

Tobacco Industry Interference Index Germany 2023

© October 2023, German Cancer Research Center (Deutsches Krebsforschungszentrum, DKFZ)

Author: Laura Graen, German Cancer Research Center

Fact-checking: Andy Hartard, German Cancer Research Center

The author would like to thank Katrin Schaller, Andy Hartard and Mary Assunta for their feedback and advice.

Imprint

Publisher

German Cancer Research Center

Responsible for the content

Dr. Katrin Schaller

Interim Head of the Cancer Prevention Unit and WHO Collaborating Centre for Tobacco Control at the German Cancer Research Center

Im Neuenheimer Feld 280

69120 Heidelberg, Germany

Phone | 00 49 (0)6221 42 30 16

E-mail | who-cc@dkfz.de

www.dkfz.de

www.tabakkontrolle.de

Endorsed by



Aktionsbündnis Nichtrauchen, Ärztlicher Arbeitskreis Rauchen und Gesundheit, Astra Plus, Deutsche Gesellschaft für Kardiologie – Herz- und Kreislaufforschung, Deutsche Gesellschaft für Pneumologie und Beatmungsmedizin, Deutsche Gesellschaft für Public Health, Deutsche Hauptstelle für Suchtfragen, Deutsche Herzstiftung, Deutsches Kinderbulletin, Deutsches Kinderhilfswerk, Deutsche Krebshilfe, Deutsches Netz rauchfreier Krankenhäuser / Rauchfrei Plus, Frauen Aktiv Contra Tabak, Friedensband, Health Care Plus, IFT Nord, Nichtraucherschutzverband Deutschland, Unfairtobacco, Vivantes, Zukunftsforum Public Health

Table of Contents

Background and Introduction.....	5
Key Findings.....	5
Recommendations.....	7
Methodology.....	8
Summary.....	9
Results and Findings.....	12
Indicator 1: Level of Industry Participation in Policy-Development.....	12
Indicator 2: Industry CSR activities.....	13
Indicator 3: Benefits to the Tobacco Industry.....	15
Indicator 4: Forms of Unnecessary Interaction.....	17
Indicator 5: Transparency.....	24
Indicator 6: Conflict of Interest.....	26
Indicator 7: Preventive Measures.....	28
Annex A: Tobacco Companies.....	31
Annex B: Tobacco and E-cigarette Industry Lobby Power.....	32
Annex C: Tobacco Industry Donations to and Sponsorship of Political Parties.....	37
References.....	41

List of abbreviations

ABF	Analytisch-Biologisches Forschungslabor (company)
AfD	Alternative für Deutschland; Alternative for Germany (political party)
BAT	British American Tobacco
BdZ	Bundesverband der Zigarrenindustrie; Federal Association of the Cigar Industry
BfR	Bundesinstitut für Risikobewertung; Federal Institute for Risk Assessment
BfTG	Bündnis für tabakfreien Genuss; Alliance for Tobacco-Free Enjoyment
BVTE	Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse; German Federal Association of Tobacco Industry and New Products
CDU	Christlich Demokratische Union Deutschlands; Christian Democratic Union of Germany (political party)
CSU	Christlich-Soziale Union in Bayern; Christian Social Union in Bavaria (political party)
COP	Conference of the Parties – here: of the WHO FCTC; the number (e.g. COP8) indicates the number of the session (e.g. 8th session of the COP)
CSR	Corporate Social Responsibility
Covid-19	Coronavirus Disease 2019
DKFZ	Deutsches Krebsforschungszentrum; German Cancer Research Center
DZV	Deutscher Zigarettenverband; German Association of the Cigarette Industry
FDP	Freie Demokratische Partei; Free Democratic Party
GdP Zoll	Bezirksgruppe Zoll der Gewerkschaft der Polizei; Customs District Group of the Trade Union of the Police
GGO	Gemeinsame Geschäftsordnung der Bundesministerien; Joint Rules of Procedure of the Federal Ministries
GRECO	Groupe d'États contre la Corruption; Group of States against Corruption
JTI	Japan Tobacco International; here also its German subsidiary JT International
MOP	Meeting of the Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products; the number (e.g. MOP2) indicates the number of the session (e.g. 2nd session of the MOP)
MP	Member of parliament
NATO	North Atlantic Treaty Organization
NGO	Non-governmental organization
NOL	Number of lobbyists
PMI	Philip Morris International; here also its German subsidiary Philip Morris GmbH
SPD	Sozialdemokratische Partei Deutschlands; Social Democratic Party of Germany
UBA	Umweltbundesamt; German Environment Agency
VdeH	Verband des eZigarettenhandels; Association of the e-cigarette trade
VdR	Verband der deutschen Rauchtobakindustrie; German Association of Smoking Tobacco
WHO FCTC	World Health Organization Framework Convention on Tobacco Control

Background and Introduction

There is a silent epidemic in Germany, killing 127,000 people every year.^[1] Its vector is not a virus but the products and practices of the tobacco industry that remain inadequately regulated in crucial areas such as tobacco taxation, advertising, promotion and sponsorship, and availability. Similarly, Germany lags behind other countries when it comes to support for quitting tobacco and related products and to protecting people from second-hand smoke.^[1-4]

According to the German Study on Tobacco Use, smoking prevalence among young people has increased in the past three years, with a recent dramatic increase from 8.7 per cent in 2021 to 15.9 per cent in 2022 among 14 to 17 year olds.^[5,6] About 40 per cent of 18 to 24 year olds are current smokers, and a growing number of young people also uses e-cigarettes.^[5-7]

Tobacco industry influence has been identified as a major obstacle to effective tobacco control policy-making worldwide. A growing body of research reveals the strategies of tobacco and other industries to influence, undermine and delay regulation, with harmful effects to public health.^[8-15] In Germany, the tobacco industry for example has a long history of influencing tobacco control policy-making by creating conflicts between the Ministry of Health on the one hand and the Ministries of Trade and Finance and the Federal Chancellery on the other, thus limiting the power of the Ministry of Health.^[8]

Germany has ratified the global tobacco control treaty, the World Health Organization Framework Convention on Tobacco Control (WHO FCTC). The treaty includes a provision requiring the protection of policy-making from tobacco industry influence (Article 5.3).^[16,17]

This report analyses the implementation status of Article 5.3 in Germany. It exposes that the tobacco industry in Germany manages to foster relationships with policymakers, sponsors public institutions and political parties, and that it likely influenced the 2021 tobacco taxation amendments. This is the third Tobacco Industry Interference Index Germany, and the scores have deteriorated each time – from 63 in 2020 to 68 in 2021 and 70 this year.^[18,19]

One reason for this is the government's reluctance to establish a firewall against tobacco industry influence: The extent of interactions between tobacco industry representatives and policymakers and public officials at all levels – from ministerial bureaucracy to the Federal President – is alarming.

In Germany the main achievements of tobacco industry lobbying are relatively low tobacco taxation rates, a patchy tobacco marketing regulation that allows the industry to continue advertising, promotion and sponsorship for its harmful products, and fragmentary smokefree legislation.^[1-3]

The strong tobacco industry lobbying explains, at least in part, why Germany lags far behind other European countries in regulating the tobacco industry.^[4]

Key Findings

There were at least ten lobbying meetings between tobacco industry representatives and the Ministry of Finance in relation to the 2021 tobacco taxation amendments, and the Ministry of Finance likely shared draft legislation with industry stakeholders (see section “Industry Participation in Policy Development” in the “Results and Findings” chapter). We also found that the cigar lobby group Bundesverband der Zigarrenindustrie collaborated with ambassadors of foreign countries to lobby members of the German federal parliament.

Moreover, in 2022, the statual Federal Institute for Risk Assessment (BfR) that is charged with important advisory functions regarding tobacco control, invited tobacco industry representatives to an event (see section “Forms of Unnecessary Interaction” in the “Results and Findings” chapter). Eventually, representatives of 29 companies or associations of the tobacco industry, e-cigarette industry or related industries registered and were allowed to participate. On its website, the Institute states that “In order to fulfil its legal mandate, BfR exchanges information with all relevant stakeholders (NGOs, consumer associations, industry, politics, science, media).”^[20] In a letter to the German Cancer Research Center, the BfR declared that it does not intend to change this event type in future. Additionally, BfR is represented regularly at events of the e-cigarette industry (see section “Forms of Unnecessary Interaction” in the “Results and Findings” chapter). BfR’s attitude towards lobby groups of the tobacco and e-cigarette industry enhances the reputation of these groups, that would like to be vindicated as stakeholders, and leads to unnecessary interactions between BfR officials and representatives of the tobacco and e-cigarette industry, in contradiction to the official guidelines for Article 5.3 of the WHO FCTC.

Apart from traditional lobbying meetings, the tobacco industry sponsors economic, political and social events, such as gatherings of political parties or economic conferences. This is so widespread that it is impossible for policymakers to completely avoid participating in such events. The tobacco industry regularly sponsors top level events that politicians feel obliged to participate in if they want to stay in touch with powerful political and business leaders. One of these events is the exclusive closed door WELT Economic Summit with representatives of Philip Morris, Chancellor Olaf Scholz and a third of the cabinet participating in 2022 and 2023 (see section “Forms of Unnecessary Interaction” in the “Results and Findings” chapter).

Often, sponsorships of events are associated with premium networking access, organization of corporate panels or company presentation with a booth or logo walls – supporting the tobacco industry’s strategy to influence governments, to set agendas and shape social norms, and to manage its reputation.

Our analysis of the newly established lobby register of the federal parliament reveals that there are more than 30 companies, associations and lobbying agencies with at least 90 lobbyists and a budget exceeding €6 million a year pursuing the interests of the tobacco and e-cigarette industry (see section “Transparency” in the “Results and Findings” chapter and Annex B). These figures are even significantly higher when including lobbying agencies that represent tobacco industry besides other industries.

The government takes almost no protective measures to counter this lobby power and prevent tobacco industry influence on policy-making. The only measure that is taken is that two ministries disclose their contacts with the tobacco industry. To our knowledge, there is no code of conduct to prescribe standards for public officials in their interaction with the tobacco industry or at least a programme to raise awareness of tobacco industry interference strategies. Lobby interactions with the tobacco industry are largely intransparent and tobacco industry sponsorship of political parties and public entities remains allowed (see sections “Transparency” and “Preventive Measures” in the “Results and Findings” chapter). Most recently, Torsten Albig, former prime minister of the state of Schleswig-Holstein, joined Philip Morris Germany as chief lobbyist, thus creating a close link to policymakers.^[21,22] This incident is not part of the scoring in the 2023 Index as it happened after the analysed period.

All of this contradicts Article 5.3 of the global tobacco control treaty WHO FCTC and its official guidelines.

Recommendations

In Germany, political decisions need to be better protected from the strong influence of the tobacco industry on policymakers. A blueprint for a package of measures already exists. In 2021, a working group of academic and civil society experts developed the Strategy for a tobacco-free Germany 2040 that was endorsed by more than 50 public health and civil society organizations.^[2,3] The experts call on the government to develop and pursue a comprehensive national tobacco control strategy, with a vision for a tobacco-free Germany in 2040 and recommend ten measures that should be included. Measure number nine urges: “Effectively protect political decisions from the influence of manufacturers of tobacco and of related products and their associations.”^[2,3]

The experts further recommend:^[2,3]

- “Reduce interactions between policymakers and manufacturers of tobacco and of related products and their associations to what is strictly necessary for the legislative process
- Make transparent all interactions between policymakers and manufacturers of tobacco and of related products and their associations: Publish planned meetings in advance and disclose minutes of discussions
- At every meeting dealing with tobacco or related products, remind participants of Article 5.3
- Government funding of non-governmental organisations to monitor interference attempts by manufacturers of tobacco and of related products and their associations and to raise public awareness of this (watchdog role of civil society)
- Develop a code of conduct for members of government, civil servants and members of the Federal Parliament and state parliaments (including rules on switching sides)
- Improve the lobby register (executive footprint, mandatory disclosure of funding, disclosure of specific lobbying issues/objectives)
- Ban sponsorship and donations by manufacturers of tobacco and of related products and their associations to public institutions and political parties
- Awareness-raising campaign by the Federal Ministry of Education and Research to denormalise donations/sponsorship of scientific institutions by manufacturers of tobacco and of related products and their associations and to promote rules on transparency and conflict of interest
- Make the allocation of public funds to non-governmental organisations for health projects conditional on them not accepting donations/sponsorship from manufacturers of tobacco and of related products and their associations”^[2,3]



Strategy for a tobacco-free Germany 2040
Download in German and English:
www.dkfz.de/de/krebspraevention/strategie-tabakfrei-2040.html

Additionally, under measure three of the Strategy for a Tobacco-Free Germany 2040, the experts recommend to ban tobacco industry sponsorship.^[2,3] Banning sponsorships would significantly impact the tobacco and e-cigarette industry's ability to use events to influence political decision-makers. It would also help policymakers avoid a significant number of interactions with tobacco industry representatives.

Methodology

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance and part of the Global Tobacco Industry Interference Index (globaltobaccoindex.org).^[13] There are 20 questions based on the official Guidelines for the implementation of Article 5.3 of the WHO FCTC.^[23,24] Information used in this report is obtained from the public domain only. A scoring system is applied to make the assessment. The score ranges from 0 - 5, where 5 indicates highest level of industry interference, and 1 is low or no interference. Hence the lower the score, the better for the country. The 0 score indicates absence of evidence or not applicable. Where multiple pieces of evidence are found, the score applied reflects an average. The report includes information on incidents from April 2021 to March 2023, but also includes prior incidents that still have relevance today.

Summary

1 INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

WHO FCTC Article 5.3 Guidelines: The government must protect policy-making processes from tobacco industry influence.^[23,24]

Publicly available information on whether any legislation was drafted in collaboration with the tobacco industry is scarce. However, there is a strong probability and at least reason for suspicion regarding the last tobacco taxation amendments. The Ministry of Finance states that exchange of draft legislation with industry stakeholders is normal procedure but due to lack of records it is uncertain whether drafts were actually shared. Moreover, there have been more than 10 meetings between tobacco industry representatives and top level officials of the ministry related to the tobacco taxation reform.

2 INDUSTRY CSR ACTIVITIES

WHO FCTC Article 5.3 Guidelines: Tobacco industry should be prohibited to sponsor or form partnerships with public institutions.^[23,24]

In contradiction to the guidelines, the Federal President partnered with the Körber Foundation, a tobacco industry related organization. Additionally, several German states received contributions from tobacco industry or related organizations, for example for celebrations of state representations to the federal government, an investment that helps to gain access to top level policymakers. The tobacco industry also managed to engage with local governments on environmental projects. On a positive note, protest from civil society and medical organizations convinced the Federal President to terminate a sponsorship agreement with the Philip Morris Foundation.

3 BENEFITS TO THE INDUSTRY

WHO FCTC Article 5.3 Guidelines: “The tobacco industry should not be granted incentives to establish or run their businesses”, such as (tax) exemptions or other benefits.^[23,24]

The outdoor tobacco advertising ban that was passed in 2020 has exemptions which allow the industry to continue advertising. Promotion and sponsorship remain allowed. This is despite the fact that Germany was required by the WHO FCTC to implement a comprehensive ban on tobacco advertising, promotion and sponsorship by 2010.

In addition, the government granted long transition and sell-off periods for taxes applied to waterpipe tobacco and e-cigarette liquids and the industry benefits from a tobacco tax exemption amounting to €5 million annually.

4 UNNECESSARY INTERACTION

WHO FCTC Article 5.3 Guidelines: Interactions between the tobacco industry and policy-makers are required to be limited to those strictly necessary for effective regulation of the tobacco industry.^[23,24]

Unnecessary interactions are widespread, involving public officials and policymakers of all levels. Top level government officials participated in events organized by or co-sponsored by tobacco industry, such as the exclusive closed door WELT Economic

Summit with Chancellor Olaf Scholz and a third of the cabinet. The First Mayor of the city-state of Hamburg, Peter Tschentscher, visited Reemtsma Cigarettenfabriken (Imperial Brands) headquarters.

The tobacco industry also fosters relationships to lower level public officials via research collaboration and sponsorship of events that target public officials.

Additionally, the ambassadors of Honduras and the Dominican Republic collaborated with the cigar industry association Federal Association of the Cigar Industry (BdZ) to lobby German members of parliament and the German ambassador to Lebanon visited the Lebanese tobacco monopoly, potentially undermining the work of health authorities and tobacco control advocates there.

5 TRANSPARENCY

WHO FCTC Article 5.3 Guidelines: All interactions between the tobacco industry and policymakers must be transparent and the tobacco industry should be required to disclose lobby representatives.^[23,24]

The newly established lobby register increases transparency and helps to measure the tobacco industry lobby power for the first time. There are at least 90 lobbyists with an annual budget of at least €6.1 million representing the interests of the tobacco industry and related industries. If lobbying agencies that represent tobacco industry among other industries were included, these figures would be significantly higher. However, an exact measurement is not possible due to lack of transparency regarding budget allocation or working hours per client. The lobby register has additional gaps. Meetings between policymakers and lobbyists are not disclosed and transparency regarding influence on specific legislative projects (executive footprint) is missing. Additionally, the government provides only partial transparency on interactions with the tobacco industry.

6 CONFLICT OF INTEREST

WHO FCTC Article 5.3 Guidelines: To avoid conflicts of interest, tobacco industry contributions to political parties should be prohibited and government officials should not be allowed to hold positions in the tobacco industry.^[23,24]

Tobacco industry contributions to political parties are allowed in Germany. As a result, political parties received at least €261,000 from the tobacco industry or related groups in 2021/22. The amounts are likely significantly higher because parties do not have to disclose sponsorship contributions, so that only voluntarily published data from a few parties is available.

There is no information on current government officials holding positions in the tobacco industry. However, the lobby groups German Association of the Cigarette Industry (DZV) and German Federal Association of Tobacco Industry and New Products (BVTE) are led by Jan Mücke, a former parliamentary state secretary. In addition, a former staff member of the German Federal Institute for Risk Assessment (BfR), e-cigarette expert Frank Henkler-Stephani, joined BVTE in 2021. Henkler-Stephani was part of the German government delegations to the 7th and 8th sessions of the WHO FCTC Conference of the Parties (COP) in 2016 and 2018. With his recruitment, BVTE could therefore also access his experience and information about German and European Union decision-making procedures at COPs.

7 PREVENTIVE MEASURES

WHO FCTC Article 5.3 Guidelines: The government should make interactions with the tobacco industry transparent, raise awareness about tobacco industry tactics to influence policy-making and ban the acceptance of any kind of gifts or contributions, including policy drafting assistance, by public officials or institutions from the tobacco industry.^[23,24]

The government takes almost no action to actively prevent tobacco industry influence on policy-making. In contradiction to the requirements of Article 5.3 of the WHO FCTC, a code of conduct to prescribe standards for public officials in their interaction with the tobacco industry or at least an awareness raising programme on tobacco industry interference tactics to our knowledge does not exist. The tobacco industry is allowed to sponsor public institutions and government entities.

Results and Findings

	0	1	2	3	4	5
--	---	---	---	---	---	---

INDICATOR 1: Level of Industry Participation in Policy-Development

1	The government ¹ 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. ² in setting or implementing public health policies in relation to tobacco control ³ (Recommendation 3.4) ⁴					5
---	--	--	--	--	--	---

Based on the little available information, it is probable that the tobacco industry had possibilities to influence the most recent tobacco taxation amendments that were favourable for tobacco industry. The tax law (Tabaksteuermodernisierungsgesetz) was approved by parliament in June 2021 and took effect in 2022. The Ministry of Finance prevented transparency regarding the development of the law and the way the tobacco industry was involved. This case was described in detail in the Tobacco Industry Interference Index Germany 2021.^[19]

2	The government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. (Recommendation 3.4)					5
---	---	--	--	--	--	---

Publicly available information regarding the question whether any policy or legislation was drafted by or in collaboration with the tobacco industry is scarce. However, there is a strong probability and at least reason for suspicion regarding the last tobacco taxation amendments (Tabaksteuermodernisierungsgesetz). Responding to a parliamentary request for information from Die Linke (Left Party), the Ministry of Finance explained that such exchange would be normal procedure but due to lack of records, it could not say with certainty whether drafts or other documents were shared.^[25]

Die Linke had asked: "Were certain associations or external third parties provided with the preliminary drafts, key points or similar preliminary work on the draft law [...] even before the formal participation pursuant to section 47(3) of the GGO, and if so, which ones, and when?"

