

FINLAND

**TOBACCO
INDUSTRY INTERFERENCE
INDEX 2025**

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Acknowledgements:

This is the first report on the implementation of WHO FCTC Article 5.3 to document tobacco industry interference and activities in Finland. To increase the reliability of the report, the views of several key experts have been consulted.

First of all, heartfelt thanks to Senior Specialist Hanna Ollila and Senior Specialist Otto Ruokolainen at the Finnish Institute for Health and Welfare who have provided invaluable help during the different stages of this report. I would also like to express my warmest thanks to Professor Pekka Puska, Chair of ASH Finland for sharing his high-level and unique expertise. Thanks to Dr Mary Assunta from the Global Centre for Good Governance in Tobacco Control (GGTC), who has provided advice and guidance specifically regarding the scoring of the evaluation. Sincere thanks to Senior Specialist Reetta Honkanen at the Ministry of Social Affairs and Health, and Special Advisor Reija Kauppi at the National Supervisory Authority for Welfare and Health for the fact-checking summary of findings. Thanks to Specialist Katri Saarelainen and Specialist Tuuli Hynynen at the Cancer Society of Finland for a brief exchange of thoughts in the beginning of this process.

Methodology:

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance. There are 20 questions based on Article 5.3 guidelines. Information used in this report is obtained from the public domain only. A scoring system is applied to make the assessment. The score ranges from 0 to 5, where 5 indicates the highest level of industry interference, and 1 is low or no interference. Hence the lower the score, the better for the country. The 0 score indicates absence of evidence or not applicable. Where multiple pieces of evidence are found, the score applied reflects an average. The report covers information on incidents from April 2023 up to March 2025.

Background and Introduction

Finland's first Tobacco Industry Interference Index

This is Finland's first Tobacco Industry Interference (TII) Index. It is based on a global survey on how governments are responding to tobacco industry interference and protecting their public health policies from the tobacco industry's commercial and vested interests as required under the World Health Organization Framework Convention on Tobacco Control (WHO FCTC). This report is based on publicly available information on tobacco industry interference in Finland and the corresponding government responses. This Tobacco Industry Interference Index generates important data for policymakers, governmental authorities, non-governmental organizations, researchers and healthcare professionals, supporting evidence-based decision-making and policy development.

The Finnish Tobacco Act provides strong support

Finland has a long history of strong and effective tobacco control. The first Tobacco Act was passed in 1976 and came into force in 1977. Since then, a series of reforms have gradually tightened restrictions on tobacco use, advertising, and availability. Key measures have included banning tobacco advertising, raising the legal purchase age to 18, introducing health warnings, point-of-sale display and advertising ban, and expanding smoke-free environments to workplaces, restaurants, beaches, and playgrounds. (1.)

In 2010, Finland set an ambitious public health goal, and it was written into the Tobacco Act: to end the use of tobacco products. Tobacco Act was comprehensively revised in 2016 and the goal was extended to include all nicotine products (excluding medicinal nicotine products which are regulated under Medicines Act), with a target of a tobacco- and nicotine-free Finland by 2030. In practice, the goal is that less than 5% of adults use these products daily. In 2016, Finland also introduced comprehensive set of regulations for electronic cigarettes, including ban on other than tobacco flavours, retail sale licensing, inclusion to display and smoking bans, and taxation.

The Tobacco Act was amended again in 2022 and 2025. Until April 2023, nicotine pouches were classified in Finland as medicinal products, and their sale required a license from the Finnish Medicines Agency. Since April 2023, they were declassified as nonmedical products which brought many challenges. Finally, in August 2025 the new Tobacco Act brought also nicotine pouches under the Tobacco Act. They are now subject to restrictions on flavors, nicotine content, sales, and marketing. Sales to minors and online sales are prohibited, while travellers' import from abroad is restricted. Their use is banned in and around schools, daycares, and other youth environments. Packaging must be standardized and include health warnings in Finnish and Swedish (the second official language of Finland). The changes will enter into force in stages during years 2025 and 2026. (1.)

