form part of the Global Tobacco Industry Interference Index, 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 was initiated by the South-East Asia Tobacco Control Alliance (SEATCA) as a regional report with support from the Bill and Melinda Gates Foundation. The Global Tobacco Industry Interference Index 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 and the STOP project with support from Bloomberg Philanthropies.

## **Suggested citation**

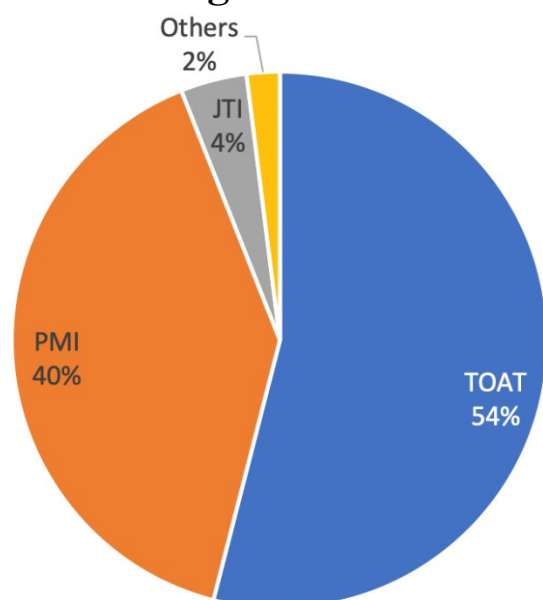
ASH-Thailand. Thailand Tobacco Industry Interference Index: Implementation Article 5.3 of the WHO Framework Convention on Tobacco Control, 2020. ASH-Thailand, Bangkok, Thailand

## Introduction and Background

Although Thailand has implemented strong tobacco control efforts<sup>1</sup> the tobacco industry continues to present challenges that must be addressed. Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC) is an obligatory provision and it enshrines the irreconcilable conflict of interest between the tobacco industry and public health. The FCTC binds signatory states to insulate their public health policies with respect to tobacco control from commercial and other vested interests of the tobacco industry, in accordance with national law.

In 2008, Parties to the FCTC unanimously adopted Article 5.3 Guidelines to give more clarity and guidance. The Guidelines provide 8 main recommendations with 34 sub-recommendations to governments to ensure that the industry is prevented from exerting its influence on public health policy.

### Thailand: cigarette market share



Tobacco Authority of Thailand (TAOT)'s market share of cigarettes – while still the largest in Thailand – has dwindled in recent years despite aggressive marketing, the introduction of new brands, and competitive pricing measures. TAOT held 54% of the market share in 2019, down from 55.4% in 2018.

Philip Morris International (PMI) has second largest share of market and has increased slightly in the same time period, from 39.3% in 2018 to 40% in 2019. JTI's market share also slightly increased from 3.5% in 2018 to 4% in 2019.<sup>2</sup>

With an estimated 9.71 million smokers (9.29 million males and 423,000 females),<sup>3</sup> Thailand still represents a lucrative market for the tobacco industry and seeks to undermine and derail tobacco control efforts. Hence it is imperative that Thailand remain vigilant in protecting tobacco control efforts.

The Tobacco Industry Interference Index is a civil society report that gauges the level of industry interference, as well as the responses or measures implemented by the government to implement Article 5.3 of the FCTC. The purpose of the Index is to define the measures and elements that contribute to the ability of the tobacco industry to interfere with policymaking. The assessment could provide an indication of the government's capacity to resist tobacco industry interference.