The Ministry responded: "In general, the Federal Ministry of Finance relies on the possibility of a constructive and unbiased exchange with external parties from society and the economy in its area of responsibility, especially with regard to current and pending political decisions, e.g. on legislative projects. Internal model calculations, considerations and

¹ 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
² The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.
³ "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour
⁴ Refers to specific recommendations in the Guidelines for the implementation of Article 5.3 of the WHO FCTC.^[23,24]

	0	1	2	3	4	5
<p>forecasts in various forms can be made and derived from the experience and knowledge gained from this. Whether and to what extent there were consultations in the sense of the question cannot be answered due to the lack of documentation.”</p> <p>Moreover, there had been more than 10 meetings between tobacco industry representatives and top level officials of the Ministry of Finance related to the tobacco taxation reform that were only revealed through parliamentary requests for information.^[26–28]</p> <p>This indicates that there is no firewall between the Ministry of Finance and the tobacco industry. A report alleging that representatives of the Ministry of Finance attended the world’s largest tobacco trade fair InterTabac in Dortmund in 2022 raises further suspicion (see question 8).</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. (Recommendation 4.8) 1 Never 5 Yes</p>		1				
<p>No such involvement of the tobacco industry in government public health committees is known.</p>						
<p>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. (Recommendations 4.9 & 8.3) For non-COP year, follow the previous score of COP year. For non-Parties, apply a score of ‘0’</p>		1				
<p>There were no tobacco industry representatives in the German delegation to the last session of the Conference of the Parties to the WHO FCTC (COP9) or the Meeting of the Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products (MOP2) in 2021.^[29,30]</p>						
<p>INDICATOR 2: Industry CSR activities</p>						
<p>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. (Recommendation 6.2) B. The government (its agencies and officials) receives CSR contributions⁵ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests during the pandemic. (Recommendation 6.4)</p>						5

⁵ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

	0	1	2	3	4	5
<i>NOTE: exclude enforcement activities as this is covered in another question</i>						

A. Government agencies or officials endorse, support or participate in tobacco industry CSR activities

Collaboration between the Federal President and the Körber Foundation

Federal President Frank-Walter Steinmeier – like all Federal Presidents since 1973 – collaborates with the Körber Foundation for the “History Competition of the Federal President”.^[19,31] The Körber Foundation is the sole owner of the Körber AG, a group of companies that is the world’s leading producer of cigarette manufacturing machines. Until recently, the company said on its website that “two thirds of the world’s filter cigarettes and tobacco products are manufactured using machines and equipment” from them.^[19] It also ventures into producing machines for new tobacco and nicotine product categories.^[32] Now Körber Foundation as well as Körber AG itself portray the company as a “technology group”, obscuring its tobacco-related background.^[33,34] Its subsidiary Körber Technologies (formerly Hauni) is a partner member of the tobacco industry lobby group German Federal Association of Tobacco Industry and New Products (BVTE).^[35]

The History Competition of the Federal President aims at children and young people under the age of 21. High-level officials (federal and state level) are members of the competition’s board of trustees and juries also include public officials.^[36,37] First prize winners on the federal level personally receive their awards from the Federal President and a Körber Foundation representative at the Federal President’s official residence. Prizes at the state level are presented in award ceremonies involving state Prime Ministers, Ministers or other high-level officials.^[19]

Philip Morris Stiftung (Philip Morris Foundation) sponsors the Federal President’s “Deutscher Zukunftspreis” (“German Future Award”)

The Deutscher Zukunftspreis is one of the most prestigious German awards for technology and innovation. For instance, in 2021, the developers of BioNTech’s Covid-19 vaccine (internationally also known as “Pfizer vaccine”) received the award of €250,000.^[38,39]

During the prime time television show, sponsors are specially acknowledged, so that the logo of the Philip Morris Stiftung (Philip Morris Foundation), that is quite similar to the Philip Morris logo, was widely broadcasted.^[38,40,41]

After protest from civil society and medical organizations, the sponsorship contract with the foundation is terminated prematurely from 2024, although it was to run until 2029. This was announced by the Office of the Federal President in unpublished letters to Ärztlicher Arbeitskreis Rauchen und Gesundheit (Medical Working Group on Smoking and Health) and German Respiratory Society, among others.^[42,43]

Local level environmental projects

Several local governments collaborated with tobacco industry on cigarette butt clean-ups: Frankfurt/Main, Füssen and Ostsee-Holstein region.^[44–52] The Ostsee-Holstein region

distributed Pepe tobacco branded pocket ashtrays of the tobacco company Von Eicken.^[50,51]

The mayor of Füssen, Maximilian Eichstätter, answered to a letter by the German Cancer Research Center (DKFZ) regarding the town’s collaboration with cigarette lobby group German Federal Association of Tobacco Industry and New Products (BVTE) via email to DKFZ, calling for cooperation between tobacco control advocates and the tobacco industry regarding cigarette butts. He shared contents of the DKFZ letter with the tobacco industry weekly Die Tabakzeitung.^[53,54]

The city of Bremen shows that it is possible to organize cigarette butt clean-ups without the tobacco industry. It is organized as a competition between urban districts. Prizes are sponsored by a health insurance company and a municipally owned housing company.^[55]

B. The government (its agencies and officials) receives CSR contributions (monetary or otherwise, including CSR contributions) from the tobacco industry

Federal level

The most recent transparency reports cover 2020 and 2021. There were no tobacco industry sponsorships reported.^[56,57] However, the sponsorships of the above mentioned “History Competition of the Federal President” and the Federal President’s “German Future Award” do not appear in the transparency reports, revealing gaps of the related anti-corruption directive.

State level

Most German states disclose sponsoring contributions, but usually with long delays. At the time of writing this report, only few reports for 2022 are available and about half of the states have published reports for 2021. The rapid publication of data by the state of Lower Saxony deserves positive mention – even data for 2023 is already available.^[58] States handle sponsorships with varying transparency: in some states, sponsors can opt to remain anonymous or that their contribution amount is not disclosed.^[19]

Public institutions in several states received sponsorship from the tobacco industry or related organizations, for example in Hamburg, Lower Saxony, North Rhine-Westphalia and Rhineland-Palatinate that host tobacco industry headquarters or factories.^[59–66] Most notably, tobacco companies contributed to celebrations of state representations to the federal government in Berlin – an investment of comparatively small amounts of €5,000 to €12,000 per event that helps gain access to high-ranking policymakers at the state and federal level.^[60,64–66] In addition, the industry sponsored cultural and educational institutions.

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)

	0	1	2	3	4	5
(Recommendation 7.1)						

Tobacco advertising, promotion and sponsorship

The tobacco industry has managed to delay advertising regulations for more than a decade. Finally, a ban on outdoor advertising for tobacco products and e-cigarettes was passed in June 2020, although Germany was required to implement a comprehensive advertising ban by 2010 due to the ratification of the WHO FCTC.^[18,67] Moreover, the law gives the industry long transition periods: outdoor advertising for conventional tobacco products is banned since 2022, for heated tobacco products since 2023 and will be banned for e-cigarettes from 2024.^[1]

Additionally, the law has exemptions that allow the industry to continue advertising campaigns. There is an exemption for advertising on the outside of specialized tobacco shops.^[1,68] Advertising at the point of sale, display of tobacco products at the point of sale, packaging and product design features, promotion and sponsorship, including corporate social responsibility, remain allowed. Before the outdoor advertising ban, tobacco industry investments in other marketing channels (e.g. promotion) made up 60 to 70 per cent of the approximately €200 million annual tobacco advertising expenditures in Germany.^[69-72]

Taxation reform

On 1 July 2022, the amended tobacco taxation decree (Tabaksteuerverordnung) came into force. It prohibits the sale of waterpipe tobacco in packs of more than 25 grams. To “avoid that retail packs of more than 25 grams [...] are withdrawn from the market on a large scale or possibly have to be destroyed,”^[73] the government granted a sell-off period until 31 December 2022. However, the lobby group of waterpipe tobacco producers and retailers launched a campaign for another extension, which was eventually granted until 30 June 2023.^[74-82]

The newly introduced tax on e-cigarettes also came into force in July 2022. However, the government granted a “quasi sell-off period” until 12 February 2023 for e-cigarette liquids that were demonstrably put on the market before 1 July 2022.^[83] E-cigarette producers therefore had more than ten months from the official promulgation of the tax law (Tabaksteuermodernisierungsgesetz) on 17 August 2021 to produce and put on the market as much as possible, and retailers had another seven months for the tax-free sale of these products.^[83,84]

7 The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Recommendation 7.3)			3			
--	--	--	---	--	--	--

The government gives the tobacco industry a tax exemption for tobacco products that manufacturers offer their employees as an in-kind allowance, amounting to approximately €5 million annually.^[85] This contradicts national sustainability goals, as the government itself acknowledges. It intends to consider abolishing this tax exemption in the context of the revision of the European Union’s Tobacco Tax Directive.^[85]

	0	1	2	3	4	5
--	---	---	---	---	---	---

There are customs exceptions for tobacco products. Germany applies European Union minimum travellers' allowances for travels within the European Union and from outside the European Union.^[86-88] Notably, for travels from outside the European Union, allowances apply to any importer who is at least 17 years old, although the minimum age for the purchase of tobacco products in Germany is 18.^[87]

Indicator 4: Forms of Unnecessary Interaction

8	Top level government officials (such as President/ Prime Minister or Minister ⁶) 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. (Recommendation 2.1)					5
---	---	--	--	--	--	---

Peter Tschentscher, First Mayor of the State of Hamburg, visits new Reemtsma Cigarettenfabriken (Imperial Brands) headquarters

The First Mayor of the city-state of Hamburg, Peter Tschentscher, visited Reemtsma Cigarettenfabriken on the day of the company's headquarter inauguration and 100 years anniversary party in March 2023.^[89,90] The title "first mayor" roughly corresponds to "prime minister" in other German states. Pictures of the visit were posted not only on company social media accounts but also on Tschentscher's Instagram and the official X account (formerly Twitter) of the Hamburg Senate.^[91-95] Both posts referred to Reemtsma as a "significant corporation for the business location".^[92,93] In a related press release by the company, Tschentscher is cited saying "Reemtsma is a well-known Hamburg company and an attractive employer. I wish the employees a good start in the new corporate headquarters."^[89]

Highlevel government representatives and politicians speak at tobacco industry co-sponsored events

Top level government officials and politicians participated and spoke in a number of tobacco industry (co-)sponsored events. This kind of sponsorship is so widespread that it is impossible to cover all incidents in this report. Here are some examples:

Körper Foundation's Berlin Foreign Policy Forum with top level government officials as speakers

Foreign Minister Annalena Baerbock (Bündnis 90/Die Grünen; Green Party) gave a speech at the Körper Foundation's 2022 Berlin Foreign Policy Forum.^[110,111] Other speakers were Artis Pabriks, Latvian Minister of Defence and Deputy Prime Minister, Christine Lambrecht (Sozialdemokratische Partei Deutschlands; Social Democratic Party of Germany; SPD), then Federal Minister of Defence, Julianne Smith, US Permanent Representative to the North Atlantic Treaty Organization (NATO), Franziska Brantner (Bündnis 90/Die Grünen),

⁶ Includes immediate members of the families of the high-level officials

Parliamentary State Secretary at the Federal Ministry of Economics, and Jens Stoltenberg, NATO Secretary General.^[112,113] In 2021, speakers at the Berlin Policy Forum included then Foreign Minister Heiko Maas (SPD) and a range of German and foreign top level policymakers.^[114,115]

Philip Morris sponsors German Employers' Conferences with Chancellor Olaf Scholz and other top level government officials as speakers

Philip Morris sponsored the 2022 German Employers' Conference with Chancellor Olaf Scholz (SPD), Vice-chancellor Robert Habeck (Bündnis 90/Die Grünen), Minister of Finance Christian Lindner (Freie Demokratische Partei; Free Democratic Party; FDP), among others, as speakers.^[116] As a main sponsor, Philip Morris must have received 50 tickets for company representatives and must have had a 25 square meter booth.^[116,117] There was a panel with the then Philip Morris Germany Director External Affairs Claudia Oeking⁷ and Reem Alabali-Radovan, State Secretary of the Federal Chancellery.^[118] Companies could pay for the organization of a "company panel" but it is not clear if Philip Morris did this because company panels were not made identifiable on the 2022 agenda.^[117,118] Philip Morris sponsored a company panel at the 2021 Employers' Conference, with Claudia Oeking supposed to speak alongside Björn Böhning, State Secretary (Ministry of Labour and Social Affairs) and others.^[119-121] Due to Covid-19, the 2021 Employers' Day was cancelled on short notice.^[96]

PMI executives participate in exclusive closed door WELT Economic Summit with participation of Chancellor Olaf Scholz, other top level policy-makers and business leaders

The WELT Economic Summits are organized annually by the influential newspaper WELT. The event is exclusive to selected sitting top level government officials, 50 top level chief executives and 100 other business representatives.^[122] Discussion setting is a roundtable with some 60 seats for the participating top political and business decision-makers, aiming for "exchange at eye level".^[123,124]

In March 2022, a third of the cabinet participated, including Chancellor Olaf Scholz (SPD), Minister of Finance Christian Lindner (FDP), Minister of the Environment Steffi Lemke (Bündnis 90/Die Grünen), Minister of Justice Marco Buschmann (FDP), Minister of Education Bettina Stark-Watzinger (FDP) and Minister of Transport Volker Wissing (FDP).^[125] In January 2023, participants included Chancellor Olaf Scholz (SPD), Minister of Defence Boris Pistorius (SPD), Minister of Finance Christian Lindner (FDP), Minister for Economic Cooperation and Development Svenja Schulze (SPD), Minister of Justice Marco Buschmann (FDP), Chairman of Christlich Demokratische Union Deutschlands (Christian Democratic Union of Germany; CDU) Friedrich Merz, Bündnis 90/Die Grünen Chairwoman Ricarda Lang, and Czech Prime Minister Petr Fiala.^[126-128]

The meeting takes place behind closed doors, a full guest list is not available and Chatham house rules are applied.^[123,124] Companies can buy sponsorship and partnership packages that include publicity within the printed and digital newspaper, its TV and social media

⁷ Claudia Oeking moved from Philip Morris to Airbus in September 2023. She is followed in her position at Philip Morris by Torsten Albig, former prime minister of Schleswig-Holstein.^[21,22,109]

channels, and access to networking opportunities at the event.^[129,130,122,131] The list of sponsors is not disclosed. However, various posts by representatives of the organizers on LinkedIn refer to Philip Morris' Managing Director Germany and Austria Markus Essing and then Philip Morris Germany's Director External Affairs Claudia Oeking as "Partners and Friends" or guests of the summit in 2023.^[132-134] Responding to a post of WELT's Knut Döring related to the 2023 summit, Claudia Oeking thanks for the invitation and says she is "happy to be participating *again*" (emphasis added).^[133]

Incidents involving members of the federal parliament

In a parliamentary democracy like Germany, members of parliament, especially those belonging to government coalition parties, can have significant influence on policy-making. Tobacco companies and lobby groups as well as e-cigarette lobby groups organized a number of events and meetings involving members of parliament.

MPs meet with tobacco or e-cigarette lobby groups or visit tobacco factory

In November 2021, Till Mansmann (FDP), MP, met with e-cigarette lobby group Association of the e-cigarette trade (VdeH). Mansmann was his party's rapporteur for the last tobacco taxation reform (Tabaksteuermodernisierungsgesetz) and is a member of the Parliament's Finance Committee.^[135]

In January 2022, Jens Teutrine and Frank Schäffler (both FDP MPs) met with cigar lobby group Federal Association of the Cigar Industry (BdZ).^[136,137] Schäffler is deputy member of the Parliament's Finance Committee. Both of them were part of their party's negotiation team at the last coalition talks.^[97]

In July 2022, Rebecca Schamber (SPD), MP, visited the Reemtsma (Imperial Brands) factory in Langenhagen, which is situated in her constituency. Reemtsma shared a picture of the visit on X (formerly Twitter) and thanked her for the exchange.^[138]

MPs participate in social functions organized by tobacco lobby groups

In October 2021 and June 2022, Albert Weiler, Carsten Körber and Reiner Genilke (all CDU) participated in social functions of the tobacco lobby group German Association of Smoking Tobacco (VdR).^[139-144] Albert Weiler was a strong opponent of the outdoor tobacco advertising ban that was eventually passed in 2020 (see question 6).^[19] A guest list of the events is not available, so it is not possible to know whether other MPs or their staff participated.

Tobacco industry sponsors party events

In 2021 and 2022, tobacco industry and related lobby groups sponsored events of political parties, including governing parties (see question 13). These sponsorships provide opportunities to reach top level government officials, including the Chancellor, as well as MPs.

MPs participate in events sponsored by e-cigarette industry lobby group Alliance for Tobacco-Free Enjoyment (BfTG)

The online e-cigarette magazine eGarage.de organizes an event series called "eGarage

Insight”, involving MPs, experts with various backgrounds, including public officials (see Federal Institute for Risk Assessment case below), and occasionally e-cigarette industry lobbyists on the panels.^[98–106] These events are sponsored by the e-cigarette lobby group Alliance for Tobacco-Free Enjoyment (BfTG), indicated on roll up banners during the event. In the timeframe covered by this report, four such events took place.^[99–106]

In these four events, members of parliament from the SPD, CDU, CSU, FDP and Bündnis 90/Die Grünen participated, most of them more than once. All of them were members of tobacco control and e-cigarette related parliamentary committees (Food and Agriculture, Health, Finance) or had related roles in their parties’ parliamentary groups.

The MPs in question are: Rita Hagl-Kehl (SPD), Carlos Kasper (SPD), Hans-Jürgen Thies (CDU), Simone Borchardt (CDU), Sebastian Brehm (CSU), Gero Hocker (FDP), Kristine Lütke (FDP), Sascha Müller (Bündnis 90/Die Grünen) and Linda Heitmann (Bündnis 90/Die Grünen). In one of the events, Pascal Detzler, staff expert of Die Linke, participated as a substitute to Ates Gürpınar (MP, Die Linke).^[99–106]

Foreign interference on behalf of / in collaboration with tobacco lobby groups

In April 2022, the cigar lobby group Federal Association of the Cigar Industry (BdZ) organized a “parliamentary cigar evening” under the patronage of the Honduran ambassador to Germany, Christa Castro Varela. According to BdZ, “more than 90 guests from politics, administration and diplomacy, including a total of seven ambassadors” from Honduras, Nicaragua, Cuba, Dominican Republic, Brazil, Costa Rica, Guatemala and Paraguay participated. The event was a follow-up of a similar event in 2020 that was planned as the start of a series that was cancelled due to Covid-19.^[19,145–150]

In January 2023, the Dominican Ambassador Francisco A. Caraballo in collaboration with the Federal Association of the Cigar Industry (BdZ) conducted a meeting with MPs of the governing party SPD.^[151,152] According to the Dominican Embassy, the “Members of the German parliament listened carefully to the explanations and promised to assess the situation before the implementation of possible taxation measures that could affect our producers.”^[151] The MPs in question belong to Seeheimer Kreis (Seeheim Circle), a conservative group within the SPD parliamentary faction that has repeatedly received BdZ and other tobacco industry funding for events (see question 13 and Annex C).^[152]

Events involving public officials

In Germany, the ministerial bureaucracy is key to political decision-making and Recommendation 2.1 of the Guidelines to Article 5.3 applies to the whole state apparatus.^[23,24] Therefore, this report also covers incidents of unnecessary interaction between tobacco industry and public officials, although question 8 only explicitly asks for incidents involving top level government officials.

Political decisions often are significantly shaped within ministries, and members of parliament receive one legislative draft with consolidated information, not a range of alternatives and the complex information that they are based on. Notably, ministers also often receive just one draft text for review from their officials and department heads. Political scientist Stefan Machura observes that compared to parliaments, public officials

“have the most differentiated and competent apparatus for obtaining complex information” and that “there are symbiotic relationships between individual specialised administrative units and their [lobby] association clientele in terms of mutual information gathering, common interests in increasing the political weight of their field and even the exchange of staff.”^[153]

In addition to ministerial bureaucracy, there are several statual institutions that have important advisory functions, such as the Federal Institute for Risk Assessment (BfR), an independent institute within the portfolio of the Ministry of Food and Agriculture, that is also tasked with tobacco control related research. The relevance of BfR for tobacco control policy-making is illustrated by the fact that a BfR representative was part of the German delegations to the 7th and 8th sessions of the Conference of the Parties of the WHO FCTC in 2016 and 2018 (COP7 and COP8). This representative, e-cigarette expert Frank Henkler-Stephani, joined the tobacco lobby group German Federal Association of Tobacco Industry and New Products (BVTE) in 2021 (see question 14).^[19,154–160]

Because of the key role of public officials in decision-making procedures, they are a target group of tobacco industry lobbying. In the timeframe covered by this report, several cases of unnecessary interaction between tobacco industry or related groups and public officials took place:

Federal Institute for Risk Assessment (BfR) invites tobacco industry to 22nd consumer protection forum in April 2022 – subject: “Opportunities and risks of e-cigarettes”:

Upon a German Cancer Research Center (DKFZ) request for information about this hybrid event, the Federal Institute for Risk Assessment (BfR) declared that it invited three tobacco and e-cigarette lobby groups to attend (German Federal Association of Tobacco Industry and New Products, BVTE; Alliance for Tobacco-Free Enjoyment, BfTG; and Association of the e-cigarette trade, VdeH).^[161] Eventually, representatives of 29 companies or associations of the tobacco industry, e-cigarette industry or related industries registered and were allowed to participate, including representatives of all big tobacco companies in Germany, industry associations and various lobbying agencies.^[161] A representative of the e-cigarette industry lobby group Alliance for Tobacco-Free Enjoyment (BfTG), Dustin Dahlmann, was a panelist of the final discussion panel.^[162] Frank Henkler-Stephani, a former official of the Federal Institute for Risk Assessment who joined the tobacco and e-cigarette lobby group German Federal Association of Tobacco Industry and New Products (BVTE) in 2021, actively participated in the discussion as part of the audience.^[163] In its letter to us, the Institute mentioned that industry groups had repeatedly asked in writing for an opportunity for exchange. It declared that it had discussed provisions of Article 5.3 beforehand and that it does not intend to change this event type in future and keep it open “for the whole public”. It is confident that the event showed that the Federal Institute for Risk Assessment (BfR) “fulfils its legal mandate independently of manufacturer association interests” despite the participation of industry representatives.^[161] On its website, the Institute states that “In order to fulfil its legal mandate, BfR exchanges information with all relevant stakeholders (NGOs, consumer associations, industry, politics, science, media).”^[20] In another letter to the German Cancer Research Center, the Institute explained that there were no other meetings

with tobacco industry in 2021 or 2022, but declared that it had conducted a meeting with representatives of German Federal Association of Tobacco Industry and New Products (BVTE), Alliance for Tobacco-Free Enjoyment (BfTG) and Association of the e-cigarette trade (VdeH) in August 2020 on the subject of e-cigarettes and oral nicotine products. The letter further states that “as part of its prevention strategy, the BfR also has contact with industry associations. [...] BfR also reports on these contacts in a booklet available online about ‘BfR risk communication in practice’. [...] The tobacco associations are not yet listed here, as there are no regular discussions”^[164–166].