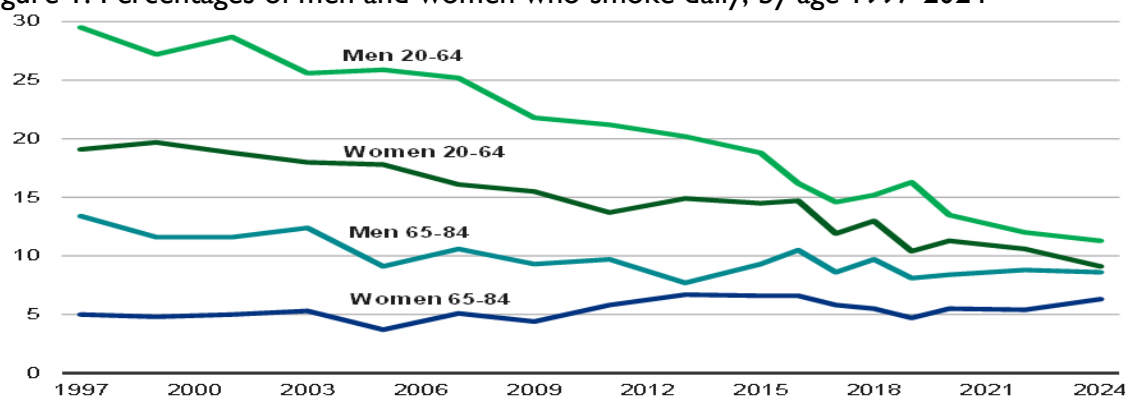
Finland's approach reflects a public health model focused on prevention, regulation, and long-term reduction of both tobacco and nicotine product use. Finland's strong Tobacco Act has a key role preventing tobacco and nicotine use.

Tobacco use, health risks and costs

Tobacco use is known to be the single largest avoidable health risk and the most significant cause of premature death in the world (2). The WHO estimates that tobacco kills more than seven million people a year (3). Tobacco use is a major risk factor for several non-communicable diseases. The majority of lung cancer and chronic obstructive pulmonary disease (COPD) cases are directly attributable to smoking. In addition, smoking significantly elevates the risk of numerous other malignancies and respiratory conditions. It is also a contributing factor in the etiology of various chronic diseases, including cardiovascular diseases, rheumatic conditions, and type 2 diabetes. (4.)

In Finland smoking rates have declined since the late 1990s (Figure 1). In 2024, the prevalence of daily smoking among Finns aged 20 to 64 was 10 %, with a higher prevalence observed in men (11 %) compared to women (9 %) (5). Despite this positive trend, smoking still causes considerable premature morbidity, mortality, and societal costs. It is estimated that 4 600 – 6 700 people die each year in Finland from smoking-related diseases (6-7). In Finland, year 2020, the societal costs caused by smoking were estimated to be between 1.0 and 1.6 million euros (8).