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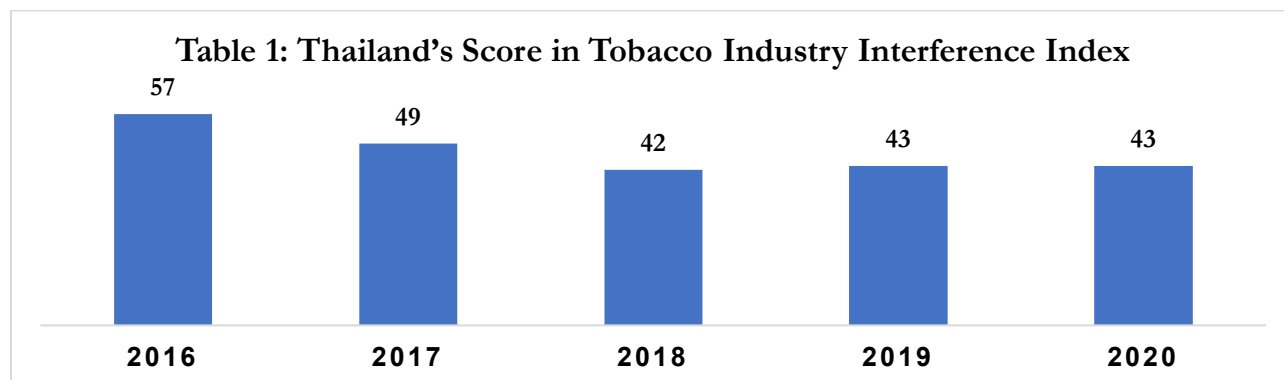
<sup>1</sup> Balderas, W. Thailand first Asian nation to join global efforts in tobacco control. IPS News Agency. 20 November 2018. <http://www.ipsnews.net/2018/11/thailand-first-asian-nation-join-global-efforts-control-tobacco/>

<sup>2</sup> Global Data. Manufacturers and brands: Cigarettes in Thailand. 2019, page 18

<sup>3</sup> Global Data. The Smoking Population: Cigarettes in Thailand. 2019, page 28-30

## Summary Findings

Table 1 provides Thailand's performance in the Index since 2016. Thailand shows a significant improvement in compliance with Article 5.3 compared to the previous years. The lower score shows lower interference and better implementation of Article 5.3 and better performance in protecting public health policy.



Compared to previous years, the total score of Thailand in the Tobacco Industry Interference Index has declined from 57 in 2015 to 43 in 2019. The lower score indicates stronger tobacco control policies and laws with better capacity of the government to resist or prevent tobacco industry interference.

## COUNTRY SUMMARY

### 1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Thailand's biggest improvement is there was no incidence of government accepting, endorsing any offer of assistance from or collaboration with the tobacco industry in implementing health policies.

### 2. INDUSTRY CSR ACTIVITIES

Thai Tobacco Monopoly's change in marketing strategies led to its corporatization and name change in May 14, 2018 to 'Tobacco Authority of Thailand' (TAOT) however it remains a State-owned enterprise under the jurisdiction of the Ministry of Finance.<sup>4</sup> Although the Tobacco Products Control Act 2017 bans all tobacco related CSR activities, TAOT regularly carries out the CSR activities as part of its public relation activities.<sup>5</sup> In 2019, TAOT had the collaboration with government agencies and representatives to conduct trainings and so-called CSR activities.

<sup>4</sup> Tobacco Authority of Thailand. About Us. <http://www.thaitobacco.or.th/en/aboutt-as/>

<sup>5</sup> Ibid, Public relations news. <https://www.thaitobacco.or.th/th/category/pr-ttm>

### **3. BENEFITS TO THE INDUSTRY**

No benefits were given to the tobacco industry. However, there is still a tax exemption for rolling tobacco.

### **4. UNNECESSARY INTERACTION**

Since the government owns the TTM, there were regular meetings (each trimester or 4 times a year) between TTM and MOF high level officers. TTM involved government officials in their smuggling control program.

### **5. TRANSPARENCY**

While minutes were taken during meetings with the industry however these are not public, sometimes high-level officials were involved.

### **6. CONFLICT OF INTEREST**

Retired senior government officials have regularly been appointed as TTM board members. Current government officials such as a senior officer from the Excise Department and the Ministry of Finance are TTM board members. Since the TTM is a state enterprise, the appointment is seen as normal.

