



Global Center for
Good Governance
in Tobacco Control



A GLOBAL
TOBACCO
INDUSTRY
WATCHDOG



Global Tobacco Industry Interference Index 2025

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Global Tobacco Industry Interference Index (Global Tobacco Index) is a global survey on how governments are responding to tobacco industry interference and protecting their public health policies from commercial and vested interests as required under the World Health Organization Framework Convention on Tobacco Control (WHO FCTC). The report was initiated as a regional index by Southeast Asia Tobacco Control Alliance (SEATCA) in 2014. The Global Tobacco Index 2025 is produced by the Global Center for Good Governance in Tobacco Control (GGTC) and the report is jointly published and disseminated in partnership with STOP. GGTC acknowledges support from Bloomberg Philanthropies and the Gates Foundation.

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INTRODUCTION

Over the past two years, governments across the globe have faced an increasingly aggressive tobacco industry (TI) that exploited policy gaps and loopholes to interfere in tobacco control. The TI dissuaded, enticed, frustrated or simply overwhelmed governments in their efforts to protect public health.

The TI has increased its meddling across countries, and many governments did not sufficiently resist TI, but 18 governments did and showed that it's possible to stand up to this insidious meddling. State Parties to the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) are obligated to protect their health policies by using Article 5.3ⁱ and its implementing guidelines, which empowers them to protect public health policies from commercial and other vested interests.¹

The Global Tobacco Industry Interference Index (the Index) surveyed 100 countries and found that many countries' parliamentarians, heads of state and ministers did not fulfill their duties to protect the human right to health under Article 5.3. The TI persuaded them to challenge and delay tobacco control measures, file pro-industry bills or promote the TI instead of supporting evidence-based life-saving measures to reduce all forms of tobacco use.

The TI targeted, lured and lobbied especially non-health sectors partly due to the lack of awareness among this sector on the importance of limiting industry interactions to only when strictly necessary for regulation. The absence of transparency in interactions with the industry and failure to reject TI contributions exacerbated this interference and undermined efforts to protect public health, implement the WHO FCTC and achieve the Sustainable Development Goals (SDGs).

The Index is a civil society review of how governments are implementing the measures of WHO FCTC Article 5.3. The 2025 edition of the Index shows worsening interference, and no country has been spared. Of the 90 countries who updated their reports, more than half (46 countries) deteriorated in their scores compared to over a third (34 countries) that improved in protecting their health policies, especially in applying greater transparency,

rejecting collaboration with the industry, and adopting procedures for interaction with the industry. Scores of 10 countries remained unchanged.

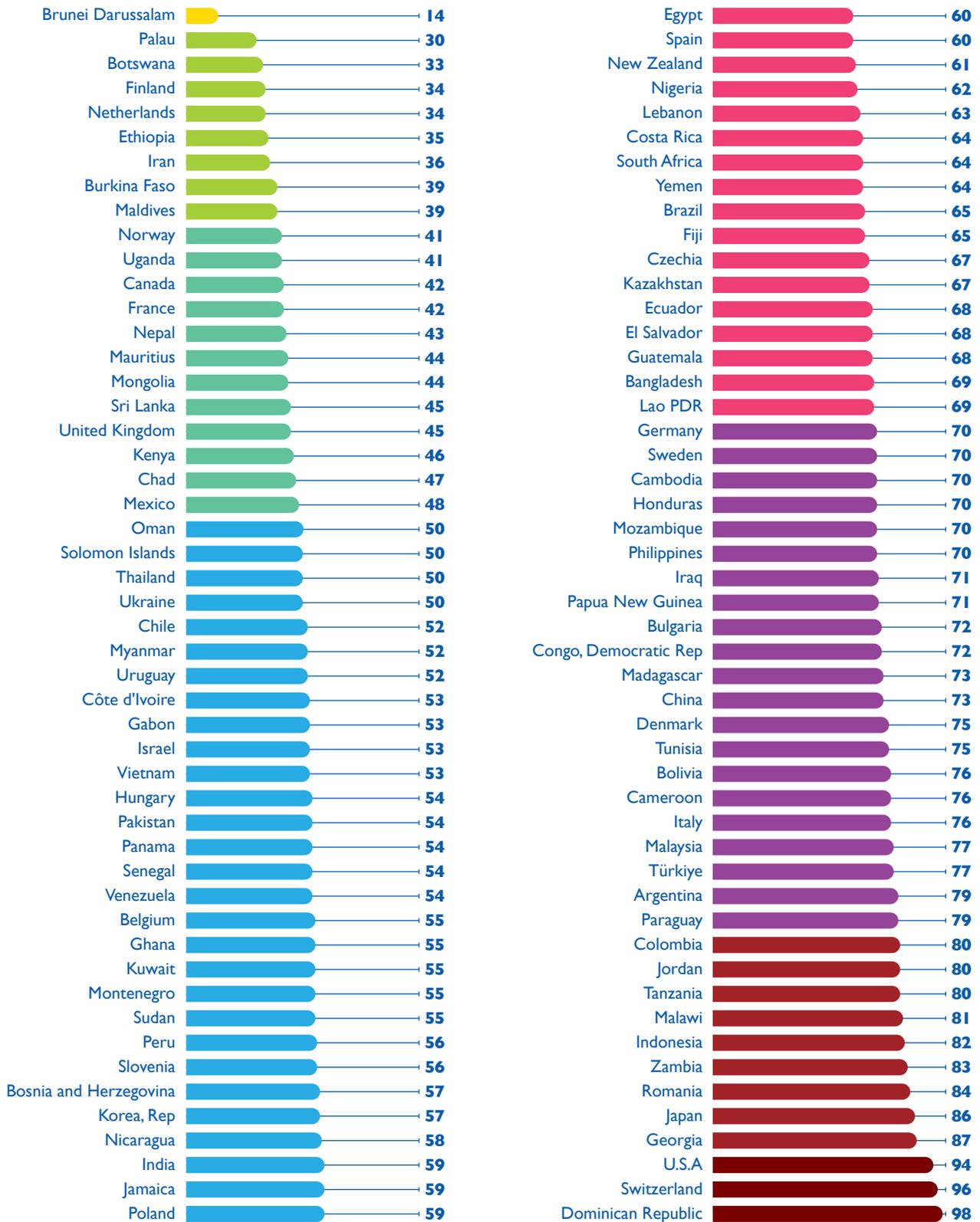
The first Index in 2019 reviewed 33 countries;² the second, 57 countries;³ the third, 80 countries;⁴ and the fourth, 90 countries.⁵ This Index reviewed 100 countries from Africa, the Eastern Mediterranean region, the Americas, Europe, South and Southeast Asia and the Western Pacific region. It ranks countries using a defined question set and scoring framework developed as a regional initiative by the Southeast Asia Tobacco Control Alliance (ASEAN Tobacco Industry Interference Index) in 2014.⁶ The questionnaire has since been revised.

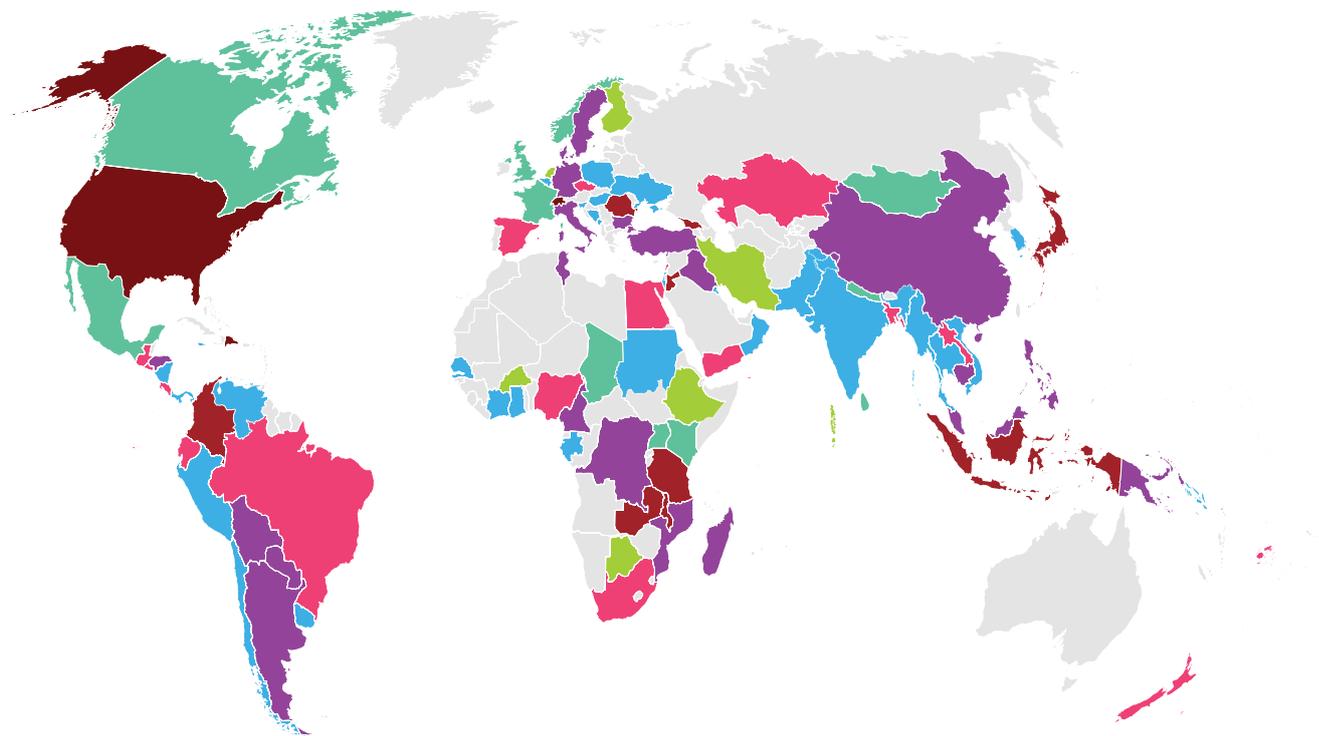
The Index is based on publicly available information on TI interference in countries and their respective governments' responses to this interference. For the countries repeating the survey, interference and responses were reviewed for the period of April 2023 to March 2025. For the 10 new countries joining the survey, interference and responses were reviewed from January 2020 to March 2025 (to capture the context). The countries are ranked (Figure 1) according to total scores provided by civil society groups, who prepared their respective country indices. The lower the score, the lower the overall level of interference, which augurs well for the country. The Summary Table (p.50) provides disaggregated scores for each country.

Many countries have taken concrete steps to protect their tobacco control policies either by incorporating Article 5.3 in their legislation or through administrative measures such as a code or circular to limit interaction with the industry to only when strictly necessary for regulation. These governments have set the standards for best practice and demonstrated they are serious about protecting the health of their population.

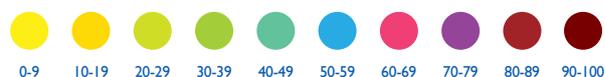
i . WHO FCTC Article 5.3: In setting and implementing their public health policies with respect to tobacco control, Parties shall act to protect these policies from commercial and other vested interests of the tobacco industry in accordance with national law.

FIGURE I: TOBACCO INDUSTRY INTERFERENCE OVERALL COUNTRY RANKING





The lower the score, the better the ranking



LEAST INTERFERENCE



MOST INTERFERENCE



KEY FINDINGS

18 countries made progress in either adopting new measures or implementing existing sector-wide guidance on Article 5.3.

Peru is the latest country to incorporate Article 5.3 into its national tobacco control legislation, bringing the total to nine countries, while the others have a code, guidance, directive or circular to protect health policies from industry interference.

More than 20 countries have banned TI donations.

Countries have banned TI donations to political campaigns or have applied restrictions. **Botswana, Bulgaria, Canada, Ethiopia, France, Israel, Lebanon, Nigeria, Ukraine, Uruguay** and **Venezuela** have prohibited political donations.

32 countries have banned TI-related corporate social responsibility (CSR) activities, and five did not accept its contributions.

The industry targeted non-health agencies with its charity, latched on to government priorities and appealed to willing ministers and parliamentarians.

46 countries resisted the tobacco industry's narrative on harm reduction and have banned e-cigarettes and heated tobacco products, effectively denormalizing the TI.

Court cases were filed in **Panama** and **Mexico** to revoke the ban. Efforts to ban flavors in tobacco and nicotine products were undermined in **Belgium, Finland** and **Israel**.

Parliamentarians in 14 countries supported and promoted the TI.

Parliamentarians filed multiple pro-industry bills, accepted industry input that resulted in delayed adoption of laws or that attempted to defeat tobacco control laws, or promoted legislation to benefit the TI.

At least 10 governments delayed or did not increase tax.

Argentina, Bangladesh, Bulgaria, Georgia, Israel, Lebanon, Poland, Sweden, Tunisia and **Ukraine** gave in to industry push-back on tax increases. However, three governments successfully used tax increases as a tobacco control measure and withstood industry pressure opposing this.

At least 20 governments collaborated with the TI.

Governments collaborated through memorandums of understanding (MOUs), training sessions and enforcement activities to tackle smuggling. 17 of these governments are non-Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products.

Members of parliament, ministers and governors accepted sponsored study visits to tobacco company facilities.

Philip Morris International (PMI)'s facility in Switzerland was the most common facility visited by high-level public officials.

Six governments allowed their diplomatic missions to endorse the TI.

The Japanese Embassy in at least seven countries (**Bolivia, Cambodia, Egypt, Indonesia, Lebanon, Nicaragua** and **Tanzania**) was lobbied by Japan Tobacco International (JTI) to promote its business.

Most countries do not have a register of TI lobbyists.

Most also do not have a register of entities linked to the industry, nor rules of disclosure for meetings with the TI. **14 countries** have a lobbyist register.

Article 5.3 was scarcely publicized among government departments.

While some governments claim to raise awareness, there is sparse publicly available information on countries' efforts to raise awareness of Article 5.3 within government departments.

01

The tobacco industry
interfered in policy
development and
implementation

Governments must protect public health policies from commercial and other vested interests of the tobacco industry, which means governments must refuse the industry a seat at the policy table. Even in countries where the TI is not officially represented in national committees that develop tobacco control policy, the industry still found ways to intervene in policy development (Figure 2).

PRO-INDUSTRY PARLIAMENTARIANS ACTIVELY CHALLENGED OR DELAYED TOBACCO CONTROL LAWS

Most countries reported that the TI does not have a seat in policy development. Where the TI has failed to stop the executive branch of governments from strengthening tobacco control measures, it has used the legislature to undermine and derail strong measures. Numerous countries across the globe documented how the TI has lobbied parliamentarians and exploited the parliamentary process to influence tobacco control policy outcomes to benefit the industry. This is possible because, in many countries, although Article 5.3 policies cover parliamentarians, separate rules for elected officials can make application to parliamentarians uneven or politically difficult.

a. Parliamentarians accepted industry input resulting in delayed or weakened laws

In **Denmark, Guatemala, Malaysia, Montenegro** and **Slovenia**, the actions of parliamentarians resulted in the delayed adoption of strong measures or left tobacco control weak and unregulated.

The **Danish** Parliament, in March 2023, sent the draft amendments of the Tobacco Products Act to the tobacco and nicotine industries, with the Health Committee inviting the industry to present its case,^{7,8} resulting in the final draft reflecting the industry's interests. The tobacco manufacturers lobbied the Health Committee and opposed the proposal to ban 100mm cigarettes and limit cigarette length to a maximum of 80mm.⁹ The industry's request was accommodated.

In **Malaysia**, the Control of Smoking Products for Public Health Act 2024 (Act 852) was passed by Parliament in October 2023 after a delay, without the crucial generational

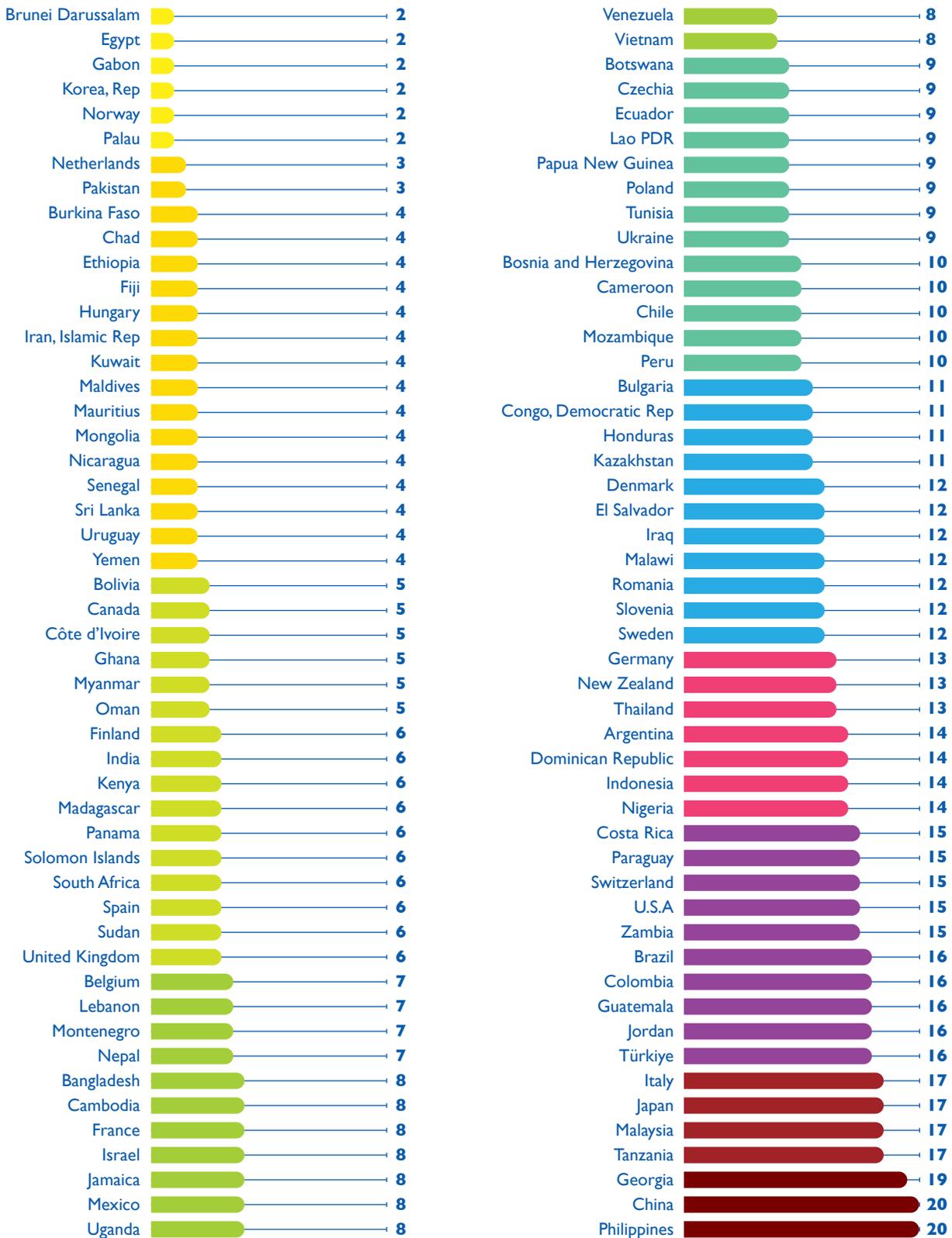
endgame (GEG) clause that would have prevented anyone born from January 1, 2007 onwards from purchasing tobacco products. The Deputy Health Minister admitted in Parliament that the tobacco and vape industry had successfully lobbied¹⁰ to drop the GEG proposal and allow electronic smoking devices, even though the Health Ministry wanted these products banned.

In **Guatemala**, the executive branch had sought to ban e-cigarettes, mainly to protect minors. In January 2025, three members of Congress introduced draft law 6498, which proposed restricting nicotine products and regulating advertising. In March, the representatives met with e-cigarette business representatives to find ways not to harm tobacco companies but find solutions. Additionally, the representatives reaffirmed their willingness to receive proposals from business leaders to work together on the draft law.¹¹

In **Slovenia**, a group of 38 Members of Parliament (MPs) introduced an amendment to delay the introduction of standardized packaging for cigarettes by three years, pushing the start from 2020 to 2023.¹² The Commission for Prevention of Corruption released documents showing that industry lobbyists provided MPs with written justifications, which the MPs directly copied into the bill's explanatory notes.¹³ Key portions of the amendment's text, authored by TI lobbyists, were adopted by the MPs.¹⁴

In **Montenegro**, nicotine products for oral use, chewing and snuffing have been sold for 13 years without excise duties or any restrictions. The Ministry of Finance approved a ban on these products as part of the amendments to the Tobacco Law. These amendments were adopted in May 2023 but not signed by the then-President. In July 2024, two parliamentarians proposed amendments to the Tobacco Law which, among other things, would ban the sale of nicotine products, but these still have not moved in the Parliament.¹⁵

FIGURE 2: TOBACCO INDUSTRY INTERFERES IN POLICY DEVELOPMENT



The lower the score, the better the ranking



b. Parliamentarians filed bills favorable to the TI

In **Argentina, Brazil** and **Colombia**, parliamentarians filed multiple bills to legalize electronic smoking devices (ESDs which includes electronic nicotine delivery systems, or e-cigarettes) or heated tobacco products (HTPs), or to revoke existing bans or weaken existing regulations. Argentina banned ESDs (Ministry of Health Resolution 565/2003)¹⁶ in March 2023. The following day, Massalin Particulares S.R.L., Philip Morris International (PMI)'s subsidiary in **Argentina**, announced that the ban had led to its suspension of a US \$300 million investment in the country to develop HTPs.¹⁷ The next month, a national deputy introduced a bill that sought to legalize and establish a regulatory framework for ESDs¹⁸ in an attempt to override the ban.