Figure 1. Percentages of men and women who smoke daily, by age 1997-2024

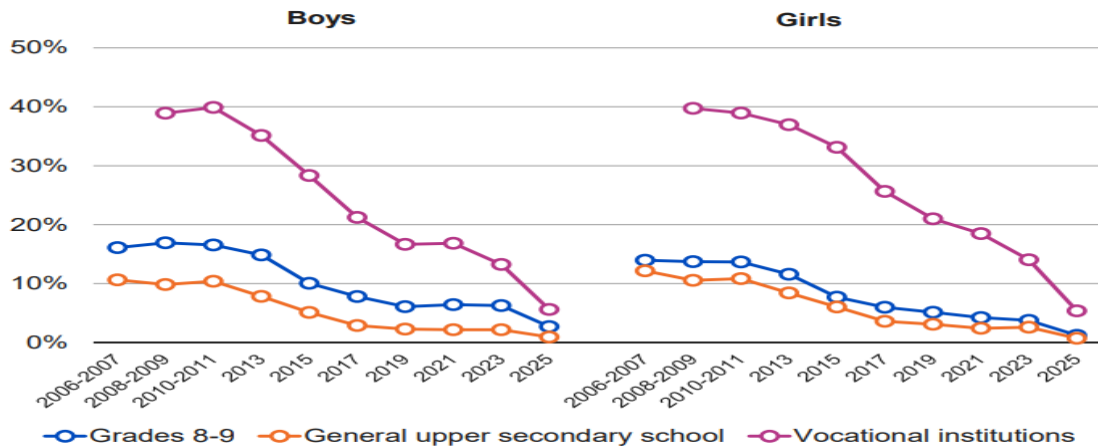


Source: Tobacco Statistics 2024, Finnish Institute for Health and Welfare (THL). Available at: <http://www.thl.fi/tilastot/tupakkatilasto>.

According to the Well-being of children and young people – School Health Promotion study 2025, youth smoking has also decreased since the early 2000s (Figure 2). In 2025, smoking was most common among first- and second-year students in vocational schools: 6% of boys and 5% of girls smoked daily. Among first- and second-year upper secondary school (students (1% of both boys and girls), the proportion remained at the same level as in 2023. (9.)

The Finnish Institute for Health and Welfare (THL) predicts that if smoking continues to decline at the current rate, an estimated 7 000 people will be diagnosed with lung cancer, 35 000 with chronic obstructive pulmonary disease (COPD), and 175 000 with coronary heart disease in Finland between 2025 and 2034. Achieving the goal set in the Finnish Tobacco Act – that the prevalence of daily use of tobacco and nicotine products is under 5% among the adult population by 2030 – could prevent over 1 000 new cases of lung cancer, more than 6 000 cases of COPD, and nearly 3 000 cases of coronary heart disease. (4.) With the current trend, the objective of the Tobacco Act will not be met (10), so further actions are needed.

Figure 2. The proportion of young people who smoke daily by gender and school level 2006–2025, %



Source: Well-being of children and young people – School Health Promotion study 2025. School Health Promotion study 2025. Statistical report 46/2025. Finnish Institute for Health and Welfare (THL). Available at: <https://urn.fi/URN:NBN:fi-fe2025091596228>.

New nicotine products are a major challenge in Finland

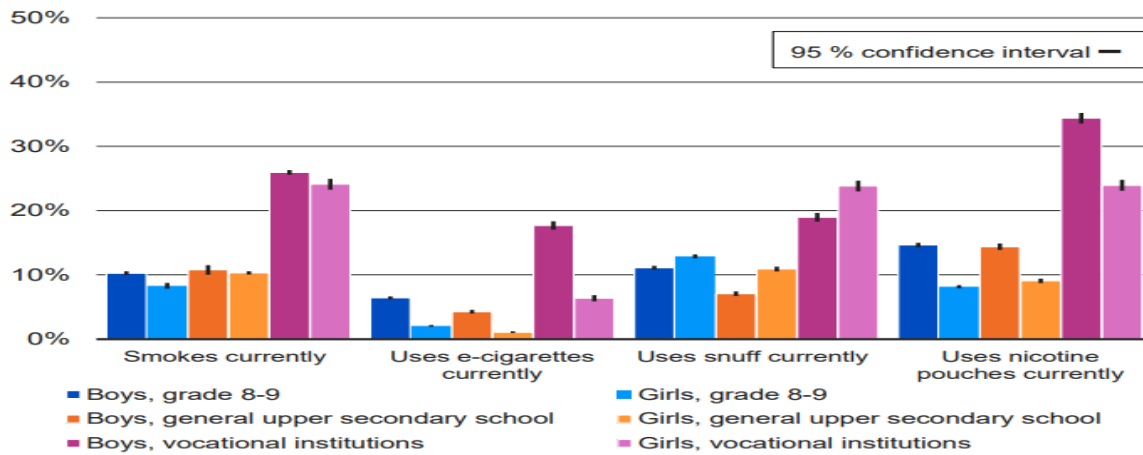
Although smoking has predominantly decreased in Finland, the use of nicotine pouches and e-cigarettes (vapes) has increased and raises serious public health concerns, particularly regarding young people. Nicotine pouches are products used in a similar way to Swedish smokeless tobacco (snus) and resemble it in appearance. They do not contain tobacco, but they do contain nicotine and various additives that are harmful to health. E-cigarettes, also known as vapes, are battery-operated devices that heat a liquid and produce an aerosol. They do not contain tobacco, but they typically contain nicotine. The appealing flavors, packaging and marketing tactics have made both nicotine pouches and e-cigarettes (vapes) particularly attractive to adolescents and young adults.