Currently, the chairman of TAOT is from business sector. TAOT's committee are from various fields including three from public universities, two are working at the Ministry of Finance and one is the representative from the Royal Thai Police.<sup>6</sup>

### **7. PREVENTIVE MEASURES**

The new Tobacco Products Control Act in Section 40 requires the manufacturer or importer of tobacco products to report the volume of production or importation, market share, marketing expense, income and expense in their annual report, audited financial statement and any other information for the benefits of tobacco products control to the Committee. The Rules, and procedures as stipulated in the Ministerial Regulations are being drawn up.

What exists currently is the MOH's rule in interacting with TI, but not applied to other Ministries. On 17 April 2012, the Cabinet agreed to the resolution to prohibit the government sectors/ office from implementing tobacco industry related CSR activities. In June 2012, the Cabinet also agreed to the resolution on 12 June 2012 to follow the national strategic plan for tobacco control B.E. 2555-2557 (A.D. 2012-2014) as proposed by the National Health Assembly to prohibit tobacco advertising, promotions and sponsorships including tobacco industry related CSR activities. The cabinet resolutions were effective for government sectors including state-own tobacco industry such as Thai Tobacco Monopoly.<sup>7</sup> TAOT is obligated to submit

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<sup>6</sup> Ibid, Board of Directors. <https://www.thaitobacco.or.th/th/board-of-directors-2>

<sup>7</sup> National Health Assembly. National strategic plan for tobacco control B.E. 2555-2557 (A.D. 2012-2014) <https://www.samatcha.org/node/103>

information on the volume of manufacturing, imports, marketing expenses, earnings and expenses as stated in Section 40 of Tobacco Product Control Act B.E. 2560.<sup>8</sup>

## Recommendations

As Thailand makes progress in implementing, some areas need to be strengthened.

- a. Strictly enforce the ban on tobacco related CSR activities under the new tobacco control law and ensure there are no loop holes for the industry to exploit.
- b. Ensure current and retired senior government officials are not immediately appointed to the tobacco industry.
- c. The implementation regulations of the new tobacco control law are drawn up as soon as possible to protect government officials from tobacco industry interference.

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<sup>8</sup> Ministry of Public Health. Tobacco Products Control Act B.E. 2560. 2017. <https://bit.ly/3hz7Hut>

# Thailand: 2020 Tobacco Industry Interference Index

## Results and Findings

	0	1	2	3	4	5
<b>INDICATOR 1: Level of Industry Participation in Policy-Development</b>						
1. The government <sup>9</sup> accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry <sup>10</sup> in setting or implementing public health policies in relation to tobacco control <sup>11</sup> (Rec 3.1)	0					
In 2019, there was no incidence of Royal Thai Government accepting, endorsing any offer of assistance from or collaboration with the tobacco industry in implementing health policies.						
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					
There was no incidence of the government accepting, supporting or endorsing any legislation drafted by 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 tobacco industry does not sit in the government multisectoral committee on tobacco control.						
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) <sup>12</sup> (Rec 4.9 & 8.3)		1				
The Thai delegation did not include any representatives from the tobacco industry to join COP8 meeting in 2018.						
<b>INDICATOR 2: Industry CSR activities</b>						
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)					4	

<sup>9</sup> 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

<sup>10</sup> The term “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

<sup>11</sup> “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

<sup>12</sup> World Health Organization. Parties to the WHO Framework Convention on Tobacco Control.