In addition, Elke Pieper, an official of the Federal Institute for Risk Assessment (BfR) participated as a representative of BfR in panel discussions organized by the online e-cigarette magazine *egarage.de* and sponsored by e-cigarette industry lobby group Alliance for Tobacco-Free Enjoyment in 2020 and 2022.^[101,102,167,168] Other speakers in these events were members of parliament (see above).

German Food Law Conferences (Deutsche Lebensmittelrechtstage) sponsored by tobacco industry

Philip Morris and the tobacco lobby group German Federal Association of Tobacco Industry and New Products (BVTE) regularly sponsor the annual German Food Law Conferences, also when tobacco-related issues are not on the agenda.^[169–172] Speakers from state and federal ministries as well as European Union institutions feature on the conference programme and participants from the public sector can register for less than half the normal price. Participants can receive continuing education credit points. These events are therefore great opportunities for the tobacco industry to foster relationships with public officials.

Among the speakers in 2021 and 2022 was Birgit Bienzle, the German representative of the European Union Commission’s Group of Experts on Tobacco Policy and head of division at Baden-Württemberg Ministry for Rural Areas and Consumer Protection.^[170,171,173]

Other speakers represented the Federal Ministry of Food and Agriculture (Lorenz Franzen, Christoph Meyer, Markus Schick), the Federal Ministry of Labour and Social Affairs (Susanne Gasde) and the European Union Commission’s Directorate-general Health and Food Safety (Dora Szentpaly-Kleis).^[170,172,174]

German Packaging Law Conferences (Deutsche Verpackungsrechtstage) sponsored by Philip Morris

Philip Morris was one of two main sponsors of the Packaging Law Conferences in February 2022 and February 2023. Like the Food Law Conferences, these events had reduced prices for public officials and participants can receive continuing education credit points.

Representatives of Philip Morris (Katrin Niethammer) and the tobacco industry lobby group (German Federal Association of Tobacco Industry and New Products (BVTE, Dirk Falke) were speakers, talking about extended producer responsibility and single-use plastics, issues related to cigarette filters and packaging. Among the speakers were also Matthias Klein, division head at the Federal Ministry for Environment, and Matthias Fabian, division head at the German Environment Agency (UBA).^[175,176]

Representatives of the Federal Ministry of Finance allegedly meet e-cigarette lobby at tobacco trade fair InterTabac

In a post on X (formerly Twitter), the e-cigarette industry lobby group Association of the e-cigarette trade (VdeH) claims that it has met representatives of the Federal Ministry of Finance for “discreet conversations” at the association’s booth at the InterTabac 2022 trade fair in Dortmund.^[177] It is not possible to identify the officials involved and verify VdeH’s claim through the picture in the tweet. InterTabac is said to be the world’s biggest tobacco industry trade fair.^[178] If meetings between officials of the Ministry of Finance and tobacco industry representatives took place there, this constitutes a contradiction to Article 5.3, WHO FCTC, as these meetings are not strictly necessary for the regulation of the tobacco industry.

Representatives of the German Environment Agency (UBA) collaborate with tobacco industry funded laboratory Analytisch-Biologisches Forschungslabor (ABF) for tobacco-related research papers

The German Environment Agency (UBA) is a statual institution with important advisory functions to the government and public.^[179,180] It has also administrative functions: For example, it will manage the newly established Single-Use Plastics Fund and “is responsible for classifying single-use plastic products, determining the type of product and identifying whether someone is a manufacturer as defined by the Single-Use Plastics Fund Act.” It will receive support and advice from the Single-Use Plastics Commission that consists of representatives of manufacturers, waste management and environmental and consumers’ associations.^[181–183] Tobacco industry associations are on the list of eligible members for the commission, but its actual composition has not yet been determined.^[184]

The Analytisch-Biologisches Forschungslabor (ABF) is a laboratory company with a long history of tobacco industry funding that was in fact established by the tobacco lobby association Verband der Cigarettenindustrie, the predecessor of the German Association of the Cigarette Industry (DZV).^[185–187] More recently, it has presented abstracts at meetings of the tobacco industry research association Cooperation Centre for Scientific Research Relative to Tobacco with Altria, British American Tobacco and Reemtsma/Imperial Brands.^[188] It received funding from Imperial Brands for a paper published in 2017 and more than €3 million from the Philip Morris International related Foundation for a Smokefree World since 2019.^[189–191]

Despite this background, staff of the German Environment Agency have collaborated with Analytisch-Biologisches Forschungslabor (ABF) for various research papers in the past years.^[192–195]

Meetings of Ministry of Health and Ministry of Food and Agriculture with tobacco industry representatives

Both ministries publish a list of meetings with tobacco industry representatives on their websites. Minutes of meetings are not disclosed. During the timeframe covered by this report, there have been no meetings of the Ministry of Health and only two meetings of

	0	1	2	3	4	5
<p>officials of the Ministry of Food and Agriculture with the tobacco industry.^[107,108] However, both lists were last updated in 2021, so some meetings might be reported late.</p> <p><i>German ambassador to Lebanon visits Lebanese tobacco monopoly</i></p> <p>In May 2022, the German Ambassador to Lebanon, Andreas Kindl, visited the headquarters of Lebanon’s state-owned tobacco monopoly Regie.^[196–198] This visit is not necessary for tobacco control regulation and might create a perception of German government endorsement for tobacco industry in Lebanon, violating Article 5.3, as it has the potential to undermine the work of health authorities and tobacco control advocates in the country.^[198]</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) (Recommendation 4.3)</p>			2			
<p>An acceptance of tobacco industry assistance on enforcement by the German government is not known. However, as reported in the German Tobacco Industry Interference Indexes 2020 and 2021, Philip Morris maintains relationships with the Customs District Group of the Trade Union of the Police (Bezirksgruppe Zoll der Gewerkschaft der Polizei, GdP Zoll) for years and co-organizes or sponsors illicit trade related trainings for their members.^[18,19] In March 2023, GdP Zoll and Philip Morris conducted a training for GdP members.^[199,200] Philip Morris representatives were among the speakers.^[201] Philip Morris sponsorship and participation in the European Police Congress that regularly attracts high-level policymakers and officials is also part of the strategy to foster relationships with enforcement authorities and politics.^[202–204]</p>						
<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. (Recommendation 3.1)</p> <p>NOTE: This must not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</p>	0					
No such agreements known.						
Indicator 5: Transparency						
<p>11 The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are</p>			3			

	0	1	2	3	4	5
strictly necessary for regulation. (Recommendation 2.2)						
<p>Partially – the Ministry of Health and the Ministry of Food and Agriculture disclose meetings on their websites after they have taken place.^[107,108] At the time of writing this report, both lists were last updated in 2021, either indicating that there have not been any meetings with the tobacco industry since then or that the respective lists are not regularly updated. Minutes of meetings are not disclosed.</p> <p>Other Ministries, such as the Ministry of Finance that has the lead management of tobacco taxation, or the Federal Chancellery, do not disclose their meetings with the tobacco industry. Some of those became public because of parliamentary requests for information or freedom of information requests.^[19]</p> <p>Additionally, tobacco industry representatives give statements in hearings required by §47(3) Joint Rules of Procedure of the Federal Ministries (GGO). Thus these hearings are a necessary part of the legislative procedure for new laws. Written statements by the invited organizations or companies related to these hearings are published on the website of the concerned ministry. Sometimes, this procedure includes oral hearings. It is unclear whether information on related in-person or virtual meetings is consistently published on those websites.</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 (Recommendation 5.3)				3		
<p>In 2022, the newly established lobby register was launched. It provides partial transparency. Companies, associations and individuals who do lobbying are legally obligated to register. However, there are a number of exemptions, e.g. for employer’s and employees’ associations and churches.</p> <p>Registered information includes the identity of the group/company or individual, its representatives, the names of the lobbyists that directly carry out the lobbying activities, field of interest and business activities, lobbying budget and a list of clients if the lobbying activities are conducted on behalf of a different entity.^[205,206]</p> <p>Information has to be updated annually. Incorrect or untimely entries in the register constitute administrative offences punishable by a fine of up to €50,000.^[205,206]</p> <p>The new lobby register helps to increase transparency. Based on the register, we could find 31 tobacco companies and lobby groups, agencies or individual lobbyists acting on behalf of tobacco or related industries (see Annex B).</p> <p>However, the lobby register has significant gaps. Transparency regarding the influence on specific legislative projects – a so called “executive footprint” – is missing. Meetings between lobbyists and political decision-makers are not disclosed. The obligation to register does not include groups targeting the ministerial bureaucracy below the level of sub-department heads despite the fact that this specialist level is a target of massive lobbying efforts (see question 8). Furthermore, registered entities can refuse to provide information</p>						

	0	1	2	3	4	5
--	---	---	---	---	---	---

on lobby budgets. Only total lobbying budgets are disclosed and there is no transparency on how much is spent on specific lobbying assignments or clients if they are acting on behalf of others.^[205]

According to the lobby register, there are more than 30 companies, associations and agencies with at least 90 lobbyists and an annual budget of at least €6.1 million representing the interests of the tobacco industry and related industries (see Annex B). These numbers do not include lobbying agencies that represent tobacco and related industries among others, due to lack of specific data on each client. If these lobbying agencies are included, the number of lobbyists and annual budgets are significantly higher. While welcoming the introduction of the lobby register, these gaps are also criticized by the Council of Europe’s Group of States against Corruption (GRECO).^[207,208]

The current government plans amendments to the lobby register law, making it stricter in parts. However, according to the most recent draft bill, significant gaps will remain.^[209]

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. (Recommendation 4.11) 1 Never 5 Yes

						5
--	--	--	--	--	--	---

Tobacco industry contributions – donations or sponsorship – to political parties, candidates or campaigns are allowed in Germany. In 2021 and 2022, political parties received at least €261,000 in contributions from tobacco industry or related groups (see below and Annex C). Contributions to political parties are either donations or sponsorships. Regarding donations, parties are required to disclose any amounts exceeding €10,000, but only in their annual reports that are usually published two years later. Donations exceeding €50,000 annually have to be disclosed immediately.^[210] In contrast, sponsorship contributions, for example for party conventions or events, do not have to be disclosed, even though they often exceed donations.

Party donations

In 2021 and 2022, CDU, CSU, SPD and FDP received at least €174,000 in party donations from the tobacco industry.^[211,212] Data for 2022 is only available from Philip Morris International’s own disclosure because annual reports of parties are not available yet.^[212] Interestingly, Philip Morris significantly increased its donations to German parties in 2022 compared to previous years.^[212–214]

Sponsorship contributions

Die Linke does not accept corporate sponsorship. Bündnis 90/Die Grünen and the SPD publish voluntary reports. CDU, CSU, FDP and AfD do not publish voluntary sponsorship reports. In 2021 and 2022, Bündnis 90/Die Grünen did not receive tobacco industry

	0	1	2	3	4	5
--	---	---	---	---	---	---

sponsoring.^[215–217] The SPD, CDU, CSU and FDP received sponsoring contributions from the tobacco industry, but amounts are only disclosed by the SPD. For the CDU, CSU and FDP, there is no comprehensive list of sponsorships. A list of sponsors is sometimes published on event websites or tobacco industry sponsorship is revealed through social media posts by lobby groups, journalists or tobacco control advocates.^[218–226]

Sponsorship amounts for the SPD are scattered across various reports on the websites of different SPD party groups (see detailed list in Annex C). In 2021 and 2022, the SPD received at least €87,000 from tobacco lobby groups (German Federal Association of Tobacco Industry and New Products, BVTE; Federal Association of the Cigar Industry, BdZ; Lebensmittelverband) or tobacco companies (Philip Morris, British American Tobacco, Japan Tobacco International).^[227–235] The majority of sponsoring contributions within the SPD received Seeheimer Kreis, the conservative group within the SPD parliamentary faction in the federal parliament, for social events such as garden parties or the annual Asparagus trip of the Seeheimer Kreis. Top level policymakers attend these annual trips. In 2022, the promotion agency organizing the sponsorship of the Asparagus trip advertised Chancellor Olaf Scholz’ participation to potential sponsors and offered tickets for sponsors to ride along.^[236,237] For its €10,000 sponsorship, Japan Tobacco International must have received five boarding passes.^[234,236]

14 Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Recommendation 4.4)

4

The managing director of the lobby groups German Association of the Cigarette Industry (DZV) and German Federal Association of Tobacco Industry and New Products (BVTE) is Jan Mücke, a former Parliamentary State Secretary at the Federal Ministry of Transport (2009-2013). He joined DZV in 2014 and still uses his title of “Parliamentary Secretary, retd.”, for example on his X (formerly Twitter) bio.^[19,238]

In May 2021, Frank Henkler-Stephani left the statual Federal Institute for Risk Assessment (BfR) to join the German Federal Association of Tobacco Industry and New Products (BVTE) as Senior Director Harm Reduction.^[160,239] Henkler-Stephani had worked for the BfR since 2011. At BfR, inter alia, he was responsible for risk assessments regarding e-cigarettes and related products and contributed to the approval of new types of products as well as to standardisation processes and youth protection legislation.^[239,240] According to Jan Mücke of the German Federal Association of Tobacco Industry and New Products (BVTE), Henkler-Stephani did not work on tobacco-related issues at BfR for the 18 months before joining BVTE, though.^[239] Furthermore, Henkler-Stephani was part of the German delegations to the 7th and 8th sessions of the WHO FCTC Conference of the Parties (COP7 and COP8).^[158,159] With his recruitment, BVTE could therefore also access his experience and information about German and European Union decision-making procedures at COPs.

15 Current government officials and relatives hold positions in the tobacco business including consultancy positions.

1

	0	1	2	3	4	5
(Recommendations 4.5, 4.8, 4.10)						

There is no information on current government officials holding positions in the tobacco industry.

According to a guidance for top level members of the federal government (such as the chancellor, ministers, and parliamentary secretaries of state), it is prohibited to pursue a business or occupation in addition to the government position. Income from assets or holding shares of a company is allowed.^[241]

There might be different rules for members of the ministerial bureaucracy.

Transparency regarding additional income of members of the federal parliament has been increased with a new law taking effect in 2021.^[242,243] However, it took until 2023 for the data to be published. Supplementary income is now disclosed on each MP’s biography page on the federal parliament’s website. A search function for supplementary income is missing, making it difficult to look for tobacco industry related engagements other than reading the pages of all 736 MPs.^[243]

The lobby watchdog LobbyControl criticizes that certain professions still do not need to disclose the identity of clients (such as lawyers and tax accountants).^[243]

Despite the welcome transparency increase, it is therefore not possible to know for sure if any MPs hold (consultancy) positions in the tobacco industry.

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. (Recommendation 5.1)						5
---	--	--	--	--	--	---

A procedure for the disclosure of records of interactions with tobacco industry does not exist. The Ministry of Health and Ministry of Food and Agriculture publish a list of meetings, but minutes are not disclosed and through the way the lists are maintained, it is uncertain if meetings with the tobacco industry recently took place (see question 11).

The government is of the opinion that “there is no obligation to record all conversations – including telephone calls”, as it states in a response to a parliamentary request for information in 2021.^[244]

Related to the Tobacco Industry Interference Index Germany 2021, several freedom of information requests regarding preparatory and follow-up documents of meetings with the tobacco industry were filed. The government’s responses were inconsistent. In some cases, documents were provided – sometimes against a fee of up to €500 – and in others, the request was denied altogether.^[19]

17 The government has formulated, adopted or implemented a code						5
---	--	--	--	--	--	---

	0	1	2	3	4	5
<p>of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Recommendation 4.2); <i>1 for whole of government code; 2 for Yes but partial if only Ministry of Health</i></p>						
<p>To our knowledge, a code of conduct does not exist.</p> <p>Freedom of information requests to the previous government’s Ministry of Health and Ministry of Food and Agriculture in 2021 revealed that they are of the opinion that a code of conduct is not necessary. In their view, the guidelines to Article 5.3 are not legally binding but rather “recommendations”, “assistance” or a “gold standard”.^[245,246] The Ministry of Health additionally stated that “there are a multitude of regulations that oblige civil servants to remain neutral. Separate rules for dealing with the tobacco industry have therefore not been considered necessary so far.”^[245]</p> <p>It is unknown if the new government or at least the Ministries that are tasked with tobacco control related policy-making are planning to adopt a code of conduct.</p>						
<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. (Recommendation 5.2)</p>		2				
<p>Partially:</p> <ul style="list-style-type: none"> • Tobacco production: no – but there is so little tobacco agriculture in Germany that this information is not important. • Manufacture: No. • Market share: Yes – sales volumes of products, disaggregated by brand name and type of product have to be provided by tobacco companies to the government, according to law. However, this data is not publicly disclosed.^[247] • Marketing expenditures: Yes – through an agreement/contract between the tobacco industry and the Federal Drug Commissioner.^[248] • Revenues: Yes – through general tax accounts of businesses. • Lobbying: Partial policy came into effect in 2022 (see question 12). • Philanthropy: No. • Political contributions: No – but partially transparent through reports of political parties (see question 13). 						
<p>19 The government has a program / system/ plan to consistently⁸ raise awareness within its departments on policies relating to FCTC</p>						5

⁸ For purposes of this question, “consistently” means: a. Each time the WHO FCTC is discussed, Article 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

	0	1	2	3	4	5
Article 5.3 Guidelines. (Recommendations 1.1, 1.2)						
To our knowledge, such an awareness raising program does not exist.						
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. (Recommendation 3.4)						5
No such policy is known and state governments even take sponsorship contributions from tobacco companies or associated organizations (see question 5).						
TOTAL SCORE	70					

Annex A: Tobacco Companies

Local tobacco companies and their market shares^[249]

Abbreviation	Local company	Multinational parent company
PMI	Philip Morris GmbH	Philip Morris International
N/A	Reemtsma Cigarettenfabriken GmbH	Imperial Brands
BAT	British American Tobacco Deutschland	British American Tobacco
JTI	JT International Deutschland	Japan Tobacco International
N/A	Heintz van Landewyck	Landewyck Group / Landewyck Tobacco S.A. (Luxembourg)
N/A	Joh. Wilh. von Eicken	N/A
N/A	Others	N/A

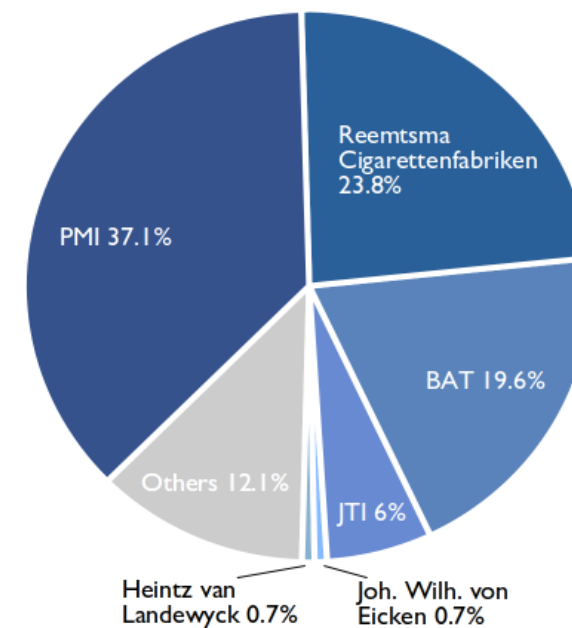


Figure 1: Market shares of tobacco companies in Germany, 2017 (Source: DZV)

Annex B: Tobacco and E-cigarette Industry Lobby Power

Tobacco and e-cigarette companies, associations, lobby agencies and other related groups, as registered in the federal lobbying register

Notes on methodology: Included in this list are tobacco companies, associations, agencies and natural persons representing tobacco or e-cigarette industry interests that are registered in the lobbying register at the federal parliament. To find these, we used the following search words: “Tabak” (“tobacco”), “Zigarette” (“cigarette”), “Philip Morris”, “Reemtsma”, “JT International”, “British American Tobacco”, “BVTE”, “E-Zigarette” (“e-cigarette”). The number of lobbyists (NOL) is the total of official representatives and the number of employees who directly exercise the representation of interests, as registered in the lobbying register. Lobby agencies and other organizations/natural persons representing others do not have to disclose the lobbying budgets or working hours for each client. Their number of lobbyists (NOL) and lobbying budgets are therefore marked N/A in the respective rows but stated in the notes section.