In Finland, the use of nicotine pouches has increased among adolescents and adults. In 2022, three percent of men and less than one percent of women aged 20–64 used nicotine pouches daily. Eight percent of men and two percent of women in this age group used nicotine pouches either daily or occasionally. Among the retired population, both daily and current use remain very low. (8.) THL's Well-being of children and young people – School Health Promotion study 2025 shows the use of nicotine pouches among youth (Figure 3). Among first- and second-year vocational school students, 25% of boys and 15% of girls reported daily use. Among 8th and 9th graders and first- and second-year general upper secondary students, the figures were 9% for boys and 4–5% for girls. (9.)

Selling snus is prohibited in Finland based on EU's Tobacco Directive yet personal imports are allowed with some restrictions. In 2025, three percent of boys in grades 8 and 9 of comprehensive school, two percent of boys in upper secondary schools, and eight percent of boys in vocational schools used Swedish smokeless tobacco (snus) daily (Figure 3). Among girls, the percentages were lower (1%, 0.3%, 2%). In 2025, five percent of boys and six percent of girls in grades 8 and 9 of comprehensive school used e-cigarettes (vapes) daily (Figure 3). Among upper secondary school students, one percent of boys and

three percent of girls used e-cigarettes (vapes) daily. Among vocational school students, five percent of boys and nine percent of girls reported daily use. (9.)

Figure 3. The proportion of young people currently using tobacco or nicotine products by gender and school level 2025, %.



Source: Well-being of children and young people – School Health Promotion study 2025. Statistical report 46/2025. Finnish Institute for Health and Welfare (THL). Available at: <https://urn.fi/URN:NBN:fi-fe2025091596228>.

The tobacco and nicotine industry lobbies prominently and behind the scenes

The tobacco and nicotine industry allocates substantial resources to lobbying efforts. While challenges remain, Finland has been able to mitigate the influence of the industry through evidence-based policies and comprehensive regulatory measures. The identified issues have been addressed, and corrective measures have been implemented.

One example is related to the national implementation of the EU's Single-Use Plastics Directive concerning the extended producer responsibility for tobacco products with filters. To explore options for transposing the Directive into Finnish legislation, the Ministry of the Environment published a commissioned study in 2019 (11). As part of the study, the authors interviewed a regulatory affairs manager from Philip Morris International. As a result, the report contained several proposals that promoted the interests of tobacco companies. E.g., the report supported the use of e-cigarettes and HTPs for environmental reasons, even by directly promoting IQOS which is not sold in Finland.

In March 2022, ASH Finland submitted a letter to the Parliamentary Ombudsman regarding provisions in a Government Proposal (Section 47a: producer responsibility for certain municipal waste management and cleaning costs; and Section 51: producer's obligation to provide information and advice). The letter requested a review of the legality of these provisions and their compliance with the Tobacco Act (594/2016), as well as with Finland's obligations under the WHO Framework Convention on Tobacco Control (WHO FCTC), particularly Article 5.3. Several other stakeholders also highlighted the same issue in their respective statements in the public consultation of the government proposal. In the final legislation, the tobacco industry was excluded from all involvement

in the implementation of the Act except for its role as a financial contributor. The above description serves as a concrete example of how influence exerted by the tobacco industry has been effectively curtailed.

