
Sudan

**TOBACCO
INDUSTRY
INTERFERENCE
INDEX
2023**

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Background and Introduction

The World Health Organization reports Sudan is facing a humanitarian crisis affecting about 15.8 million people or about 32% of the population and in need of assistance in 2023.¹ Of these, about 11 million people require emergency assistance for life-threatening conditions related to critical physical and mental well-being and need life-sustaining support to meet minimum living standards. In such a crisis situation, tobacco control is not a high priority.

Sudan ratified the WHO Framework Convention on Tobacco Control (FCTC) on 31 October 2005 and has made progress in implementing the treaty. Sudan has banned direct tobacco advertising in the media and well as promotions, but corporate social responsibility (CSR) activities are still allowed. Cigarette packs carry 30% health warnings but effort to introduced 75% pictorial warnings have been opposed by the industry.

About 5 billion sticks worth US\$ 355.7 million were sold in the Sudanese cigarette market in 2020. Two transnational tobacco companies control the whole cigarette market; Japan Tobacco International (JTI) [who acquired Hagggar Cigarette & Tobacco Factory] and British American Tobacco (BAT) [who acquired Blue Nile Cigarette Company]. BAT is increasing its cigarette market in Sudan.

Domestically produced cigarettes dominate the Sudanese market by occupying 87.3% of sales in 2018. Imports, although increasing in recent years, are generally premium brands and thus have a limited market. The Sudanese Government has levied hefty taxes on both domestic and imported brands. Per capita consumption in Sudan, stood at 160 pieces per person in 2019. Duty paid cigarette sales for Sudan are forecast to expand by 34.5% to 9,620 million pieces between 2020 and 2030, equating to an 3.9% increase in per capita terms to 163 pieces.

This is Sudan's third report on the Tobacco Industry Interference Index which reviews government efforts in protecting health policies from industry influence as outlined in Article 5.3 of the WHO FCTC. This report shows that there is a slight deterioration in Sudan's score from 51 points in 2021, to 56 points. The deterioration is in the delay in the implementation of the new enlarged pictorial warnings on cigarette packs due to interference from the tobacco industry's participation in the standards body developing the warnings.

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance. There are 20 questions based on Article 5.3 guidelines. 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 the 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. The report includes information on incidents from April 2021 to March 2023, but also includes prior incidents that still have relevance today.

¹ World Health Organization. Sudan. Available at: <https://www.who.int/emergencies/funding/outbreak-and-crisis-response-appeal/2023/2023-appeals/appeal-sudan>

Summary Findings

1 INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The government does not approve any policy or adopt an offer of assistance from tobacco companies. However, there is tobacco industry participation in developing the standards for tobacco. Three representatives from tobacco companies sit on five committees of the Sudanese Organization for Standardization and Metrology.

The government does not allow the tobacco industry on its delegations to the COP or any of its related meetings.

2 INDUSTRY CSR ACTIVITIES

The officials don't attend or participate in such activities.

Despite the Tobacco Control regulation's 2021 prohibiting any sponsorship by the tobacco industry in Sudan, BAT Company has sponsored an event.

3 BENEFITS TO THE INDUSTRY

The new regulation to increase the GHWs from 30% to 75% was published in the Gazeta of the Sudanese Ministry of Justice in March 2021. Accordingly, the Standardization organization has convened the meetings for more than a year for the committee to develop specifications, but till now they have not finished it. Besides, they are working to increase the warning to 65% and not 75% as the law requires.

In addition, the main companies sent objections on the new Tobacco Control regulation to the Ministry of Finance, Head, and the deputy of the Sovereign Council, but the government officials refused their objection.

The National Investment Law allows all companies, including tobacco companies, to benefit from the privileges provided in the law such as exempting production inputs, allocating land to factories, and exemption from some fees, according to what is stated in the law.

International travelers can bring in duty free 200 cigarettes or 50 cigars or 1 lb. of tobacco.