Brazil banned ESDs in 2009. In October 2023, a senator (Podemos-MS), introduced Bill No. 5.008/2023 to legalize the production, marketing and advertising of e-cigarettes¹⁹ and admitted the TI's role in drafting the bill.^{20,21} The senator had been on a sponsored trip to PMI's HTP facility in Bologna, Italy, in May 2023.²² A director from British American Tobacco (BAT) Brazil had access to the Brazilian Congress, maintaining direct contact with legislators and closely monitoring the progress of the bill in addition to other proposals related to the ban on e-cigarettes.²³

In **Colombia**, in 2023, four congressmembers, who have ties with tobacco industry front groups,^{24,25} promoted a constitutional amendment aimed at establishing a regulatory framework for adult-use cannabis (House Bill No. 01/23, Senate Bill No. 17/23).²⁶ Although the constitutional amendment did not pass, it could have severely weakened existing tobacco control regulations.

c. The TI used parliamentarians to attempt to defeat tobacco control laws or promote amendments to benefit the TI

In **Ghana**, attempts by industry allies to mobilize several parliamentarians to obstruct the passage of the Excise Duty Amendment Bill to increase tobacco tax failed. According to an MP from the Parliamentary Health Committee, "these institutions did not use money, however, they were strong in their moves to talking individual MPs into seeing the law as a retrogression and unnecessary at the time."²⁷ The law was passed in May 2023.

In the **Democratic Republic of Congo (DRC)**, opaque partnerships between parliamentarians and the TI have obstructed the adoption of basic tobacco control policies.²⁸ The former Prime Minister was a Senator and Member of the Board of Directors of BAT, and a current MP is the CEO of Shenimed (a cigarette distributor).^{29,30,31} These fluid relationships have contributed to the delay in the adoption of basic tobacco control measures.

The parliaments in **Switzerland, Uganda** and the **U.K.** have seen TI-friendly legislators proactively giving TI representatives privileged entry into members-only parliamentary areas, raising integrity and transparency concerns. **Swiss** parliamentarians have openly represented TI interests and have given their access badges to lobbyists to enter restricted areas in the federal building, including the chamber lobbies.^{32,33} For example, a national councillor from the Centre Party representing St. Gallen gave one of his parliamentary access badges to SwissTabac's secretary general and his second badge to the vice director of the Swiss Farmers' Union, a TI ally.³⁴ Several legislators representing the TI sit in both chambers of Parliament, which is reflected in Switzerland's weak tobacco control laws.

In the **U.K.**, Greenbutts, a company that produces biodegradable cigarette filters and that has multiple links to the TI³⁵ and the political news platform, parliamentnews.co.uk, supported a "Plastic Free Butt" campaign, which aimed to obtain an amendment to the U.K. government's Tobacco and Vapes Bill. In February 2025, an MP, backed by a cross-party group of other MPs, tabled an amendment to the Tobacco and Vapes Bill which would require cigarette manufacturers to use biodegradable alternatives.^{36,37}

In **Uganda**, contrary to its Tobacco Control Act, which has incorporated Article 5.3,³⁸ the Parliamentary Committee on Finance, Planning and Economic Development, when finalizing the Tax Amendment Bill 2025 in April 2025, invited industry representatives and allies including BAT Uganda, Leaf Tobacco and Commodities Uganda Ltd, Uganda Manufacturers Association, the Uganda Tobacco Tax Alliance and the American Chamber of Commerce, to provide input on taxing tobacco products.³⁹

“The WHO FCTC, a global public health treaty, includes particular obligations on governments to protect public health from the vested and commercial interests of the tobacco industry. Governments repeatedly report that interference by the tobacco industry is among the most significant barriers to making progress on tobacco control. The Global Tobacco Industry Interference Index reveals the extent of this problem and how countries around the world are impacted.”

Andrew Black,
Secretariat of the WHO FCTC

WHEN GOVERNMENTS ACCOMODATED THE TOBACCO INDUSTRY, TOBACCO CONTROL LAWS REMAINED STALLED OR UNENFORCED

Omnibus tobacco control laws or their implementing regulations were stalled in **eight countries** due to strong industry push-back.

In **Tanzania**, ongoing efforts to enact a new tobacco control law since 2017 have been unsuccessful due to accommodating TI concerns.⁴⁰ **Zambia's** 2018 draft tobacco control bill sought regulatory impact assessment approval in 2020, conducted further inter-departmental consultations in 2020 and 2021 and received Cabinet approval for tabling in Parliament in December 2022,⁴¹ but the bill continues to be hindered by industry interference⁴² and is still not tabled.

In **Papua New Guinea (PNG)**, after nearly nine years, the Tobacco Control Act 2016,⁴³ with no implementing regulations, remains unenforced.⁴⁴ In **Bolivia**, the government views the TI positively and allows it to be part of the economic recovery agendas.⁴⁵ Its tobacco control law (Law 1280), passed five years ago, has remained unenforced.⁴⁶ In **Bosnia and Herzegovina**, amendments and procedural delays introduced by the TI have diluted the effectiveness of the tobacco control bylaws and delayed them for a year.⁴⁷

GOVERNMENTS GAVE IN TO INDUSTRY INTERFERENCE IN TAX INCREASES

The TI continued to derail tax increases across the globe and at least 10 governments (**Argentina, Bangladesh, Bulgaria, Georgia, Israel, Lebanon, Poland, Sweden, Tunisia** and **Ukraine**) gave in to industry push-back. On the other hand, three governments proceeded to use taxation as a tobacco control measure despite pressure from the industry opposing tax increases.

In **Argentina**, in 2024, the TI successfully lobbied⁴⁸ former executives in government advisory or management positions to eliminate the minimum tax on cigarettes, which benefited big companies, such as Massalin Particulares (Philip Morris) and BAT, further lowering prices for their cheaper brands. A former industry executive, who spent almost 30 years at Massalin (PMI), was appointed president of the Mint and influenced the drafting of the tobacco tax requirements.⁴⁹

In **Georgia**, the Parliament, lobbied by local tobacco producers such as Tbilisi Tobacco,⁵⁰ approved a 50% tax reduction on raw tobacco, chewing tobacco, snus and hookah tobacco in May 2024.⁵¹ In **Bulgaria**, there was only a minimal excise duty increase on tobacco products in 2023, following a new tax calendar adopted in 2022 after close consultation with TI representatives. During a public consultation on the amendments to the Excise Duties and Tax Warehouses Act in 2023, three proposals from the Bulgarian Association of Tobacco Industry (BATI) were accepted, including not displaying the price of cigarettes and HTPs on the packaging.⁵²

In **Israel**, the implementation of the 2024 State Budget Balancing Plan to cancel the tax exemption on tobacco and nicotine products sold in duty-free stores, was slowed to a gradual phase-in until 2028.^{53,54} The **Polish** National Revenue Administration has facilitated a Cooperation Program with businesses, including the TI, since December 2022, resulting in more favorable conditions for the TI to conduct its business in Poland,⁵⁵ while also delaying new tobacco taxes.

In **Ukraine**, the tobacco producers' association, "Ukrutun," opposed a new excise tax and lobbied for preferential tax rates for HTPs, eventually leading to a tax increase that was 20% lower compared to cigarettes.⁵⁶

Both **Lebanon** and **Tunisia** have lowered tobacco taxes in support of their respective state-owned tobacco enterprises. In **Lebanon**, tax was lowered⁵⁷ because, according to the Minister of Interior and Municipalities, "the Lebanese state will provide whatever it can to facilitate the Regie's continued success,"⁵⁸ while **Tunisia** reduced the consumption tax on HTPs from 135% to 50% and further lowered tax on molasses tobacco and Jirac to 10%.⁵⁹

In **Chile** and **Türkiye**, the governments withstood industry interference and increased taxes. Between May 2023 and April 2024, BAT visited **Chilean** tax officials, expressing opposition to tobacco tax increases,^{60,61,62} however, the Ministry of Finance ultimately proposed a tax reform that included corrective taxes. **Türkiye** raised special consumption tax on tobacco in 2022⁶³ and again in 2025,⁶⁴ tied to inflation. While some governments gave awards to the tobacco companies for being the top or most compliant taxpayer (Table 7), the Turkish tax inspection authority in 2024 fined a tobacco company 6 billion Turkish Liras (US \$181.2 million) for unreported revenue.⁶⁵

In **Bangladesh**, in April 2024, the Pabna Bidi Factory Laborers' Association submitted a memorandum to the Prime Minister by lobbying the Pabna district's Deputy Commissioner, demanding the withdrawal of taxes on bidis, prioritizing fiscal relief for manufacturers, instead of laborers' rights.⁶⁶ While no new taxes were added on bidis in the FY 2024–25 budget, the government maintained the same level of taxes.⁶⁷

In **Costa Rica**, the Minister of Health criticized the Social Affairs Commission for introducing a new version of a bill that eliminated the specific tax on electronic smoking devices,⁶⁸ accusing a legislator of being a TI lobbyist and promoting positions favorable to the TI.⁶⁹

GOVERNMENTS ALLOWED DELAYS IN STANDARDIZED PACKAGING OF TOBACCO

The governments of **Oman** and **Burkina Faso** implemented their standardized packaging laws as scheduled. **Oman's** standardized packaging laws, passed in 2023 with a six-month implementation period, were executed without any delays. **Chad** rejected a tobacco importer's request to import cigarettes with outdated health warnings.

However, governments in seven countries, **Côte d'Ivoire, Denmark, Georgia, Lao PDR, Myanmar, Slovenia** and **Sri Lanka**, have delayed the implementation of their standardized packaging laws.

In **Georgia**, standardized packaging adopted in January 2018 was postponed three times (for more than seven years total) to April 1, 2025. The tobacco industry and its allies lobbied the Business Ombudsman's Office, the Ministry of Economy and Sustainable Development and the Ministry of Finance to support its request for a postponement.^{70,71,72}

Myanmar's standardized packaging, slated for implementation in April 2022, has been postponed four times, now slated for October 2025, giving the industry 42 months' leeway. **Slovenia** delayed the implementation of standardized packaging by three years, from 2020 to 2023.⁷³ In **Denmark**, the Minister of Health granted the TI's request for a longer implementation period (17 months) from the issuance of the executive order, until the sale of non-standardized e-cigarette packs ceased completely.⁷⁴ In **Lao PDR**, the TI failed to meet the six-month (December 2024) standardized packaging compliance deadline, leading to the implementation deadline being postponed to August 2025.⁷⁵ Similarly, in **Côte d'Ivoire**, implementation was delayed for a year after the deadline passed in December 2023.

Governments in **Bangladesh, Cameroon, Costa Rica, DRC, Nigeria, Sudan** and **Tunisia** allowed the delay in the application of prominent pictorial health warnings (PHW) on tobacco packs by giving in to industry requests for extensions.

In **Cameroon**, PHW on tobacco products were approved in January 2018 with one year for implementation, but an extension was granted until June 2023, following repeated requests from the industry. The warnings are still not fully enforced.

In **Sudan**, the Ministry of Justice published a new regulation in March 2021 that increased the PHW size from 30% to 75%, and banned kiddie packs (10 sticks), allowing only 20-stick packs. However, three TI representatives sit on the five committees of the Sudanese Organization for Standardization and Metrology (SOSM), which is responsible for the development of the standards. The PHW standards have been delayed, and Sudan has yet to implement the 75% PHW and ban on kiddie packs.

THE INDUSTRY PRESSURED COUNTRIES TO EMBRACE E-CIGARETTES, NICOTINE DEVICES AND POUCHES, AND FLAVORED PRODUCTS

The tobacco industry aggressively countered the regulation of ENDS and HTPs. Departments of health across the globe faced industry interference in their efforts to either ban or strictly regulate ENDS and HTPs. The interference included attempting to revoke existing bans through court cases, weaken regulations, oppose and delay tax increases of these products and lobby policymakers to pass laws favorable to the industry.

As of May 2025, at least **46 countries** have banned e-cigarettes and HTPs,⁷⁶ including more recently the **Maldives, Venezuela** and **Vietnam**, while the industry continues to push these products. The **Cambodian** Prime Minister took a bold step in May 2025, announcing that investments in e-cigarettes are not welcome in the country, placing such investment on the negative list.⁷⁷

The **Maldives** banned the import of e-cigarettes in 2024,⁷⁸ fast-tracked overall tobacco control by raising the purchase age of tobacco products from 18 to 21 years and in May 2025 set a generational ban that prohibits the sale and purchase of tobacco products to anyone born on or after January 1, 2007.⁷⁹

Panama's ban on the use, sale and import of e-cigarettes and heated tobacco (Law No. 315) in 2021 was reversed by a case filed by an individual in August 2023 on behalf of the Tobacco Harm Reduction Association of Panama (ARDTP), claiming the ban deprived 200,000 adult smokers of a less harmful alternative. The Supreme Court ruled the ban unconstitutional for violating due legislative process, as the number of favorable votes in the third debate fell short of the minimum required by the Constitution.^{80,81}

When the **Mexican** government banned e-cigarettes in 2023, PMI Mexico obtained an injunction from the Supreme Court to allow it to continue sales.⁸² This prompted then-President Andrés Manuel López Obrador to say, "... just imagine how much economic interest is at play at the expense of the people's health and that of young people... These global corporations spend huge amounts of money on advertising and lobbying... money to corrupt anyone willing to play along."⁸³ Mexico has enforced the ban.

In **Sweden**, nicotine pouches were unregulated until 2022 and when regulations came into place, they were watered down by TI influence⁸⁴ to allow advertising on social media and minimal taxation, a move supported by the Prime Minister.⁸⁵ The Trade Minister defended Sweden's snus business to the EU, claiming it is "our way of life,"⁸⁶ while a Swedish member of the European Parliament championed the industry rhetoric that the "Swedish model is not a problem—it's a solution."⁸⁷

Efforts to ban flavors in tobacco and nicotine products were undermined in **Belgium, Finland**, and **Israel**. In **Belgium**, the draft Royal Decree on the manufacture and marketing of e-cigarettes had called for a ban on the mention of added flavors or aromas on the packaging. However, when the Royal Decree was issued in November 2022, it took into consideration Perstablo's (a federation of newsstand shops) argument and allowed the mention of flavors or aromas.⁸⁸ In **Finland**, a former Minister of Education supported the inclusion of certain flavored nicotine pouches in the Tobacco Act, allegedly promoting the interest of a particular Jakobstad-based nicotine pouch manufacturer.⁸⁹ The publicly available internal Juul Labs documents have revealed that a flavor ban on tobacco products proposed in **Israel's** Amendment No. 7 of the Prohibition of Advertising Law was defeated due to interference from Juul.⁹⁰

02

Tobacco-related CSR
activities enhanced
access to high-level
public officials

WHO FCTC Article 13 Guidelines call for a ban on corporate social responsibility (CSR) activities because they are a form of promotion⁹¹ and Article 5.3 Guidelines recommend such activities be denormalized. The tobacco industry uses CSR as a strategy to distract from the harms it causes and restore its public image. When governments accept charity from the tobacco industry, they compromise their role as regulators of the industry.

Thirty-two countries have banned tobacco-related CSR activities, while five others don't endorse or accept any contributions from the industry. As governments strengthen tobacco control measures, and as more exposés denormalize industry greenwashing activities, the TI has avoided calling them CSR activities, instead referring to them as sustainability activities. This Index has found these activities were targeted more at non-health agencies, were cherry-picked and tied to government

priorities and engaged sympathetic ministers and parliamentarians. Through this tactic, the industry traps governments into endorsing and supporting it (Table 1).

At least 18 governments partnered or collaborated with the TI. Ministers and parliamentarians in at least eight countries, **Bolivia, Gabon, Jamaica, Bangladesh, Fiji, El Salvador, the U.K. and Zambia**, endorsed CSR activities, including tree planting programs, donations of drinking water and food crop seeds to farmers and cigarette butt cleanups.

TABLE 1: HOW GOVERNMENTS BECOME TRAPPED BY INDUSTRY CHARITY

Industry tactic	Industry-sponsored activities endorsed by governments	Consequences of governments endorsing industry CSR ⁹²
Exploiting the poor	Governments endorsed the industry's ad hoc poverty alleviation programs in rural poor communities.	When the government accepts charity from the industry, it compromises its role as a regulator of the industry.
Distracting attention away from toxic cigarette butts	Governments participated in industry-funded cigarette butt cleanup programs or endorsed the industry's Extended Producer Responsibility (EPR) programs.	Instead of regulating the industry and making it pay for damaging the environment, the government endorses its CSR activities.
Diverting attention away from deforestation caused by tobacco growing	Government institutions collaborated with the industry on tree planting programs.	Greenwashing diverts governments' attention to short-term publicity stunts while they absorb the long-term costs of deforestation and land-/water remediation and become more likely to endorse industry-framed fixes—such as EPR programs, instead of polluter pays approaches, and eco-filters—that are health-harming and contrary to the SDG goals.
Sneaking into governments' programs for farmers	Governments endorsed industry-sponsored assistance to farmers, e.g. giving seeds to grow food crops.	These schemes yield no independent evidence of national food-supply gains, and they normalize tobacco in agriculture and dilute government efforts to transition away from it.

GOVERNMENTS ENDORSED INEFFECTIVE INDUSTRY CLEANUP CAMPAIGNS INSTEAD OF STOPPING THE INDUSTRY FROM POLLUTING

Cigarette filters are a single use plastic (cellulose acetate) which harm health and pollute the environment. About 4.5 trillion cigarette butts are discarded every year, leaving behind a huge cost of managing the waste and environmental pollution caused by these butts.⁹³ WHO has called for a ban on cigarette filters,⁹⁴ and in 2024 governments at the tenth session of the FCTC Conference of the Parties (COP10) were urged to take comprehensive regulatory measures on filters in cigarettes and in other tobacco and related products, and their related electronic devices.⁹⁵ Tobacco's plastics alone cost a modest estimate of at least US \$26 billion annually in ecosystem damage, prompting a global movement on the TI to stop polluting and be penalized for the harm its products cause to the environment.

To distract from the toxic harmfulness of its filters and impact of butts on the environment, the TI has stepped up its CSR activities and engaged with national and municipal governments across the globe to instead focus on cigarette butt cleanups and anti-litter campaigns, (Appendix I) which are ineffective.

Two members of the **U.K.** House of Lords serve as directors of the community interest company, CleanStreets CIC, which is funded by the TI to conduct cigarette butt litter cleanups.⁹⁶

In **Mexico**, as part of World Cleanup Day 2024, the Directorate of Environment and Ecology and the Directorate of Youth of Isla Mujeres endorsed Philip Morris Mexico's sponsorship of a beach cleanup.⁹⁷

In **Belgium**, although cigarette producers are required to pay a fee to the government for their share of litter costs and awareness campaigns,⁹⁸ the Public Waste Agency of Flanders (OVAM) signed an agreement for a separate anti-litter campaign with PMI and the Federation of Cigarette Manufacturers.⁹⁹ In **Denmark**, four municipalities, through an environmental organization, Keep Denmark Clean, collaborated with tobacco manufacturers to develop new ashtrays/cigarette butt collectors.¹⁰⁰ In **Switzerland**, the Federal Office for the Environment (FOEN) routinely collaborates with the tobacco industry on litter cleanups and was criticized for lacking neutrality, predominantly involving TI representatives in recurrent roundtable discussions.¹⁰¹

The COP decision specifically warned governments that Extended Producer Responsibility (EPR) system can be disguised as CSR activities allowing the TI to access policymakers and participate in policy development and implementation.¹⁰² **Finland** initially gave the TI a central role in managing cigarette butt waste as part of its implementation of the EU's Single-Use Plastics Directive.¹⁰³ Following civil society's advocacy to the parliamentary ombudsman, invoking FCTC Article 5.3, the proposal was revised.¹⁰⁴ Municipalities now handle waste collection and awareness efforts, while the TI is only required to pay the costs.