More regulation and stricter legislation are needed to protect future generations

Political decisions play a crucial role in shaping public health outcomes. The more actively smoking and nicotine use are addressed, the greater the improvements in population health and the more lives that can be saved. In Finland stricter regulation is needed. Raising the minimum legal age for purchasing tobacco and nicotine products to 20 years would be a highly effective measure to prevent initiation. Additionally, restricting availability and continuing to implement regular tax increases on tobacco and nicotine products could significantly reduce related morbidity. Achieving national goals requires a strong focus on preventing initiation and supporting cessation of all tobacco and nicotine products.

One of the most important duties of society is to protect children and young people. The Constitution of Finland obliges public authorities to promote the health of the population. The objective of Finland's Tobacco Act is to end the use of tobacco products and other nicotine-containing products. The purpose of the Finnish Health Protection Act is to maintain and promote both public and individual health, as well as to prevent health hazards. Tobacco and nicotine industry must not influence decision-making nor health policy. This report highlights problem areas from which policymakers, governmental authorities, non-governmental organizations, researchers and healthcare professionals can learn. Based on the report, five recommendations have been highlighted, which can be found on page 11 of the report.

References:

- 1) The Finnish Tobacco Act: [Tupakkalaki | 549/2016 | Lainsäädäntö | Finlex](#)
- 2) WHO: [Tobacco EURO](#)
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- 4) THL: <https://thl.fi/-/thl-julkaisi-skenaarioita-tupakoinnin-ja-alkoholinkayton-vaikutuksista-kansanterveyteen-seuraavan-kymmenen-vuoden-aikana>
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- 6) Reitsma MB, Kendrick PJ, Ababneh E, Abbafati C, Abbasi-Kangevari M, Abdoli A, ym. Spatial, temporal, and demographic patterns in prevalence of smoking tobacco use and attributable disease burden in 204 countries and territories, 1990–2019: a systematic analysis from the Global Burden of Disease Study 2019. *The Lancet*. 2021;397(10292):2337–60.
- 7) Viljakainen A, Jääskeläinen M, Ruokolainen O, Ollila H, Laatikainen T. Tupakoinnin yhteiskunnalliset kustannukset vuonna 2020 ja vertailu vuoteen 2012. Tutkimuksesta tiiviisti 52/2022. Helsinki: Terveyden ja hyvinvoinnin laitos, 2022.
- 8) THL: [Tupakkatilasto 2023](#)
- 9) THL: [Wellbeing of children and adolescent School Health Promotion study Statistical report_46_2025.pdf \(1.209Mt\)](#)
- 10) Ruokolainen O, Reinikainen J, Ollila H, Härkänen T: Saavutetaanko tupakkalain tavoite? Mallinnustutkimus aikuisväestössä. *Yhteiskuntapolitiikka* 2023;88(5–6): 500–512.
- 11) [Kertakäyttömuovituotteita koskevan direktiivin toimeenpanon vaihtoehtojen tarkastelu - Valto](#)

Summary of Findings

Finland participated Tobacco Industry Interference Index first time ever year 2025. Although the current state in Finland is quite good in many aspects, there is still much work to be done in the implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control. Year 2025 Finland's total score is 34 points. Below you can find summary of findings.

I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

(Summarize your evidence/ points in questions 1-4)

There is not any evidence found to suggest that the Finnish government accepts or endorses any offer of assistance when setting or implementing tobacco / nicotine control policy. There is neither any evidence found to show that the government accepts or endorses policies or legislation drafted by or in collaboration with the tobacco / nicotine industry. The government does not allow or invite the tobacco / nicotine industry to sit in government multisectoral committee that sets public health policy, and the government does not nominate and does not allow tobacco / nicotine industry representatives or allies to participate in the official Finnish delegation to the COP WHO FCTC.