4 UNNECESSARY INTERACTION

No information available about interaction between government and tobacco industry

The government does not accept or endorse or enter into partnerships or agreements with the tobacco industry.

5 TRANSPARENCY

While the Ministry of Health previously disclosed their meetings /interactions with the tobacco industry however there was no disclosure since 2016. Overall, the government doesn't publicly disclose meetings/interactions with the tobacco industry.

There are no rules for disclosure or registration of tobacco industry entities, affiliated organizations and individuals acting on its behalf.

There is a registered union for Tombak traders, and they conduct meetings with the government as an organisation that defends tobacco trade and agriculture, and there have been joint meetings between the union and the government.

6 CONFLICT OF INTEREST

There are no record of retired senior government officials joining the tobacco industry upon their retirement nor current government officials and relatives holding positions in the tobacco business.

7 PREVENTIVE MEASURES

There is no procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.

The government has not formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry.

The government does not require the tobacco industry to submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and other activities, including lobbying, philanthropy, and political contributions. A focal point for tobacco control has been established. They conduct seminars, awareness meetings, health forums and through various media and public lectures. However, there has been no program to create awareness specifically around Article 5.3

There is no policy to disallow the acceptance of contributions/ gifts from the tobacco industry including offers of assistance, policy drafts, or study visit invitations given or offered to the government and its agencies.

RECOMMENDATIONS

- 1) The government must adopt a code of conduct for public officials to guide their interactions with the tobacco industry when strictly necessary.
- 2) There must be a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.
- 3) There must be a program to create awareness specifically around Article 5.3 for government departments.
- 4) To include Article 5.3 in the drafted updated law.
- 5) The government should strengthen the implementation of banning the industry sponsorship of public events.

Sudan

Tobacco Industry Interference Index 2023

Results and Findings

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ² 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. ³ in setting or implementing public health policies in relation to tobacco control ⁴ (Rec 3.4)	0					
The government does not approve any policy or adopt an offer from tobacco companies, according to statements from the Ministry of Health.						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)	0					
The government does not depend on any policy or adopt legislation prepared by the tobacco industry according to statements from the Ministry of Health.						
3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8) I Never 5 Yes						5
Three representatives from tobacco companies sit on the five committees of the Sudanese Organization for Standardization and Metrology. These representatives are able to participate in developing the standards for tobacco. [attached copy of the decision for the committees]						
4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ⁵ (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year. For non-Parties, apply a score of '0'		1				
The government does not allow the tobacco industry on its delegations to the COP or any of its related meetings.						
INDICATOR 2: Industry CSR activities						
5. A. Government agencies or their officials endorse, support, form partnerships with or participates in activities of the tobacco industry described as “socially responsible” or “sustainable”. For example, environmental programs. (Rec 6.2)		1				

² 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

³ The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

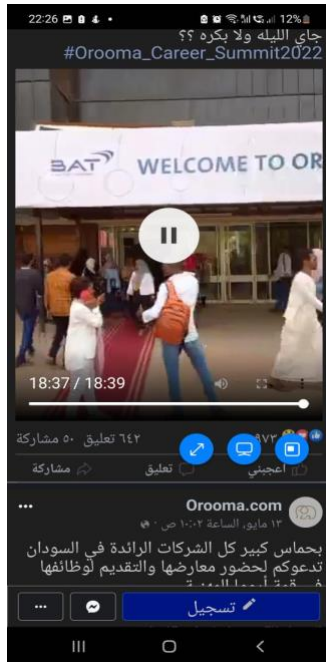
⁴ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

⁵ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

	0	1	2	3	4	5
B. The government (its agencies and officials) receives CSR contributions ⁶ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests during the pandemic. (Rec 6.4) <i>NOTE: exclude enforcement activities as this is covered in another question</i>						

Arooma event in Khartoum:⁷

Despite the Tobacco Control regulation's 2021 prohibition against any sponsorship by the tobacco industry in Sudan, the main sponsor of this educational event was BAT Company. This event was not attended by the government.