<http://www.who.int/fctc/cop/en/>

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B. The government (its agencies and officials) receives contributions (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)						
<p><b>I. National Level</b></p> <p>7 January 2019, Mr. Saranakhom Pariyaisut Marketing Deputy Director of Tobacco Authority of Thailand represented TAOT to make a donation of 500,000 THB (15,615 USD) to the Prime Minister to help affected people by the windstorm in the Southern Region of Thailand.<sup>13</sup></p> <p>27 February 2019, Ms. Daonoi Suttiniphapunt, Managing Director of TAOT represented TAOT to sign the memorandum of cooperation in drug prevention and resolution with Ministry of Labour and 15 State Enterprise Agencies. Deputy Prime Minister and the Minister of Justice presided over the ceremony.<sup>14</sup></p> <p>2 May 2019, Ms. Daonoi Suttiniphapunt, Managing Director of TAOT presided over the opening ceremony of the ‘School of the Elderly of Tobacco Project’, third cohort. About 139 elderly people attended the event.<sup>15</sup></p> <p><b>II. Provincial level</b></p> <p>24 April 2019, Benchakitti Park Hospital (under the supervision of TAOT) organized mobile medical unit activities on the occasion of the 80<sup>th</sup> anniversary of Tobacco Authority of Thailand. The medical unit provided medical treatment and wound dressing to people with free of charge. People obtaining services from the medical unit also received the UHT milk and snack. The activity was located in Klongtoei, Bangkok.<sup>16</sup></p> <p><b>III. Institutions under government</b></p> <p>7 February 2019, Benchakitti Park Hospital conducted the Health Symposium on “Thai Tobacco, Strong Kidney”. One of speakers was an expert working in food prescription program at Siriraj Hospital (outstanding public hospital in Thailand).<sup>17</sup></p> <p>1 March and 29 April 2019, Benchakitti Park Hospital conducted the capacity building training for medical professions (medical doctors and nurses) in Bangkok, to enhance the effectiveness on the joint care for ischemic stroke patients. Trainer was from Chulalongkorn Hospital.<sup>18 19</sup></p>						

<sup>13</sup> Tobacco Authority of Thailand. TAOT made a donation to affected people by the windstorm in the Southern Region of Thailand. 7 January 2019. <https://www.thaitobacco.or.th/th/2019/01/0021818.html>

<sup>14</sup> Tobacco Authority of Thailand. TAOT signed the memorandum of cooperation in drug prevention and resolution. 27 February 2019. <https://www.thaitobacco.or.th/th/2019/02/0022431.html>

<sup>15</sup> Tobacco Authority of Thailand. opening ceremony of the ‘School of the Elderly of Tobacco Project’, third cohort. 2 May 2019. <https://www.thaitobacco.or.th/th/2019/05/0024279.html>

<sup>16</sup> Tobacco Authority of Thailand. Benchakitti Park Hospital organized mobile medical unit activities. 24 April 2019. <https://www.thaitobacco.or.th/th/2019/04/0023199.html>

<sup>17</sup> Tobacco Authority of Thailand. Benchakitti Park Hospital conducted the Health Symposium on “Thai Tobacco, Strong Kidney”. 7 February 2019. <https://www.thaitobacco.or.th/th/2019/02/0022206.html>

<sup>18</sup> Tobacco Authority of Thailand. Training on the potential of doctors and nurses in 13<sup>th</sup> health zone, Bangkok, to increase the effectiveness of the joint care of ischemic stroke patients. 29 April 2019. <https://bit.ly/3n7IEB4>

<sup>19</sup> Tobacco Authority of Thailand. Training on the potential of doctors and nurses in Bangkok to increase the effectiveness of the joint care of ischemic stroke patients. 29 April 2019. <https://bit.ly/3rKPU8m>