However, the tobacco and nicotine industry has been able to influence political decision making. According to the Chancellor of Justice, former Minister of Education compromised the legislative process of the Tobacco Act, in year 2024. The issue concerned the inclusion of certain flavored nicotine pouches in the tobacco law proposal. When it became apparent that lobbying by the nicotine industry had influenced the preparation of the Tobacco Act (former Minister of Education), the law was sent back for re-drafting.

2 INDUSTRY CSR ACTIVITIES

(Summarize your evidence/ points in question 5)

In Finland, government agencies and officials do not cooperate with the tobacco / nicotine industry in matters related to public health policy and adhere to the principles of Article 5.3 of the WHO Framework Convention on Tobacco Control. There is no information indicating that government agencies or officials in Finland have received corporate social responsibility (CSR) contributions - monetary or otherwise - from the tobacco / nicotine industry or entities acting on its behalf.

Regardless in the past, the tobacco industry has been allowed to participate in planning of the national implementation of the SUP Directive but in the adopted legislation, tobacco industry was denied of any other participation than cost recovery.

In May 2024 two members of parliament from the Social Democratic Party were lobbied by tobacco giant Philip Morris in Switzerland, even though according to the WHO Framework Convention, decision-makers should decline such free trips. Two

members of parliament from the Finns Party went on a lobbying trip to Switzerland in December 2024, paid for by the tobacco company Philip Morris. Politicians have received invitations from the tobacco giant to Christmas parties, river cruises, and trips to Switzerland, according to an investigation by MTV News.

3 BENEFITS TO THE INDUSTRY

(Summarize your evidence/ points in questions 6-7)

There is no evidence about benefits to the industry, but standardized packaging and appearance for nicotine pouches were given a one-year transition period, which is relatively long. The sale of Swedish smokeless tobacco (Snus) is banned in the EU, but it is allowed with an exemption in Sweden, which shares a border with Finland. Swedish smokeless tobacco (Snus) has had an exceptionally large passenger import quota for a long time, and in the future, nicotine pouches will have a large passenger import quota as well.

4 UNNECESSARY INTERACTION

(Summarize your evidence/ points in questions 8-10)

There is no general information suggesting that Finnish ministers, the Prime Minister, or the President participate in events organized by tobacco or nicotine companies. There is no evidence that the government accepts assistance / offers of assistance from the tobacco / nicotine industry or that the government accepts / endorses / enters into partnership with the tobacco / nicotine industry.

Members of parliament has gone on a lobbying trips to Switzerland, paid for by the tobacco company Philip Morris. The lobbying exists, but the register reveals almost nothing about lobbying activities by the tobacco / nicotine industry. The National Audit Office of Finland is launching an investigation into lobbying by tobacco companies. Lobbying by the tobacco / nicotine industry has remained hidden from the transparency register.

5 TRANSPARENCY

(Summarize your evidence/ points in questions 11-12)

In Finland, the government does not systematically disclose meetings. However, the Act on the Openness of Government Activities guarantees citizens the right to request information from official documents, which makes it possible to obtain details about such meetings through information requests. Given its monitoring tasks, National Supervisory Authority for Welfare and Health (Valvira) interaction with the tobacco and electronic cigarette industry is necessary and unavoidable, and minutes must be prepared of all meetings between Valvira and the industry.

The Transparency of Lobbying Act (also known as the Lobbying Register) entered into force in Finland in 2024. This law requires actors seeking to influence Parliament or ministries to register their lobbying activities. It applies to the tobacco

and nicotine industries as well, but it is not limited to them. Lobbying by the tobacco and nicotine industry has remained hidden from the transparency register.