#	Company/Association	(Inofficial) English translation / Parent company	Abbreviation	Number of lobbyists (NOL)	Annual lobby budget in €	Notes
1	Berlin Kommunikation UG ^[250]	Berlin Kommunikation UG	N/A	N/A	N/A	NOL: 1; budget: €210,001-220,000; represents VdeH besides 4 other clients
2	Bernstein Public Policy ^[251]	Bernstein Public Policy	N/A	N/A	N/A	NOL: 15; budget: €190,001-200,000; represents BAT besides 20 other clients
3	Brandenburgisches Institut für Gesellschaft und Sicherheit gGmbH ^[252]	Brandenburg Institute for Society and Security	N/A	N/A	N/A	NOL: 2; budget: €1-10,000; represented PMI besides 1 other client (until May 2023)
4	British American Tobacco ^[253]	British American Tobacco	BAT	7	790,001-800,000	
5	Bundesverband des Tabakwaren-Einzelhandels ^[254]	Federal Association of Tobacco Retailers	BTWE	2	30,001-40,000	

#	Company/Association	(Inofficial) English translation / Parent company	Abbreviation	Number of lobbyists (NOL)	Annual lobby budget in €	Notes
6	Bundesverband der Lottoverkaufsstellen in Deutschland ^[255]	Federal Association of Lottery Sales Agents in Germany	BLD	N/A	N/A	NOL: 3; budget: €20,001-30,000; BLD is a member of BTWE and cooperated on a campaign against the tobacco taxation law with BVTE, BTWE and PMI in 2021 ^[256,257]
7	Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse ^[258]	German Federal Association of Tobacco Industry and New Products	BVTE	7	1,430,001-1,440,000	
8	Bundesverband der Zigarrenindustrie ^[259]	Federal Association of the Cigar Industry	BdZ	3	150,001-160,000	
9	Bundesverband Deutscher Tabakpflanzer/Vereinigung der Tabak-Erzeugergemeinschaften ^[260]	Federal Association of German Tobacco Growers/Association of Tobacco Producers' Associations	BdT	4	30,001-40,000	
10	Bundesverband Deutscher Tabakwaren-Großhändler und Automatenaufsteller e.V. ^[261]	Federal Association of German Tobacco Wholesalers and Vending Machine Operators	BDTA	3	110,001-120,000	
11	Bundesverband Wasserpfeifentabak (Der Shisha-Verband) ^[262]	German Shisha Tobacco Association	N/A	5	150,001-160,000	

#	Company/Association	(Inofficial) English translation / Parent company	Abbreviation	Number of lobbyists (NOL)	Annual lobby budget in €	Notes
12	Bündnis für Tabakfreien Genuss ^[263]	Alliance for Tobacco-Free Enjoyment	BfTG	3	300,001-310,000	E-cigarette lobby group; does not accept tobacco companies as members ^[264]
13	CBE Digiden AG ^[265]	CBE Digiden AG	N/A	N/A	N/A	NOL: 3; budget: €30,001-40,000; represents Swedish Match besides 1 other client
14	Deekeling Arndt Advisors in Communications GmbH ^[266]	Deekeling Arndt Advisors in Communications GmbH	N/A	N/A	N/A	NOL: 13; budget: 810,001-820,000; represents PMI besides 8 other clients
15	Deutscher Zigarettenverband ^[267]	German Association of the Cigarette Industry	DZV	10	1-10,000	NOL: 5 of them also represent DZV spin off organization BVTE
16	Dr. phil. Erich Vad (natural person) ^[268]	Dr. phil. Erich Vad (natural person)	N/A	1	1-10,000	Swedish Match is the only client
17	European Rolling Paper Association ^[269]	European Rolling Paper Association	ERPA	6	120,001-130,000	
18	EUTOP Brussels ^[270]	EUTOP Brussels	N/A	3	30,001-40,000	BAT is the only client
19	Fuchs & Cie. ^[271]	Fuchs & Cie.	N/A	N/A	N/A	NOL: 8; budget: 610,001-620,000; represents Reemtsma (Imperial Brands) besides 22 other clients
20	Interessengemeinschaft Tabakwirtschaft ^[272]	Interest Group Tobacco	N/A	7	1-10,000	Registered at PMI Germany

#	Company/Association	(Inofficial) English translation / Parent company	Abbreviation	Number of lobbyists (NOL)	Annual lobby budget in €	Notes
		Industry				headquarters in Munich, all its lobbyists are also registered in PMI's lobby register entry
21	JT International Germany ^[273]	Japan Tobacco International	JTI	6	510,001-520,000	
22	Lebensmittelverband Deutschland ^[274]	Food Federation Germany	N/A	N/A	N/A	NOL: 6; budget: 900,001-910,000; according to self-description represents tobacco industry interests, among others; among its members are VdR and BdZ, VdR is also a member of the board of trustees ^[274-276]
23	MSL Group ^[277]	MSL Group	MSL	N/A	N/A	NOL: 25; budget: 1,580,001-1,590,000; represents PMI besides 35 other clients
24	Philip Morris GmbH ^[278]	Philip Morris International	PMI	13	1,300,001-1,310,000	
25	Reemtsma Cigarettenfabriken ^[279]	Imperial Brands	N/A	8	560,001-570,000	
26	Stefan von der Heiden (natural person) ^[280]	Stefan von der Heiden (natural person)	N/A	N/A	N/A	NOL: 1; budget: 20,001-30,000; represents PMI besides 2 other clients

#	Company/Association	(Inofficial) English translation / Parent company	Abbreviation	Number of lobbyists (NOL)	Annual lobby budget in €	Notes
27	Swedish Match ^[281]	Swedish Match (PMI)	N/A	2	180,001-190,000	
28	Torben Theis (natural person) ^[282]	Torben Theis (natural person)	N/A	N/A	N/A	NOL: 1; budget: 10,001-20,000; represents VdeH besides 4 other clients
29	Verband der deutschen Rauchtabakindustrie ^[283]	German Association of Smoking Tobacco	VdR	6	230,001-240,000	
30	Verband der Zigarettenpapier verarbeitenden Industrie e.V. ^[284]	German Association of the Cigarette Paper Processing Industry	VZI	3	40,001-50,000	
31	Verband des eZigarettenhandels ^[285]	Association of the e-cigarette trade	VdeH	3	170,001-180,000	
	Total at least *(excluding entities representing tobacco industry among other clients; lobbyists registered for more than one entity are counted only once)			90*	6,130,020-6,330,000*	

Annex C: Tobacco Industry Donations to and Sponsorship of Political Parties

Donations to political parties 2021^[211]

Political party	Company / Association	Amount (€)
CDU	PMI	15,000
CSU	PMI	15,000
FDP	PMI	15,000
SPD	PMI	15,000
Total		60,000

Donations to political parties 2022 (only disclosure of PMI donations available)^[212]

Political party	Company / Association	Amount (€)
CDU	PMI	28,514*
CSU	PMI	28,514*
FDP	PMI	28,514*
SPD	PMI	28,514*
Total		114,056

*Estimate; original data: US\$ 29,940; exchange rate US\$ 1,05 = € 1^[286]

Note: Donations are published with a long delay. That is why only 2022 information about PMI donations is available at the time of writing this report. PMI voluntarily publishes political contributions on their website.

Sponsorship of political parties 2021

Political party	Company / Association	Purpose	Amount (€)
AfD	No sponsorship report found.		N/A
CDU	No sponsorship report found.		N/A
CSU	No sponsorship report found.		N/A
FDP	No sponsorship report found. But DZV and PMI sponsored the 2021 party convention. ^[225,226]		N/A
Bündnis 90/Die Grünen (Green Party)	No tobacco industry sponsorship. ^[215]		0
Die Linke (Left Party)	No sponsorship report found; party does not accept sponsorship of party conventions. ^[287]		0
SPD	BdZ	Booth and logo appearance at Garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[229]	5,000
	BVTE	SPD's Vorwärts magazine digital conference (BVTE was sole „gold sponsor“) ^[228]	2,333
	JTI	Logo appearance at asparagus dinner of Seeheimer Kreis (conservative group of SPD MPs) ^[233]	5,000
	JTI	Logo appearance at Garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[229]	5,000
Total			17,333

Sponsorship of political parties 2022

Political party	Company / Association	Purpose	Amount (€)
AfD	No sponsorship report found.		N/A

Political party	Company / Association	Purpose	Amount (€)
CDU		No sponsorship report found. But tobacco industry sponsored the 2022 party convention (BVTE, JTI, PMI) and summer party of the Parlamentskreis Mittelstand, a group of CDU/CSU MPs representing medium-sized companies (BdZ, PMI). ^[218–220]	N/A
CSU		No sponsorship report found. But tobacco industry sponsored the 2022 party convention (BAT and VdR through Vereinigung der Bayerischen Wirtschaft) and the summer party of Parlamentskreis Mittelstand (see CDU). ^[218,220–224]	N/A
FDP		No sponsorship report found. But BVTE and PMI sponsored the 2022 party convention. ^[225]	N/A
Bündnis 90/Die Grünen (Green Party)		No tobacco industry sponsorship. ^[216,217]	0
Die Linke (Left Party)		No sponsorship report found; party does not accept sponsorship of party conventions. ^[287]	0
SPD	BAT	Booth and logo appearance at 2022 garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[230]	6,000
	BdZ	Logo appearance at 2022 asparagus trip of Seeheimer Kreis (conservative group of SPD MPs) ^[234]	2,000
	BdZ	Logo appearance at 2022 summer party of Seeheimer Kreis (conservative group of SPD MPs) ^[235]	2,000
	BdZ	Booth and logo appearance at 2022 garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[230]	4,000
	BVTE	Smokers' lounge and logo appearance at SPD's Vorwärts magazine's summer party 2022 ^[227]	11,000
	JTI	Logo appearance at networking evening of Seeheimer Kreis (conservative group of SPD MPs) in February 2022 ^[235]	5,000

Political party	Company / Association	Purpose	Amount (€)
	JTI	Logo appearance and print advertising at 2022 asparagus trip of Seeheimer Kreis (conservative group of SPD MPs) ^[234]	10,000
	JTI	Logo appearance at 2022 garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[230]	3,000
	Lebensmittelverband	Logo appearance at 2022 asparagus trip of Seeheimer Kreis (conservative group of SPD MPs) ^[234]	4,200
	PMI	Booth and logo appearance at SPD Vorwärts magazine's summer party 2022 ^[227]	10,000
	PMI	Booth and logo appearance at 2022 summer party of Seeheimer Kreis (conservative group of SPD MPs) ^[235]	7,500
	PMI	Logo appearance at 2022 garden party of Seeheimer Kreis (conservative group of SPD MPs) ^[230]	5,000
Total			69,700

References

1. Deutsches Krebsforschungszentrum. (2020). *Tabakatlas Deutschland 2020*. Deutsches Krebsforschungszentrum, Pabst Science Publishers.
<https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/Tabakatlas-Deutschland-2020.pdf?m=1606813115&> (Accessed 15 December 2020)
2. Deutsches Krebsforschungszentrum, Deutsche Krebshilfe, & Aktionsbündnis Nichtraucher (Eds.). (2021). *Strategie für ein tabakfreies Deutschland 2040*.
https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/2021_Strategie-fuer-ein-tabakfreies-Deutschland-2040.pdf (Accessed 1 June 2021)
3. Deutsches Krebsforschungszentrum, Deutsche Krebshilfe, & Aktionsbündnis Nichtraucher (Eds.). (2021). *Strategy for a tobacco-free Germany 2040*.
https://www.dkfz.de/de/krebspraevention/Downloads/pdf/Buecher_und_Berichte/2021_Strategy-for-a-tobacco-free-Germany-2040.pdf?m=1665667277& (Accessed 19 September 2023)
4. Joossens, L., Olefir, L., Feliu, A., & Fernandez, E. (2022). *The Tobacco Control Scale 2021 in Europe*.
5. Kotz, D., Acar, Z., & Klosterhalfen, S. (2022). *DEBRA Factsheet 09: Konsum von Tabak und E-Zigaretten bei Jugendlichen und jungen Erwachsenen*. <https://www.debra-study.info/wp-content/uploads/2022/12/Factsheet-09-v3.pdf> (Accessed 19 September 2023)
6. DEBRA Study. (2022, December). *Tabakrauchen nach Alter. DEBRA study – Deutsche Befragung zum Rauchverhalten | German Study on Tobacco Use*. DEBRA study. <https://www.debra-study.info/> (Accessed 19 September 2023)
7. Kotz, D., Pashutina, Y., & Kastaun, S. (2022). *DEBRA Factsheet 07: Aktueller E-Zigarettenkonsum unter Jugendlichen und jungen Erwachsenen*.
<https://www.debra-study.info/wp-content/uploads/2022/02/Factsheet-07-v5.pdf> (Accessed 19 September 2023)
8. Grüning, T., Weishaar, H., Collin, J., & Gilmore, A. B. (2012). Tobacco industry attempts to influence and use the German government to undermine the WHO Framework Convention on Tobacco Control. *Tobacco Control*, 21(1), 30–38. <https://doi.org/10.1136/tc.2010.042093>
9. Gilmore, A. B., Fabbri, A., Baum, F., Bertscher, A., Bondy, K., Chang, H.-J., Demaio, S., Erzse, A., Freudenberg, N., Friel, S., Hofman, K. J., Johns, P., Karim, S. A., Lacy-Nichols, J., Carvalho, C. M. P. de, Marten, R., McKee, M., Petticrew, M., Robertson, L., ... Thow, A. M. (2023). Defining and conceptualising the commercial determinants of health. *The Lancet*, 0(0).
[https://doi.org/10.1016/S0140-6736\(23\)00013-2](https://doi.org/10.1016/S0140-6736(23)00013-2)
10. Hoe, C., Weiger, C., Minosa, M. K. R., Alonso, F., Koon, A. D., & Cohen, J. E. (2022). Strategies to expand corporate autonomy by the tobacco, alcohol and sugar-sweetened beverage industry: A scoping review of reviews. *Globalization and Health*, 18(1), 17.
<https://doi.org/10.1186/s12992-022-00811-x>
11. Hird, T. R., Gallagher, A. W. A., Evans-Reeves, K., Zatoński, M., Dance, S., Diethelm, P. A., Edwards, R., & Gilmore, A. B. (2022). Understanding the long-term policy influence strategies of the tobacco industry: Two contemporary case studies. *Tobacco Control*, 31(2), 297–307.
<https://doi.org/10.1136/tobaccocontrol-2021-057030>
12. Matthes, B. K., Kumar, P., Dance, S., Hird, T., Carriedo Lutzenkirchen, A., & Gilmore, A. B. (2023). Advocacy counterstrategies to tobacco industry interference in policymaking: A scoping review of peer-reviewed literature. *Globalization and Health*, 19(1), 42.
<https://doi.org/10.1186/s12992-023-00936-7>

13. Global Center for Good Governance in Tobacco Control (GGTC). (2021). *Global Tobacco Industry Interference Index*. Global Tobacco Index. <https://globaltobaccoindex.org> (Accessed 1 June 2021)
14. Smith, K. E., Fooks, G., Collin, J., Weishaar, H., Mandal, S., & Gilmore, A. B. (2010). "Working the System" —British American Tobacco's Influence on the European Union Treaty and Its Implications for Policy: An Analysis of Internal Tobacco Industry Documents. *PLoS Medicine*, 7(1), e1000202. <https://doi.org/10.1371/journal.pmed.1000202>
15. Committee of Experts on Tobacco Industry Documents. (2000). *Tobacco Company Strategies to Undermine Tobacco Control Activities at the World Health Organization. Report of the Committee of Experts on Tobacco Industry Documents*. http://www.who.int/tobacco/en/who_inquiry.pdf (Accessed 2 July 2012)
16. WHO. (2003). *WHO Framework Convention on Tobacco Control (FCTC)*. <http://apps.who.int/iris/bitstream/10665/42811/1/9241591013.pdf?ua=1> (Accessed 23 December 2019)
17. Deutsches Krebsforschungszentrum. (2011). Der Vertragstext der FCTC. In *Perspektiven für Deutschland: Das Rahmenübereinkommen der WHO zur Eindämmung des Tabakgebrauchs. WHO Framework Convention on Tobacco Control (FCTC)*. http://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/Das_Rahmenuebereinkommen_der_WHO_zur_Eindaemmung_des_Tabakgebrauchs_FCTC.pdf (Accessed 20 September 2016)
18. Graen, L. (2020). *2020 Tobacco Industry Interference Index Germany*. <https://globaltobaccoindex.org/country/DE> (Accessed 15 January 2021)
19. Graen, L. (2021). *Tobacco industry interference index Germany 2021*. <https://globaltobaccoindex.org/download/1352> (Accessed 18 September 2023)
20. Bundesinstitut für Risikobewertung. (2023). *Risikobewertung am BfR: unabhängig und transparent—Fragen und Antworten zur Sicherung der Unabhängigkeit des Bundesinstituts für Risikobewertung*. <https://www.bfr.bund.de/cm/343/fragen-und-antworten-zur-sicherung-der-unabhaengigkeit-des-bundesinstituts-fuer-risikobewertung.pdf> (Accessed 27 September 2023)
21. Süddeutsche Zeitung. (2023, September 1). Torsten Albig: Vom Ministerpräsidenten zum Tabaklobbyisten. *Süddeutsche.de*. <https://www.sueddeutsche.de/wirtschaft/philip-morris-torsten-albig-lobbyist-1.6183748> (Accessed 4 September 2023)
22. Politik & Kommunikation. (2023, September 1). *Albig übernimmt External Affairs bei Philip Morris*. <https://www.politik-kommunikation.de/personalwechsel/albig-uebernimmt-external-affairs-bei-philip-morris/> (Accessed 4 October 2023)
23. Conference of the Parties of the WHO Framework Convention on Tobacco Control. (2008). *Guidelines for implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control on the protection of public health policies with respect to tobacco control from commercial and other vested interests of the tobacco industry (decision FCTC/COP3(7))*. <https://fctc.who.int/publications/m/item/guidelines-for-implementation-of-article-5.3> (Accessed 16 August 2021)
24. Deutsches Krebsforschungszentrum. (2011). Leitlinien für die Umsetzung von Artikel 5.3— Schutz gesundheitspolitischer Maßnahmen zur Eindämmung des Tabakgebrauchs vor kommerziellen und sonstigen berechtigten Interessen der Tabakindustrie. In *Perspektiven für Deutschland: Das Rahmenübereinkommen der WHO zur Eindämmung des Tabakgebrauchs. WHO Framework Convention on Tobacco Control (FCTC)*. <http://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/>

- Das_Rahmenuebereinkommen_der_WHO_zur_Eindaemmung_des_Tabakgebrauchs_FCTC.pdf (Accessed 20 September 2016)
25. Die Bundesregierung. (2021). *Drucksache 19/30104: Antwort der Bundesregierung auf die Kleine Anfrage der Abgeordneten Jan Korte, Dr. Petra Sitte, Friedrich Straetmanns, weiterer Abgeordneter und der Fraktion DIE LINKE. – Drucksache 19/29098 – Einflussnahme von Interessenvertreterinnen und Interessenvertretern auf den Gesetzentwurf der Bundesregierung – Entwurf eines Gesetzes zur Modernisierung des Tabaksteuerrechts (Tabaksteuermodernisierungsgesetz – TabStMoG) (Bundesratsdrucksache 243/21)*. <https://dserver.bundestag.de/btd/19/301/1930104.pdf> (Accessed 6 April 2023)
 26. Hecking, C., & Reiermann, C. (2021, August 31). Olaf Scholz: Wie die Zigarettenlobby Einfluss auf die Tabaksteuer-Novelle nahm. *Der Spiegel*. <https://www.spiegel.de/wirtschaft/olaf-scholz-wie-die-zigarettenlobby-einfluss-auf-die-tabaksteuer-novelle-nahm-a-5aea94f9-8f55-497b-956e-d575cb0c0a66> (Accessed 5 June 2023)
 27. Deutscher Bundestag. (2021). *Drucksache 19/31171. Schriftliche Fragen mit den in der Woche vom 21. Juni 2021 eingegangenen Antworten der Bundesregierung*. <https://dserver.bundestag.de/btd/19/311/1931171.pdf> (Accessed 31 May 2023)
 28. Deutscher Bundestag. (2021). *Drucksache 19/32373. Schriftliche Fragen mit den in der Woche vom 6. September 2021 eingegangenen Antworten der Bundesregierung*. <https://dserver.bundestag.de/btd/19/323/1932373.pdf> (Accessed 31 May 2023)
 29. Conference of the Parties to the WHO Framework Convention on Tobacco Control. (2021). *FCTC/COP/9/DIV/1. List of participants*. <https://fctc.who.int/publications/m/item/cop-9-div-1-list-of-participants> (Accessed 25 May 2023)
 30. Meeting of the Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products. (2021, November 15). *FCTC/MOP/2/DIV/1. List of participants*. <https://fctc.who.int/publications/m/item/mop2-div-1-list-of-participants> (Accessed 30 May 2023)
 31. Körber-Stiftung. (2020). *Der Geschichtswettbewerb*. Körber-Stiftung. <https://www.koerberstiftung.de/geschichtswettbewerb/portraet> (Accessed 22 April 2020)
 32. Körber Beteiligungen GmbH. (2023). *Konzernabschluss zum Geschäftsjahr vom 01.01.2021 bis zum 31.12.2021*. www.bundesanzeiger.de (Accessed 7 August 2023)
 33. Körber Stiftung. (2020). *We are Körber-Stiftung*. https://koerber-stiftung.de/site/assets/files/20036/koerber-stiftung_at-a-glance.pdf (Accessed 7 August 2023)
 34. Körber AG. (2023). *Home: We are Körber*. Körber AG. <https://www.koerber.com/en/> (Accessed 7 August 2023)
 35. Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse. (2023). *Mitglieder*. <https://www.bvte.de/de/ueber-den-bvte/mitglieder.html> (Accessed 7 August 2023)
 36. Körber-Stiftung. (2022). *Geschichtswettbewerb des Bundespräsidenten*. https://koerberstiftung.de/site/assets/files/17381/kurzportrait_geschichtswettbewerb-1.pdf (Accessed 6 June 2023)
 37. @geschichtswettbewerb. (2023, April 3). *Wusstest du schon wer in unseren Jurys sitzt? Erfahre es jetzt!* Instagram. <https://www.instagram.com/geschichtswettbewerb/> (Accessed 6 June 2023)
 38. ZDF. (2021, November 17). *Deutscher Zukunftspreis 2021*. <https://www.zdf.de/uri/582610f4-371b-4062-804e-65f44e33179c> (Accessed 30 May 2023)
 39. Deutscher Zukunftspreis. (2021, November 4). *25. Preisverleihung des Deutschen Zukunftspreises am 17. November in Berlin / Bildtermin*. presseportal.de. <https://www.presseportal.de/pm/25570/5064110> (Accessed 8 August 2023)