In **Korea**, cigarette prices already include an environmental levy. Initially, local governments conducted initiatives to convert cigarette butts into compost, but this failed because cigarette butts cannot be safely recycled. A Korean study found that the use of fertilizers from recycled butts is linked to increased cancer incidence. Tobacco is no longer a part of the comprehensive Korean EPR system.¹⁰⁵

GOVERNMENTS WERE LURED INTO PARTNERING WITH THE INDUSTRY ON TREE PLANTING AND REFORESTATION PROGRAMS

A core feature of the tobacco industry's ESG "environment" pillar is partnering with governments and NGOs on environmental programs.¹⁰⁶ Where Article 5.3 policies exist, governments prohibit these ties, but in other countries, these partnerships persist. In at least **ten countries**, governments collaborated with or endorsed tree planting and reforestation programs with the TI.

Long-term government collaboration with the TI on forest conservation is ongoing in **Madagascar, Pakistan** and **Sri Lanka**. In **Pakistan**, the Irrigation and Forest Departments in 2024 collaborated with Pakistan Tobacco Company (PTC) to plant 44 hectares of native forest species across conservation sites. The National Rural Support Program has a 13-year partnership with PTC to carry out reforestation initiatives among rural communities.¹⁰⁷ The **Sri Lanka** Department of Forest Conservation has collaborated with the Ceylon Tobacco Company (CTC) on restoring degraded forest land in Dambulla,¹⁰⁸ while the **Madagascar** Ministry of Environment and Sustainable Development collaborated with Imperial Brands on the Madagasikarantsika project,¹⁰⁹ both of which are still ongoing.

In **Brazil**, Philip Morris Brazil conducted the Floresta Viva program in partnership with the National Bank for Economic and Social Development (BNDES) to restore the Atlantic Forest in the Southeast mesoregion of Paraná, covering 21 cities and 25 conservation units.¹¹⁰ In **Nicaragua**, the Ministry of Environment and Natural Resources (MARENA) endorsed the tobacco industry's reforestation activities in Esteli as part of the national "Green, I love you Green" campaign.¹¹¹

The **Fiji** Ministry for Fisheries and Forestry partnered with BAT to promote forest landscape reforestation, endorsed by the Minister.¹¹²

In **Zambia**, a Member of Parliament endorsed a multi-partner tree planting program of which JTI was a silver sponsor.¹¹³

The **Japanese** Forestry Agency collaborated with JTI in reforestation and forest management activities by establishing "JT Forests" across the country as part of its natural environmental conservation.¹¹⁴

“At a moment when global health progress is threatened, the tobacco industry continues to put profit over health. This report shows the industry exploits loopholes and attempts to influence governments and other decision-makers across the globe. In 2025, interference worsened in about half of all the countries, and only 34 countries made progress. From political donations to corporate social responsibility, the industry’s tactics are relentless. However, governments have the opportunity to support public health by taking decisive action against the industry.”

Kelly Henning,
Bloomberg Philanthropies

GOVERNMENTS ENDORSED THE TOBACCO INDUSTRY'S SPONSORSHIP OF FOOD CROPS FOR FARMERS

Since food security and uplifting farmers is a priority for many governments, the TI leverages seed for food programs for farmers to lure governments into endorsing its charity, normalize tobacco in agriculture and dilute government efforts to transition away from it.

The **Fijian** Minister of Trades, Cooperatives, Small and Medium Enterprises and Communications officiated at BAT's annual Star Farmers Incentives Award¹¹⁵ and the Agriculture Ministry endorsed BAT's sponsorship of greenhouses and seedlings to farmers.¹¹⁶

In **Malaysia**, in 2023, the Deputy Prime Minister, who is also the Rural and Regional Development Minister, expanded BAT's "Beyond Benih" program to assist farmers to grow food crops as a national program.¹¹⁷ The program, in collaboration with the federal and state Department of Agriculture, will run until 2026.

In **Nepal**, where tobacco-related CSR activities are banned, local authorities collaborated with tobacco manufacturer Surya Nepal on a project for farmers called "subsoiling" to increase crop productivity.¹¹⁸

GOVERNMENTS ENDORSED THE TOBACCO INDUSTRY'S CHARITY AMONG VULNERABLE COMMUNITIES

Addressing violations in bans on tobacco-related CSR is good enforcement and denormalizes the TI. In 2024, regional authorities in **Ethiopia** took corrective action to close the JTI-National Tobacco Enterprise (NTE)-sponsored community hall built in the Sidama region and issued a warning letter to the NTE, citing the ban on the tobacco industry's involvement in charitable contributions or any promotional activities.¹¹⁹

Governments in low- and middle-income countries remain vulnerable to accepting CSR sponsorship from the TI, especially basic amenities for poor communities, education for children, disaster relief and community development.

In the **Philippines**, the Secretary of Social Welfare and Development accepted a donation of four mobile labs from PMI for "social welfare and disaster response operations"¹²⁰ as part of the First Lady's "Lab for All" program. Turn-over of the mobile labs took place in March 2025 at the Presidential Palace grounds, attended by the First Lady and the Secretaries of Health and Social Welfare, with the First Lady receiving a symbolic key from the PMI CEO, with the Secretaries applauding.^{121,122}

On behalf of the Labour Welfare Foundation, the **Bangladesh** State Minister of Labor and Employment received a check donation from BAT Bangladesh.¹²³

BAT's subsidiary in **Jamaica**, Carreras Ltd, sent letters to MPs requesting them to invite their constituents to apply for the company's 2023/2024 scholarships. The Health Minister intervened expressing his disapproval and exposing the industry's attempts to collaborate with MPs.¹²⁴

In **Zambia**, which has documented youth tobacco use (22%) and persistent child labor in tobacco cultivation,¹²⁵ the Western Province Minister endorsed JTI's sponsorship of classrooms in the province.¹²⁶

In **Cambodia**, in June 2024, the Ministry of Environment signed an MOU with JTI on environmental conservation and sustainable development, facilitated by the Ambassador of **Japan** to Cambodia.¹²⁷

Despite the pollution caused by cigarette butts dumped into oceans, lakes and other water sources,¹²⁸ in **Bolivia**, in June 2024, the Vice Minister of Water endorsed the JTI-sponsored YAKU project which provided drinking water and sanitation to communities in the cities of La Paz, Cochabamba and Santa Cruz.¹²⁹

Although TI-related CSR activities are banned in **Yemen**, the Director-General of the Youth and Sports thanked the HSA Group, which includes a tobacco business, for supporting Second Division Football League competitions.¹³⁰

03

Governments gave various incentives to the tobacco industry which benefited its business

Despite Article 5.3 Guidelines stating that Parties should not grant incentives, privileges or benefits to the TI to establish or run its businesses, many governments ignored these provisions and proceeded to grant the industry various benefits and tax exemptions. The TI also benefited when governments delayed passing tobacco control measures, postponed implementation or extended implementation timelines at the request of the industry.

GOVERNMENTS DID NOT RAISE TOBACCO TAXES, DELAYED TAX INCREASES OR GAVE DISCOUNTS TO THE TOBACCO INDUSTRY

Tax increases are among the most effective tobacco control measures, yet more than 60 countries, often due to industry influence, did not raise taxes, delayed implementation of tax increases, lowered tax rates, or gave tax exemptions if tobacco products were manufactured for export. There is an increasing pattern of officials advocating for differential taxation for alternative tobacco industry products such as e-cigarettes, HTPs and nicotine pouches, to be taxed lower than conventional cigarettes, a position aligned with the tobacco industry's interests. Italy's Deputy Prime Minister for example had stated alternative tobacco products should not be taxed the same way as cigarettes.¹³¹

The TI was able to extract benefits in a variety of ways, as shown in Table 2. This illustrates that non-health departments, especially Customs and Departments of Finance and Trade, treat the tobacco industry like any other industry and give it benefits.

The governments of **Cameroon, Iraq, Madagascar, Malawi, Mozambique, Tanzania** and **Zambia** have given various benefits to encourage the local TI to flourish. Some allowed new factories to be set up, while others offered lower tax rates for locally produced cigarettes, or tax exemptions for small scale producers or for using local leaf. This is problematic, as taxes on tobacco products need to continue to increase to keep products' cost prohibitive.

“Long before ‘fake news,’ the tobacco industry built an empire of harm on disinformation, and continues to adapt its tactics to undermine governance and public health. The 2025 Global Tobacco Industry Interference Index shows this influence deepening across governments and institutions, even as health and development goals drift further off course. Protecting policymaking cannot rely on goodwill alone; it must be anchored in governance through law, transparency, and coordination across sectors. Only then can systems prevent tobacco industry interference rather than absorb it.”

Roy Small,
Health Governance and Financing,
United Nations Development Program

TABLE 2: EXAMPLES OF TAX BENEFITS GIVEN TO THE TOBACCO INDUSTRY

No excise tax increase on tobacco	Bosnia and Herzegovina (since 2018); Colombia (since 2017); Gabon (since 2017); Jamaica (since 2017); Kuwait (since 2017); Malaysia (since 2015); Nigeria (increase from 20% to 30% in 2023 suspended); Paraguay (since 2022)
Low tax or no minimum tax level	Argentina ; Czechia ; Guatemala (no fiscal policy on new tobacco products); Israel (tax only final products, not components); Lao PDR (low tax due to investment agreement); Montenegro (below EU requirements); Mozambique (low taxes); U.K. (no import duties on cigars and cheroots); Yemen (57% tax rate, whereas law requires 90%)
Tax exemption	Bangladesh (new leaf processing factory); Belgium (no tax on e-liquids); Cameroon (use of local leaf); Denmark (nicotine pouches untaxed for 3 years); India (exemption on bidi cess); Malawi (small scale farmers, 25% export tax allowance for exporters); Senegal (bulk tobacco use for manufacture); Solomon Islands (raw materials, machinery); Uruguay (small scale growers); Venezuela (no tax for export); Vietnam (no duty up to 71,835 tons imported leaf)
Lower tax on nicotine or “smoke-free” products compared to cigarettes	Italy (60% lower for e-cigarettes, HTPs); Japan (30% lower for HTPs); Tunisia (consumption tax reduced from 135% to 10% for molasses; from 135% to 50% for HTPs)
Delayed implementation of tax increases	Bulgaria (4 years); Ghana (8 months to affix tax stamps); PNG ; Peru (bill to tax e-cigarettes delayed); Romania ; Slovenia ; Sri Lanka (indexing of prices)
Tax rate decrease	Ecuador ; Georgia (50% reduction for snus, hookah); Kazakhstan (HTPs); Madagascar (2% lower for use of local leaf); New Zealand (50% reduction for HTPs); Türkiye ; Uganda (locally produced cigarettes)

DELAYED TOBACCO CONTROL LAWS BENEFITED THE INDUSTRY

Omnibus tobacco control laws in at least eight countries, all Parties to the WHO FCTC, have been delayed, providing the industry an unregulated or weakly regulated environment to grow its business.

In Africa, draft tobacco control bills have not been tabled in Parliament in **DRC**, **Malawi**, **Mozambique**, **Tanzania** and **Zambia**. While the draft tobacco control bill in Zambia has been languishing since 2018, a Tobacco Act protecting the industry was passed in 2022.¹³²

Chile’s tobacco control bill has been under consideration in Parliament since 2020. The delay in adoption has also affected the country’s adoption of standardized packaging for tobacco products.

The promulgation of **Jamaica’s** Tobacco Control Bill 2020 into law continues to be delayed. According to BAT’s local subsidiary, Carreras, the law “significantly impairs the Group’s ability to communicate with consumers, differentiate our products in the marketplace or launch future products which pose a risk to the Group’s long-term sustainability.”¹³³ In **PNG**, the Tobacco Control Act was passed in 2016, but the implementing regulations have been delayed due to TI interference in prolonging the finalization process.¹³⁴

GOVERNMENTS DELAYED REGULATIONS ON E-CIGARETTES AND HEATED TOBACCO PRODUCTS

As governments around the world acted to either ban or regulate emerging nicotine products, the industry interfered by trying to delay implementation of the law or by suing the government.

In **South Africa**, the Tobacco Products and Electronic Delivery Systems Control Bill has faced persistent delays from industry interference and opposition campaigns since it was tabled in mid-December 2022.^{135,136,137} The Parliament held 27 public hearings across all nine provinces as part of the consultation process and the bill is still being debated. In **Costa Rica**, following a court case challenging the decree on e-cigarettes and HTPs, the regulation was finally published in August 2024, two years after the legally established deadline, following a mandate from the Constitutional Court.¹³⁸

In **Belgium**, when HTPs were classified as a tobacco product, Philip Morris Benelux challenged this classification, disputing the characterization of heated tobacco as “a product intended for smoking” and brought the case to the Council of State¹³⁹ which ruled in its favor. In May 2023, in another court case, BAT and PMI challenged the Royal Decree banning the sale of nicotine pouches, arguing this product is less harmful than cigarettes and a ban may be counterproductive.¹⁴⁰ These court cases have contributed to the delay in the regulation of these products.

In **New Zealand**, just days before the new vaping regulations came into force on March 21, 2024, the government delayed its implementation by six months. The rules required vaping products to comply with additional safety measures to protect children. The delay enabled PMI to sell its HTP devices which would have otherwise been pulled from the market.¹⁴¹

GOVERNMENTS DELAYED BANS ON FLAVORS

The European Union’s November 2022 directive banning flavors in heated tobacco gave Member States until July 23, 2023 to bring national legislation in line with the Directive. In previous cases, some Member States have managed to align national legislation within 12 months or less of an EU directive. In the **Netherlands**,

the prohibition of flavors in e-cigarettes came into force in January 2024, giving manufacturers six more months to comply with the new standard.¹⁴²

Sri Lanka’s ban on the sale of flavored cigarettes has allegedly been violated by the TI, resulting in the National Authority on Tobacco and Alcohol to file complaints against Ceylon Tobacco Company in the districts of Matara, Anuradhapura and Colombo.¹⁴³ In **Thailand**, the ministerial regulation to ban tobacco additives, including flavors, first proposed in November 2022, was approved in November 2024 and will go into effect after four years.^{144,145}

In the **U.S.A.**, the FDA’s proposed bans on menthol cigarettes and flavored cigars were expected in 2023 after being postponed multiple times amid lobbying pressure, but were eventually shelved.¹⁴⁶ On January 4, 2025, the government formally withdrew the two FDA-proposed product standards, which was seen by tobacco control advocates as an outcome favorable to the industry.¹⁴⁷

GOVERNMENTS SUBSIDIZED TOBACCO CULTIVATION TO MAKE IT VIABLE

Tobacco farming is not only capital- and labor-intensive, requiring significant investments to make it viable, it is destructive to farmers’ health and the environment. The tobacco control treaty requires governments to shift away from tobacco dependence (by promoting alternative livelihoods (Art. 17) and safeguarding environmental and occupational health). In line with this, the European Union stopped giving incentives for the tobacco industry to run its business by discontinuing direct subsidies for tobacco growing in 2023;¹⁴⁸ however, subsidies are still given to farmers in **Bulgaria**, **Montenegro** and **Switzerland** (Table 3).

In **Tanzania**, tobacco production is increasing, and the President has offered TZS 11.2 billion (about US \$5 million) as a subsidy¹⁴⁹ as well as other support from the government¹⁵⁰ to the tobacco sector. In the **Philippines**, financial support is given by law to tobacco growers and distributed through the National Tobacco Administration (NTA). For the cropping year 2024-2025, the NTA distributed P100 million (US \$1.7 million) from the total tobacco fund of P550.5 million (US \$9.4 million)¹⁵¹ that was allocated by the national government.¹⁵² Tobacco subsidies can come in a variety of forms (Table 3).

TABLE 3: TOBACCO SUBSIDIES IN SELECT COUNTRIES

Argentina	The Special Tobacco Fund (FET), funded by a tax on tobacco products created through the National Tobacco Law No. 19.800 which works as a subsidy, grants tax benefits to the tobacco production supply chain. ¹⁵³
Bulgaria	National subsidies to tobacco growers are 3 times more than the value of tobacco produced. ¹⁵⁴
Indonesia	Tobacco farmers receive support from local governments, funded through a 2% tobacco excise tax, sharing revenue to finance a universal health insurance program (50%) and tobacco growing activity (50%). ¹⁵⁵
Lebanon	Subsidies are given through a price support system with a set quote and price. ¹⁵⁶
Malawi	Tobacco farmers receive a variety of subsidies, especially tax incentives. ¹⁵⁷
Montenegro	24 tobacco growers were given €16,000 total in subsidies. ¹⁵⁸
Philippines	15% of tobacco excise tax revenues are allocated to Virginia tobacco-growing provinces ¹⁵⁹ and 15% of incremental tobacco excise tax revenues to burley and native tobacco-growing provinces. ¹⁶⁰
Poland	BAT Polska received three subsidies from the National Fund for Environmental Protection and Water Management in 2023-2024 for a total sum of PLN 8,973,398.52. ^{161,162,163}
Romania	Provides direct subsidies to raw tobacco growers under the Transitional National Aid (ANT) scheme, offering rates of over €1,600 per hectare in 2024, making tobacco one of the most subsidized crops per hectare. ^{164,165}
Switzerland	A subsidy of CHF 40,000 (US \$44,990) was given per hectare of planted tobacco. ¹⁶⁶ 114 farmers received the subsidy to grow tobacco on about 366 hectares. ¹⁶⁷
Tanzania	The President offered TZS 11.2 billion (about US \$5 million) as a subsidy to support the tobacco sector. ¹⁶⁸
U.S.A.	The 2024 Farm Bill (H.R. 8467), covering crop years 2022–2024, continued to provide Area & Other (A&O) subsidies and reinsurance support for farmers, including tobacco growers, effectively subsidizing tobacco production. ¹⁶⁹
Uruguay	Tobacco growers benefit from tax exemptions from employer contributions to benefit growers and family producers. ^{170,171}

DUTY-FREE TOBACCO PRODUCTS WERE STILL ALLOWED BY MOST COUNTRIES

Ninety-six countries still allow some form of duty-free tobacco for international travelers (Table 4). Only two countries (**Maldives** and **Brunei**) have banned duty-free tobacco while two others allow international travelers to bring an opened pack.

The **Maldives** banned the import and sale of e-cigarettes as of December 2024¹⁷² and removed duty exemptions for tobacco products, but international travelers continue to be able to purchase duty-free tobacco in most countries (Table 4).¹⁷³ Of the 100 countries surveyed for this Index, only **Brunei** has completely banned duty-free tobacco products and

every cigarette brought into the country is charged BND 0.50 per stick.¹⁷⁴ **Palau** has applied the lowest limit of duty free purchase to 20 cigarettes or one cigar. Similarly, **New Zealand** allows just 50 cigarettes or 50 grams of cigars or tobacco.

India allows 100 cigarette sticks or 25 cigars, while the bulk of the countries allow 200 cigarette sticks or 50 cigars.

International travelers within EU countries are allowed a generous 800 cigarettes or 200 cigars for personal use. Travelers to **Türkiye** can bring duty-free 600 cigarettes or 10 single-use electronic cigarettes or one vaping device and 30 ml of vape liquid.¹⁷⁵

TABLE 4: STATUS OF DUTY-FREE TOBACCO PRODUCTS

	CIGARETTES	CIGARS	WEIGHT (GM)
Palau	20 sticks	1	15 gm
New Zealand	50 sticks	n/a	50 gm
India	100 sticks	25	125 gm
Bolivia, Cameroon, Costa Rica, Ecuador, Georgia, Japan, Myanmar	400 sticks	50	500 gm
Kuwait	500 sticks	50	900 gm
Türkiye	600 sticks	100	250 gm
EU countries	800 sticks	200	1000 gm
Most other countries	200 sticks	50	250 gm

04

Governments freely
engaged with the industry



Governments should interact with the TI only when strictly necessary and only to the extent necessary to effectively regulate the industry and tobacco products. Unnecessary interactions occurred when high-level officials met with the industry to foster relations, made agreements to collaborate, used their diplomatic missions to promote the TI, spoke at industry-sponsored conferences and gave trivial awards to the industry (Figure 3).

HEADS OF STATE AND MINISTERS ENDORSED THE INDUSTRY

There were many instances when heads of state promoted the TI by visiting its facilities, attending its events, giving it an audience or endorsing its investments. These appearances drew public-health criticism for undermining WHO FCTC Article 5.3.

In March 2025, the President of **Lebanon** visited the Regie, the state-owned tobacco enterprise, and endorsed its work.¹⁷⁶ The Minister of Finance¹⁷⁷ and the Speaker of the Parliament¹⁷⁸ met with the Regie on several occasions and acknowledged its work and achievements.