	0	1	2	3	4	5
<b>INDICATOR 3: Benefits to the Tobacco Industry</b>						
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)				3		
7 May 2019, the cabinet agreed to postpone raising the excise tax from 20% to 40% from 1 October 2019 to 1 October 2020 in order to help tobacco farmers and tobacco industry. <sup>20</sup>						
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)			2			
<p><b>1. Tax exemption for roll-your-own tobacco leaves</b> According to Section 165 of Excise Act in 2017 (attached with this document), tax exemption is given for rolling tobacco up to 1 kilogram, with no commercial purposes.<sup>21</sup> However, the Excise Department will raise tax on tobacco leaves to 10 Satang per gram in 2019.<sup>22</sup></p> <p><b>2. Duty free cigarettes</b> International travelers are allowed to bring 250 grams of cigars or smoking tobacco, or 200 cigarettes into Thailand.<sup>23</sup></p> <p><b>3. Corporatization of TTM - TAOT</b> In 2019, TAOT implemented the cooperation with foreign tobacco companies to expand the cigarette sale volumes, such as the cooperation with tobacco company in Vietnam so that TAOT could export the cigarettes to Vietnam started from April 2019.<sup>24</sup> One of missions of TAOT is to sell hemp and marijuana to medical industries.<sup>25</sup></p>						
<b>INDICATOR 4: Forms of Unnecessary Interaction</b>						
8. Top level government officials (such as President/ Prime Minister or Minister <sup>26</sup> ) meet with/ foster relations with the tobacco companies such as attending social functions and other		2				

<sup>20</sup> Voice Online. Smokers relieved, cabinet agreed to postpone raising the excise tax to October 2020. 7 May 2019. <http://www.voicetv.co.th/read/zLhxfEceY>

<sup>21</sup> Matichon Online. Expected to announce new tax rates next week. Local tobacco hit with "Excise" confirms that there is no quarantine. 7 September 2017. [https://www.matichon.co.th/economy/news\\_656262](https://www.matichon.co.th/economy/news_656262)

<sup>22</sup> The Standard. Excise Department announces a fine of tobacco tax by 10 satang / gram and extends the tax enforcement period for another one year. 9 May 2019. <https://thestandard.co/tobacco-taxation/>

<sup>23</sup> Tourism Authority of Thailand. Declaration and Allowance – Duty Free. <https://bit.ly/3hAkfSb>

<sup>24</sup> ThaiQuote. TAOT adjusted the business plan to establish the joint investment with Vietnam with the expected profit of 3.2 billion THB. 25 February 2019. <https://www.thaiquote.org/content/216985>

<sup>25</sup> CatwatchOnline. TAOT expected to sell hemp-marijuana instead of tobacco. 23 February 2019. <https://bit.ly/35LQQyF>

<sup>26</sup> Includes immediate members of the families of the high-level officials

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events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)						
<p>25 September 2019, the Prime Minister, during his mission at 74<sup>th</sup> UN General Assembly in New York, together with high level officers, attended a dinner reception organized by USABC where Philip Morris International (PMI) one of the sponsors.<sup>27</sup></p> <p>October 2019, US-ABC hosted a luncheon in honor of the new appointed Ambassador of Thailand, H.E. Thani Thongphakdi, to the United States. PMI was one of the sponsors of the luncheon.<sup>28</sup></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)			2			
<p>5 March 2019, TAOT in collaboration with Ministry of Finance organized a meeting and press conference on the result of the suppression of illegal cigarettes (smuggling) in the southern region of Thailand.<sup>29</sup></p>						
10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) <i>NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>	0					
<p>The government did not accept or entered into partnerships or agreement with the tobacco industry in 2019.</p>						
<b>INDICATOR 5: Transparency</b>						
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)				3		
<p>Minutes were taken during the meeting with tobacco industry, but these are NOT made public, sometimes high-level officials were involved.</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)					4	
<p>There is no registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf. But the representatives of the TAOT are known.</p>						

<sup>27</sup> US ASEAN Business Council Press Release. 25 September 2019. <https://bit.ly/3hzLFaO>

<sup>28</sup> US-ABC website. 7 October 2019. <https://www.usasean.org/countries/thailand>

<sup>29</sup> Manager Online. The Tobacco Authority of Thailand announced the results of the suppression of smuggled cigarettes in the southern region. 5 March 2019. <https://mgronline.com/south/detail/9620000022371>