40. ZDF. (2022, October 26). *Deutscher Zukunftspreis 2022*.
https://www.zdf.de/uri/p12_sendebereich_24701352 (Accessed 30 May 2023)
41. ZDF. (2021, November 15). *Deutscher Zukunftspreis 2021 im ZDF und in der ZDFmediathek*.
presseportal.de. <https://www.presseportal.de/pm/7840/5073689> (Accessed 28 June 2023)
42. Bundespräsidialamt, Ministerialdirektor Dr. Oliver Schmolke. (2023, February 28).
Geschäftszeichen 13—13-461 09-15-6/2015 [Letter to Friedrich Wiebel & Ärztlicher
Arbeitskreis Rauchen und Gesundheit].
43. Bundespräsidialamt, Ministerialdirektor Dr. Oliver Schmolke. (2023, February 28).
Geschäftszeichen 13—13-461 09-15-6/2015 [Letter to Anja Flender & Deutsche Gesellschaft
für Pneumologie und Beatmungsmedizin e.V.].
44. Stadt Frankfurt am Main. (2021, June 23). *FFM ist kein Aschenbecher | #cleanffm*.
<https://web.archive.org/web/20210623063001/https://www.cleanffm.de/fika> (Accessed 11
July 2023)
45. Stadt Frankfurt am Main. (2021). *Frankfurt ist kein Aschenbecher*. #cleanffm.
<https://www.cleanffm.de/fika> (Accessed 11 July 2023)
46. Stadt Frankfurt am Main, Dezernat für Umwelt und Frauen. (2021). „*Frankfurt ist kein
Aschenbecher*“: Umweltdezernentin Rosemarie Heilig startet vierwöchige Projektstudie.
[https://cleanffm.de/user/pages/02.menu/07.downloads/04._pressemittelungen/
2020_06_11%20PM%20Frankfurt%20ist%20kein%20Aschenbecher.pdf](https://cleanffm.de/user/pages/02.menu/07.downloads/04._pressemittelungen/2020_06_11%20PM%20Frankfurt%20ist%20kein%20Aschenbecher.pdf) (Accessed 11 July
2023)
47. Die Tabak Zeitung. (2021, June 23). Für die Umwelt. *Die Tabak Zeitung*.
48. Philip Morris Deutschland [@PhilipMorrisDE]. (2021, June 11). *Heute geht's los: Wir
unterstützen @Stadt_FFM bei ihrer Sauberkeitsinitiative @cleanffm. Gemeinsam für mehr
Sauberkeit, mehr Lebensqualität, mehr Frankfurt – weniger Littering und mehr
Verantwortungsbewusstsein für eine saubere Stadt.* <http://cleanffm.de> #cleanffm
<https://t.co/pGdAERepnK> [Tweet]. Twitter.
<https://twitter.com/PhilipMorrisDE/status/1403355227680645124> (Accessed 7 June 2023)
49. Die Tabak Zeitung. (2021, 14). Verantwortung übernehmen: BVTE-Kampagne 'Achte auf die
Umwelt': Übergabe von 5000 Taschenaschenbechern in Füßen. *Die Tabak Zeitung*.
50. Ostsee-Holstein-Tourismus e.V. (2019, July 31). *Kippenfrei am Strand der Ostsee Schleswig-
Holstein*. <https://www.ostsee-schleswig-holstein.de/pressemeldung/91?amp> (Accessed 9 May
2023)
51. Ostsee-Holstein-Tourismus e.V. (2021, August 11). *Aktion „Sauberer Strand“ mit
Strandaschenbechern auch 2021 ein Erfolg*.
[https://www.ostsee-schleswig-holstein.de/pressemeldung/aktion-sauberer-strand-mit-
strandaschenbechern-auch-2021-ein-erfolg](https://www.ostsee-schleswig-holstein.de/pressemeldung/aktion-sauberer-strand-mit-strandaschenbechern-auch-2021-ein-erfolg) (Accessed 9 May 2023)
52. Ostsee-Holstein-Tourismus e.V. (2022). *Geschäftsbericht 2021/2022*. [https://www.ostsee-
schleswig-holstein.de/aufgaben-und-ziele?file=files/download/_B2B-Bereich/Marketing/
Marke%20Ostsee/OHT-Geschaeftsbericht-2021-2022-web.pdf&cid=17939](https://www.ostsee-schleswig-holstein.de/aufgaben-und-ziele?file=files/download/_B2B-Bereich/Marketing/Marke%20Ostsee/OHT-Geschaeftsbericht-2021-2022-web.pdf&cid=17939) (Accessed 9 May
2023)
53. Marc Reisner. (2021, September 8). Liebe Leserin, lieber Leser. *Die Tabak Zeitung*, 1.
54. Maximilian Eichstetter. (2021, July 21). *Aktion saubere Stadt—Miteinander statt gegeneinander*
[Letter to Katrin Schaller, A. Rothe, Jan Mücke, Jutta Ehlermann, Nicole Eikmeier, & Peter
Hartung].
55. Die Bremer Stadtreinigung. (2023). *Kippen-Marathon 2023*. Die Bremer Stadtreinigung.
<https://www.dbs.info/mission-orange/kippen-marathon/> (Accessed 6 June 2023)
56. Bundesministerium des Innern und für Heimat. (2022). *Integrität in der Bundesverwaltung.
Jahresbericht 2021*.

- https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/moderne-verwaltung/integritaet-der-verwaltung/integritaetsbericht-2021/integritaetsbericht2021.pdf?__blob=publicationFile&v=3#%5B%7B%22num%22%3A425%2C%22gen%22%3A0%7D%2C%7B%22name%22%3A%22FitH%22%7D%2C533%5D (Accessed 15 May 2023)
57. Bundesministerium des Innern, für Bau und Heimat. (2021). *Integrität in der Bundesverwaltung. Jahresbericht 2020*.
https://www.bmi.bund.de/SharedDocs/downloads/DE/veroeffentlichungen/themen/moderne-verwaltung/integritaet-der-verwaltung/integritaetsbericht-2020/integritaetsbericht2020.pdf?__blob=publicationFile&v=7 (Accessed 15 May 2023)
58. Land Niedersachsen. (2023). *Sponsoringleistungen, Spenden, Schenkungen und Werbezuwendungen für Land Niedersachsen im Jahr 2023*.
<https://www.niedersachsen.de/startseite/service/sponsoring/sponsoringlisten-der-niedersaechsischen-landesregierung-fuer-2012-20090.html?year=2023#sponsor> (Accessed 3 July 2023)
59. Freie Hansestadt Bremen, Senator für Finanzen. (2023). *Bericht über die Annahme und Verwendung von Beträgen aus Sponsoring, Werbung, Spenden und mäzenatische Schenkungen zur Finanzierung öffentlicher Aufgaben der Freien Hansestadt Bremen (Land und Stadtgemeinde Bremen) 2022*.
https://www.senatspressestelle.bremen.de/sixcms/media.php/13/20230328_Sponsoring_Bericht_2022.pdf (Accessed 16 May 2023)
60. Finanzbehörde, Hansestadt Hamburg. (2023). *Bericht der Senatskanzlei über Zuwendungen in Form von Sponsoring, Spenden und mäzenatischen Schenkungen, 2. Halbjahr 2022*.
<https://www.hamburg.de/contentblob/16872210/f9eed38e75a6c45064028291d11dc908/data/sk-halbjahr2-2022.xlsx> (Accessed 28 June 2023)
61. Finanzbehörde, Hansestadt Hamburg. (2022). *Bericht der Behörde für Wissenschaft, Forschung, Gleichstellung und Bezirke über Zuwendungen in Form von Sponsoring, Spenden und mäzenatischen Schenkungen, 1. Halbjahr 2022*.
<https://www.hamburg.de/contentblob/16401050/9fa76b1bb51aca13bd3a387c2aa180bc/data/bwfgb-sponsoring-bericht-1-halbjahr-2022.xlsx> (Accessed 28 June 2023)
62. Finanzbehörde, Hansestadt Hamburg. (2023). *Bericht der Behörde für Kultur und Medien über Zuwendungen in Form von Sponsoring, Spenden und mäzenatischen Schenkungen. 2. Halbjahr 2022*.
<https://www.hamburg.de/contentblob/16872002/9896f90ae7db772d46e87ddf030f7cef/data/bkm-sponsoringbericht-2-halbjahr-2022.xlsx> (Accessed 3 July 2023)
63. Finanzbehörde, Hansestadt Hamburg. (2023). *Bericht des Bezirksamtes Bergedorf über Zuwendungen in Form von Sponsoring, Spenden und mäzenatischen Schenkungen*.
<https://www.hamburg.de/contentblob/16388602/f51902722169aecbdbce4225f0e9f577/data/ba-b-sponsoringbericht-1-halbjahr-2022.xlsx> (Accessed 3 July 2023)
64. Niedersächsisches Ministerium für Bundes- und Europaangelegenheiten und Regionale Entwicklung. (2023, January 27). *Sponsoringleistungen, Spenden, Schenkungen und Werbezuwendungen für Nds. Ministerium für Bundes- und Europaangelegenheiten und Regionale Entwicklung im Jahr 2022*.
<https://www.mb.niedersachsen.de/startseite/service/sponsoring/zuwendungen-167577.html?year=2022#sponsor> (Accessed 22 May 2023)
65. Ministerium des Innern des Landes Nordrhein-Westfalen. (2023). *Gesamttabelle Sponsoring 2022*.

- http://www.im.nrw/system/files/media/document/file/gesamttabelle_sponsoring_ministerien_nrw_2022.csv (Accessed 7 August 2023)
66. Staatskanzlei Rheinland-Pfalz. (2023). *Zuwendungsbericht 2022. Geschäftsbereich der Staatskanzlei*. <https://tpp.rlp.de/dataset/8f6b7e1d-d65d-4d73-8fb9-5a5ff85c2b21/resource/cff90966-063a-42ed-8aa7-548e1416d79f/download/formular-zuwendungsbericht-2022.pdf> (Accessed 22 May 2023)
 67. Deutsches Krebsforschungszentrum. (2019). *Aus der Wissenschaft—Für die Politik: Große Zustimmung zu einem Verbot der Tabakaußenwerbung*. https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/AdWfP/AdWfP_2019_Grosse-Zustimmung-zu-einem-Verbot-der-Tabakausenwerbung.pdf (Accessed 30 April 2020)
 68. Deutscher Bundestag. (2020, July 2). *Bundestag schränkt Tabakwerbung weiter ein*. Deutscher Bundestag. <https://www.bundestag.de/dokumente/textarchiv/2020/kw27-de-tabakerzeugnisgesetz-701734> (Accessed 17 August 2020)
 69. Die Drogenbeauftragte der Bundesregierung. (2021). *Jahresbericht 2021*. https://www.bundesgesundheitsministerium.de/fileadmin/Dateien/5_Publikationen/Drogen_und_Sucht/Berichte/DSB_Jahresbericht_2021_final.pdf (Accessed 3 July 2023)
 70. Die Drogenbeauftragte der Bundesregierung. (2020). *Jahresbericht 2020*. https://www.drogenbeauftragte.de/assets/user_upload/DSB_2020_final_bf.pdf (Accessed 15 January 2021)
 71. Rummel, C., Lehner, B., & Kepp, J. (2023). Daten, Zahlen und Fakten. In *DHS Jahrbuch Sucht 2023*. Pabst Science Publishers.
 72. Starker, A., & Kuntz, B. (2023). Tabak—Zahlen und Fakten zum Konsum. In *DHS Jahrbuch Sucht 2023*. Pabst Science Publishers.
 73. Generalzolldirektion. (2021). *Ergänzende Informationen und Hinweise zum Tabaksteuermodernisierungsgesetz und zur Siebten Verordnung zur Änderung von Verbrauchsteuerverordnungen*. https://www.zoll.de/SharedDocs/Downloads/DE/Links-fuer-Inhaltseiten/Fachthemen/Verbrauchsteuern/informationsschreiben_verbaende_20211223.pdf (Accessed 3 July 2023)
 74. Bühling, A. (2023, April 3). Zoll stellt tonnenweise illegalen Wasserpfeifentabak sicher. *BR24*. <https://www.br.de/nachrichten/bayern/zoll-stellt-tonnenweise-illegalen-wasserpfeifentabak-sicher,TaMdRTa> (Accessed 31 May 2023)
 75. Bundesverband Wasserpfeifentabak. (2022, April 28). *Wasserpfeifentabak-Absatz bricht dramatisch ein: Bundesfinanzministerium zerstört legalen Markt für Wasserpfeifentabak*. [presseportal.de. https://www.presseportal.de/pm/162828/5207569](https://www.presseportal.de/pm/162828/5207569) (Accessed 31 May 2023)
 76. Bundesverband Wasserpfeifentabak. (2022, May 4). *Offener Brief an Bundesfinanzminister Christian Lindner zur 25-Gramm-Regel*. Bundesverband Wasserpfeifentabak e. V. <https://www.wpt-verband.de/2022/05/04/offener-brief-an-bundesfinanzminister-christian-lindner-zur-25-gramm-regel/> (Accessed 31 May 2023)
 77. Wolf von Dewitz & dpa. (2023, February 18). Geschäft mit Shisha-Tabak bricht ein—Schwarzmarkt-Boom? *Berliner Morgenpost*. <https://www.morgenpost.de/wirtschaft/article237680147/Geschaeft-mit-Shisha-Tabak-bricht-ein-Schwarzmarkt-Boom.html> (Accessed 31 May 2023)
 78. Frankfurter Allgemeine Zeitung. (2022, October 10). Shisha-Geschäft bricht wegen neuer Verpackungsvorschrift ein. *FAZ.NET*. <https://www.faz.net/aktuell/wirtschaft/shisha-geschaeft-bricht-wegen-neuer-verpackungsvorschrift-ein-18377529.html> (Accessed 31 May 2023)

79. Die Tabak Zeitung. (2022, May 6). *Aus für Shisha-Tabak? Eigentlich attraktives Zusatzsortiment des Handels droht wegzufallen*. http://tabakzeitung.de/fe_0_22_meldung_detail.php?id=8551 (Accessed 31 May 2023)
80. Die Tabak Zeitung. (2022, November 3). *Frist wird wohl verlängert: Abverkaufsfrist für Wasserpfeifen-Verpackungen*. *Die Tabak Zeitung*. http://tabakzeitung.de/fe_0_22_meldung_detail.php?id=8814 (Accessed 31 May 2023)
81. Generalzolldirektion. (2023, June 21). *Ende der Abverkaufsfrist am 30. Juni 2023: Wasserpfeifentabak in Kleinverkaufspackungen*. https://www.zoll.de/SharedDocs/Fachmeldungen/Aktuelle-Einzelmeldungen/2023/vst_ende_abverkaufsfrist_wasserpfeifentabak_1.html (Accessed 3 July 2023)
82. Generalzolldirektion. (2022). *Information zur Verlängerung der Abverkaufsfrist für Wasserpfeifentabak in Kleinverkaufspackungen über 25 Gramm*. https://www.zoll.de/SharedDocs/Downloads/DE/Links-fuer-Inhaltseiten/Fachthemen/Verbrauchssteuern/informationsschreiben_verbaende_20221102.pdf (Accessed 3 July 2023)
83. Generalzolldirektion. (2022, July 14). *Erinnerung—Änderungen ab 1. Juli 2022: Tabaksteuermodernisierungsgesetz*. https://www.zoll.de/SharedDocs/Fachmeldungen/Aktuelle-Einzelmeldungen/2022/vst_erinnerung_tabaksteuermodernisierungsgesetz.html (Accessed 3 July 2023)
84. Generalzolldirektion. (2021). *Informationen und Hinweise zum Tabaksteuermodernisierungsgesetz*. https://www.zoll.de/SharedDocs/Downloads/DE/Links-fuer-Inhaltseiten/Fachthemen/Verbrauchssteuern/informationsschreiben_20211014.pdf?__blob=publicationFile&v=2 (Accessed 4 July 2023)
85. Bundesministerium der Finanzen. (2021). *28. Subventionsbericht des Bundes 2019-2022*. https://www.bundesfinanzministerium.de/Content/DE/Downloads/Broschueren_Bestellservice/28-subventionsbericht.pdf?__blob=publicationFile&v=6 (Accessed 28 June 2023)
86. Your Europe - European Union. (2023, April 27). *Rules for carrying alcohol and tobacco in the EU and leaving and entering the EU*. Your Europe. https://europa.eu/youreurope/citizens/travel/carry/alcohol-tobacco-cash/index_en.htm (Accessed 4 July 2023)
87. Central Customs Authority. (2023). *Travellers' allowances*. https://www.zoll.de/EN/Private-individuals/Travel/Entering-Germany/Duties-and-taxes/Travellers-allowances/travellers-allowances_node.html (Accessed 4 July 2023)
88. Central Customs Authority. (2023). *Alcohol, tobacco and products containing coffee*. https://www.zoll.de/EN/Private-individuals/Travel/Travel-within-the-EU/Taxation/Alcohol-tobacco-and-products-containing-coffee/alcohol-tobacco-and-products-containing-coffee_node.html (Accessed 4 July 2023)
89. Reemtsma Cigarettenfabriken GmbH. (2023, March 22). *Hamburgs Erster Bürgermeister Dr. Peter Tschentscher besucht neue Reemtsma-Zentrale in der „Alten Marzipanfabrik“*. <https://www.reemtsma.com/das-unternehmen/pressemeldungen/hamburgs-erster-buergermeister-dr-peter-tschentscher-besucht-neue-reemtsma-zentrale-in-der-alten-marzipanfabrik/> (Accessed 4 July 2023)
90. Schmidt, H. (2023, February 2). *Zigaretten: Warum Reemtsma gleich zweimal innerhalb von zwei Jahren umzieht*. *Hamburger Abendblatt*. <https://www.abendblatt.de/wirtschaft/article237530703/zigaretten-reemtsma-hamburg-warum-der-zigarettenhersteller-zweimal-innerhalb-von-zwei-jahren-umzieht.html> (Accessed 25 May 2023)
91. dior decupper [@diordecupper]. (2023, March 22). *It was an honor to welcome Hamburg's Mayor, Dr Peter Tschentscher in our new offices at Reemtsma Cigarettenfabriken GmbH and*