⁶ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

⁷ Orooma Career Summit 2022 <https://fb.watch/jMfybBNbMF/>

Orooma.com
May 9 at 3:17 PM

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BAT (British American Tobacco)

"British American Tobacco (BAT) is a leading multi-category consumer goods business. Established in 1902, headquarter is in London, England.
BAT has operations across more than 180 markets, with 45 factories in 43 different countries, and around 55,000 employee all over the world with various nationalities.
BAT established its operation in Sudan since 2015 by acquiring a local company (Blue Nile Cigarette Company) in which BAT was able to transform the business and bring the multinational culture"

#Orooma_Career_Summit2022
#OCS2022
#Jobs #Sudan

13-14 May 2022
www.orooma.com
Khartoum International



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www.orooma.com/careersummit

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British American Tobacco
#Orooma_Career_Summit2022
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#Jobs #Sudan
#السودان #وظائف

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Orooma.com

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يعمل برنامج الأمم المتحدة الإنمائي في ما يقرب من 170 دولة وإقليم ، للمساعدة في تحقيق القضاء على الفقر ، والحد من عدم المساواة والإقصاء.
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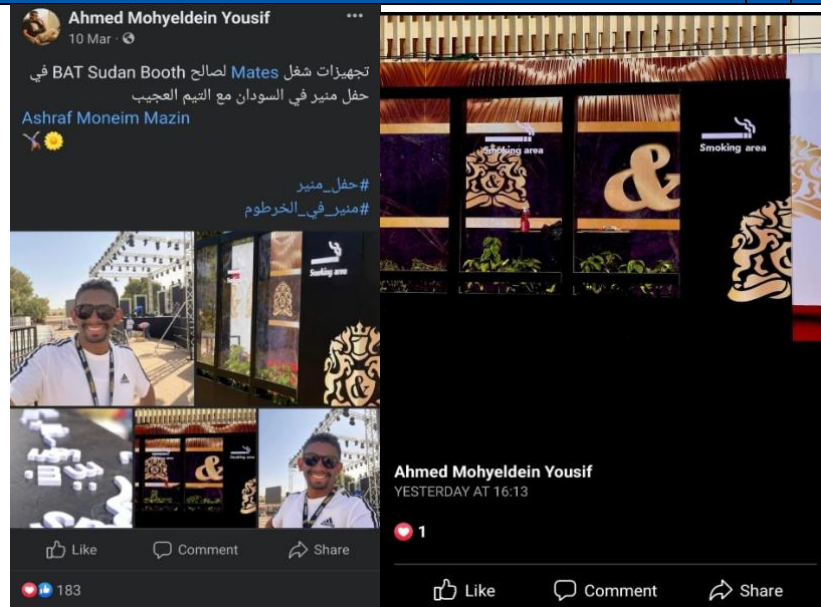
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سجّل لحضور القمة

The party of Egyptian singer Mohamed Monier (Khartoum):⁸
This event was not attended by the government. A huge logo for BAT company was displayed in the designated area for smoking.

⁸ [BAT... لصالح Mates تجهيزات شغل](#) | Ahmed Mohyeldin Youusif | Facebook



INDICATOR 3: Benefits to the Tobacco Industry

6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)							5
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The new regulation to increase the GHWs from 30% to 75% was published in the Gazeta of the Sudanese Ministry of Justice in March 2021. Accordingly, the Standardization organization has convened the meetings for more than a year for the committee to develop specifications, but till now they have not finished it. Besides, they are working to increase the warning to 65% and not 75% as the law requires.

In addition, the main companies sent objections on the new Tobacco Control regulation (change the contents of cigarette packs from 10 cigarettes to 20 cigarettes and increase the GHWs to 75%) to the Ministry of Finance, Head and the deputy of the Sovereign Council, but the government officials refused their objection.