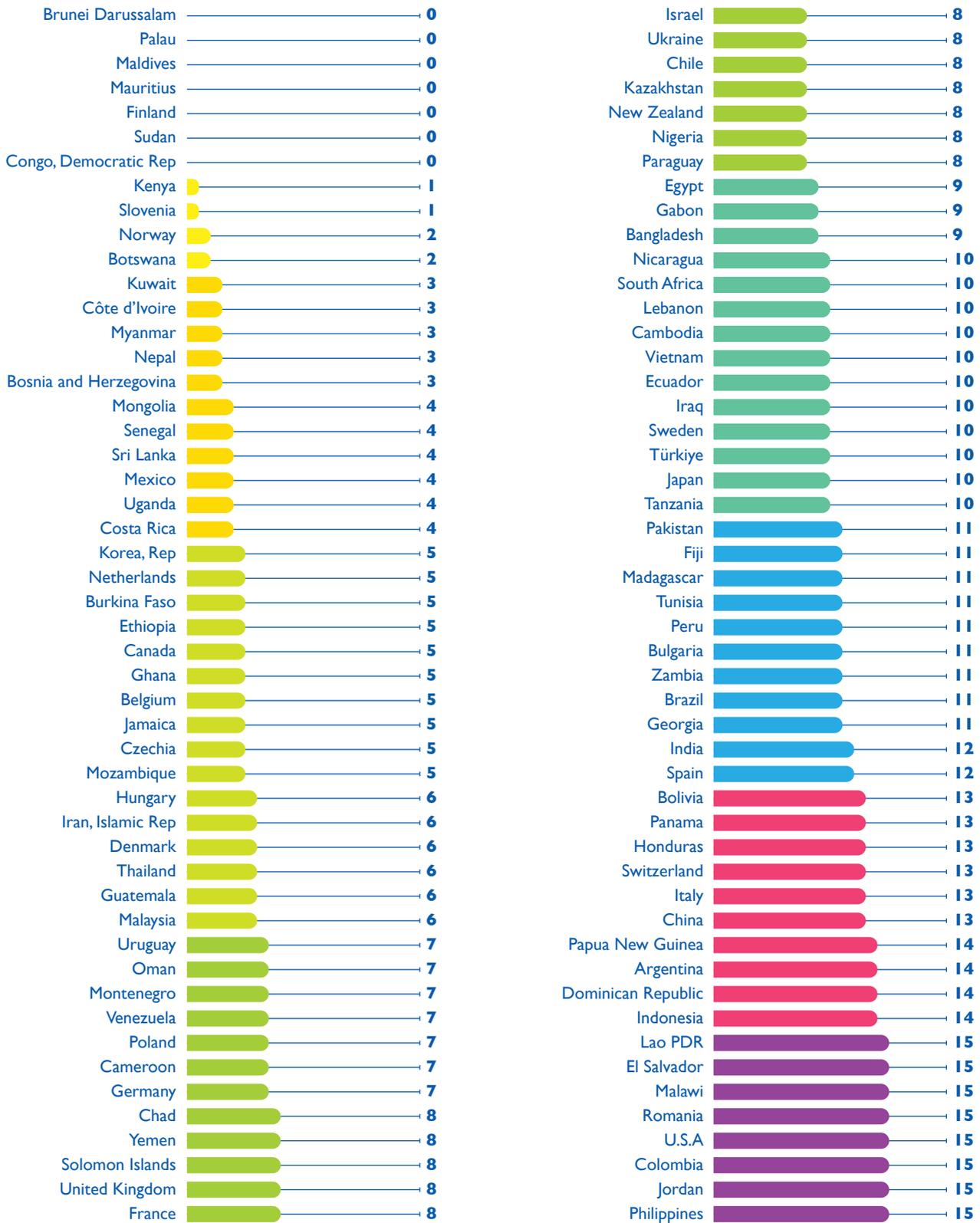
In **Tunisia**, which also has a state-owned enterprise, members of the Parliamentary Finance and Budget Committee conducted an official visit to RNTA (Régie Nationale des Tabacs et des Allumettes) headquarters in May 2025.¹⁷⁹ In **Yemen**, the Minister of Industry and Trade participated in Kamran Company's product launch and praised the company for making a great contribution to the national economy and expressed the ministry's support.¹⁸⁰ In **Nigeria**, in February 2024, former President and the Executive Governor of Oyo State attended BAT Nigeria's 20th anniversary event.¹⁸¹ In February 2024, the President of **Tanzania**, during her visit to the Vatican, met with PMI's Senior Vice President where they committed to procure 12,000 tons of processed tobacco from Tanzania for the next five years.¹⁸²

In June 2025, the President of **Kazakhstan** met with PMI Central Asia's head about its investment projects. The subsequent "handshake" photo on the President's website is a public endorsement of the industry.¹⁸³ In September 2023, **Romania's** Prime Minister delivered a keynote speech¹⁸⁴ at the 30th anniversary event of Philip Morris Romania at the company's facility¹⁸⁵ and spoke favorably of PMI's planned investment and said that it aligned with government policy to support such industries.

In the **Philippines**, the First Lady and the Secretary of Agriculture led the inauguration of the manufacturing facility of PMI and its Philippine affiliate, PMFTC, in April 2024.¹⁸⁶ Parliamentarians in **Indonesia**¹⁸⁷ and **Jordan**¹⁸⁸ visited the local Philip Morris subsidiary's factory. The **Indonesian** Minister of Investment and Downstream Industry and the Acting Governor of East Java inaugurated the opening of PT Sampoerna's hand-rolled kretek cigarette facilities in Blitar and Tegal.¹⁸⁹

BAT's subsidiary, Pakistan Tobacco Company, lobbied the **Pakistani** Prime Minister to amend the country's tobacco control law and allow it to manufacture kiddie packs (10 sticks) for export to Sudan after its manufacturing there was affected due to civil war.¹⁹⁰ Although the Prime Minister approved the request, the Ministry of Health stood firm and refused to change the law banning kiddie packs.¹⁹¹

FIGURE 3: GOVERNMENTS ENGAGE IN UNNECESSARY INTERACTION WITH THE TOBACCO INDUSTRY



The lower the score, the better the ranking



NON-HEALTH SECTORS COLLABORATED WITH THE INDUSTRY TO TACKLE SMUGGLING

Tackling illicit trade of tobacco products is an area of vulnerability for governments. Most customs departments face immense challenges tackling illicit trade, providing an opportunity for the industry to offer solutions and trainings to mitigate, and persuade governments not to increase taxes. At least 20 governments collaborated with the TI through MOUs, training sessions, enforcement activities and the acceptance of resources in kind (Appendix 2). Most of the countries that collaborated with the industry are non-Parties to the FCTC Protocol to Eliminate Illicit Trade in Tobacco Products;¹⁹² a context that heightens conflict-of-interest risks given documented findings by tribunals and regulators in several jurisdictions regarding the complicity of the tobacco industry in illicit trade.

The Customs Commission of **Ethiopia** terminated its MOU with JTI in 2024 in line with the government's compliance with Article 5.3.¹⁹³

Several countries including **Lao PDR**, **Lebanon**, the **Netherlands** and the **U.S.A.** have a long-term collaboration with the industry to tackle smuggling. The Lebanese Regie is a state-owned enterprise and even has its own anti-smuggling unit. The Italian Carabinieri Corps, Ministry of Defence, renewed its agreement with Philip Morris Italy for another three years to promote safety in Italian tobacco shops.¹⁹⁴ In the U.S.A., PMI sponsored a multi-week training for both state and local law enforcement through the Department of Homeland Security–PMI framework.¹⁹⁵

In **Georgia**, the Revenue Service and Customs Service accepted JTI's donation of detection dogs and drones to identify smuggling, in addition to training sessions for staff.¹⁹⁶ **Uganda's** Revenue Authority accepted a cigarette destruction machine donated by BAT,¹⁹⁷ while in **Sri Lanka**, Customs officials handed the seized illicit cigarettes to Ceylon Tobacco Company for destruction.¹⁹⁸

POLICYMAKERS ACCEPTED SPONSORED STUDY VISITS TO TOBACCO FACILITIES

Members of parliament, ministers and governors have accepted sponsored study visits to tobacco companies' facilities, the most common being to PMI's heated tobacco product research facility, the Cube, in Neuchâtel, Lausanne, Switzerland, which conducts research on heated tobacco and nicotine products (Appendix 3)—visits that have faced public criticism in several countries.¹⁹⁹

In 2025, a current member of the **U.K.'s** House of Lords disclosed that he went to PMI's facility in Neuchâtel and that his flights and accommodation were paid for by PMI.²⁰⁰

Youth parliamentarians from **Denmark** were sponsored on a trip to PMI's facility in May 2022,²⁰¹ and two months later, several of these parliamentarians criticized the government's proposed legislation to raise the purchase age of tobacco and nicotine products from 21 to 25 years, referring to it as “out of proportion” and “pointless.”²⁰²

Following a trip by two **Finish** members of parliament to PMI's Neuchâtel facility in May 2024, who did not declare expenses of their paid trip in the transparency register, the National Audit Office of Finland has launched an investigation into lobbying by tobacco companies.²⁰³

In **Colombia**, during the period of the final debate on Law 2354 to regulate the use, sale and advertising of e-cigarettes in March 2024, Philip Morris invited 12 Congress members to visit its Neuchâtel facility, seen as an attempt to block the law's approval,^{204,205} however, the trip was cancelled, and the law was passed on May 9, 2024.

In May 2024, three senators from **Brazil** went on a sponsored study trip to PMI's facility in Bologna, Italy, where its HTPs are manufactured.²⁰⁶ Also in May, a Brazilian governor and state officials visited JTI headquarters in Japan during an international mission.²⁰⁷

The most recent record of a study trip is by the **Mozambican** Minister of Economy, who made an official visit to PMI's facility in Neuchâtel in July 2025 on the sidelines of the World Intellectual Property Organization meeting in Geneva.²⁰⁸

DIPLOMATIC MISSIONS PROMOTED THE TOBACCO INDUSTRY

Using public resources to assist a tobacco company's business confers privileged access and benefits that should be prohibited under the Article 5.3 Guidelines. For this reason, diplomatic missions (high commissions, embassies and consulates), are specifically covered under Article 5.3 Guidelines, as clarified when FCTC Parties adopted a decision in 2014²⁰⁹ that their implementation measures would apply to all parts of government. The **U.K.**²¹⁰ and **U.S.A.**²¹¹ have specific policies to prevent their foreign missions from promoting tobacco products/companies in foreign countries; however, the diplomatic missions of most countries remain vulnerable to influence from the industry. The Index recorded at least five government missions promoting or endorsing the TI (Appendix 4).

The **Japanese** Embassy in at least seven countries, **Bolivia, Cambodia, Egypt, Indonesia, Lebanon, Nicaragua** and **Tanzania**, was lobbied by JTI to support and promote its business. The embassies participated in events such as JTI's CSR activities, facilitated MOUs and explored future investment opportunities for JTI in the country. In **Cambodia**, the Embassy facilitated an MOU between JTI and the Ministry of Environment to strengthen environmental conservation and sustainable development,²¹² and in **Tanzania**, an MOU was created between the government and JTI to purchase local tobacco leaves.²¹³

In **Egypt**, in March 2024, the Japanese Ambassador met with JTI at the inauguration of its new office in Cairo and discussed future investment opportunities to strengthen JTI's presence in Egypt.²¹⁴

The **Korean** Embassy in **Indonesia, Kazakhstan** and **Türkiye** supported KT&G to conduct its activities. In **Kazakhstan**, the Korean Ambassador joined the Almaty Governor and KT&G CEO to attend the inauguration of its new factory.²¹⁵ In **Indonesia**, the Korean Ambassador and the South Korean Ambassador to the ASEAN, participated in KT&G's event in Jakarta to celebrate the 50th anniversary of diplomatic relations between the two countries.²¹⁶

The Chargé d'Affaires at the **Bangladesh** Embassy in **Tokyo** received a JTI delegation in November 2024, where he endorsed JTI's activities in Bangladesh and affirmed its business in Bangladesh would continue.²¹⁷

HIGH LEVEL GOVERNMENT OFFICIALS HANDED OUT INAPPROPRIATE AWARDS

While governments in most countries avoided giving any awards to the TI, high ranking public officials in at least 10 countries gave special recognition to tobacco companies for routine obligations (tax payment, facility upkeep, presenting annual reports) and for being an exporter. This is an unnecessary interaction that confers privileged access and state-backed prestige (i.e., preferential treatment contrary to Article 5.3 Guidelines) and normalizes tobacco industry CSR despite documented human-rights harms and inconsistency with SDG commitments (Appendix 5).

The President or Prime Minister, or their representative, in at least four countries, **Korea, Pakistan, Tanzania** and **Türkiye**, gave awards to tobacco companies for "Crime Prevention," "Second Highest Taxpayer," "Most Compliant Taxpayer" and "Top Exporter" respectively. The **Cambodian** government's award to JTI for Gold Tax Compliance in 2023 and 2024²¹⁸ came with a perk: They are exempted from audit for two years.

The **Bangladeshi** Minister of Commerce handed BAT Bangladesh an award for "Best Presented Annual Report,"²¹⁹ while the **Thai** Minister of Finance gave an "excellent" rating to the Tobacco Authority of Thailand from among 51 state enterprises.²²⁰

05

Transparency
and accountability
were lacking

Governments are obligated to ensure transparency by requiring disclosures from the tobacco industry about its activities and practices as well as disclosures of government interactions and interests. When procedures such as lobbyist registers, disclosure of meetings with the industry and periodic reporting by the tobacco industry are in place, the information can guide officials in preventing tobacco industry interference.

LOBBYISTS REGISTER HELP PROVIDE TRANSPARENCY

At least 14 countries, **Belgium, Canada, Finland, France, Germany, Italy, Peru, Panama, Poland, Hungary, Mexico, the Netherlands, Slovenia** and the **U.S.A.**, have a lobbying law and an established general register for all lobbyists which is accessible to the public. However lobbyist registers need to be compliant with Article 5.3.

In the **U.S.A.**, the Federal Lobbying Disclosure Act (LDA, 1995) mandates all lobbyists, including those representing tobacco and vape industries, to register and file regular reports detailing clients and expenditures. These filings are publicly available, letting stakeholders track the tobacco industry's federal lobbying activity.²²¹ A total of 1,275 registered state-level tobacco lobbyists and lobbying firms were active in 2025, a 24% increase from 2024.²²²

Germany's Federal Lobby Register, which came into force in January 2022 (amended on March 1, 2024), includes information on the identity of persons directly engaged in lobbying, areas of interest, lobbying budgets as well as a list of clients if the lobbying is carried out on behalf of third parties. Incorrect or late entries in the register constitute administrative offences, punishable with a fine of up to EUR 50,000 (US \$57,000).²²³

Canada's Lobbyist Registration Act requires all tobacco company lobbyists to register, including consulting lobbyists; however, there are no special restrictions on these lobbying activities beyond the general restrictions

outlined in the Act. Tobacco industry-sponsored or affiliated organizations are not required to report their funding sources or commercial alliances.²²⁴

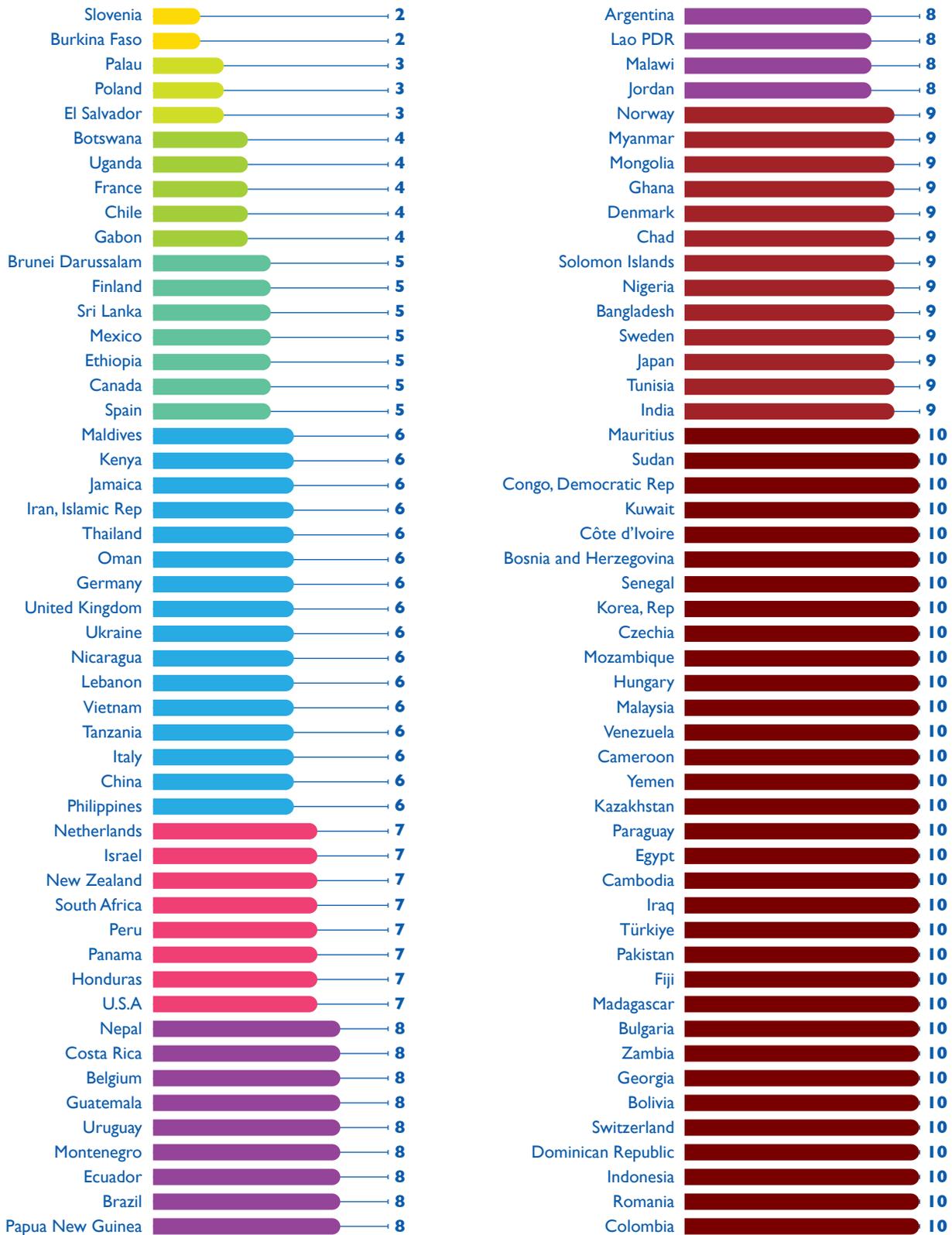
Mexico's Congress of the Union requires the registration of lobbyists,^{225,226} but the accreditation is optional as some legislators received unregistered lobbyists. The Senate's registered lobbyist list shows "health" as an area of interest, but it doesn't specify if the lobbyist is from the TI.

Colombia's House of Representatives has a register for lobbyists; however, it is voluntary. **Israel's** lobbyist register is limited only to the Knesset (legislative) building. **Slovenia's** Commission for the Prevention of Corruption maintains a public lobbyists register where 84 professional lobbyists (including foreign registrants) were listed up till 2023.²²⁷ But there is no specific system to track TI entities, nor require explicit registration of tobacco-funded organizations.

The **Netherlands** has a lobby register only for the House of Representatives.²²⁸ It is not mandatory for lobbyists to register, but registration has the advantage of gaining an access card. This access card gives access to the semi-public areas of the House. No tobacco industry lobbyists were registered between April 2023 and March 2025.²²⁹

In 2024, **Montenegro** adopted a new lobbying law which emphasizes transparency in the lobbying process, requiring the person being lobbied to submit an official note on the lobbyist to the competent authority.

FIGURE 4: LACK OF TRANSPARENCY



The lower the score, the better the ranking



The lobby register in the **U.K.** is voluntary. Only **Scotland** has an official lobbying register in which all regulated (face-to-face) lobbying must be recorded. The Central Government Corporate Transparency Commitments require government departments to publish details of ministers' gifts, hospitality, overseas travel and meetings on a quarterly basis. Additionally, the Department of Health and Social Care's guidance on Article 5.3 notes that all U.K. government departments or bodies should publish correspondence received from tobacco industry representatives, replies sent to tobacco industry representatives and minutes of any meetings.

In **Panama**, there is a general public registry for all companies or organizations, but no specific rules or laws that entities related to the TI must be registered. Organizations related to their interests can participate in commissions such as the National Assembly, but each party must submit a list of its representatives to be accredited.

LACK OF DISCLOSURE OF INTERACTIONS BETWEEN GOVERNMENT AND TOBACCO INDUSTRY FACILITATES INTERFERENCE

In **Peru**, transparency in meetings between authorities has been regulated under Law No. 32159²³⁰ since November 2024. Prior to the enactment of this law, industry representatives intervened in Congress, weakening public health measures during the legislative process. As a result of the interactions, significant rollbacks were made to the provisions in Bill No. 3437/2022-CR, including the removal of the regulation of tobacco and nicotine products, exclusion of plain packaging and the rejection of a ban on flavored cigarettes.