- understand his #vision on #newworkplace, #sustainability and #hamburg as a city turned towards #innovation and the #future* <https://t.co/gtsr8131yx> [Tweet]. Twitter. <https://twitter.com/diordecupper/status/1638482030244634625> (Accessed 5 April 2023)
92. Peter Tschentscher. (2023, March 21). *Peter Tschentscher auf Instagram: 'Seit 100 Jahren hat das Unternehmen Reemtsma seinen Sitz in Hamburg und ist ein bedeutendes Unternehmen für den Wirtschaftsstandort. Bürgermeister Tschentscher hat heute den neuen Verwaltungssitz auf dem Campus der "Marzipanfabrik" besucht und sich mit Mitarbeitenden ausgetauscht. #Hamburg #WeLoveHH #Reemtsma #Bahrenfeld'*. Instagram. <https://www.instagram.com/p/CqDuyBkMwUk/> (Accessed 25 May 2023)
93. Hamburger Senat [@Senat_Hamburg]. (2023, March 21). *Seit 100 Jahren hat die @Reemtsma_ITG ihren Sitz in Hamburg und ist ein bedeutendes Unternehmen für den Wirtschaftsstandort. BGM @TschenPe hat heute den neuen Verwaltungssitz auf dem Campus der 'Marzipanfabrik' besucht und sich mit Mitarbeitenden ausgetauscht.* [Https://t.co/K0oCe3kU2u](https://t.co/K0oCe3kU2u) [Tweet]. Twitter. https://twitter.com/Senat_Hamburg/status/1638219924018528256 (Accessed 25 May 2023)
94. Peter Fobe [@PeFoBe]. (2023, March 21). *Jahre @Reemtsma_ITG in Hamburg! Das ist auch dem Ersten Bürgermeister einen Besuch in unserer brandneuen Zentrale wert. Vielen Dank für Ihre Zeit, Ihr Interesse und die Gespräche mit unseren Mitarbeiter:innen, @TschenPe!* [Tweet]. Twitter. <https://twitter.com/PeFoBe/status/1638265190465564674> (Accessed 25 May 2023)
95. Julian Stürcken [@stuercken]. (2023, March 21). *Danke für den netten Besuch @TschenPe!* [Tweet]. Twitter. <https://twitter.com/stuercken/status/1638280880148959236> (Accessed 25 May 2023)
96. dpa. (2021, November 12). *Verbände: Wegen Corona-Lage: BDA sagt Arbeitgebtag ab. Die Zeit.* https://www.zeit.de/news/2021-11/12/wegen-corona-lage-bda-sagt-arbeitgebtag-ab?utm_referrer=https%3A%2F%2Fwww.google.com%2F (Accessed 7 June 2023)
97. Deutschlandfunk. (2021, October 21). *Ampel-Koalition — Das sind die Verhandlungsteams von SPD, Grünen und FDP. Deutschlandfunk.* https://www.deutschlandfunk.de/ampel-koalition-das-sind-die-verhandlungsteams-von-spd.1939.de.html?drn:news_id=1313994 (Accessed 22 October 2021)
98. eGarage. (2018, November 28). *eGarage Insight in Berlin: Das Video. Unabhängiges Informationsportal zur E-Zigarette.* <https://www.egarage.de/egarage-insight-in-berlin-das-video/> (Accessed 8 May 2023)
99. eGarage. (2022, January 27). *6. eGarage Insight: Politik und Experten diskutieren. Unabhängiges Informationsportal zur E-Zigarette.* <https://www.egarage.de/6-egarage-insight-politik-und-experten-diskutieren/> (Accessed 13 July 2023)
100. Politik & Kommunikation. (2022, January 31). *6. eGarage Insight.* <https://www.politik-kommunikation.de/politikszene/galerie/6-egarage-insight/> (Accessed 13 July 2023)
101. eGarage. (2022, June 22). *Politik und Experten im Gespräch: Die 7. eGarage Insight. Unabhängiges Informationsportal zur E-Zigarette.* <https://www.egarage.de/politik-und-experten-im-gespraech-die-7-egarage-insight/> (Accessed 8 May 2023)
102. Politik & Kommunikation. (2022, June 27). *7. eGarage Insight.* <https://www.politik-kommunikation.de/politikszene/galerie/7-egarage-insight/> (Accessed 8 May 2023)
103. eGarage. (2022, November 10). *8. eGarage Insight zu Steuer-Debatte und neuer Studie. Unabhängiges Informationsportal zur E-Zigarette.* <https://www.egarage.de/8-egarage-insight-zu-steuer-debatte-und-neuer-studie/> (Accessed 13 July 2023)
104. Politik & Kommunikation. (2022, November 14). *8. eGarage Insight.* <https://www.politik-kommunikation.de/politikszene/galerie/8-egarage-insight/> (Accessed 13 July 2023)

105. eGarage. (2023, March 16). 9. eGarage Insight: Neue Forschungsergebnisse, Disposables und Steuerdebatte. *Unabhängiges Informationsportal zur E-Zigarette*. <https://www.egarage.de/9-egarage-insight-neue-forschungsergebnisse-disposables-und-steuerdebatte/> (Accessed 3 May 2023)
106. Politik & Kommunikation. (2023, March 20). 9. *eGarage Insight – Wissenschaft, Experten und Bundestag diskutieren*. <https://www.politik-kommunikation.de/politikszene/galerie/9-egarage-insight-wissenschaft-experten-und-bundestag-diskutieren/> (Accessed 3 May 2023)
107. Bundesministerium für Ernährung und Landwirtschaft. (2021, August 9). *Gespräche mit der Tabakwirtschaft*. BMEL. <https://www.bmel.de/DE/themen/verbraucherschutz/tabak/gespraeche-tabakindustrie.html> (Accessed 31 May 2023)
108. Bundesministerium für Gesundheit. (2021, December 17). *Rauchen: Gespräche mit der Tabakwirtschaft*. <https://www.bundesgesundheitsministerium.de/service/begriffe-von-a-z/r/rauchen.html> (Accessed 31 May 2023)
109. Politik & Kommunikation. (2023, May 19). *Oeking wechselt von Philip Morris zu Airbus*. <https://www.politik-kommunikation.de/personalwechsel/oeking-wechselt-von-philip-morris-zu-airbus/> (Accessed 4 October 2023)
110. Auswärtiges Amt. (2022, October 18). *Speech by Foreign Minister Annalena Baerbock at the Körber Foundation's Berlin Foreign Policy Forum*. German Federal Foreign Office. <https://www.auswaertiges-amt.de/en/newsroom/news/-/2559158> (Accessed 12 July 2023)
111. Auswärtiges Amt. (2022, October 18). *Rede von Außenministerin Annalena Baerbock beim Berliner Forum Außenpolitik der Körber-Stiftung*. Auswärtiges Amt. <https://www.auswaertiges-amt.de/de/newsroom/-/2559154> (Accessed 12 July 2023)
112. Körber-Stiftung. (2022). *Berliner Forum Außenpolitik 2022*. <https://koerber-stiftung.de/projekte/berliner-forum-aussenpolitik/2022/> (Accessed 13 July 2023)
113. Körber Foundation. (2022). *Berlin Foreign Policy Forum 2022*. <https://koerber-stiftung.de/en/projects/berlin-foreign-policy-forum/2022/> (Accessed 13 July 2023)
114. Körber Foundation. (2021). *Berlin Foreign Policy Forum 2021*. Körber-Stiftung. <https://koerber-stiftung.de/en/projects/berlin-foreign-policy-forum/berliner-forum-aussenpolitik-2021/> (Accessed 13 July 2023)
115. Körber-Stiftung. (2021). *Berliner Forum Außenpolitik 2021*. Körber-Stiftung. <https://koerber-stiftung.de/projekte/berliner-forum-aussenpolitik/berliner-forum-aussenpolitik-2021/> (Accessed 13 July 2023)
116. Bundesvereinigung der Deutschen Arbeitgeberverbände. (2022, September 9). *Sponsoren. Deutscher Arbeitgebtag 2022*. <https://web.archive.org/web/20220909071920/https://www.deutscher-arbeitgebtag.de/Sponsoren.html> (Accessed 7 June 2023)
117. Bundesvereinigung der Deutschen Arbeitgeberverbände. (2022). *Deutscher Arbeitgebtag 2022 – Sponsoring*. https://web.archive.org/web/20220424181005/https://www.deutscher-arbeitgebtag.de/assets/pdf/DAT2022_Sponsoringbooklet.pdf (Accessed 7 June 2023)
118. Bundesvereinigung der Deutschen Arbeitgeberverbände. (2022). *Deutscher Arbeitgebtag 2022: Programm*. https://web.archive.org/web/20221005052133/https://www.deutscher-arbeitgebtag.de/assets/pdf/DAT2022_Programm_Druck.pdf (Accessed 7 June 2023)
119. Bundesvereinigung der Deutschen Arbeitgeberverbände. (2021). *Deutscher Arbeitgebtag 2021: Sponsoring*. https://web.archive.org/web/20211109121522/https://www.deutscher-arbeitgebtag.de/assets/pdf/DAT2021_Sponsoringbooklet.pdf (Accessed 7 June 2023)

120. Philip Morris Deutschland [@PhilipMorrisDE]. (2021, November 12). *Wie wollen wir in Zukunft führen, fördern und arbeiten? Am 16.11. Findet der Dt. Arbeitgebertag des @DieBDA statt. Auf einem spannenden Panel wird unsere GF External Affairs @ClaudiaOeking mit Vertreter:innen aus Wirtschaft und Politik das Thema #NewWork diskutieren. #DAT2021* <https://t.co/ieT8ALfRWk> [Tweet]. Twitter. <https://twitter.com/PhilipMorrisDE/status/1459147723861630983> (Accessed 7 June 2023)
121. Bundesvereinigung der Deutschen Arbeitgeberverbände. (2021, November 11). #DAT2021 / Programm. <https://web.archive.org/web/20211111165853/https://www.deutscher-arbeitgebertag.de/programm.html> (Accessed 7 June 2023)
122. Media Impact. (2022). *WELT-Wirtschaftsgipfel 2023*. https://www.mediaimpact.de/data/uploads/2022/11/welt_wirtschaftsgipfel_crossmedia_mi_2023_update-1.pdf (Accessed 12 July 2023)
123. Wilken, D. (2023, January 19). *WELT-Wirtschaftsgipfel: Speed-Dating für Top-Entscheider*. Axel Springer. <https://www.axelspringer.com/de/inside/welt-wirtschaftsgipfel-speed-dating-fur-top-entscheider> (Accessed 12 July 2023)
124. Wilken, D. (2023, January 19). *WELT Economic Summit: Speed dating for top decision-makers*. Axel Springer. <https://www.axelspringer.com/en/inside/welt-economic-forum-speed-dating-for-top-decision-makers> (Accessed 12 July 2023)
125. Ettl, A., & Zschäpitz, H. (2022, March 16). *WELT-Wirtschaftsgipfel 2022: Wir müssen uns auf eine neue Weltordnung einstellen - WELT*. DIE WELT. <https://www.welt.de/wirtschaft/article237538853/WELT-Wirtschaftsgipfel-2022-Wir-muessen-uns-auf-eine-neue-Weltordnung-einstellen.html> (Accessed 12 July 2023)
126. Roth, J. (2023, January 24). *14. WELT-Wirtschaftsgipfel: Politik und Wirtschaft diskutieren über aktuelle sicherheits- und wirtschaftspolitische Herausforderungen*. Axel Springer. <https://www.axelspringer.com/de/ax-press-release/14-welt-wirtschaftsgipfel-politik-und-wirtschaft-diskutieren-ueber-aktuelle-sicherheits-und-wirtschaftspolitische-herausforderungen> (Accessed 12 July 2023)
127. Roth, J. (2023, January 24). *14th WELT Economic Summit: Politicians and business leaders discussed current security and economic challenges*. Axel Springer. <https://www.axelspringer.com/en/ax-press-release/14th-welt-economic-forum-politicians-and-business-leaders-discussed-current-security-and-economic-challenges-2> (Accessed 12 July 2023)
128. Die Bundesregierung. (2023, January 23). *Der Bundeskanzler hält beim WELT-Wirtschaftsgipfel im Axel-Springer-Haus in Berlin eine Rede und beteiligt sich anschließend an einer Diskussionsrunde. Am Rande der Veranstaltung trifft er auch den tschechischen Ministerpräsidenten Fiala zu einem bilateralen Gespräch zu aktuellen Themen*. Die Bundesregierung informiert | Startseite. <https://www.bundesregierung.de/breg-de/service/newsletter-und-abos/bundesregierung-aktuell/der-bundeskanzler-haelt-beim-welt-wirtschaftsgipfel-im-axel-springer-haus-in-berlin-eine-rede-und-beteiligt-sich-anschliessend-an-einer-diskussionsrunde-am-rande-der-veranstaltung-trifft-er-auch-den-tschechischen-ministerpraesidenten-fiala-zu-einem-bilateralen-gespraech-zu-aktuellen-themen--2159152> (Accessed 12 July 2023)
129. Media Impact. (2021). *Thirteenth WELT Economic Summit*. https://www.mediaimpact.de/data/uploads/2021/12/2022-11-26-eng-welt-wirtschaftsgipfel_crossmedia-2022-mi.pdf (Accessed 13 July 2023)
130. Media Impact. (2021). *13. WELT-Wirtschaftsgipfel*. https://www.mediaimpact.de/data/uploads/2021/11/2022-welt-wirtschaftsgipfel_crossmedia_mi-1.pdf (Accessed 12 July 2023)

131. Media Impact. (2022). *Fourteenth WELT Economic Summit*.
https://www.mediaimpact.de/data/uploads/2022/11/welt_wirtschaftsgipfel_crossmedia_mi_2023_eng_v3b-1.pdf (Accessed 13 July 2023)
132. Mölling, S. (2023). *In diesen Zeiten ist der Ausspruch von Milton Friedman 'The business of business is business.' zu hinterfragen...* LinkedIn. https://www.linkedin.com/posts/stefan-m%C3%B6lling-0171011_wwg23-wwg23-activity-7024033257948086272-EyXM (Accessed 12 July 2023)
133. Knut Döring. (2023). *Nach #davos2023 ist vor dem Welt-Wirtschaftsgipfel!* LinkedIn. https://www.linkedin.com/posts/knut-d%C3%B6ring-a4896510_davos2023-axelspringer-axelspringer-activity-7022196285923282944-YEOH (Accessed 12 July 2023)
134. Knut Döring. (2023). *Der 14. Welt Wirtschaftsgipfel in Berlin hat neue Maßstäbe gesetzt*. LinkedIn. https://www.linkedin.com/posts/knut-d%C3%B6ring-a4896510_wwg23-ecosystem-wwg23-activity-7023960898507558912-2lI (Accessed 12 July 2023)
135. VdeH_Verband [@VdeH_Verband]. (2021, November 19). *Zwei Hessen unter sich. In dieser Woche traf sich unser Geschäftsführer Oliver Pohland auch mit @TillMansmann, FDP-Bundestagsabgeordneter und bisheriges Mitglied im Finanzausschuss sowie Berichterstatter zum Tabaksteuermodernisierungsgesetz. Alles Gute für die neue Legislatur!* <https://t.co/7eTJrLN4R9> [Tweet]. Twitter. https://twitter.com/VdeH_Verband/status/1461739925523603468 (Accessed 24 May 2023)
136. Jens Teutrine. (2022, January 25). *Als Bundestagsabgeordneter im Kreis Herford, der auch die Zigarrenstadt Bünde umfasst, ist es für mich eine Selbstverständlichkeit sich mit der Vielzahl der örtlichen Produzenten auszutauschen und eine Zigarrenproduktion vor Ort zu besuchen...* Facebook. <https://www.facebook.com/Jens.teu/posts/pfbid0qDow6jt727D4QYme3r3P8Z7DkqXNttPtGYzBETM4CxdVGhiZnuwi6t5zhApo8m4DI> (Accessed 25 May 2023)
137. Bodo Mehrlein. (2022, January 25). *Ein sehr konstruktiver Austausch des Bundesverband der Zigarrenindustrie mit der Politik und das Verständnis, dass das Kulturgut Zigarre/Zigarillo ein besondere und differenzierte Regulierung benötigt*. Facebook. <https://www.facebook.com/bodo.mehrlin/posts/pfbid0gZt1jH7vEYWn11zj8SbnV8kuz3gHH5fc4ZG8NV7e4HShzGEBNC44WCemrb2FdxzJI> (Accessed 25 May 2023)
138. Reemtsma [@Reemtsma_ITG]. (2022, July 26). *Welcome home: Gestern besuchte uns unsere #Wahlkreisabgeordnete im Deutschen Bundestag , Rebecca #Schamber. Danke für den spannenden Austausch. Schön, wenn #Politik die Praxisnähe sucht und vor Ort zuhört, was die wichtigen Themen sind*. <https://t.co/rOYlWCVjPn> [Tweet]. Twitter. https://twitter.com/Reemtsma_ITG/status/1551825048981442560 (Accessed 25 May 2023)
139. Verband der deutschen Rauchtobakindustrie e.V. [@VdR_Mittelstand]. (2021, October 4). *Nach zwei Jahren findet morgen endlich wieder die genussvollste Veranstaltung Berlins statt: Politik & Currywurst! Wir freuen uns vor allem auf @sara__si von @focusonline* <https://t.co/oQsDywzzeH> [Tweet]. Twitter. https://twitter.com/VdR_Mittelstand/status/1445027401860268041 (Accessed 23 May 2023)
140. Verband der deutschen Rauchtobakindustrie e.V. [@VdR_Mittelstand]. (2021, October 7). *Das war Politik & Currywurst! Wir bedanken uns bei allen, die dabei waren und den Abend mit uns gemeinsam genossen haben. Besonderer Dank geht an @sara__si für ihren inspirierenden Impuls für weitergehende spannende Diskussionen an diesem Abend*. <https://t.co/QmA8dSKgBX> [Tweet]. Twitter. https://twitter.com/VdR_Mittelstand/status/1446041513197195265 (Accessed 23 May 2023)

141. Verband der deutschen Rauchtobakindustrie e.V. [@VdR_Mittelstand]. (2021, October 18). *Unser erstes Event von Mensch zu Mensch nach den harten Lockdowns! Danke, @punk für den Beitrag über unser Event „Politik & Currywurst“! Ein Abend voller Genuss, Freiheit und spannenden Hintergründen aus den –Gesprächen von @sara__si.* <https://t.co/r0zPuuOnOW> [Tweet]. Twitter. https://twitter.com/VdR_Mittelstand/status/1450118659389673475 (Accessed 23 May 2023)
142. Politik & Kommunikation. (2021, October 18). *VdR – Politik & Currywurst.* <https://www.politik-kommunikation.de/politikszene/galerie/vdr-politik-currywurst/> (Accessed 23 May 2023)
143. Politik & Kommunikation. (2022, July 12). *Sommerfest des VdR.* <https://www.politik-kommunikation.de/politikszene/galerie/sommerfest-des-vdr/> (Accessed 23 May 2023)
144. Verband der deutschen Rauchtobakindustrie e.V. [@VdR_Mittelstand]. (2022, June 28). *Musik – Wein – #Tabak! Unser erstes Sommerfest zurück in #Freiheit war ein voller Erfolg. Gemeinsam mit unseren Freunden wird der VdR immer eine Bastion der Freiheit bleiben. Wir freuen uns auf das nächste Jahr.* <https://t.co/LMAhoKnyUj> [Tweet]. Twitter. https://twitter.com/VdR_Mittelstand/status/1541805200373080064 (Accessed 23 May 2023)
145. Die Tabak Zeitung. (2020, November 5). *„Kulturgut und Genussartikel“: Jahresversammlung des BdZ / Vorstand neu aufgestellt / Zusammenarbeit mit Botschaften.* http://tabakzeitung.de/fe_0_22_meldung_detail.php?id=7830 (Accessed 24 May 2021)
146. Uwe Dorendorf. (2020, March 15). *Am vergangenen Mittwoch – Noch bevor Veranstaltungen aufgrund des Coronavirus abgesagt wurden – Besuchte ich den parlamentarischen Zigarrenabend des Bundesverbandes der Zigarrenindustrie. Ehren-Gast war Maribé Sánchez Comiero, die Botschafterin der Dominikanischen Republik. Der Inselstaat ist für die deutsche Zigarrenwirtschaft ein wichtiger Wirtschaftspartner.* Facebook. <https://www.facebook.com/UD.CDU/posts/2825981927498875> (Accessed 27 April 2021)
147. Uwe Dorendorf. (2020, March 15). *Parlamentarischer Zigarrenabend.* Uwe Dorendorf. <https://uwe-dorendorf.de/parlamentarischer-zigarrenabend/> (Accessed 27 April 2021)
148. Bundesverband der Zigarrenindustrie. (2022, May 6). *Wirtschaftsfaktor Zigarrenherstellung in Honduras und anderen Drittstaaten / Die Herstellung von Zigarren und Zigarillos ist in bestimmten Staaten ein nicht zu vernachlässigender Wirtschaftsfaktor.* [presseportal.de. https://www.presseportal.de/pm/66198/5214768](https://www.presseportal.de/pm/66198/5214768) (Accessed 24 May 2023)
149. Bundesverband der Zigarrenindustrie. (2022, April 30). *Der Bundesverband der Zigarrenindustrie hat seinen parlamentarischen Abend unter der Schirmherrschaft der Botschaft Honduras in Berlin...* Facebook. https://www.facebook.com/permalink.php?story_fbid=pfbid037ne27MW1YW9aDx2AE7cyhD2iR69obYrF1iVe2rogSwGkFTBswk1E6GonsrczZJrJl&id=258188324624069 (Accessed 25 May 2023)
150. smokersplanet. (2022, May 9). *Bundesverband der Zigarrenindustrie hatte zum parlamentarischen Abend unter der Schirmherrschaft der Botschaft von Honduras eingeladen.* [smokersplanet | Ich rauche gerne. https://smokersplanet.de/bundesverband-der-zigarrenindustrie-hatte-zum-parlamentarischen-abend-unter-der-schirmherrschaft-der-botschaft-von-honduras-eingeladen/](https://smokersplanet.de/bundesverband-der-zigarrenindustrie-hatte-zum-parlamentarischen-abend-unter-der-schirmherrschaft-der-botschaft-von-honduras-eingeladen/) (Accessed 24 May 2023)
151. Embajada de la República Dominicana en Alemania. (2023, February 3). *El pasado 26 de enero de 2023 esta Embajada junto a la Asociación Federal de la Industria Alemana del Tabaco...* <https://www.facebook.com/RDenAlemania/posts/pfbid02ZaVNz3j3B3TpEXBLt9FTSiDvN5gn7iwwfxMiViYMcwt2FThEWkhxHdbFsVPXSYX5I> (Accessed 24 May 2023)
152. Bundesverband der Zigarrenindustrie. (2023, January 28). *Treffen mit der SPD – Die Zigarre als Kultur- und Genussgut.* <https://www.facebook.com/permalink.php?>

