

Denmark



SUMMARY OF FINDINGS

1. Industry Participation in Policy Development

Danish politicians, including Members of Parliament, have engaged with the tobacco industry, and the industry has even been invited to present before the Health Committee. The Danish government also invites the tobacco industry to provide feedback on draft legislation and has incorporated its responses into the final policy, reflecting industry interests. While there is no evidence that the government allows the industry to sit on committees or advisory groups shaping public health policy, the Tax Committee has invited the tobacco industry to discuss future legislation and possible initiatives to reduce new smokers.

2. Industry CSR Activities

Government officials have participated in TI-related corporate social responsibility (CSR) activities, raising concerns about potential conflicts of interest.

3. Benefits to the Industry

The Ministry of Health and the Elderly has on several occasions accommodated TI requests for extended implementation periods or postponements of tobacco control laws. Despite political agreements to regulate and tax nicotine products, the TI benefited from significant delays. Nicotine pouches remained untaxed for more than three years, and a planned cigarette price increase in 2020 was not implemented on time, enabling continued sales of cigarettes at lower prices.

4. Unnecessary Interaction

No interactions between senior government officials and the TI were identified. However, several Members of Parliament have engaged in unnecessary interactions with tobacco companies. There is also no evidence that the government has accepted assistance from the TI for tobacco control enforcement. The Ministry of Taxation reported that it is always willing to receive information from the TI.

5. Transparency

The government does not publicly disclose meetings or interactions with the TI. There is a lack of transparency regarding TI donations to political parties and politicians in Denmark. While parliamentary documents on questions and answers to the Danish Parliament are publicly available, they provide no insight into committee meetings with the TI. The government does not require disclosure or registration of TI entities, affiliated organizations, or lobbyists acting on their behalf.

6. Conflict of Interest

The government does not prohibit contributions from the TI or any entity working to further its interests to political parties, candidates, or campaigns. Information about contributions above DKK 25,000 should be publicly available, but many political parties have established so-called “business clubs” or organizations that pool funding before transferring it to parties.



There is no evidence that retired senior government officials have joined the TI. However, two former political advisers to senior government officials now hold executive positions in the TI. In addition, a former Head of Business Affairs of a major tobacco company is now an adviser to the current Minister of Health. There are no current officials or relatives holding positions in the TI.

7. Preventive Measures

The government does not have a code of conduct to regulate interactions with the TI and its representatives. Nor does it require the TI to submit information on tobacco production, manufacture, market share, marketing expenditures, revenues, or other activities, including lobbying, philanthropy, political contributions, and tobacco advertising, promotion, and sponsorship. There are also no requirements to disclose activities of TI entities, affiliated organizations, or lobbyists acting on their behalf.

RECOMMENDATIONS

1. Fully implement Article 5.3 of the WHO FCTC and its guidelines. Limit interactions of public officials and civil servants with the TI only to those strictly necessary to regulate the industry and its products. Avoid granting benefits, such as extended implementation timeframes, to the TI.
2. Prohibit donations and contributions from the tobacco and nicotine industry to political parties, politicians, civil servants, trade unions, and their foundations. Regulate CSR activities by the tobacco and nicotine industry, ensuring that the government does not endorse, support, form partnerships with, or participate in these activities.
3. Implement a program to consistently raise awareness across all government departments about policies relating to Article 5.3 of the WHO FCTC and its guidelines.
4. Develop a specific code of conduct for government officials, including civil servants and politicians, and establish a mandatory procedure for disclosing records of interactions with the TI and its representatives.
5. Require the tobacco and nicotine industry to periodically submit information not only on production, market share, marketing expenditures, and revenues, but also on lobbying, philanthropy, political contributions, and activities of affiliated organizations, lobbying firms, and individuals acting on its behalf.