Botswana's Tobacco Control Act requires public disclosure of TI interactions, including meeting agendas, attendees and outcomes. In 2025, the Ministry of Health rejected a proposal from African Global Health, a tobacco-affiliated group promoting tobacco-linked "harm reduction" products including e-cigarettes and vapes.^{231,232} While the Act promotes transparency, it lacks a formal registry of industry affiliates or lobbyists.

In **New Zealand**, there is no requirement for the TI and affiliated entities to register with the government, and it is unclear how the relationship between the TI and the government is moderated. In November 2023, a PMI lobbyist attended the swearing-in ceremony of the new government ministers.²³³

The Standards Organisation of **Nigeria** (SON) occasionally publishes meeting summaries involving industry actors, but most government agencies fail to comply with mandatory transparency requirements. Interactions often surface through media reports or in the phrasing of industry-friendly drafts, rather than through proactive government disclosure.

06

Public officials
grappled with
conflicts of interest

The Article 5.3 Guidelines provide clear guidance on how government officials can avoid conflicts of interest by prohibiting all contributions from the TI and enacting rules to protect public health policies from its interference. However, legislators in many countries have opened their doors to industry interference by accepting TI donations for political campaigns or other contributions. Some officials have become involved in tobacco businesses by taking up positions in the TI (Figure 5).

More than 20 countries have banned TI donations to political campaigns or have applied restrictions. **Botswana, Bulgaria, Canada, Ethiopia, France, Israel, Lebanon, Nigeria, Ukraine, Uruguay** and **Venezuela** are some of the countries that have prohibited political donations.

Botswana's Tobacco Control Act specifically bans financial or other contributions from the tobacco industry to any political party, candidate or campaign; as well as the soliciting or accepting of any financial or other contribution from the tobacco industry; penalties apply.²³⁴ This provision of the law overrides any existing omnibus election codes that may be permissive. **Nigeria's** National Tobacco Control Act explicitly prohibits tobacco industry funding of political parties, candidates or campaigns,²³⁵ however the lack of transparency in the political financing processes makes compliance impossible to verify.

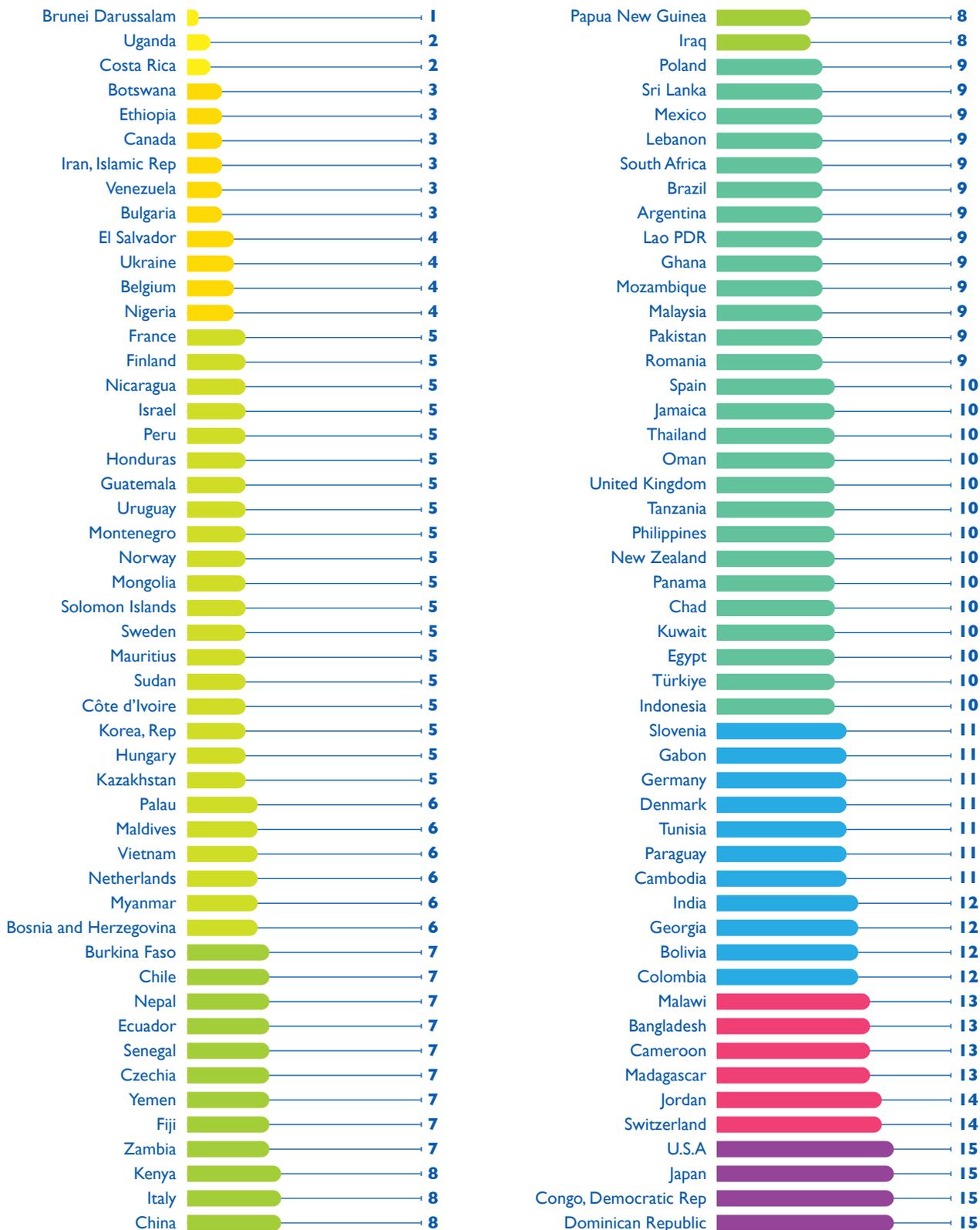
Ukrainian law prohibits all forms of financial or other support from the TI for events, individuals or groups, including political parties or politicians, sportsmen, artists and all educational institutions, regardless of whether the contribution is publicized or not.²³⁶

Several countries, including **Brazil, Bulgaria, Canada, Chile, Colombia, Ecuador** and **Sri Lanka**, do not allow contributions from corporations. Under **Sri Lanka's**

Election Expenditure Act 3 of 2023, it is prohibited to accept or receive a donation or contribution from any company registered under the Companies Act No. 7 of 2007 which includes tobacco companies.²³⁷ In **Canada**, there are several measures to reduce conflicts of interest between the government and any commercial interests including the federal Conflict of Interest Act, Treasury Board policies on Conflict of Interest and Post-Employment, which significantly limits the acceptance of gifts, hospitality or any benefits.

Political contributions are allowed in **Chile, France, Germany, the Netherlands, New Zealand, Panama, Solomon Islands, South Africa, the U.K.** and the **U.S.A.**, but must be declared. In the **U.S.A.**, tobacco companies and their political action committees (PACs) donated to candidates and parties across the political spectrum, with no requirement for real-time public disclosure beyond existing campaign finance regulations. Altria's PAC contributed a total of US \$821,000 to federal candidates in the 2023–2024 election cycle, and PMI and affiliates donated at least US \$426,000 during the same period.^{238,239} Between January 2023 to July 2025, tobacco companies have spent US \$8,375,000.

FIGURE 5: CONFLICT OF INTEREST PROBLEM PERSISTS



The lower the score, the better the ranking



THE REVOLVING DOOR BETWEEN PUBLIC OFFICIALS AND INDUSTRY EXECUTIVES CONTINUED

A recurring problem across the globe that creates opportunities for undue industry influence on tobacco control policies is a revolving door of retiring senior government officials joining tobacco companies or industry executives taking up senior government positions (Appendix 6).

Exit policies are important to ensure there is a suitable cooling off period to avoid conflict of interest situations. Public officials in **Nepal**, after their retirement, must wait at least five years before they can join the tobacco industry.

At least 17 countries registered instances of senior government officials moving to an industry position when they left or retired from the government.

In **Pakistan**, a former Principal Secretary to the Prime Minister was appointed Chairman of Pakistan Tobacco Company in April 2025. **Romania's** former senior advisor to the Ministry of Health became Philip Morris România's Head of Scientific and Medical Affairs. **Slovenia's** former State Secretary became a registered lobbyist for PMI.

In **Ecuador**, former Director of Corporate Affairs of Philip Morris subsidiary ITABSA was appointed Ecuador's new ambassador to the U.S.A in 2025. In **New Zealand**, a former Corporate Affairs Manager of PMINZ (2011-2014), who "actively worked against the Government's plans to increase excise on tobacco and plain packaging,"²⁴⁰ became the transport minister in 2023. A former BAT executive in **Ghana** became the country's Deputy Minister of Energy.

In at least five countries (Appendix 6), public officials held positions with the industry simultaneously. In **Bangladesh**, an Additional Secretary in the Ministry of Finance was also a Non-Executive Director of the Board of BAT. In **Sri Lanka**, in September 2022, the Chairman of Ceylon Tobacco Company was also the Head of State-Owned Enterprise Restructuring Unit, Ministry of Finance. While Article 5.3 calls on governments to treat state owned tobacco industry the same way as any other tobacco industry, in **Tunisia**, the President of the Board of Directors of RNTA, a state-owned enterprise, was also the Minister of Finance.

07

Governments can
protect themselves from
industry interference

Article 5.3 Guidelines provide a range of measures governments can take to protect their tobacco control policies from being derailed by commercial and vested interests. Eighteen countries made progress in either adopting new measures or implementing existing sector-wide codes of conduct, guidance, circulars or legislation to protect their policies from industry interference (Figure 6).

Countries can either incorporate Article 5.3 into their legislation or draw up administrative measures, whichever works effectively for them. In November 2024, **Peru** passed legislation on the Control of the Consumption of Tobacco, Nicotine, or Related Products (Law No. 32159)²⁴¹ which includes provisions prohibiting industry participation in the development and implementation of policies related to the control of tobacco, nicotine or their substitutes. In so doing, Peru joins several other countries, including **Botswana**,²⁴² **Bosnia and Herzegovina**, **Chad**,²⁴³ **Ethiopia**, **Gabon**, **Lao PDR**,²⁴⁴ **Nepal** and **Uganda**,²⁴⁵ who have incorporated Article 5.3 into their national tobacco control legislations. Legislative measures are ideal because they have implementing regulations including penalties for non-compliance.

Ethiopia's Proclamation 1112/2019²⁴⁶ mandates that a procedure be established to disclose all records of interactions between government agencies and the TI. To ensure transparency and accountability, the Food and Drug Authority has developed a code of conduct for members of the National Multisectoral Tobacco Control Steering Committee. This code is designed to establish clear procedures for documenting and reporting any meetings or discussions with TI representatives, ensuring all interactions are recorded and publicly disclosed.

Several countries, including **Brunei**, **Ethiopia**, the **Netherlands**, the **Philippines**, and the **U.K.**, are implementing their sector-wide codes of conduct, guidance or circulars on Article 5.3 Guidelines which apply to all public officials.

In December 2024, **Canada** adopted a cross-government guidance on TI interference in accordance with Article 5.3 Guidelines.²⁴⁷ The guidance applies to all federal public service representatives and employees across Canada, covering about 350,000 officials. The guidance recommends against accepting gifts and contributions from the TI.

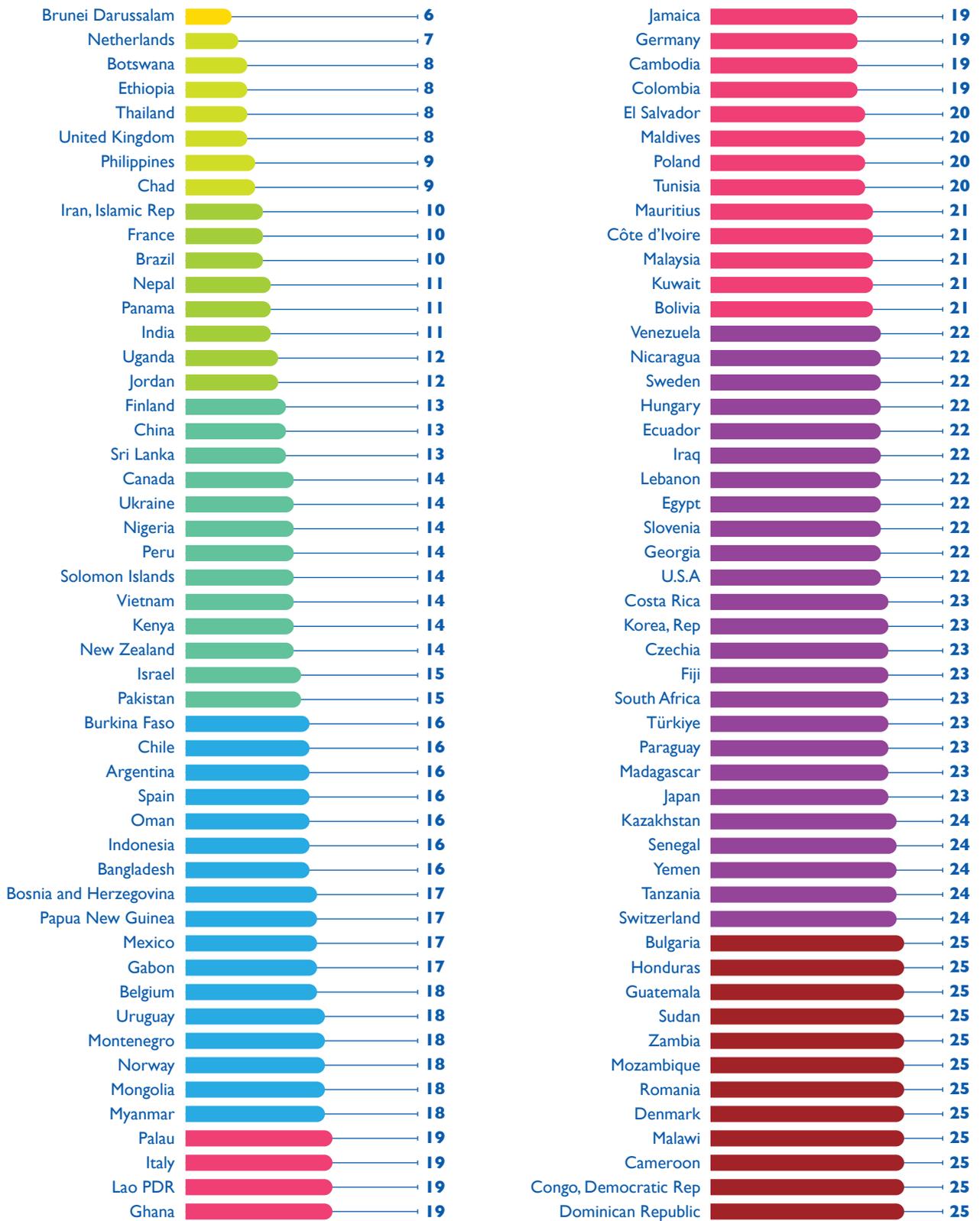
MPs, senators, parliamentary staff and federal Crown corporations are, however, exempt from the guidance as they are not classified as public service representatives.

The government of the **Netherlands** has a protocol for civil servants interacting with the TI and its representatives. Additionally, all civil servants are required to follow the Code of Conduct on Integrity (Gedragcode Integriteit Rijk), which encompasses guidelines on interacting with TI lobbyists, making specific reference to Article 5.3.²⁴⁸ However, the Dutch Parliament is not covered in this code because they are elected officials.

Adoption of guidance or implementing regulations on Article 5.3 was delayed in several countries, including **Jamaica**, **Sri Lanka** and **Uganda**. In **Uganda**, the implementing regulations to limit interactions with the TI, as required in the country's Tobacco Control Act (Part VIII),²⁴⁹ have been in the drafting stage for almost 10 years. In **Jamaica**, preventive measures to regulate interactions between public officials and the TI have been included in the draft Tobacco Control Bill,²⁵⁰ which has been delayed since 2020. **Sri Lanka's** National Authority on Tobacco & Alcohol developed national guidelines for implementation of Article 5.3 in 2019,²⁵¹ but the administrative orders have not been formulated yet.

In 2010, the **Philippines** was the first country globally to adopt an Article 5.3 policy (Civil Service Commission-Department of Health Joint Memorandum Circular [JMC], which limits all public officials' interactions with the TI to only when strictly necessary), but it has been severely compromised for the past two years. Non-health departments, particularly Social Welfare and Development, and Agriculture, set aside the JMC and accepted a donation^{252,253} from and endorsed the TI,^{254,255} respectively. Although the DOH participated in these activities, it has since maintained it will adhere to its mandate to shield the government from the influence of the TI.²⁵⁶

FIGURE 6: GOVERNMENTS THAT ACTED TO PROTECT THEMSELVES WITH PREVENTIVE MEASURES



The lower the score, the better the ranking



The departments of health in **Colombia, Ethiopia, India, Indonesia, Myanmar** and **New Zealand** adopted a code or guidance for their sector years earlier, but they have not advanced their code/guidance to cover the whole government, as Article 5.3 requires.

A consistent awareness-raising program on Article 5.3 is a legal obligation under the WHO FCTC but remains sparsely implemented across departments. **Ethiopia**²⁵⁷ conducts media campaigns, awareness programs and workshops across all branches of the government, while **Iran**²⁵⁸ has a policy on disclosure and management of conflicts of interest for persons involved in tobacco control policies. The lack of concerted efforts to publicize and inform all departments of their obligations under Article 5.3 has resulted in the industry targeting and influencing the non-health departments.

Being transparent when interacting with the industry and reporting meetings contributes to awareness raising. The departments of health of **Canada, Germany, New Zealand**, and the **U.K.** publicize scheduled meetings with the TI on their websites; however, this is limited to meetings with their departments only. The **U.K.** HM Revenue and Customs report their meetings with tobacco stakeholders,²⁵⁹ while the Department for Environment, Food and Rural Affairs reports its meeting with the private sector.²⁶⁰

NON-PARTIES TO THE WHO FCTC ARE FALLING BEHIND IN PROTECTING THEIR POLICIES

The five non-Parties to the WHO FCTC (**Argentina, Dominican Republic, Indonesia, Switzerland**, and the **U.S.A.**) faced high levels of industry interference, undermining and derailing their tobacco control policies. The **U.S.A.** and **Switzerland**, which are already ranked among the bottom three countries facing the highest levels of interference, further deteriorated in their scores.

The **U.S.A.**'s deterioration in the scores is reflective of several issues including the FDA's proposed bans on menthol cigarettes and flavored cigars which were formally withdrawn, representing a major policy concession to industry pressure.

Switzerland hosts the headquarters of the major transnational tobacco companies, which enjoy unprecedented political access. Parliamentarians openly

represent tobacco interests, and lobbyists and industry-linked individuals occupy influential political positions. The industry also participated in official consultations and informal processes, sometimes even drafting policy language adopted by authorities. This has allowed the industry to directly influence legislation, watering down and stifling tobacco control measures.