- story_fbId=pfbid033DFwtsVfc6usP4k4AK6oqMyqTEQskHSunHLpLqJeEfcCNnp49usz9z2Z2bcy5phl&id=100064871373102 (Accessed 25 May 2023)
153. Machura, S. (2021). Ministerialbürokratie. In *Handwörterbuch des politischen Systems der Bundesrepublik Deutschland* (8., aktualisierte Auflage). Springer VS. <https://www.bpb.de/kurzknapp/lexika/handwoerterbuch-politisches-system/202070/ministerialbueroekratie/> (Accessed 5 July 2023)
 154. Federal Institute for Risk Assessment. (2023). *Remit*. <https://www.bfr.bund.de/en/remitt-9763.html> (Accessed 5 July 2023)
 155. Federal Institute for Risk Assessment. (2023). *Statutory foundations of BfR - BfR*. https://www.bfr.bund.de/en/statutory_foundations_of_bfr-1832.html (Accessed 5 July 2023)
 156. Bundesinstitut für Risikobewertung. (2023). *Gesetzlicher Auftrag*. https://www.bfr.bund.de/de/gesetzlicher_auftrag-7465.html (Accessed 5 July 2023)
 157. Bundesinstitut für Risikobewertung. (2023). *Rechtsgrundlagen des BfR*. https://www.bfr.bund.de/de/rechtsgrundlagen_des_bfr-282.html (Accessed 5 July 2023)
 158. Conference of the Parties to the WHO Framework Convention on Tobacco Control. (2016). *List of participants. Document FCTC/COP/7/DIV/1*. https://fctc.who.int/docs/librariesprovider12/meeting-reports/cop7_lopdelegateslist.pdf (Accessed 30 May 2021)
 159. Conference of the Parties to the WHO Framework Convention on Tobacco Control. (2018). *List of Participants. FCTC/COP/8*. <https://fctc.who.int/publications/m/item/fctc-cop-8-div-1-list-of-participants> (Accessed 18 September 2023)
 160. Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse (BVTE). (2021, April 21). *Dr. Frank Henkler-Stephani wird neuer Senior Director Harm Reduction / Top-Fachmann wechselt vom Bundesinstitut für Risikobewertung zum BVTE. !* <https://www.bvte.de/de/presse/pressemitteilung/dr-frank-henkler-stephani-wird-neuer-senior-director-harm-reduction.html> (Accessed 22 April 2021)
 161. Gaby-Fleur Böl, Bundesinstitut für Risikobewertung (BfR). (2023, June 7). *Anfrage DKFZ zu Tabakindustrie beim BfR-Verbraucherforum* [Letter to Laura Graen, Deutsches Krebsforschungszentrum (DKFZ)].
 162. Bundesinstitut für Risikobewertung. (2022). *Programm: 22. BfR-Forum Verbraucherschutz 'Chancen und Risiken der E-Zigarette'*. <https://www.bfr-akademie.de/media/wysiwyg/2022/EZIG22/Programm.pdf> (Accessed 10 May 2023)
 163. BfR, Bundesinstitut für Risikobewertung (Director). (2022, July 15). *Podiumsdiskussion*. https://www.youtube.com/watch?v=9F50nqC_qNE (Accessed 10 May 2023)
 164. Torsten Herold, Bundesinstitut für Risikobewertung (BfR). (2023, August 10). *Anfrage des DKFZ zu Kontakte des BfR zu Vertretern der Tabakindustrie* [Letter to Laura Graen, Deutsches Krebsforschungszentrum (DKFZ)].
 165. Bundesinstitut für Risikobewertung. (2018). *Die Risikokommunikation des BfR in der Praxis*. <https://www.bfr.bund.de/cm/350/die-risikokommunikation-des-bfr-in-der-praxis.pdf> (Accessed 22 August 2023)
 166. Bundesinstitut für Risikobewertung. (2018). *BfR risk communication in practice*. <https://www.bfr.bund.de/cm/364/bfr-risk-communication-in-practice.pdf> (Accessed 22 August 2023)
 167. eGarage. (2020, October 3). Die Dokumentation der 5. eGarage Insight. *Unabhängiges Informationsportal zur E-Zigarette*. <https://www.egarage.de/die-dokumentation-der-5-egarage-insight/> (Accessed 8 May 2023)

168. eGarage. (2020, September 18). 5. eGarage Insight: Ärzte und Abgeordnete im Gespräch. *Unabhängiges Informationsportal zur E-Zigarette*. <https://www.egarage.de/5962-2/> (Accessed 8 May 2023)
169. Zeitschrift für das gesamte Lebensmittelrecht & Wissenschaftliche Gesellschaft für Lebensmittelrecht. (2020). 33. *Deutscher Lebensmittelrechtstag*. http://www.wgfl.de/pdf/tagungsflyer/33_DLRT_2020_Flyer.pdf (Accessed 6 April 2023)
170. Zeitschrift für das gesamte Lebensmittelrecht & Wissenschaftliche Gesellschaft für Lebensmittelrecht. (2021). 34. *Deutscher Lebensmittelrechtstag*. https://veranstaltungen.ruw.de/images/content/Lebensmittelrechtstag/2021/Daten/Programm_34._Deutscher_Lebensmittelrechtstag_2021.pdf (Accessed 6 April 2023)
171. Zeitschrift für das gesamte Lebensmittelrecht & Wissenschaftliche Gesellschaft für Lebensmittelrecht. (2022). 35. *Deutscher Lebensmittelrechtstag*. https://veranstaltungen.ruw.de/images/content/Lebensmittelrechtstag/2022/Daten/35._Deutscher_Lebensmittelrechtstag_Programm-2022_neu.pdf (Accessed 6 April 2023)
172. Zeitschrift für das gesamte Lebensmittelrecht & Wissenschaftliche Gesellschaft für Lebensmittelrecht. (2023). 36. *Deutscher Lebensmittelrechtstag*. https://www.ruw-fachkonferenzen.de/website/images/dlrt23_programmflyer_a4_230309_einzelseiten_compressed.pdf (Accessed 6 April 2023)
173. Bundesrat. (2020). *Drucksache 523/20: Benennung von Beauftragten des Bundesrates in Beratungsgremien der Europäischen Union für die Expertengruppe der Kommission für Tabakpolitik sowie für deren Untergruppen „Zutaten von Tabakerzeugnissen“ und „elektronische Zigaretten“*. [https://www.bundesrat.de/SharedDocs/drucksachen/2020/0501-0600/523-20\(B\).pdf;jsessionid=F7EBC32B4C7273814CE1C8BA887A98D5.1_cid391?__blob=publicationFile&v=1](https://www.bundesrat.de/SharedDocs/drucksachen/2020/0501-0600/523-20(B).pdf;jsessionid=F7EBC32B4C7273814CE1C8BA887A98D5.1_cid391?__blob=publicationFile&v=1) (Accessed 10 July 2023)
174. 35. *Deutscher Lebensmittelrechtstag—Programm—R&W*. (n.d.). Retrieved 6 April 2023, from <https://veranstaltungen.ruw.de/archiv/lebensmittelrecht/35-deutscher-lebensmittelrechtstag/programm> (Accessed 6 April 2023)
175. Zeitschrift für das gesamte Lebensmittelrecht & Pack Report. (2022). *Deutscher Verpackungsrechtstag 2022*. https://veranstaltungen.ruw.de/images/content/Verpackungsrechtstag/2022/Daten/verpackungsrecht_2022_programmflyer_211217.pdf (Accessed 6 April 2023)
176. Zeitschrift für das gesamte Lebensmittelrecht & Pack Report. (2023). 2. *Deutscher Verpackungsrechtstag 2023*. https://www.ruw-fachkonferenzen.de/website/images/verpackungsrecht_2023_anzeige_ohne-Anmeldung_210x297_DU4mm.pdf (Accessed 6 April 2023)
177. VdeH_Verband [@VdeH_Verband]. (2022, September 15). *#InterTabac: Auch vertrauliche Gespräche sind am VdeH Stand B.20 auf der #InterTabac2022 möglich. Heute war das Bundesministerium für Finanzen (BMF) zu einem konstruktiven Gedankenaustausch zu Gast*. <https://t.co/wQbsnEqSYD> [Tweet]. Twitter. https://twitter.com/VdeH_Verband/status/1570400027444482053 (Accessed 24 May 2023)
178. InterTabac. (2022, September 19). *Abschlussbericht: InterTabac und InterSupply sind zurück – 12.100 Besucher feiern Comeback des Jahres in Dortmund*. <https://www.intertabac.de/abschlussbericht-intertabac-und-intersupply-sind-zurueck-12-100-besucher-feiern-comeback-des-jahres-in-dortmund> (Accessed 11 July 2023)
179. German Environment Agency. (2023, January 17). *About us* [Text]. Umweltbundesamt; Umweltbundesamt. <https://www.umweltbundesamt.de/en/the-uba/about-us> (Accessed 11 July 2023)

180. Umweltbundesamt. (2023, January 17). *Wer wir sind* [Text]. Umweltbundesamt; Umweltbundesamt. <https://www.umweltbundesamt.de/das-uba/wer-wir-sind> (Accessed 11 July 2023)
181. German Environment Agency. (2023, May 23). *Plastic manufacturers to pay into Single-Use Plastic Fund in future* [Text]. Umweltbundesamt; Umweltbundesamt. <https://www.umweltbundesamt.de/en/press/pressinformation/plastic-manufacturers-to-pay-into-single-use> (Accessed 14 July 2023)
182. Umweltbundesamt. (2023, May 19). *Plastikhersteller müssen künftig in Einwegkunststofffonds einzahlen* [Text]. Umweltbundesamt; Umweltbundesamt. <https://www.umweltbundesamt.de/presse/pressemitteilungen/plastikhersteller-muessen-kuenftig-in> (Accessed 14 July 2023)
183. Gesetz über den Einwegkunststofffonds (Einwegkunststofffondsgesetz—EWKFondsG). Retrieved 14 July 2023, from <https://www.gesetze-im-internet.de/ewkfondsg/BJNR07C0B0023.html> (Accessed 14 July 2023)
184. Umweltbundesamt. (2022). Bekanntmachung in Vorbereitung der Einrichtung und Besetzung der Einwegkunststoffkommission. *Bundesanzeiger*. <https://www.bundesanzeiger.de/pub/publication/VT9HGPzhXPubHojVnNc/content/VT9HGPzhXPubHojVnNc/BAanz%20AT%2028.11.2022%20B7.pdf?inline> (Accessed 7 August 2023)
185. Kyriakos, T., & Schneider, N. K. (2013). The development of scientific consultants: How the tobacco industry creates controversy on the carcinogenicity of tobacco-specific nitrosamines. *Tobacco Control*, 22(3), e3–e3. <https://doi.org/10.1136/tobaccocontrol-2012-050696>
186. Kyriakos, T., & Schneider, N. (2010, December 23). Forschen gegen die Wahrheit. *Süddeutsche.de*. <https://www.sueddeutsche.de/wissen/toxikologen-und-die-tabakindustrie-forschen-gegen-die-wahrheit-1.1039469> (Accessed 11 July 2023)
187. Lobbycontrol. (2022). *Philip Morris*. Lobbypedia. https://lobbypedia.de/wiki/Philip_Morris (Accessed 11 July 2023)
188. CORESTA. (2023). *Abstracts—Search Results ‘ABF’*. <https://www.coresta.org/abstracts/search/ABF> (Accessed 11 July 2023)
189. Foundation for a Smoke-Free World, Inc. (2022). *Form 990-PF. Return of private foundation for tax year 2022*. https://www.smokefreeworld.org/wp-content/uploads/2023/05/FSFW_2022_990-PF_Public-Inspection-Copy.pdf (Accessed 11 July 2023)
190. Goettel, M., Niessner, R., Mueller, D., Scherer, M., Scherer, G., & Pluym, N. (2017). Metabolomic Fingerprinting in Various Body Fluids of a Diet-Controlled Clinical Smoking Cessation Study Using a Validated GC-TOF-MS Metabolomics Platform. *Journal of Proteome Research*, 16(10), 3491–3503. <https://doi.org/10.1021/acs.jproteome.7b00128>
191. STOP: Stopping Tobacco Organizations & Products. (2020). *Addiction at any cost: Philip Morris International Uncovered*. https://exposetobacco.org/wp-content/uploads/STOP_Report_Addiction-At-Any-Cost.pdf (Accessed 10 March 2020)
192. Burkhardt, T., Scherer, M., Scherer, G., Pluym, N., Weber, T., & Kolossa-Gehring, M. (2023). Time trend of exposure to secondhand tobacco smoke and polycyclic aromatic hydrocarbons between 1995 and 2019 in Germany – Showcases for successful European legislation. *Environmental Research*, 216, 114638. <https://doi.org/10.1016/j.envres.2022.114638>
193. Hahn, D., Schmied-Tobies, M., Rucic, E., Pluym, N., Scherer, M., Debiak, M., Murawski, A., & Kolossa-Gehring, M. (2023). Urinary cotinine and exposure to passive smoke in children and

- adolescents in Germany – Human biomonitoring results of the German Environmental Survey 2014–2017 (GerES V). *Environmental Research*, 216, 114320. <https://doi.org/10.1016/j.envres.2022.114320>
194. Murawski, A., Roth, A., Schwedler, G., Schmied-Tobies, M. I. H., Rucic, E., Pluym, N., Scherer, M., Scherer, G., Conrad, A., & Kolossa-Gehring, M. (2020). Polycyclic aromatic hydrocarbons (PAH) in urine of children and adolescents in Germany – human biomonitoring results of the German Environmental Survey 2014–2017 (GerES V). *International Journal of Hygiene and Environmental Health*, 226, 113491. <https://doi.org/10.1016/j.ijheh.2020.113491>
195. Schwedler, G., Murawski, A., Schmied-Tobies, M. I. H., Rucic, E., Scherer, M., Pluym, N., Scherer, G., Bethke, R., & Kolossa-Gehring, M. (2021). Benzene metabolite SPMA and acrylamide metabolites AAMA and GAMA in urine of children and adolescents in Germany – human biomonitoring results of the German Environmental Survey 2014–2017 (GerES V). *Environmental Research*, 192, 110295. <https://doi.org/10.1016/j.envres.2020.110295>
196. Regie Lebanese Tobacco and Tobacco Administration. (2022, May 18). *The visit of the German ambassador to the Regie*. <https://www.rltt.com.lb/article/616/%d8%b2%d9%8a%d8%a7%d8%b1%d8%a9-%d8%a7%d9%84%d8%b3%d9%81%d9%8a%d8%b1-%d8%a7%d9%84%d8%a7%d9%84%d9%85%d8%a7%d9%86%d9%8a-%d9%84%d9%84%d8%b1%d9%8a%d8%ac%d9%8a/en> (Accessed 23 May 2023)
197. Regie Libanaise de Tabacs et Tombacs (RLTT). (2022, September 18). *زيارة السفير الالمانى للريجى*. <https://www.rltt.com.lb/article/616/%d8%b2%d9%8a%d8%a7%d8%b1%d8%a9-%d8%a7%d9%84%d8%b3%d9%81%d9%8a%d8%b1-%d8%a7%d9%84%d8%a7%d9%84%d9%85%d8%a7%d9%86%d9%8a-%d9%84%d9%84%d8%b1%d9%8a%d8%ac%d9%8a/ar> (Accessed 23 May 2023)
198. Alebshehy, R., Silver, K., & Chamberlain, P. (2023). A “willingness to be orchestrated”: Why are UK diplomats working with tobacco companies? *Frontiers in Public Health*, 11. <https://www.frontiersin.org/articles/10.3389/fpubh.2023.977713> (Accessed 23 May 2023)
199. GdP Bezirksgruppe Zoll & Philip Morris GmbH. (2023). *Zoll Training: Effektive Bekämpfung des illegalen Tabakhandels*. Guestoo. <https://app.guestoo.de/public/event/2c4c15ac-0f6a-4d21-9372-99bc24b0f754> (Accessed 1 June 2023)
200. GdP-Zoll [@gdp_zoll]. (2023, February 2). *Workshop der @gdp_zoll mit Unterstützung der @PhilipMorrisDE zur Wirksamen Bekämpfung des Schwarzmarktes für Tabakwaren—Jetzt anmelden #zoll* <https://app.guestoo.de/public/event/2c4c15ac-0f6a-4d21-9372-99bc24b0f754> <https://t.co/AOod0oUaFc> [Tweet]. Twitter. https://twitter.com/gdp_zoll/status/1621186451823009795 (Accessed 1 June 2023)
201. Mattetat, F. (2023). Zoll- und Polizeibeamte gemeinsam im Kampf gegen illegalen Tabakhandel. *Deutsche Polizei - Bezirksjournal Bundespolizei | Zoll*, 06/2023.
202. GdP Bezirksgruppe Zoll. (2021, September 15). *Europäischer Polizeikongress in Berlin*. https://www.gdp.de/gdp/gdpbupo.nsf/id/DG_13_BZGZoll_Europaeisch-Polizeikongress-in-Berlin (Accessed 1 June 2023)
203. Philip Morris Deutschland [@PhilipMorrisDE]. (2021, September 14). *Wir freuen uns, in diesem Jahr beim 24. Europäischen #Polizeikongress in Berlin dabei zu sein. Mit eigenem Stand, Video-, und Infomaterial stehen wir als Ansprechpartner:innen im Einsatz gegen #OrganisierteKriminalität zur Verfügung. #EPK21* <https://t.co/cTZPYtDOOs> [Tweet]. Twitter. <https://twitter.com/PhilipMorrisDE/status/1437792213120032777> (Accessed 7 June 2023)
204. Behörden Spiegel. (2022). 25. *Europäischer Polizeikongress 2022*. https://www.europaeischer-polizeikongress.de/wp-content/uploads/2022/02/EPK_Programm_2022.pdf (Accessed 1 June 2023)

205. Lobbycontrol. (2022). *Lobbyregister Deutschland*. Lobbypedia.
https://lobbypedia.de/wiki/Lobbyregister_Deutschland (Accessed 16 July 2023)
206. Deutscher Bundestag. (2022). *Handbuch für Interessenvertreterinnen und Interessenvertreter zur Eintragung in das Lobbyregister*.
<https://www.bundestag.de/resource/blob/871508/3d2a9ad7b473bc8c5b986c67c8e29897/Handbuch-data.pdf> (Accessed 16 July 2023)
207. Council of Europe Group of States against Corruption (GRECO). (2022). *Fifth evaluation round. Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies. Compliance Report Germany (GrecoRC5(2022)7)*.
<https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680aa89ee> (Accessed 17 July 2023)
208. Council of Europe Group of States against Corruption (GRECO). (2022). *Fünfte Evaluierungsrunde. Korruptionsprävention und Integritätsförderung in Zentralregierungen (hochrangige Entscheidungsträgerinnen und -träger der Exekutive) und Strafverfolgungsbehörden. Umsetzungsbericht Deutschland (GrecoRC5(2022)7)*.
<https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680aa89f0> (Accessed 17 July 2023)
209. Timo Lange. (2023, June 19). *Ampel will Lobbyregister besser machen*. LobbyControl.
<https://www.lobbycontrol.de/lobbyregister/ampel-will-lobbyregister-besser-machen-109559/> (Accessed 18 July 2023)
210. Gesetz über die politischen Parteien (Parteiengesetz): § 25 Spenden. Retrieved 16 April 2020, from https://www.gesetze-im-internet.de/partg/__25.html (Accessed 16 April 2020)
211. Deutscher Bundestag. (2023). *Unterrichtung durch die Präsidentin des Deutschen Bundestages: Bekanntmachung von Rechenschaftsberichten politischer Parteien für das Kalenderjahr 2021 (1. Teil – Bundestagsparteien)*. <https://dserver.bundestag.de/btd/20/059/2005960.pdf> (Accessed 10 May 2023)
212. Philip Morris International. (2023). *Political contributions 2022*.
<https://www.pmi.com/resources/docs/default-source/pmi-our-company/political-contributions-2022.pdf> (Accessed 19 April 2023)
213. Philip Morris International. (2020). *Political Contributions 2019*.
https://www.pmi.com/resources/docs/default-source/our_company/transparency/pmi-political-contributions-2019.pdf (Accessed 16 April 2020)
214. Philip Morris International. (2021). *Political contributions 2020*.
https://www.pmi.com/resources/docs/default-source/our_company/transparency/political-contributions-2020.pdf?sfvrsn=dc91b6b4_2 (Accessed 26 April 2021)
215. Bündnis 90/Die Grünen. (2021). *Transparenzübersicht digitale Bundesdelegiertenkonferenz in Berlin (11. - 13. Juni 2021)*. <https://cms.gruene.de/uploads/documents/Transparenz-%C3%9Cbersicht-BDK-2021.pdf> (Accessed 15 May 2023)
216. Bündnis 90/Die Grünen. (2022). *Aussteller, Sponsoren und Unterstützer der digitalen Bundesdelegiertenkonferenz im Januar 2022*.
<https://cms.gruene.de/uploads/documents/Tranzsparenz-%C3%9Cbersicht-DBDK-2022.pdf> (Accessed 15 May 2023)
217. Bündnis 90/Die Grünen. (2022). *Transparenzübersicht Bundesdelegiertenkonferenz in Bonn 2022*. <https://cms.gruene.de/uploads/documents/Transparenz%C3%BCbersicht-BDK-22.pdf> (Accessed 15 May 2023)
218. Parlamentskreis Mittelstand. (2022, June 20). *PKM Sommerfest: Sponsoren*.
<https://web.archive.org/web/20220620161503/https://www.pkm-sommerfest.de/sponsoren/> (Accessed 22 August 2023)