	0	1	2	3	4	5
<b>INDICATOR 6: Conflict of Interest</b>						
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)					4	
<p>NACC law, Section 128 there are some regulations that are in line with FCTC Article 5.3 on Conflict of Interest.</p> <p>While, there is no complete prohibition of political contribution, some limits are set in the Organic Act on Political Parties, B.E. 2560 (2017) – Section 66 mentions that political parties must not accept donation from anybody (including TI) more than 10,000,000 THB a year, while the politicians must not accept gift from anybody (including TI) more than 3,000 THB.<sup>30</sup></p> <p>Section 66 of the Organic Act on Political Parties, B.E. 2560 (2017)<sup>31</sup></p>						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)					4	
Currently, no retired senior government official works for TAOT but one police general working as a board member. <sup>32</sup>						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)					4	
TAOT's CEO is still regarded as a government official.						
<b>INDICATOR 7: Preventive Measures</b>						
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>At the juridical council deliberation, it was considered since the Ministry of Public Health had issued a ministerial regulation on “Guidelines on Interaction with Tobacco Entrepreneurs and Related Persons”<sup>33</sup> and the Office of the Civil Service Commission’s regulation prohibited civil servants’ interaction with industry in a way that may lead to policy interference, this should apply to all ministries. Hence, the implementation of Recommendation 2 of WHO FCTC Article 5.3 was at ministerial regulation. TC law drafting working group will work with other ministries to develop the regulation on interaction with tobacco entrepreneurs and related persons, as MOPH had done earlier.</p>						

<sup>30</sup> Parliament of Thailand. Donation to Political Parties. 2018 <https://bit.ly/2WZcaxb>

<sup>31</sup> Senate of Thailand. An act of the Thai National Assembly, called the "Organic Act on Political Parties BE 2560. 2017. [http://m.senate.go.th/eppo/3\\_60.pdf](http://m.senate.go.th/eppo/3_60.pdf)

<sup>32</sup> Tobacco Authority of Thailand. Board of Directors. <https://www.thaitobacco.or.th/th/board-of-directors-2>

<sup>33</sup> Regulation of the Ministry of Public Health On communication between the authorities and operators or concerned persons of tobacco products B.E. 2559 (A.D.2016). 2016. <https://bit.ly/2YJ0Lm7>

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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			
The new law was passed in 2017. The implementation regulations are being drawn up.						
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)			2			
Tobacco Products Control Act 2017						
Section 40: The manufacturer or importer of tobacco products have the duty to report the volume of production or importation into the Kingdom, market share, marketing expense, income and expense as per Article 35, annual report, audited financial statement and any other information for the benefits of tobacco products control to the Committee, according to the rules, procedures and conditions as stipulated in the Ministerial Regulations by recommendations of the Committee. <sup>34</sup> The implementing regulations are being drawn up.						
This section aims to monitor whether tobacco industry is transparent and provides accurate information. Information provided will ascertain whether the tobacco industry violates the law by allocating the budget for tobacco industry related CSR activities, lobbying activities and any tobacco advertisement that is prohibited by law. If such expenses are found in the report, action will be taken against the tobacco industry as provided in the law. If false or incomplete information is provided by the tobacco industry, it shall be subjected to imprisonment or a fine as stated in Section 66.						
19. The government has a program / system/ plan to consistently <sup>35</sup> raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)			2			
Currently the ministerial regulation is established only in the MOPH. Other ministries can establish their respective regulation, following MOPH and the Office of the Civil Service Commission that has regulation to prohibit civil servants' interaction with the tobacco industry that applies to all ministries.						
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			
There is no policy is in place. While there is no contribution offered to the government, however there is no restriction on study visits.						
<b>TOTAL</b>			<b>43</b>			

<sup>34</sup> Notification of the Ministry of Public Health Re: Criteria, Methods and Conditions for Information Submission by Manufacturers or Importers Engaging in Sale of Cigarette Tobacco Products in the Kingdom B.E. 2562. 2019

<sup>35</sup> 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.



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Working together for  
effective evidence-based  
tobacco control measures  
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