The **Dominican Republic's** tobacco control measures are 20 years old (2001, Law 42-01 and Law 48-00) and have not been updated. Instead, the government has an explicit pro-tobacco policy²⁶¹ and plans to relaunch the tobacco industry in the country. The President of the Republic and the Minister of Industry led the inauguration of a tobacco processing plant.²⁶² The Agricultural Bank granted RD \$260 million (US \$4.2 million) in direct financing to tobacco production, showing a state incentive to support the expansion of the sector.²⁶³

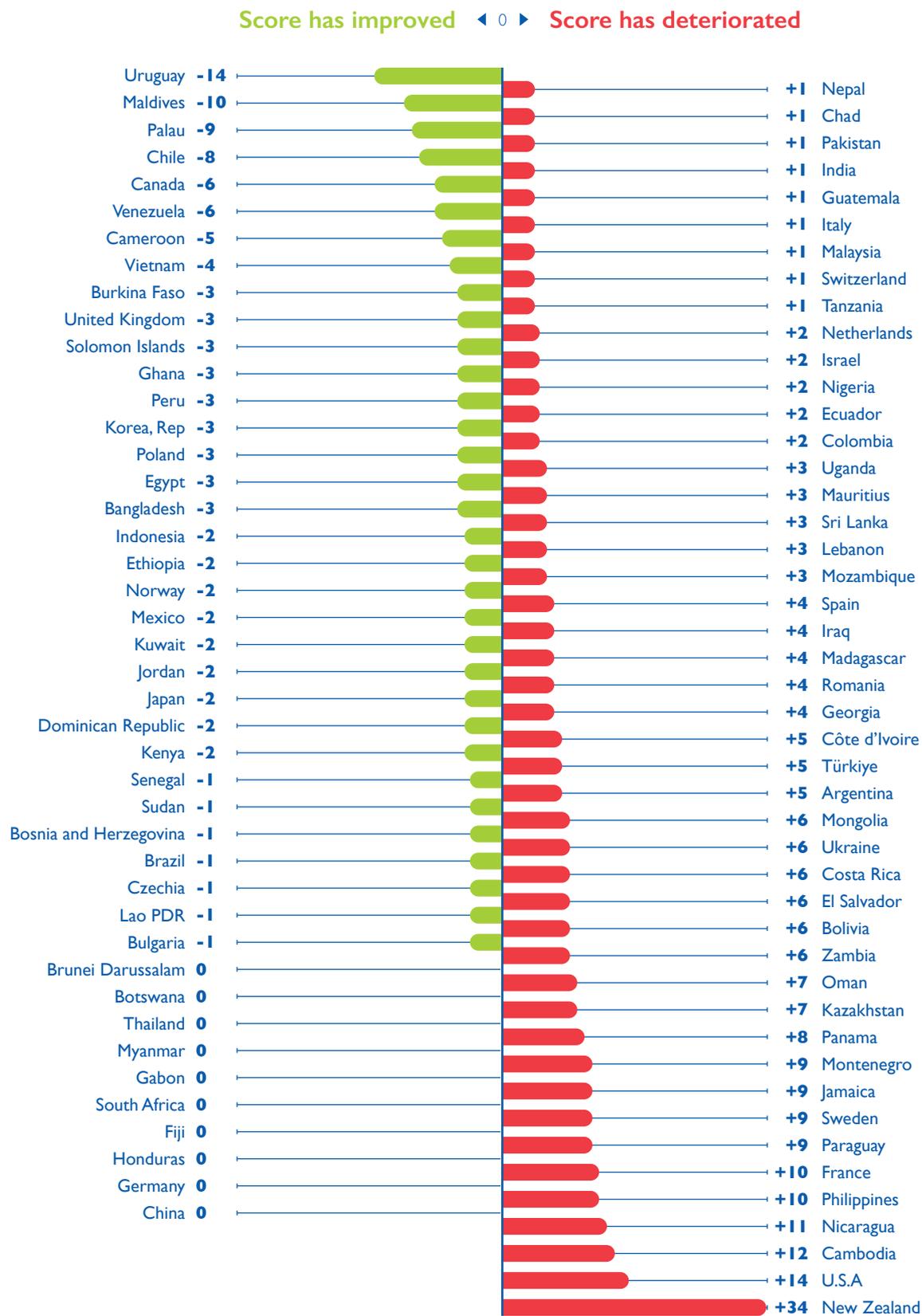
In **Indonesia**, senior public officials, from ministers to regional agency heads, have engaged in interactions that benefit the TI, such as visits to cigarette factories and inaugurations of production facilities, and support tobacco export and business development efforts. The Deputy Minister of Trade met with executives from PT HM Sampoerna (PMI's subsidiary) and expressed support for its "SMEs Go Global" initiative.²⁶⁴

Argentina shows increased industry interference in two key areas: taxation policy and the opening of the market for electronic cigarettes and heated tobacco products. The TI intervened with intense lobbying in the parliamentary debate on tax reform in 2024.^{265,266,267} It has also managed to involve former executives in government advisory or management positions. Despite the Ministry of Health's ban on the sale of electronic tobacco and nicotine devices, the TI held meetings with senior officials to negotiate entry of these products into the market.^{268,269}

MOST-IMPROVED AND MOST-DETERIORATED COUNTRIES

Of the 90 countries covered in the 2023 report, 34 countries showed improvements, 46 registered a deterioration and 10 remained unchanged in the Index (Figure 7). How much a country improves or deteriorates is not determined or confined by region or income level.

FIGURE 7: COMPARISON OF 90 COUNTRIES BETWEEN 2023 AND 2025



MOST IMPROVED

Uruguay, which in 2023 showed the worst deterioration among all the participating countries with the reversal of its 2009 ban on HTPs, is now the most improved. Some of the aggressive industry interference previously recorded was not seen during this survey period. The government was not seen allowing the TI to participate in any inter-institutional government body/multi-sectoral committee/consultative group involved in the development of public health policy or accommodating attempts to undermine tobacco control. No meetings between government officials and the tobacco industry were identified. Decree 282/022, which undermined the tobacco plain packaging law of 2019, was suspended by the court.

The **Maldives** has shown improvement by taking several significant actions such as banning e-cigarettes, removing duty exemptions on tobacco products and passing a law in May 2025 banning the import, production and sale of tobacco products to individuals born on or after January 1, 2009, effectively enacting a generational ban. The Maldives is one of the first countries to take such legislative action. The government maintained a firm stance in refusing offers of assistance, collaboration or policy input from the industry or its affiliates.

Palau prohibited the import, distribution, sale, possession and use of e-cigarettes, which came into force in May 2023.²⁷⁰ This legislation was passed with public health community support. Taking advantage of the 2024 World No Tobacco Day theme, “Protecting children from tobacco industry interference,” May was declared “Tobacco Industry Interference Awareness” month by the President and progress was made on a code of conduct on Article 5.3.

MOST DETERIORATED

New Zealand recorded the most deterioration in industry interference. Besides repealing strong tobacco control policies, citing industry arguments as rationale, the current government implemented several TI-friendly policies. Most notably, in 2024 the government implemented a 50% excise tax cut on HTPs, going against official advice of the Ministry of Health and Treasury.²⁷¹ Officials pointed out that PMINZ (as the sole supplier of HTPs in New Zealand) was likely to be the main beneficiary of this policy change.²⁷² Several revolving-door connections between the current government and the TI have been reported, including a tobacco lobbyist for PMINZ being photographed with MPs at the swearing in of the new government.²⁷³

In **Nicaragua**, there was no progress in addressing interference, and the government, at national and local levels, has been promoting domestic tobacco in the largest production locations and also promoting it in the country's embassies in the largest Nicaraguan markets, such as China and Europe.²⁷⁴ The Ministry of Economy and Commerce, Ministry of Labor and the Tourism Institute endorsed the Puro Sabor Festival, which promotes the country's tobacco brand.^{275,276}

LIMITATIONS

This report only cites publicly available information and therefore does not adequately capture all evidence of interference that has occurred. The information that is publicly available may not be the most up to date. Lack of government and industry transparency makes it hard to collect information on industry interference. The rankings of countries in this Index should be viewed with this limitation in mind.

CONCLUSION

As governments implement tobacco control measures and tobacco use continues to decline, the industry is aggressively trying to find ways to stay in the nicotine addiction business. It is opposing or sabotaging regulation, rebranding itself as innovative and as part of the solution and promoting its investments to policymakers. WHO FCTC Article 5.3 empowers governments to denormalize the industry and ensure their interactions with the industry are limited to only when strictly necessary for regulation. Governments can stand up to industry interference.

The findings of this Index show that interference has intensified and that the industry has not been denormalized in many countries, enabling it to create and exploit regulatory gaps. It has co-opted willing high-level policymakers, especially parliamentarians, heads of state and ministers, to champion its business and do its bidding to undermine or derail strong tobacco control. Officials have endorsed the industry and given their support by accepting its CSR activities, donations and other in-kind contributions.

The lack of transparency in governments' interactions with the industry has provided a breeding ground for interference. The absence of lobby registers and disclosures, and the failure to inform the public about meetings with the industry lets this interference continue.

The lack of a regular whole-of-government awareness campaign about countries' obligations under Article 5.3, and the lack of a specific code or directive to guide public officials accordingly, has left the non-health sector vulnerable to industry enticement, lobbying and influence.

Only governments can correct this situation. When they act to limit interactions with the industry to only when strictly necessary and are transparent about their interactions, they are able to curb the interference and protect public health. The experiences of countries who successfully implemented good governance measures serve as best practice for others. The advancement made in countries that took action shows industry interference can be curbed so tobacco control can progress.

“The findings of this year’s Index are a stark reminder that the tobacco industry continues to interfere with health policies worldwide, exploiting gaps in governance and transparency. Governments must act decisively to protect public health by fully implementing Article 5.3 of the WHO FCTC, ensuring transparency in all interactions, and rejecting industry influence in any form. Only by doing so can we safeguard progress and prevent industry tactics from undermining evidence-based tobacco control measures.”

Vinayak Prasad,
World Health Organization

RECOMMENDATIONS

Governments can and must halt TI interference. The quicker they act to protect and advance their tobacco control policies, the better they can protect public health. Article 5.3 Guidelines calls on governments to limit interactions with the industry to only when strictly necessary and to be transparent. Specific actions include the following:

1

The whole government must act cohesively to curb TI interference. The government must act as a whole and cohesively to stop TI interference and implement Article 5.3 as shown in the exemplary actions taken by 18 countries.

2

Adopt legislation or a directive or code on Article 5.3 to apply to all public officials. This should include parliamentarians, heads of state and ministers.

3

Require greater transparency for increased accountability. Transparency when dealing with the TI will reduce instances of interference and will help hold government officials and the industry accountable. All interactions with the TI must be recorded and made publicly available. Require the TI to disclose information such as its expenditures on marketing and lobbying activities.

4

Prohibit contributions from the TI, including to political campaigns. When governments accept contributions from the TI, they make themselves vulnerable, as illustrated by countries that compromised on tobacco control or reversed legislative measures.

5

Require the TI to pay a levy for environmental damage. Reject all industry-led cleanup campaigns and reforestation activities. Exclude the TI from standard Extended Producer Responsibility schemes.

6

Stop giving incentives to the TI. The TI should not be granted preferential treatment, incentives, exemptions or any form of benefit to run its businesses, which conflict directly with tobacco control policy.

7

Reject all collaboration and partnership with the TI. Governments are often put at a disadvantage when they collaborate, partner with or agree to cooperate with the TI through non-binding agreements. There should be no collaboration between governments and the TI.

8

Denormalize the TI. The TI is unique and unlike any other industry; its core business is incompatible with human rights and undermines multiple SDGs. Ban all tobacco-related CSR activities. Reject all study visits to industry facilities.

SUMMARY TABLE

	ARG	BGD	BEL	BOL	BIH	BWA	BRA	BRN	BGR	BFA
PARTICIPATION IN POLICY DEVELOPMENT	14	8	7	5	10	9	16	2	11	4
The government accepts, supports or endorses offers for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies (Rec 3.1)	5	4	3	1	4	1	4	0	4	1
The government accepts, supports or endorses legislation drafted by/in collaboration with the tobacco industry (Rec 3.4)	5	2	2	2	4	2	3	0	5	1
The government allows the tobacco industry to sit in multi-sectoral committee/advisory groups that sets public health policy (Rec 4.8)	4	1	1	1	1	5	5	1	1	1
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates (Rec 4.9 & 8.3)	0	1	1	1	1	1	4	1	1	1
TOBACCO-RELATED CSR ACTIVITIES	4	5	5	5	3	1	4	0	3	1
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) Government agencies/officials endorse, form partnerships with/participate in tobacco industry CSR activities (Rec 6.2)	4	5	5	5	3	1	4	0	3	1
BENEFITS TO THE TOBACCO INDUSTRY	10	9	8	10	8	6	7	0	9	4
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control laws (Rec 7.1)	5	4	4	5	5	2	3	0	4	2
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	5	5	4	5	3	4	4	0	5	2
FORMS OF UNNECESSARY INTERACTION	14	9	5	13	3	2	11	0	11	5
Top-level government officials meet with/foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies (Rec 2.1)	5	5	2	5	0	1	5	0	5	1
The government accepts assistance/offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	5	0	3	4	3	1	3	0	5	3
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	4	4	0	4	0	0	3	0	1	1

	KHM	CMR	CAN	TCD	CHL	CHN	COL	COD	CRI	CZE	CIV	DNK	DOM	ECU	EGY	SLV	ETH	FJI	FIN	FRA	GAB
	8	10	5	4	10	20	16	11	15	9	5	12	14	9	2	12	4	4	6	8	2
	3	1	1	1	3	5	4	5	5	4	2	4	4	4	0	4	1	1	3	3	0
	1	3	2	1	3	5	5	5	4	3	1	5	5	3	0	4	1	1	1	3	0
	3	5	1	1	3	5	5	0	5	1	1	2	5	1	1	3	1	1	1	1	1
	1	1	1	1	1	5	2	1	1	1	1	1	0	1	1	1	1	1	1	1	1
	5	1	3	1	1	5	4	1	3	4	1	4	5	3	4	5	3	5	3	3	5
	5	1	3	1	1	5	4	1	3	4	1	4	5	3	4	5	3	5	3	3	5
	7	10	7	6	6	8	4	10	9	9	8	8	10	9	3	9	7	5	2	4	5
	2	5	4	1	3	5	0	5	5	5	5	4	5	4	0	4	3	1	0	1	3
	5	5	3	5	3	3	4	5	4	4	3	4	5	5	3	5	4	4	2	3	2
	10	7	5	8	8	13	15	0	4	5	3	6	14	10	9	15	5	11	0	8	9
	5	1	3	4	2	4	5	0	4	3	1	3	4	3	4	5	1	5	0	2	4
	1	3	0	4	5	5	5	0	0	0	1	0	5	4	0	5	3	1	0	3	0
	4	3	2	0	1	4	5	0	0	2	1	3	5	3	5	5	1	5	0	3	5

SUMMARY TABLE (cont.)

	ARG	BGD	BEL	BOL	BIH	BWA	BRA	BRN	BGR	BFA
TRANSPARENCY	8	9	8	10	10	4	8	5	10	2
The government does not publicly disclose meetings/interactions with the tobacco industry where such interactions are strictly necessary for regulation (Rec 2.2)	3	4	5	5	5	2	5	0	5	1
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists	5	5	3	5	5	2	3	5	5	1
CONFLICT OF INTEREST	9	13	4	12	6	3	9	1	3	7
The government does not have a policy (written or otherwise) to 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 4.1.1)	5	5	1	5	5	1	5	1	1	5
Retired senior officials work for the tobacco industry (Rec 4.4)	0	4	3	3	1	1	2	0	1	1
Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	4	4	0	4	0	1	2	0	1	1
PREVENTIVE MEASURES	16	16	18	21	17	8	10	6	25	16
The government has a procedure for disclosing records of interaction with the tobacco industry and its representatives (Rec 5.1)	2	5	5	5	5	1	2	2	5	3
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply with when dealing with the tobacco industry (Rec 4.2)	5	2	4	3	2	1	1	1	5	4
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, and political contributions (Rec 5.2)	2	2	3	4	2	2	2	0	5	2
The government has a program/system/plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines (Rec 1.1, 1.2)	5	5	4	5	4	3	3	2	5	5
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives (Rec 3.4)	2	2	2	4	4	1	2	1	5	2
TOTAL	79	69	55	76	57	33	65	14	72	39

	KHM	CMR	CAN	TCD	CHL	CHN	COL	COD	CRI	CZE	CIV	DNK	DOM	ECU	EGY	SLV	ETH	FJI	FIN	FRA	GAB
	10	10	5	9	4	6	10	10	8	10	10	9	10	8	10	3	5	10	5	4	4
	5	5	3	5	1	3	5	5	3	5	5	4	5	4	5	0	2	5	3	2	2
	5	5	2	4	3	3	5	5	5	5	5	5	5	4	5	3	3	5	2	2	2
	11	13	3	10	7	8	12	15	2	7	5	11	15	7	10	4	3	7	5	5	11
	5	5	1	5	5	1	5	5	1	5	1	5	5	5	5	4	1	5	5	1	3
	1	5	2	4	1	3	4	5	1	2	1	3	5	1	5	0	1	1	0	2	3
	5	3	0	1	1	4	3	5	0	0	3	3	5	1	0	0	1	1	0	2	5
	19	25	14	9	16		19	25	23	23	21	25	25	22	22	20	8	23	13	10	17
	5	5	3	2	1	2	4	5	5	5	5	5	5	5	5	5	2	5	2	3	3
	3	5	3	1	2	2	5	5	5	5	4	5	5	4	5	5	3	5	3	2	3
	5	5	3	2	3	2	2	5	3	3	2	5	5	4	2	3	1	3	5	1	5
	4	5	3	3	5	4	4	5	5	5	5	5	5	5	5	4	1	5	1	2	4
	2	5	2	1	5	3	4	5	5	5	5	5	5	4	5	3	1	5	2	2	2
	70	76	42	47	52	60	80	72	64	67	53	75	98	68	60	68	35	65	34	42	53

SUMMARY TABLE (cont.)

	GEO	DEU	GHA	GTM	HND	HUN	IND	IDN	IRN	IRQ
PARTICIPATION IN POLICY DEVELOPMENT	19	13	5	16	11	4	6	14	4	12
The government accepts, supports or endorses offers for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies (Rec 3.1)	5	5	2	5	1	1	1	5	1	3
The government accepts, supports or endorses legislation drafted by/in collaboration with the tobacco industry (Rec 3.4)	5	2	1	5	3	1	1	5	1	3
The government allows the tobacco industry to sit in multi-sectoral committee/advisory groups that sets public health policy (Rec 4.8)	5	5	1	1	3	1	3	4	1	5
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates (Rec 4.9 & 8.3)	4	1	1	5	4	1	1	0	1	1
TOBACCO-RELATED CSR ACTIVITIES	3	5	2	1	3	1	5	4	1	1
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) Government agencies/officials endorse, form partnerships with/participate in tobacco industry CSR activities (Rec 6.2)	3	5	2	1	3	1	5	4	1	1
BENEFITS TO THE TOBACCO INDUSTRY	10	9	6	7	6	6	4	10	6	8
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control laws (Rec 7.1)	5	5	3	3	1	3	0	5	2	4
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	5	4	3	4	5	3	4	5	4	4
FORMS OF UNNECESSARY INTERACTION	11	7	5	6	13	6	12	14	6	10
Top-level government officials meet with/foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies (Rec 2.1)	5	5	1	5	5	3	5	5	4	5
The government accepts assistance/offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	3	2	0	1	3	3	2	4	1	0
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	3	0	4	0	5	0	5	5	1	5

	ISR	ITA	JAM	JPN	JOR	KAZ	KEN	KOR	KWT	LAO	LBN	MDG	MWI	MYS	MDV	MUS	MEX	MNG	MNE	MOZ	MMR
	8	17	8	17	16	11	6	2	4	9	7	6	12	17	4	4	8	4	7	10	5
	4	4	3	4	5	3	0	0	1	5	2	0	3	5	1	1	1	1	4	3	1
	2	4	1	5	5	4	4	0	1	2	1	0	4	5	1	0	3	1	1	3	2
	1	5	3	5	5	3	1	1	1	1	3	1	2	5	1	2	3	1	1	2	1
	1	4	1	3	1	1	1	1	1	1	1	5	3	2	1	1	1	1	1	2	1
	1	5	4	3	5	5	4	5	1	0	5	5	3	5	1	1	2	1	4	3	4
	1	5	4	3	5	5	4	5	1	0	5	5	3	5	1	1	2	1	4	3	4
	9	8	7	9	10	4	7	7	6	9	4	5	5	9	2	3	3	3	6	8	7
	5	3	4	4	5	1	4	3	3	4	1	0	0	5	1	0	1	2	3	4	4
	4	5	3	5	5	3	3	4	3	5	3	5	5	4	1	3	2	1	3	4	3
	8	13	5	10	15	8	1	5	3	15	10	11	15	6	0	0	4	4	7	5	3
	0	4	0	4	5	5	0	5	1	5	5	5	5	2	0	0	2	0	4	3	0
	4	4	2	3	5	0	1	0	1	5	5	1	5	4	0	0	1	4	0	1	0
	4	5	3	3	5	3	0	0	1	5	0	5	5	0	0	0	1	0	3	1	3

SUMMARY TABLE (cont.)