219. CDU. (2022). 35. Parteitag der CDU Deutschlands 9./10. September 2022. 35. Parteitag der CDU Deutschlands. <https://www.cdu-parteitag.de/> (Accessed 15 May 2023)
220. Bundesverband der Zigarrenindustrie. (2022, July 8). *PKM Sommerfest—Parlamentskreis Mittelstand der CDU / CSU mit viel politischer Prominenz. Seit vielen Jahren wird dieses Event mit dem Genuss von Zigarren und Zigarillos aus der Zigarrenlounge des Bundesverbandes der Zigarrenindustrie abgerundet. Mit dabei Bodo Mehrlein , Philipp Kugler / CigarKings und Rene Schumann/ Davidoff.* Facebook. https://www.facebook.com/permalink.php?story_fbid=pfbid02vSaSsRbfPBFc6La4GipMM6z5Ft58y1J6tk34AnegZnZLojhbd56s6oC8xJUR1C4l&id=258188324624069 (Accessed 25 May 2023)
221. Nichtrauchererschutzverband Deutschland [@NRSVGGermany]. (2022, October 30). *Die #CSU im Sumpf der Tabaklobby—Eine Branche, die jährlich allein in 127.000 Menschenleben auf dem Gewissen hat. Profite werden über #Gesundheit & Menschenleben gestellt. Verstoß gegen Art. 5.3 #FTC & großes Hindernis für wirksame #Prävention|politik! #csupt22* <https://t.co/53nC6TULGZ> [Tweet]. Twitter. <https://twitter.com/NRSVGGermany/status/1586698493472776194> (Accessed 15 May 2023)
222. vbw-bayern [@vbw_bayern]. (2022, October 29). *#StimmerWirtschaft Die vbw im Dialog mit der Politik. Eindrücke vom zweiten Tag des großen Parteitags der @CSU in Augsburg. #csupt22 @BDS_Bayern @der_bpa @BayBaugewerbe @DEHOGA_Bayern @MUC_Airport @VGLBayern* <https://t.co/rc2LHvzoJS> [Tweet]. Twitter. https://twitter.com/vbw_bayern/status/1586331814498648066 (Accessed 23 May 2023)
223. vbw - Die bayerische Wirtschaft. (2022, October 29). *#StimmerWirtschaft Die vbw im... - Vbw – Die bayerische Wirtschaft | Facebook.* <https://www.facebook.com/vbwbayern/posts/pfbid0eL8uDZwFyFRkMC1nFCfT59wmax1JVvugXRHdcHhqn4YNUMvzctawJXD2aXwdd3Ql> (Accessed 23 May 2023)
224. vbw - Die bayerische Wirtschaft. (2022, October 28). *#StimmerWirtschaft Die vbw im... - Vbw – Die bayerische Wirtschaft | Facebook.* <https://www.facebook.com/vbwbayern/posts/pfbid02xEHcguYhd2Zjpx5tgL1yNymbhUo8hxcu1EpJvjywkScihNt53fvapvwwcfYPZ9e5l> (Accessed 23 May 2023)
225. Malte Kreuzfeldt [@MKreuzfeldt]. (2022, April 23). *Update: Zunächst war hier auf dem #BPT22 der #FDP offenbar der Aufsteller vom letzten Parteitag zu sehen. Inzwischen wurde er ausgetauscht: <https://t.co/ogXNZnOt7l>* [Tweet]. Twitter. <https://twitter.com/MKreuzfeldt/status/1517840653819994113> (Accessed 15 May 2023)
226. Malte Kreuzfeldt [@MKreuzfeldt]. (2022, April 23). *Das sind die Hauptsponsoren des #BPT22 der #FDP: <https://t.co/zAUeRjoVHa>* [Tweet]. Twitter. <https://twitter.com/MKreuzfeldt/status/1517788972952469505> (Accessed 15 May 2023)
227. vorwärts Verlagsgesellschaft mbH. (2023). *Sponsorenakquise Berliner vorwärts Verlagsgesellschaft mbH 2022.* https://vorwaerts.de/system/files/sponsorenerloese_vorwaerts_2022.pdf (Accessed 11 May 2023)
228. vorwärts Verlagsgesellschaft mbH. (2022). *Sponsorenakquise Berliner vorwärts Verlagsgesellschaft mbH 2021.* https://vorwaerts.de/system/files/sponsoren_vorwaerts_2021.pdf (Accessed 11 May 2023)
229. Seeheimer Kreis. (2022). *Sponsoring Gartenfest 2021.* https://www.seeheimer-kreis.de/fileadmin/data/documents/20211005_Sponsoring_Gartenfest.pdf (Accessed 24 May 2023)
230. Seeheimer Kreis. (2022). *Sponsoring Gartenfest 2022.* https://www.seeheimer-kreis.de/fileadmin/data/documents/2022_Sponsoring_Gartenfest.pdf (Accessed 24 May 2023)

231. Christian Schweppe [@ChSchweppe]. (2022, September 20). *Gestern wurde im Klubhaus der Abgeordneten am #Bundestag wieder Gartenfest der Seeheimer gefeiert. Obwohl die Gäste selbst 50€ zahlten, gab es viele Sponsoren: Wie Rheinmetall, Zigarrenverband, Doc Morris & Automatenwirtschaft. @ThePioneerDe #DPG #ParlamentarischeGesellschaft* <https://t.co/jf54rXw8kv> [Tweet]. Twitter. <https://twitter.com/ChSchweppe/status/1572113723191619585> (Accessed 24 May 2023)
232. Bundesverband der Zigarrenindustrie. (2022, September 19). *Gartenfest des SeeheimerKreis. Der BdZ mit seinem Geschäftsführer Bodo Mehrlein sorgt für die Genussmomente mit seiner Zigarrenlounge.* Facebook. https://www.facebook.com/permalink.php?story_fbid=pfbid02NZW8VwgoVCK9T4AcFRogZ1pu7kEX3zyYGQ4eSXW6tbuSLJQbAfVoSdg9UWKyQGgl&id=258188324624069 (Accessed 25 May 2023)
233. Seeheimer Kreis. (2021). *Einnahmen Spargelessen 2021.* https://www.seeheimer-kreis.de/fileadmin/data/images/veranstaltungen/spargelfahrt/210628-Einnahmen_Spargelessen_2021.pdf (Accessed 24 May 2023)
234. Seeheimer Kreis. (2022). *Übersicht Sponsoring Spargelfahrt 2022.* https://www.seeheimer-kreis.de/fileadmin/data/images/veranstaltungen/spargelfahrt/Uebersicht_Sponsoring_Spargelfahrt2022.pdf (Accessed 24 May 2023)
235. Seeheimer Kreis. (2023). *Sponsoring weitere Veranstaltungen.* https://www.seeheimer-kreis.de/fileadmin/data/documents/2022_Sponsoring_Seeheim_weitereVeranstaltungen.pdf (Accessed 24 May 2023)
236. Harbusch, N., & Schäfr, J. W. (2022, June 19). Spargelfahrt auf dem Wannsee: Bis zu 15 000 Euro für Essen mit Scholz. *bild.de*. <https://www.bild.de/politik/inland/politik-inland/spargelfahrt-auf-dem-wannsee-bis-zu-15-000-euro-fuer-essen-mit-scholz-80450486.bild.html> (Accessed 24 May 2023)
237. Bundesregierung. (2022). *Drucksache 20/3351: Antwort der Bundesregierung auf die Kleine Anfrage der Abgeordneten Thomas Seitz, Corinna Miazga, Stephan Brandner und der Fraktion der AfD.* <https://dserver.bundestag.de/btd/20/033/2003351.pdf> (Accessed 24 May 2023)
238. Jan Mücke. (2023, July 17). *Jan Mücke (@jan_muecke) / Twitter.* Twitter. https://twitter.com/jan_muecke (Accessed 18 July 2023)
239. Maurin, J. (2021, April 22). E-Zigaretten-Fachmann der Behörde BfR: Tabaklobby „kauft“ Experten. *Die Tageszeitung: taz*. <https://taz.de/!5762483/> (Accessed 30 May 2021)
240. Die Tabak Zeitung. (2021, April 21). BVTE engagiert 'Top-Fachmann'. *Die Tabak Zeitung*.
241. Bundesministerium des Innern, für Bau und Heimat. (2021). *Orientierungshilfe zu den Rechtsverhältnissen der Mitglieder der Bundesregierung und der Parlamentarischen Staatssekretärinnen und Parlamentarischen Staatssekretäre des Bundes.* <https://fragdenstaat.de/dokumente/237097-orientierungshilfe-zu-den-rechtsverhaeltnissen-der-mitglieder-der-bundesregierung-und-der-parlamentarischen-staatssekretaerinnen-und-parlamentarischen-staatssekretaere-des-bundes/> (Accessed 15 May 2023)
242. Reyher, M., & Röttger, T. (2023, June 5). *Einkünfte veröffentlicht: Das verdienen die Abgeordneten des Bundestags nebenher | abgeordnetenwatch.de.* <https://www.abgeordnetenwatch.de/recherchen/nebentaetigkeiten/das-verdienen-die-abgeordneten-des-bundestags-nebenher> (Accessed 6 June 2023)
243. Eschelmann, A., & Lange, T. (2023, June 21). *Nebeneinkünfte der Abgeordneten: Was taugen die neuen Regeln?* LobbyControl. <https://www.lobbycontrol.de/nebeneinkuenfte/was-taugen-die-neuen-abgeordneten-regeln-i-109637/> (Accessed 18 July 2023)
244. Die Bundesregierung. (2021). *Drucksache 19/26014: Antwort der Bundesregierung auf die Kleine Anfrage der Abgeordneten Niema Movassat, Dr. André Hahn, Gökay Akbulut, weiterer*

- Abgeordneter und der Fraktion DIE LINKE. Drucksache 19/25566.*
<https://dip21.bundestag.de/dip21/btd/19/260/1926014.pdf> (Accessed 1 February 2021)
245. FragDenStaat. (2021). *Verhaltenskodex zum Umgang mit der Tabakindustrie. Anfrage an Bundesministerium für Gesundheit.* <https://fragdenstaat.de/anfrage/verhaltenskodex-zum-umgang-mit-der-tabakindustrie/> (Accessed 31 May 2021)
246. Bundesministerium für Ernährung und Landwirtschaft. (2021, April 27). *Antrag auf Informationszugang nach dem Informationsfreiheitsgesetz (IFG) – Ihre E-Mail vom 31. März 2021.* <https://fragdenstaat.de/anfrage/verhaltenskodex-des-bmel-zum-umgang-mit-der-tabakindustrie/> (Accessed 31 May 2021)
247. TabakerzV - Verordnung über Tabakerzeugnisse und verwandte Erzeugnisse, (2019). <https://www.gesetze-im-internet.de/tabakerzv/BJNR098010016.html> (Accessed 28 April 2020)
248. Die Drogenbeauftragte der Bundesregierung. (2016). *Drogen- und Suchtbericht der Bundesregierung 2016.* https://www.drogenbeauftragte.de/fileadmin/dateien-dba/Drogenbeauftragte/4_Presse/1_Pressemitteilungen/2016/2016_2/160928_Drogenbericht-2016_NEU_Sept.2016.pdf (Accessed 13 May 2020)
249. Deutscher Zigarettenverband. (2020). *Marktanteile Zigarettenhersteller 2017 (2016).* https://www.zigarettenverband.de/wp-content/uploads/Marktanteil_Zigarettenhersteller_2017.pdf (Accessed 8 April 2020)
250. Deutscher Bundestag. (2023, July 10). *Detailansicht des Registereintrags: Berlin Kommunikation UG.* <https://www.lobbyregister.bundestag.de/suche/R002433/23471> (Accessed 10 August 2023)
251. Deutscher Bundestag. (2023, July 12). *Detailansicht des Registereintrags: Bernstein Public Policy GmbH.* <https://www.lobbyregister.bundestag.de/suche/R001191/23747> (Accessed 10 August 2023)
252. Deutscher Bundestag. (2023, May 2). *Detailansicht des Registereintrags: Brandenburgisches Institut für Gesellschaft und Sicherheit gGmbH.* <https://www.lobbyregister.bundestag.de/suche/R005937/18361> (Accessed 10 August 2023)
253. Deutscher Bundestag. (2023, May 3). *Detailansicht des Registereintrags: British American Tobacco (Industrie) GmbH.* <https://www.lobbyregister.bundestag.de/suche/R000873/19107> (Accessed 10 August 2023)
254. Deutscher Bundestag. (2023, March 1). *Detailansicht des Registereintrags: Bundesverband des Tabakwaren-Einzelhandels e.V.* <https://www.lobbyregister.bundestag.de/suche/R003689/16553> (Accessed 10 August 2023)
255. Deutscher Bundestag. (2023, July 18). *Detailansicht des Registereintrags: Bundesverband der Lottoverkaufsstellen in Deutschland e.V.* <https://www.lobbyregister.bundestag.de/suche/R003802/24092> (Accessed 10 August 2023)
256. Die Tabak Zeitung. (2021, June 10). *BLD will nicht „dauerhaft geschlossen“ sein: Bundesverband der Lotto-Toto-Verkaufsstellen mit erster Aktions-Zwischenbilanz zufrieden.* http://tabakzeitung.de/fe_0_22_meldung_detail.php?id=8119 (Accessed 31 May 2023)
257. Bundesverband der Lotto-Toto-Verkaufsstellen. (2021, June 7). *BLD-Kampagne „dauerhaft geschlossen“ wirkt.* <https://www.bld-lottoverband.de/index.php?id=379> (Accessed 31 May 2023)
258. Deutscher Bundestag. (2023, March 20). *Detailansicht des Registereintrags: Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse (BVTE).* <https://www.lobbyregister.bundestag.de/suche/R001924/18212> (Accessed 10 August 2023)

259. Deutscher Bundestag. (2022, December 21). *Detailansicht des Registereintrags: Bundesverband der Zigarrenindustrie e.V.* <https://www.lobbyregister.bundestag.de/suche/R000185/14099> (Accessed 10 August 2023)
260. Deutscher Bundestag. (2023, June 9). *Detailansicht des Registereintrags: Bundesverband Deutscher Tabakpflanzer / Vereinigung der Tabak-Erzeugergemeinschaften.* <https://www.lobbyregister.bundestag.de/suche/R000640/22796> (Accessed 10 August 2023)
261. Deutscher Bundestag. (2023, July 10). *Detailansicht des Registereintrags: Bundesverband Deutscher Tabakwaren-Großhändler und Automatenaufsteller e.V.* <https://www.lobbyregister.bundestag.de/suche/R000210/23523> (Accessed 10 August 2023)
262. Deutscher Bundestag. (2023, June 30). *Detailansicht des Registereintrags: Bundesverband Wasserpfeifentabak (Der Shisha-Verband).* <https://www.lobbyregister.bundestag.de/suche/R000682/22782> (Accessed 10 August 2023)
263. Deutscher Bundestag. (2023, July 11). *Detailansicht des Registereintrags: Bündnis für Tabakfreien Genuss.* <https://www.lobbyregister.bundestag.de/suche/R000193/23672> (Accessed 10 August 2023)
264. Bündnis für Tabakfreien Genuss. (2021). *Bündnis für Tabakfreien Genuss.* <https://www.tabakfreiengenuss.org/das-buendnis/> (Accessed 2 June 2021)
265. Deutscher Bundestag. (2023, July 11). *Detailansicht des Registereintrags: CBE DIGIDEN AG.* <https://www.lobbyregister.bundestag.de/suche/R001914/23659> (Accessed 10 August 2023)
266. Deutscher Bundestag. (2023, June 22). *Detailansicht des Registereintrags: Deekeling Arndt Advisors in Communications GmbH.* <https://www.lobbyregister.bundestag.de/suche/R004838/21257> (Accessed 10 August 2023)
267. Deutscher Bundestag. (2023, March 15). *Detailansicht des Registereintrags: Deutscher Zigarettenverband e.V.* <https://www.lobbyregister.bundestag.de/suche/R001929/11377> (Accessed 10 August 2023)
268. Deutscher Bundestag. (2023, July 17). *Detailansicht des Registereintrags: Dr.phil. Erich Vad.* <https://www.lobbyregister.bundestag.de/suche/R000630/24001>
269. Deutscher Bundestag. (2023, February 23). *Detailansicht des Registereintrags: European Rolling Paper Association (ERPA e.V.).* <https://www.lobbyregister.bundestag.de/suche/R001289/12455> (Accessed 10 August 2023)
270. Deutscher Bundestag. (2023, June 29). *Detailansicht des Registereintrags: EUTOP Brussels SRL (EUTOP).* <https://www.lobbyregister.bundestag.de/suche/R002284/22631> (Accessed 10 August 2023)
271. Deutscher Bundestag. (2023, June 23). *Detailansicht des Registereintrags: Fuchs & Cie. | Unternehmensberatung für Strategie & Kommunikation GmbH.* <https://www.lobbyregister.bundestag.de/suche/R000801/22155> (Accessed 10 August 2023)
272. Deutscher Bundestag. (2023, February 23). *Detailansicht des Registereintrags: Interessengemeinschaft Tabakwirtschaft e.V.* <https://www.lobbyregister.bundestag.de/suche/R000962/17008> (Accessed 10 August 2023)
273. Deutscher Bundestag. (2023, July 6). *Detailansicht des Registereintrags: JT International Germany GmbH.* <https://www.lobbyregister.bundestag.de/suche/R001548/22710> (Accessed 10 August 2023)
274. Deutscher Bundestag. (2023, June 6). *Detailansicht des Registereintrags: Lebensmittelverband Deutschland.* <https://www.lobbyregister.bundestag.de/suche/R002050/20696> (Accessed 10 August 2023)
275. Lebensmittelverband Deutschland e.V. (2023). *Mitglieder.* <https://www.lebensmittelverband.de/de/verband/mitglieder> (Accessed 6 April 2023)

276. Lebensmittelverband Deutschland e.V. (2023). *Kuratorium*.
<https://www.lebensmittelverband.de/de/verband/organisation/kuratorium> (Accessed 6 April 2023)
277. Deutscher Bundestag. (2023, July 18). *Detailansicht des Registereintrags: MSLGROUP Germany GmbH*. <https://www.lobbyregister.bundestag.de/suche/R000756/24087> (Accessed 10 August 2023)
278. Deutscher Bundestag. (2023, January 24). *Detailansicht des Registereintrags: Philip Morris GmbH*. <https://www.lobbyregister.bundestag.de/suche/R000144/15302> (Accessed 10 August 2023)
279. Deutscher Bundestag. (2023, March 30). *Detailansicht des Registereintrags: REEMTSMA Cigarettenfabriken GmbH*. <https://www.lobbyregister.bundestag.de/suche/R000542/18685> (Accessed 10 August 2023)
280. Deutscher Bundestag. (2023, January 6). *Detailansicht des Registereintrags: Stefan von der Heiden*. <https://www.lobbyregister.bundestag.de/suche/R000343/15022> (Accessed 10 August 2023)
281. Deutscher Bundestag. (2023, July 11). *Detailansicht des Registereintrags: Swedish Match AB*. <https://www.lobbyregister.bundestag.de/suche/R004575/23651> (Accessed 10 August 2023)
282. Deutscher Bundestag. (2023, February 28). *Detailansicht des Registereintrags: Torben Theis*. <https://www.lobbyregister.bundestag.de/suche/R001831/17333> (Accessed 10 August 2023)
283. Deutscher Bundestag. (2023, February 17). *Detailansicht des Registereintrags: Verband der deutschen Rauchtobakindustrie*.
<https://www.lobbyregister.bundestag.de/suche/R000102/16636> (Accessed 10 August 2023)
284. Deutscher Bundestag. (2023, February 21). *Detailansicht des Registereintrags: Verband der Zigarettenpapier verarbeitenden Industrie e.V.*
<https://www.lobbyregister.bundestag.de/suche/R001286/15996> (Accessed 10 August 2023)
285. Deutscher Bundestag. (2023, June 30). *Detailansicht des Registereintrags: Verband des eZigarettenhandels (VdeH)*. <https://www.lobbyregister.bundestag.de/suche/R000028/22833> (Accessed 10 August 2023)
286. Statista. (2023, January 2). *Durchschnittlicher Dollarkurs bis 2022*. Statista.
<https://de.statista.com/statistik/daten/studie/200194/umfrage/wechselkurs-des-euro-gegenueber-dem-us-dollar-seit-2001/> (Accessed 22 August 2023)
287. Drescher, F. (2021, March 15). *Lobbyismus und Parteitagssponsoring – "Dieser Parteitag wird Ihnen präsentiert von..."*. Deutschlandfunk Kultur.
https://www.deutschlandfunkkultur.de/lobbyismus-und-parteitagssponsoring-dieser-parteitag-wird.976.de.html?dram:article_id=494075 (Accessed 30 May 2021)