7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)							4
--	--	--	--	--	--	--	---

The National Investment Law allows all companies, including tobacco companies, to benefit from the privileges provided in the law such as exempting production inputs, allocating land to factories, and exemption from some fees, according to what is stated in the law. In a testimony from an employee of the Ministry of Investment for the purposes of this research, he stated that there is no positive or negative discrimination on tobacco companies, as they enjoy all the advantages of the law. (attached)

International travelers can bring in duty free 200 cigarettes or 50 cigars or 1 lb. of tobacco.

INDICATOR 4: Forms of Unnecessary Interaction

	0	1	2	3	4	5
8. Top level government officials (such as President/ Prime Minister or Minister ⁹) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)	0					
There is no record of top-level government officials attending functions to foster relations.						
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)	0					
The government does not accept any form of assistance or support from the tobacco industry.						
10. The government accepts, supports, endorses, or enters into partnerships or non-binding agreements with the tobacco industry or any entity working to further its interests. (Rec 3.1) <i>NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>	0					
The government does not accept or endorse or enter into partnerships or agreements with the tobacco industry.						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)						5
While the Ministry of Health previously disclosed their meetings/ interactions with the tobacco industry however there was no disclosure since 2016. Overall, the government does not publicly disclose meetings/ interactions with the tobacco industry.						
12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)						5
There are no rules for disclosure or registration of tobacco industry entities, affiliated organizations and individuals acting on their behalf. There is a registered union for tombak traders, and they conduct meetings with the government as an organization that defends tobacco trade and agriculture, and there have been joint meetings between the union and the government.						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) / Never 5 Yes						5

⁹ Includes immediate members of the families of the high-level officials

	0	1	2	3	4	5
The government does not prohibit contributions from the tobacco industry to political parties, candidates, and does not request a disclosure of the value of the contributions paid by tobacco companies (there are no statistics).						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					
There is no record of senior government officials joining the tobacco industry.						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	0					
No record of current government officials and relatives holding positions in the tobacco business including consultancy positions.						
INDICATOR 7: Preventive Measures						
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)						5
There is no procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Rec 4.2); <i>1 for whole of government code; 2 for Yes but partial if only MOH</i>						5
The government has not formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry.						
18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)						5
The government does not require the tobacco industry to submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and other activity, including lobbying, philanthropy, and political contributions.						
19. The government has a program / system/ plan to consistently ¹⁰ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
A focal point for tobacco control has been established. They conduct seminars, awareness meetings, health forums and also through various media and public lectures. However, there has been no program to create awareness specifically around Article 5.3						

¹⁰ For purposes of this question, “consistently” means: a. Each time the FCTC is discussed, 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

	0	1	2	3	4	5
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)						5
There is no policy to disallow the acceptance of contributions/ gifts from the tobacco industry including offers of assistance, policy drafts, or study visit invitations given or offered to the government and its agencies.						
TOTAL SCORE						56

Annex A: Sources of Information

	TOP TOBACCO COMPANIES/ DISTRIBUTORS	MARKET SHARE	BRANDS	SOURCE
1	Japanese Tobacco International factory (JTI) (Acquired Haggar Cigarette & Tobacco Factory)	80%	Winner, Aspen Bringi	JT to Acquire Leading Tobacco Company in the Republics of Sudan and South Sudan (jti.com)
2	British American tobacco factory (BAT) operates through Blue Nile Cigarette Company which it acquired in 2016.	About 10%	Benson - Red Benson (PALL MALL - Lord - Mint - Gold)	BAT Annual Report 2015
3	Afrah	less than 10%.	Mossel: <ul style="list-style-type: none"> • Khaleej • Alarabi • Alsultan Cigarettes: <ul style="list-style-type: none"> • Tradition • Golden 	https://afrahtobacco.com/
5	Alwatania	Moassel with flavours	Girak	
6	Ishbelia	Moassel ishbelia with flavours	Girak	

	TOP MEDIA/ NEWSPAPERS	URL
1	AL-Tayar	Print
2	Al-Jareeda	Print
3	Al-Sudani	Print
4	Al-Sudani Aldawylia	Print
5	Al-Yom Altali	Print