	GEO	DEU	GHA	GTM	HND	HUN	IND	IDN	IRN	IRQ
TRANSPARENCY	10	6	9	8	7	10	9	10	6	10
The government does not publicly disclose meetings/interactions with the tobacco industry where such interactions are strictly necessary for regulation (Rec 2.2)	5	4	5	3	3	5	5	5	3	5
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists	5	2	4	5	4	5	4	5	3	5
CONFLICT OF INTEREST	12	11	9	5	5	5	12	10	3	8
The government does not have a policy (written or otherwise) to 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 4.1.1)	5	5	5	5	5	5	5	5	1	5
Retired senior officials work for the tobacco industry (Rec 4.4)	4	5	0	0	0	0	5	4	1	2
Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	3	1	4	0	0	0	2	1	1	1
PREVENTIVE MEASURES	22	19	19	25	25	22	11	16	10	22
The government has a procedure for disclosing records of interaction with the tobacco industry and its representatives (Rec 5.1)	5	2	5	5	5	5	2	5	1	5
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply with when dealing with the tobacco industry (Rec 4.2)	4	5	4	5	5	5	2	2	3	5
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, and political contributions (Rec 5.2)	3	2	5	5	5	2	2	2	4	3
The government has a program/system/plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines (Rec 1.1, 1.2)	5	5	4	5	5	5	3	5	1	4
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives (Rec 3.4)	5	5	1	5	5	5	2	2	1	5
TOTAL	87	70	55	68	70	54	59	82	36	71

	ISR	ITA	JAM	JPN	JOR	KAZ	KEN	KOR	KWT	LAO	LBN	MDG	MWI	MYS	MDV	MUS	MEX	MNG	MNE	MOZ	MMR
	7	6	6	9	8	10	6	10	10	8	6	10	8	10	6	10	5	9	8	10	9
	4	3	1	4	5	5	3	5	5	4	5	5	4	5	3	5	3	4	4	5	4
	3	3	5	5	3	5	3	5	5	4	1	5	4	5	3	5	2	5	4	5	5
	5	8	10	15	14	5	8	5	10	9	9	13	13	9	6	5	9	5	5	9	6
	1	5	5	5	5	5	5	5	5	1	5	5	5	5	5	5	5	5	5	5	1
	3	1	0	5	4	0	0	0	5	3	0	3	4	3	1	0	1	0	0	1	3
	1	2	5	5	5	0	3	0	0	5	4	5	4	1	0	0	3	0	0	3	2
	15	19	19	23	12	24	14	23	21	19	22	23	25	21	20	21	17	18	18	25	18
	2	2	3	5	3	5	4	5	5	5	5	5	5	5	4	5	3	5	4	5	2
	2	5	5	5	2	5	4	4	2	2	5	5	5	4	4	5	3	2	5	5	2
	4	2	3	3	2	4	3	4	5	4	5	3	5	5	4	5	5	5	2	5	5
	5	5	4	5	3	5	2	5	4	3	5	5	5	4	3	5	4	5	5	5	5
	2	5	4	5	2	5	1	5	5	5	2	5	5	3	5	1	2	1	2	5	4
	53	76	59	86	80	67	46	57	55	69	63	73	81	77	39	44	48	44	55	70	52

SUMMARY TABLE (cont.)

	NPL	NLD	NZL	NIC	NGA	NOR	OMN	PAK	PLW	PAN
PARTICIPATION IN POLICY DEVELOPMENT	7	3	13	4	14	2	5	3	2	6
The government accepts, supports or endorses offers for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies (Rec 3.1)	2	1	2	1	5	0	1	1	0	1
The government accepts, supports or endorses legislation drafted by/in collaboration with the tobacco industry (Rec 3.4)	1	0	5	1	3	0	2	0	0	3
The government allows the tobacco industry to sit in multi-sectoral committee/advisory groups that sets public health policy (Rec 4.8)	3	1	5	1	5	1	1	1	1	1
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates (Rec 4.9 & 8.3)	1	1	1	1	1	1	1	1	1	1
TOBACCO-RELATED CSR ACTIVITIES	4	0	0	5	5	1	4	2	0	1
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) Government agencies/officials endorse, form partnerships with/participate in tobacco industry CSR activities (Rec 6.2)	4	0	0	5	5	1	4	2	0	1
BENEFITS TO THE TOBACCO INDUSTRY	4	6	9	6	8	4	2	4	0	6
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control laws (Rec 7.1)	2	3	4	3	4	2	1	2	0	2
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	2	3	5	3	4	2	1	2	0	4
FORMS OF UNNECESSARY INTERACTION	3	5	8	10	8	2	7	11	0	13
Top-level government officials meet with/foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies (Rec 2.1)	3	0	5	5	5	2	5	5	0	4
The government accepts assistance/offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	0	5	0	0	3	0	1	3	0	4
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	0	0	3	5	0	0	1	3	0	5

	PNG	PRY	PER	PHL	POL	ROU	SEN	SVN	SLB	ZAF	ESP	LKA	SDN	SWE	CHE	TZA	THA	TUN	TUR	UGA	UKR	
	9	15	10	20	9	12	4	12	6	6	6	4	6	12	15	17	13	9	16	8	9	
	5	4	2	5	3	5	1	4	0	1	0	1	0	5	5	4	5	2	5	1	3	
	3	5	4	5	4	5	1	4	2	1	0	1	0	5	5	5	2	1	5	1	3	
	0	5	3	5	1	1	1	3	3	3	5	1	5	1	5	5	5	5	5	5	5	2
	1	1	1	5	1	1	1	1	1	1	1	1	1	1	0	3	1	1	1	1	1	1
	5	4	0	5	3	4	1	0	3	3	4	5	0	2	5	5	1	5	3	4	2	
	5	4	0	5	3	4	1	0	3	3	4	5	0	2	5	5	1	5	3	4	2	
	10	8	9	5	8	9	4	8	5	6	7	5	9	10	10	8	6	10	5	7	7	
	5	4	4	0	4	4	1	5	2	3	3	4	5	5	5	5	4	5	0	2	3	
	5	4	5	5	4	5	3	3	3	3	4	1	4	5	5	3	2	5	5	5	4	
	14	8	11	15	7	15	4	1	8	10	12	4	0	10	13	10	6	11	10	4	8	
	4	4	1	5	5	5	1	0	5	3	5	0	0	5	5	5	3	2	5	0	3	
	5	1	5	5	1	5	1	0	0	4	3	4	0	0	4	0	2	4	5	3	3	
	5	3	5	5	1	5	2	1	3	3	4	0	0	5	4	5	1	5	0	1	2	

SUMMARY TABLE (cont.)

	NPL	NLD	NZL	NIC	NGA	NOR	OMN	PAK	PLW	PAN
TRANSPARENCY	8	7	7	6	9	9	6	10	3	7
The government does not publicly disclose meetings/interactions with the tobacco industry where such interactions are strictly necessary for regulation (Rec 2.2)	3	2	2	3	5	4	1	5	2	3
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists	5	5	5	3	4	5	5	5	1	4
CONFLICT OF INTEREST	7	6	10	5	4	5	10	9	6	10
The government does not have a policy (written or otherwise) to 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 4.1.1)	5	5	5	5	1	5	1	5	5	5
Retired senior officials work for the tobacco industry (Rec 4.4)	1	1	0	0	0	0	5	4	0	4
Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	1	0	5	0	3	0	4	0	1	1
PREVENTIVE MEASURES	11	7	14	22	14	18	16	15	19	11
The government has a procedure for disclosing records of interaction with the tobacco industry and its representatives (Rec 5.1)	5	1	1	5	2	4	5	5	3	3
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply with when dealing with the tobacco industry (Rec 4.2)	2	1	5	5	2	2	2	2	3	2
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, and political contributions (Rec 5.2)	2	2	2	2	3	3	5	2	5	2
The government has a program/system/plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines (Rec 1.1, 1.2)	1	1	4	5	5	4	2	1	5	2
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives (Rec 3.4)	1	2	2	5	2	5	2	5	3	2
TOTAL	44	34	61	58	62	41	50	54	30	54

	PNG	PRY	PER	PHL	POL	ROU	SEN	SVN	SLB	ZAF	ESP	LKA	SDN	SWE	CHE	TZA	THA	TUN	TUR	UGA	UKR
	8	10	7	6	3	10	10	2	9	7	5	5	10	9	10	6	6	9	10	4	6
	5	5	5	1	1	5	5	1	5	4	3	0	5	4	5	3	3	4	5	1	3
	3	5	2	5	2	5	5	1	4	3	2	5	5	5	5	3	3	5	5	3	3
	8	11	5	10	9	9	7	11	5	9	10	9	5	5	14	10	10	11	10	2	4
	5	5	5	5	1	5	5	5	5	5	5	1	5	5	4	5	5	5	5	0	1
	3	5	0	5	4	4	1	5	0	3	4	4	0	0	5	5	2	1	5	1	1
	0	1	0	0	4	0	1	1	0	1	1	4	0	0	5	0	3	5	0	1	2
	17	23	14	9	20	25	24	22	14	23	16	13	25	22	24	24	8	20	23	12	14
	5	5	3	1	5	5	5	2	3	5	3	3	5	5	5	5	3	4	5	5	3
	3	5	1	1	5	5	5	5	3	4	2	3	5	5	5	5	2	4	5	2	3
	2	3	5	5	4	5	5	5	3	4	2	3	5	5	5	4	1	2	3	1	2
	2	5	3	1	5	5	5	5	2	5	4	3	5	5	5	5	1	5	5	3	3
	5	5	2	1	1	5	4	5	3	5	5	1	5	2	4	5	1	5	5	1	3
	71	79	56	70	59	84	54	56	50	64	60	45	55	70	96	80	50	75	77	41	50

SUMMARY TABLE (cont.)

	GBR	USA	URY	VEN	VNM	YEM	ZMB
PARTICIPATION IN POLICY DEVELOPMENT	6	15	4	8	8	4	15
The government accepts, supports or endorses offers for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies (Rec 3.1)	1	5	1	3	3	1	5
The government accepts, supports or endorses legislation drafted by/in collaboration with the tobacco industry (Rec 3.4)	2	5	1	1	1	1	4
The government allows the tobacco industry to sit in multi-sectoral committee/advisory groups that sets public health policy (Rec 4.8)	2	5	1	3	3	1	3
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates (Rec 4.9 & 8.3)	1	0	1	1	1	1	3
TOBACCO-RELATED CSR ACTIVITIES	3	5	4	1	5	4	5
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) Government agencies/officials endorse, form partnerships with/participate in tobacco industry CSR activities (Rec 6.2)	3	5	4	1	5	4	5
BENEFITS TO THE TOBACCO INDUSTRY	4	10	6	3	4	7	10
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control laws (Rec 7.1)	1	5	1	1	2	3	5
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	3	5	5	2	2	4	5
FORMS OF UNNECESSARY INTERACTION	8	15	7	7	10	8	11
Top-level government officials meet with/foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies (Rec 2.1)	2	5	5	1	4	5	5
The government accepts assistance/offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	3	5	1	5	5	3	1
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	3	5	1	1	1	0	5

	GBR	USA	URY	VEN	VNM	YEM	ZMB
TRANSPARENCY	6	7	8	10	6	10	10
The government does not publicly disclose meetings/interactions with the tobacco industry where such interactions are strictly necessary for regulation (Rec 2.2)	2	4	3	5	1	5	5
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists	4	3	5	5	5	5	5
CONFLICT OF INTEREST	10	15	5	3	6	7	7
The government does not have a policy (written or otherwise) to 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 4.1.1)	5	5	3	1	1	5	5
Retired senior officials work for the tobacco industry (Rec 4.4)	3	5	1	1	0	0	1
Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	2	5	1	1	5	2	1
PREVENTIVE MEASURES	8	22	18	22	14	24	25
The government has a procedure for disclosing records of interaction with the tobacco industry and its representatives (Rec 5.1)	1	5	5	5	5	5	5
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply with when dealing with the tobacco industry (Rec 4.2)	1	5	5	5	2	5	5
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, and political contributions (Rec 5.2)	2	2	2	2	2	4	5
The government has a program/system/plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines (Rec 1.1, 1.2)	2	5	5	5	4	5	5
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives (Rec 3.4)	2	5	1	5	1	5	5
TOTAL	45	94	52	54	53	64	83

APPENDICES



APPENDIX I: EXAMPLES OF GREENWASHING VIA TOBACCO “CLEANUP” DRIVES

Below are examples of tobacco “cleanup” campaigns—PR activities that shift costs, normalize the product, and risk policy influence.

COUNTRY	TOBACCO COMPANY	SPONSORSHIP
Brazil	Philip Morris Brazil	In 2024, the non-profit organization Instituto Limpa Brazil promoted sponsored cigarette butt collection campaigns as part of World Cleanup Day. ²⁷⁷
Bulgaria	Philip Morris Bulgaria	#ChangeThePicture is a long-term CSR campaign aimed at reducing cigarette butt litter; ²⁷⁸ involving municipal authorities ²⁷⁹ and endorsed by a local mayor. ²⁸⁰
Canada	Rothmans, Benson and Hedges Inc.	“UNSMOKE Butt Blitz” is Canada’s largest cigarette litter cleanup campaign. Based on its partnership with TerraCycle, ²⁸¹ all cigarette butts will be sent to the latter’s facilities for recycling. ²⁸²
Colombia	PMI	“Bogotá Is Not an Ashtray” (“Bogotá no es un cenicero”) was launched around the “Parque de los Hippies” to educate citizens on the proper disposal of cigarette butts. ²⁸³
Costa Rica	Philip Morris Costa Rica	“Costa Rica Is Not an Ashtray” (“Costa Rica no es un cenicero”), conducted in the Municipality of Escazú, the Municipality of Tibás and the Municipality of San José (Barrio Escalante sector), places cigarette butt collectors in public areas, which are then sent to a lab at the School of Chemistry at the University of Costa Rica. ²⁸⁴
Czechia	Multiple tobacco manufacturers	In 2024, a collective system, NEVAJGLUJ, founded by tobacco manufacturers, paid 78 million crowns to Czech municipalities and cities to cover the costs associated with cleaning up cigarette butts, as part of an EPR scheme. ²⁸⁵ NEVAJGLUJ is chaired by PMI CR.
Denmark	Multiple tobacco manufacturers	In 2021, four municipalities, through environmental group Keep Denmark Clean (Hold Danmark Rent) collaborated with tobacco manufacturers to develop new ashtrays/cigarette butt collectors to reduce cigarette litter. ²⁸⁶
Fiji	BAT Fiji	On World Environment Day, the Suva City Council collaborated with BAT Fiji on a cleanup of the Suva Foreshore. ²⁸⁷
France	PMI and BAT (via Alcome)	Alcome (funded by the TI) collaborated with NGOs such as Surfrider and Wings of the Ocean to collect cigarette butts in many cities across France. ²⁸⁸

COUNTRY	TOBACCO COMPANY	SPONSORSHIP
Germany	PMI	On World Cleanup Day 2024, PMI conducted a cleanup of discarded cigarette butts as part of the "Kippen-Buddies" project, in collaboration with wirBerlin. ²⁸⁹
Italy	BAT and JTI	The Ministry of Environment partnered with BAT's "Piccoli gesti, grandi crimini" campaign with NGO Marevivo, ²⁹⁰ and with JTI's "loLaButtoli" anti-litter initiative. ²⁹¹
Korea (Rep of)	Philip Morris Korea	On June 5, 2024, the local government of Yangsan joined PMK for a waste collection campaign. ²⁹²
Mexico	Philip Morris Mexico	In January 2024, as part of World Cleanup Day, with the support of the Directorate of Environment and Ecology and the Directorate of Youth of Isla Mujeres, Para Bien o Para Mal (which led the initiative) conducted a beach cleanup of cigarette butts. ²⁹³
Philippines	JTI	Balete LGU collaborated with JTI Batangas Factory and media partners in a coastal cleanup at Poblacion Lakeshore at Balete, Batangas on June 19, 2025. ²⁹⁴
Switzerland	JTI	JTI is one of the sponsors of the Swiss Competence Centre Against Littering's "Clean-Up-Day," supported by the Swiss Federal Office for the Environment. ²⁹⁵
Tunisia	PMI	The municipality of Dar Chaaben El Fihri collaborated with PMI and the Tunisian-Swiss Chamber of Commerce and Industry to clean up litter from drains to address flooding, and to install Zigofiltres. ²⁹⁶
U.K.	Tobacco Manufacturers Association	Two members of the House of Lords serve as directors of CleanStreets CIC, which was set up to tackle smoking-related litter, funded by the TMA and/or its members. ²⁹⁷
U.S.A.	Altria	Altria collaborates with Keep America Beautiful (KAB), a national nonprofit focused on funding beach, park and waterway clean-ups. KAB operates through hundreds of local governments. ²⁹⁸
	Reynolds American, Santa Fe Natural Tobacco Co.	They support Keep America Beautiful and TerraCycle in butt collection and recycling. ²⁹⁹

APPENDIX 2: ILLICIT TRADE COLLABORATIONS WITH THE TOBACCO INDUSTRY—ENGAGEMENTS THAT UNDERMINE CONFLICT-OF-INTEREST RULES

This section lists government tobacco industry arrangements on illicit trade (e.g., MOUs, trainings, joint operations) identified as engagements inconsistent with Article 5.3 and the Protocol to Eliminate Illicit Trade in Tobacco Products, which prohibit delegating obligations to the tobacco industry and require limiting any interaction to what is strictly necessary.

WHO FCTC PARTY	PARTY TO PROTOCOL TO ELIMINATE ILLICIT TRADE IN TOBACCO PRODUCTS?	AGREEMENT/TRAINING/ENFORCEMENT
Argentina	Not a Party to WHO FCTC	In January 2024, the National Security Minister inaugurated the National Gendarmerie Intelligence Analysis Centre in Puerto Iguazú, Triple Border, funded by PMI, to support national security forces in the investigation of smuggling. ³⁰⁰
Bosnia and Herzegovina	No	The administration of Indirect Taxation's "Stop the Smuggling" campaign, in collaboration with the Association of Economists SWOT was sponsored by the TI, including PMI, BAT and JTI. ³⁰¹
Bulgaria	No	The Director of the Customs Agency collaborates with the industry through joint meetings every three months. ³⁰²
Chad	Yes, since June 13, 2018	In November 2023, the DG of Customs visited the premises of the Manufacture des Cigarettes du Tchad (MCT) and accepted support of MCT in the fight against smuggling. ³⁰³
Chile	No	In early 2024, the Tarapacá Region Undersecretariat for Crime Prevention attended a training session conducted by BAT Chile on tobacco smuggling and identification of illegal products. ³⁰⁴
Colombia	Signed on Feb. 21, 2013	The National Federation of Departments (FND) has an agreement with PMI until 2028 to implement several projects including training and assisting the authorities in tobacco anti-smuggling operations. ^{305,306}
Georgia	No	In 2023, JTI provided support to the Revenue Service and Customs Service by organizing training sessions for staff and supplying detection dogs and drones to identify smuggling. ³⁰⁷
Indonesia	Not a Party to WHO FCTC	The DG of Customs and Excise collaborated with Sampoerna to identify, authenticate and investigate illicit tobacco products. ³⁰⁸
Israel	Signed on Dec. 23, 2013	The Israeli Federation for Intellectual Property engages in continued cooperation with Philip Morris to tackle illicit trade. ³⁰⁹

WHO FCTC PARTY	PARTY TO PROTOCOL TO ELIMINATE ILLICIT TRADE IN TOBACCO PRODUCTS?	AGREEMENT/TRAINING/ENFORCEMENT
Italy	No	Carabinieri Corps (Ministry of Defence) renewed its partnership with Philip Morris Italy in May 2024, valid for three years, on enforcement-related issues. ³¹⁰
Lao PDR	No	The Ministry of Industry and Commerce has an MOU with the tobacco industry to enforce smuggling control. ³¹¹
Lebanon	No	The Regie, seen as a public institution, has its own anti-smuggling unit. It conducted an anti-smuggling training in collaboration with JTI. ³¹²
Netherlands	Yes, since July 3, 2020	Dutch Customs signed an MOU with groups associated with the tobacco industry to combat fraud and the smuggling of tobacco products. ³¹³
South Africa	Signed on Jan. 10, 2013	The SARS website states it is “working with tobacco industry experts to develop a way of detecting illicit cigarettes.” ³¹⁴
Sri Lanka	Yes, since Feb. 8, 2016	The government seeks assistance from the Ceylon Tobacco Company to destroy illicit cigarettes. ³¹⁵
U.S.A	Not a Party to WHO FCTC	Under the Department of Homeland Security–PMI framework, PMI has sponsored a multi-week training for state and local law enforcement directly related to tobacco enforcement. ³¹⁶
Uganda	No	The Uganda Revenue Authority accepted a cigarette destruction machine from BAT as a donation to support the national fight against illicit cigarette trade. ³¹⁷
Venezuela	No	The government collaborated with the tobacco industry to fight smuggling between 2023 and 2025. ³¹⁸
Vietnam	No	The government collaborates with the tobacco industry to tackle smuggling. ³¹⁹

APPENDIX 3: STUDY TRIPS TO TOBACCO INDUSTRY FACILITIES

COUNTRY	WHO VISITED A TI FACILITY	THE VISIT/FACILITY
Brazil	Governor Eduardo Leite and state government officials	Visit to JTI headquarters in Japan during an international mission in 2024. ³²⁰
	Senator Soraya Thronicke and other members of parliament	A PMI-sponsored trip to Bologna, Italy in May 2024 to visit PMI's facilities where heated tobacco products are manufactured. ³²¹
Denmark	Youth Parliamentarians	A sponsored trip in May 2022 to PMI's facility, the Cube, in Neuchâtel,* Switzerland. ³²²
	Political commentator of BT, a large Danish newspaper	A PMI-sponsored trip to visit the Cube in Neuchâtel, Switzerland. ³²³
Finland	Members of Parliament	A visit to PMI's facility, the Cube, in Neuchâtel, Switzerland by two MPs from the Social Democratic Party in May 2024. ³²⁴
Kuwait	Journalist, Kuwait Times	A sponsored visit to PMI's facility, the Cube, in Neuchâtel, Switzerland in Nov. 2022. ³²⁵
Mozambique	Minister of Economy	An official visit to PMI's facility, the Cube, in Neuchâtel, Switzerland on July 9, 2025, on the sidelines of the 66th Series of Meetings of the Assemblies of Member States of the World Intellectual Property Organization (WIPO), held in Geneva. ³²⁶
Philippines	Journalist	A one-week trip in July 2022 to Geneva; in addition to visiting the Cube at Neuchâtel, the trip included "watch-making, cheese, and chocolates" and a day tour of French border city, Annecy, the ice cream capital of France. ³²⁷
U.K.	Lord Vaisey of Didcot	A sponsored visit to PMI's facility, the Cube, in Neuchâtel, Switzerland from March 31-April 1, 2025. PMI paid for his flights and accommodation. ³²⁸
Global	Media professionals, researchers	PMI's Technovation event on October 31, 2023, ³²⁹ December 2024, ³³⁰ and May 27, 2025 ³³¹ at PMI's facility, the Cube, in Neuchâtel, Switzerland.

*Once a year, the State Council of Neuchâtel in corpore [whole cantonal government] meets with PMI management to hear their proposals.³³²

APPENDIX 4: DIPLOMATIC MISSIONS INVOLVED IN PROMOTING TOBACCO

COUNTRY	ACTIVITY PROMOTING TOBACCO
Bangladesh	On November 4, 2024, a delegation led by JT's Director, International Affairs met the Chargé d'Affaires of the Bangladesh Embassy in Tokyo , who endorsed JT's activities in Bangladesh and wished its business in Bangladesh to continue. ³³³
Honduras	At the 2024 summer party of the German Parliamentary Group for Small and Medium-Sized Businesses, a group of the Christian Democrats in the Federal Parliament, the Ambassador of Honduras, Mauricio Arturo Bueso, visited the stand of the Federal Association of the Cigar Industry. ³³⁴
Japan	In Bolivia , on June 5, 2024, the Japanese Embassy endorsed the JTI-sponsored YAKU project to provide basic amenities to people in the cities of La Paz, Cochabamba and Santa Cruz. ³³⁵
	In June 2024, the Embassy of Japan to Cambodia facilitated an MOU between JTI Cambodia and the Ministry of Environment to strengthen environmental conservation and sustainable development. ³³⁶
	In March 2024, JT's Global President and CEO opened a new JTI office in Cairo and met with Oka Hiroshi, the Japanese Ambassador to Egypt , where they discussed the company's milestones in the Egyptian market and explored future investment opportunities to solidify JTI's presence in Egypt. ³³⁷
	In May 2023, the Japanese Ambassador to Indonesia , Kanasugi Kenji, attended the launch of the CSR initiative between the Wahid Foundation and JTI Indonesia to create a Peace Village in the Banyuwangi area of East Java. ³³⁸
	On April 26, 2023, the Ambassador of Japan to Lebanon , Magoshi Masayuki, endorsed a JTI-funded solar-powered lighting system project in the Gibran National Museum in Bcharri. ³³⁹
	On February 6, 2025, the Japanese Ambassador in Nicaragua visited the Joya de Nicaragua tobacco factory in Estelí. ³⁴⁰
On September 12, 2024, the Japanese Embassy facilitated an MOU between the government of Tanzania and Japan Tobacco to support the community in areas where they purchase tobacco leaves. The MOU was signed by the Deputy Minister of State, Prime Minister's Office on behalf of the government; and the CEO of JT. ³⁴¹	

COUNTRY	ACTIVITY PROMOTING TOBACCO
Korea (Rep of)	The inauguration of the new KT&G factory in Kazakhstan was attended by KT&G CEO Bang Kyung-man, Almaty oblast governor Sultangaziev Marat Eleusizovich, and Korean Ambassador to Kazakhstan, Cho Tae-ick. ³⁴²
	In February 2025, the Korean ambassador to Türkiye , Yeon-doo Jeong, participated in KT&G's celebration of its Türkiye factory as a "global top-tier" to expand its global operations. ³⁴³
	On September 24, 2023, South Korean ambassador to Indonesia , Jang Keun Lee, and South Korean ambassador to ASEAN, Jang Keun Lee, participated in KT&G's plugging event in Jakarta to celebrate the 50th anniversary of diplomatic relations between Indonesia and Korea. ³⁴⁴
Nicaragua	The Nicaraguan Embassy in China participated as the guest of honor at a cigar and tobacco promotion event in Beijing. At this event, the Embassy extended an invitation to participate in the 12th Puro Sabor International Tobacco Festival. ³⁴⁵
U.K.	In February 2023, a representative of the British Embassy in Lebanon attended the inauguration of a new production line of the Regie, the Lebanese state-owned tobacco monopoly. The ceremony was also attended by representatives of international tobacco companies. ³⁴⁶

APPENDIX 5: AWARDS AND RECOGNITION GIVEN TO TOBACCO COMPANIES

COUNTRY	OFFICIAL/DEPARTMENT	AWARD	COMPANY
Bangladesh	The Minister of Commerce	Best Presented Annual Report ³⁴⁷	BAT Bangladesh
	National Board of Revenue (NBR)	Top taxpayer ³⁴⁸	BAT Bangladesh
	The Finance and Commerce Advisors	ICMAB Best Corporate Award 2023 ³⁴⁹	BAT Bangladesh
Bulgaria	Chairman of the Committee on Economy and Innovation in Parliament	Winner of the "24 Chasa" campaign "Business Honoris Causa" for supporting the development of local communities ³⁵⁰	Philip Morris Bulgaria
Cambodia	Royal Government of Cambodia	Gold Tax Compliance in 2023; recognition in 2024 for being one of the largest taxpayers, ³⁵¹ exempted from audit for two years	JTI Cambodia
Czechia	Business for Society partnered with a representative of the European Commission in Czechia, under the patronage of the President of Czechia	TOP Responsible Large Company 2024 award ³⁵²	Philip Morris ČR a.s.
Indonesia	Provincial Government of Central Java	2025 CSR Awards (Private Sector), 3rd Place	PT Nojorono Kudus ³⁵³
Korea, Rep of	Presidential award, represented by Minister of Justice	Presidential Citation at the 2023 Crime Prevention Award ³⁵⁴	KT&G
Nigeria	National Environmental Standards and Regulations Enforcement Agency and Oyo State Ministry of Environment & Natural Resources	December 2024, Best-Kept Industrial Premises Award in the Multinationals Category ³⁵⁵	BAT Nigeria

COUNTRY	OFFICIAL/DEPARTMENT	AWARD	COMPANY
Pakistan	Prime Minister	March 2024, the second highest taxpayer award in all categories of taxes ³⁵⁶	Pakistan Tobacco Company
Tanzania	President Samia Suluhu Hassan	Most Compliant Taxpayer in the Manufacturing Sector, FY 2023/24, at the Taxpayer's Appreciation Day ³⁵⁷	Tanzania Cigarette Company Plc
Thailand	Ministry of Finance	ITA Awards 2024 with rating of "Excellent" among 51 state enterprises ³⁵⁸	Tobacco Authority of Thailand
Türkiye	President	Top Exporter	PMI for 2022 ³⁵⁹ and JTI for 2023 ³⁶⁰
U.K.	Department for Work and Pensions	Equality-based certification	BAT; utilizes award recognition in its promotional material: "We are proud to retain our U.K. government-backed accreditation Disability Confident Leader (Level 3) status which remains valid until 2026." ³⁶¹

APPENDIX 6: REVOLVING DOOR INSTANCES BETWEEN GOVERNMENT OFFICIALS AND INDUSTRY EXECUTIVES

COUNTRY	GOVERNMENT		INDUSTRY
Bangladesh	Mr. Shirajun Noor Chowdhury, Additional Secretary Ministry of Finance	<>	Appointed as Non-Executive Director to the Board of BAT on May 12, 2022 ³⁶²
Brazil	Alessandra Bastos Soares, headed an Anvisa Department (2017-2020)	>	Consultant to BAT Brazil since 2021 ³⁶³
Democratic Republic of Congo	A sitting Member of Parliament	<>	General Manager of Shenimed, one of the main cigarette distributors (affiliated with JTI) ³⁶⁴
Colombia	Joaquín Campo, former legislative advisor, Congress (2015-2019), advisor to Land Access Directorate (2019-2020)	>	Co-managing partner at disposable e-cigarette brand GluCloud ³⁶⁵
	Juan Carlos R Piedrahita, former Director of Intelligence Agency, former Director of Anti-Narcotics Agency, former presidential adviser for security	>	Director of legal and external affairs for BAT ³⁶⁶
	Claudia De Francisco, former Communications Minister	>	Managing Partner, SEC Newgate Communications (formerly Seclatam), ³⁶⁷ a lobbying firm that has BAT as a client ³⁶⁸
Ecuador	Ecuador's new ambassador to the U.S.A, 2025 ³⁶⁹	<	Former Director of Corporate Affairs, Philip Morris subsidiary for Ecuador and Peru (ITABSA)
Georgia	Mr. Irakli Nadareishvili, Deputy Minister Economy and Sustainable Development	<	Former Commercial Director of Imperial Brands for Georgia and Moldova (2013-2016) ³⁷⁰
Germany	Torsten Albig, Social Democratic Party of Germany (SPD), former Minister-President of the federal state of Schleswig-Holstein (2012-2017)	>	Head of External Affairs at PMI since 2023 ³⁷¹
Ghana	Herbert Krapa, Deputy Minister for Energy	<	Previously worked with BAT Ghana ³⁷²
Israel	Adv. Ilan Bombach, attorney with close ties to the government and senior party member in Shas	>	Philip Morris ³⁷³

COUNTRY	GOVERNMENT		INDUSTRY
Jamaica	People's National Party (PNP) representative for St. Mary South East, former Advisor to Minister of National Security and Policy Director for Electoral and Parliamentary Affairs ³⁷⁴	<	Christopher Brown, former head of Carreras, Head of Legal and External Affairs for 24 markets across the Caribbean ³⁷⁵
Japan	High-level officials upon retirement from government service	>	Board positions at JT ³⁷⁶
Jordan	Minister of Trade, reinstated in September 2024	<>	Consultancy position at PMI
New Zealand	Mr. Chris Bishop, Minister of Transport	<	Former Corporate Affairs Manager, PMINZ (2011-2014) ³⁷⁷
	Apirana Dawson, former Director of Operations and Research, NZ First Party	>	Director, External Affairs & Communications PMINZ as of May 2025 ³⁷⁸
Pakistan	Former Principal Secretary to the Prime Minister	>	Mr. Nasir Mahmood Khan Khosa Chairman PTC, April 24, 2025 ³⁷⁹
	Former Secretary Water & Power, Secretary Commerce and Secretary Cabinet, among other senior roles	>	Mr. Zafar Mahmood, served as chairman of PTC (2016–April 23, 2024) ³⁸⁰
	Muhammad Riaz, Former Federal Board of Revenue, Prime Minister's Office, and National Assembly Secretariat ³⁸¹	>	Independent Director, Pakistan Tobacco Company
Papua New Guinea	Former Assistant Secretary (Fiscal Policy), Economic Policy Division ³⁸²	>	Corporate Affairs Manager, BAT PNG
Paraguay	Juan Carlos Lopez Moreira, Chief of Staff of previous administration	>	Board of Directors Palermo S.A. ³⁸³
Poland	Wojciech Bronicki, former Director of Excise Tax Department, Finance Ministry ³⁸⁴	>	Partner, BBGTAX, tax consultancy for tobacco companies ³⁸⁵
	Director of Excise and Gaming Tax Department, Ministry of Finance ³⁸⁶	<	Edyta Bialas-Giejbatow, former partner of Wojciech Bronicki's consultancy firm

COUNTRY	GOVERNMENT		INDUSTRY
Romania	Mihai Bundoï, former senior adviser to the Ministry of Health	>	Philip Morris România (2022) as Head of Scientific and Medical Affairs ³⁸⁷
Slovenia	Gregor Krajc, former State Secretary, and Jernej Pavlin, former public relations officer affiliated with the government	>	Registered lobbyist for PMI, ³⁸⁸ and lobbyist for JTI ³⁸⁹ respectively
South Africa	Navi Pillay, former acting judge of South African High Court	>	Member of the PMI IMPACT Expert Council since 2017 ³⁹⁰
Sri Lanka	Kushan D'Alwis, Chairman, Office of the National Unity and Reconciliation, member of Board of Investment and Financial System Stability Consultative Committee of Central Bank ³⁹¹	<>	Independent Non-Executive Director, Board of Ceylon Tobacco Company since April 20, 2022 ³⁹²
	Suresh Shah, appointed Head of State-Owned Enterprise Restructuring Unit, Ministry of Finance, Planning and Economic Development in Sept 2022	<>	At the time of the appointment, he was serving as Chairman of Ceylon Tobacco Company ³⁹³
Switzerland	Thomas Borer, previously a Swiss Ambassador	>	Now runs a consultancy firm, had JUUL as a client ³⁹⁴
Tanzania	Hon. Mohamed Chande Othman, former Chief Justice of Tanzania	>	New Board Chairperson of TCC Plc effective February 12, 2025 ³⁹⁵
Thailand	Former Permanent Secretary of the Ministry of Agriculture	>	Chairman, Tobacco Authority of Thailand, ³⁹⁶ TOAT Board includes retired senior officials
Tunisia	The Minister of Finance and three Finance Ministry officials	<>	President of RNTA's Board of Directors; ^{397,398} three MOF officials are Board members
U.S.A.	Jenny (Mary-Sumpter) Lapinski, ex-Counselor, Public Health and Science	>	Joined Juul Labs in January 2025 to lead federal lobbying office ³⁹⁹
Uruguay	Eduardo Mezzera, former Vice Minister of Foreign Affairs, several roles in the ruling National Party	>	Mezzera's law firm is reportedly leading the legal claims filed by tobacco companies ⁴⁰⁰

MAIN COUNTRY COLLABORATORS

1. Argentina: Fundación Interamericana del Corazón Argentina
2. Bangladesh: PROGGA Knowledge for Progress
3. Belgium: Silke Cnockaert (Sciensano); Stefanie Vandevijvere (Sciensano); Suzannah D'Hooghe (Sciensano)
4. Bolivia: Fundación InterAmericana del Corazón
5. Bosnia and Herzegovina: Progressive Reinforcement of Organizations and Individuals
6. Botswana: Anti-Tobacco Network
7. Brazil: ACT Health Promotion; Observatory for Monitoring TI Strategies, the Center for Studies on Tobacco and Health (CETAB); National School of Public Health (ENSP); Oswaldo Cruz Foundation (Fiocruz)
8. Brunei Darussalam: Ministry of Health
9. Bulgaria: Smoke-Free Life Coalition
10. Burkina Faso: Afrique Contre Le Tabac
11. Cambodia: Cambodia Movement for Health
12. Cameroon: Tobacco Coalition of Cameroon
13. Canada: Action on Smoking & Health (ASH Canada)
14. Chad: Association pour la Défense des Droits des Consommateurs (ADC)
15. Chile: Alianza ENT Chile
16. China: Consultant
17. Colombia: Red Papaz
18. Costa Rica: Red National Anti-Tobacco Network
19. Cote d'Ivoire: Comité/Club Unesco Universitaire pour la lutte contre la drogue et autres pandémies
20. Czechia: First Faculty of Medicine, Charles University
21. Democratic Republic of Congo: Alliance Congolaise Contre le Tabac (ACCT)
22. Denmark: Charlotta Pisinger, University of Southern Denmark; Tryg Foundation
23. Dominican Republic: Alianza Dominicana Antitabaquismo
24. Ecuador: Ecuadorian Respiratory Health Foundation (FESAR); Anti-Tobacco Alliance; Youth Anti-Tobacco Alliance; Corporate Accountability
25. Egypt: Cairo Association Against Smoking, Tuberculosis and Lung Diseases (CASTLE)
26. El Salvador: Center for Consumer Advocacy
27. Ethiopia: Health Development & Anti-Malaria Association
28. Fiji: Fiji Cancer Society
29. Finland: Action on Smoking and Health (ASH Finland)
30. France: National Committee Against Smoking (CNTC)
31. Gabon: Mouvement Populaire pour la Santé au Gabon
32. Georgia: Tobacco Control Alliance, Georgia
33. Germany: Laura Graen, German Cancer Research Center
34. Ghana: Vision for Accelerated Sustainable Development (VASD)
35. Guatemala: Departamento de Investigacion, Unidad de Cirugia Cardiovascular
36. Honduras: Centro de Promoción en Salud y Asistencia Familiar
37. Hungary: Consultant
38. India: Dialectics Services Pte Ltd; Partners in Change
39. Indonesia: Indonesia Health Policy Forum (RUKKI)
40. Iran (Islamic Republic): Iranian Anti-Tobacco Association
41. Iraq: Alrafidain Center for Health Development, Baghdad

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42. Israel: Smoke Free Israel
 43. Italy: Laboratory of Lifestyle Research Department of Medical Epidemiology, Istituto di Ricerche Farmacologiche Mario Negri
 44. Jamaica: SDW Consulting Company; Jamaica Coalition for Tobacco Control
 45. Japan: Japan Society for Tobacco Control
 46. Jordan: Global Alliance for Tobacco Control; Cancer Control Office, King Hussein Cancer Center; Tobacco Free Jordan; National Jordanian Anti-Smoking Society
 47. Kazakhstan: For a Smoke-Free Kazakhstan (Salauat Astana)
 48. Kenya: Consumer Information Network
 49. Korea (Republic of): Korea Center for Tobacco Control Research & Education
 50. Kuwait: Lama El Kadi, Consultant
 51. Lao PDR: Consultants
 52. Lebanon: Lama El Kadi, Consultant
 53. Madagascar: NY SAHY
 54. Malaysia: Women's Action for Tobacco Control and Health
 55. Malawi: Drug Fight Malawi
 56. Maldives: Maldives Cancer Research Foundation
 57. Mauritius: Marie France Chan Sun, Associate Professor; University of Mauritius
 58. Mexico: Salud Justa México
 59. Mongolia: Healthy City Association
 60. Montenegro: Stevo Muk, Consultant
 61. Mozambique: Associação Moçambicana de Saúde Pública
 62. Myanmar: People's Health Foundation
 63. Nepal: Health Rights & Tobacco Control Network
 64. The Netherlands: Trimbos Institute
 65. New Zealand/Aotearoa: Cancer Society of New Zealand
 66. Nicaragua: Consultants
 67. Nigeria: Corporate Accountability and Public Participation for Africa (CAPPA)
 68. Norway: Norwegian Cancer Society
 69. Oman: Ruth Mabry, Consultant
 70. Pakistan: Society for Alternative Media and Research
 71. Palau: Coalition for a Tobacco Free Palau
 72. Panama: Facultad de Economía de la Universidad de Panamá
 73. Papua New Guinea: Kia-Henry W. Nema, Consultant
 74. Paraguay: Enfoque Territorial
 75. Peru: National Anti-Smoking Control Commission (COLAT)
 76. Philippines: HealthJustice Philippines
 77. Poland: Department of Public Health and Social Medicine, Medical University of Gdansk
 78. Romania: AER Pur Romania
 79. Senegal: Ligue Senegalaise Contre Le Tabac
 80. Slovenia: No Excuse Slovenia
 81. Solomon Islands: Global Youth Leadership Nexus
 82. South Africa: Dhamaravelli Moodley, Consultant, National Council Against Smoking
 83. Spain: Catalan Institute of Oncology
 84. Sri Lanka: Alcohol & Drug Information Centre
 85. Sweden: A Non Smoking Generation
 86. Switzerland: Swiss Association for Smoking Prevention
 87. Sudan: Ikhlass Nimir, Consultant
 88. Tanzania: Tanzania Tobacco Control Forum
 89. Thailand: Action on Smoking and Health Foundation

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90. Tunisia: Khaoula Sliti, Policy and Advocacy Officer, Beder
 91. Türkiye: Turkish National Coalition on Tobacco or Health
 92. Uganda: Hellen Neima, Consultant; Health Consumers' Organisation (UNHCO)
 93. Ukraine: Advocacy Center LIFE
 94. United Kingdom: Tobacco Control Research Group, University of Bath
 95. U.S.A: Action on Smoking & Health
 96. Uruguay: Multidisciplinary Organization for Social Integration (OMIS)
 97. Venezuela: Asociación Civil Tabaco o Salud
 98. Vietnam: HealthBridge Vietnam
 99. Yemen: Consultant
 100. Zambia: Tobacco-Free Association of Zambia (TOFAZA)

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