6 CONFLICT OF INTEREST

(Summarize your evidence/ points in questions 13-15)

The government does not prohibit contributions from the tobacco / nicotine industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. However, legislation imposes certain rules and transparency requirements on such donations. In the Audit Office's view, it is justified that the guidelines explicitly prohibit the acceptance of money and trips offered by external parties.

No retired senior government officials have been identified as holding positions in the tobacco business. No current government officials have been identified as holding positions in the tobacco / nicotine business.

7 PREVENTIVE MEASURES

(Summarize your evidence/ points in questions 16-20)

In Finland, the government does not systematically disclose the records of the interaction with the tobacco / nicotine industry and its representatives. However, the Act on the Openness of Government Activities guarantees citizens the right to request information from official documents, which makes it possible to obtain details about such meetings through information requests.

To ensure transparency, National Supervisory Authority for Welfare and Health (Valvira) publishes minutes on Valvira's web page. The government has also a general ethical code of conduct for public officials, and Ministry of Social Affairs and Health (STM) has given advice for public officials on how to implement Article 5.3 of the FCTC. The Finnish Institute for Health and Welfare (THL) has an internal code of conduct which states that THL does not collaborate with companies that produce health damaging products such as tobacco.

The Tobacco Act requires only the submission of sales volume data to National Supervisory Authority for Welfare and Health (Valvira). There is no program / system/ plan to consistently raise awareness within government departments on policies relating to FCTC Article 5.3 Guidelines. The general rules to curb bribery and corruption is installed to prohibit government officials from accepting any forms of contributions/ gifts. There is no policy specifically formulated for disallowing contributions, monetary or otherwise, from the tobacco or nicotine industry, but the same general rules exists.

Recommendations

Recommendation 1:

Finland should incorporate the prevention of tobacco / nicotine industry influence into its **Tobacco Act** by referring Article 5.3 of the WHO FCTC, as previously recommended by a ministerial working group on Finnish tobacco and nicotine policy.

Recommendation 2:

Finland should ensure that all **political decision-makers**, their advisors and officials in public administrations involved directly or indirectly with tobacco and nicotine control policies, are fully aware of, understand, are committed and adhere to all obligations arising from Article 5.3 of the WHO FCTC. They should also recognize that Article 5.3, which Finland has ratified, is as legally binding as Finnish law.

Recommendation 3:

Finland should ensure continuous awareness-raising across all **government** departments and other parts of public administration regarding the policies and guidelines related to Article 5.3 of the WHO FCTC.

Recommendation 4:

Finland should ensure that failure to report lobbying activities by **tobacco and nicotine industries** in the transparency register is sanctioned. These industries should be obligated to disclose their profit margins, as well as their advertising and promotional activities, to improve transparency.

Recommendation 5:

Finland should tighten the regulation of **passenger import quotas** for snus, tobacco and nicotine products in order not to grant any benefits to the tobacco and nicotine industry and to prevent the distribution of products to young people.

FINLAND

Tobacco Industry Interference Index 2025

Results and Findings

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ¹ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry or any entity or person working to further its interests . ² in setting or implementing public health policies in relation to tobacco control ³ (Rec 3.4)				3		
No, not any evidence is found to suggest that the government accepts or endorses any offer of assistance when setting or implementing tobacco / nicotine control policy. However, the tobacco and nicotine industry has been able to influence political decision making. According to the Cancellor of Justice, former Minister of Education compromised the legislative process of the Tobacco Act. The issue concerned the inclusion of certain flavored nicotine pouches in the tobacco law proposal. The complaints criticised the Minister's action to promote the inclusion of flavours produced by a Jakobstad-based nicotine pouch manufacturer in legislation and thus promote the interests of one company. The Chancellor of Justice stated that former Minister did not disclose the background of the list of permitted flavors, which were part of the nicotine industry's flavor range. (Ref 1-2.)						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)		1				
No, not any evidence is found to show that the government accepts or endorses policies or legislation drafted by or in collaboration with the tobacco / nicotine industry. Finland's public health policy is well protected from the influence of the tobacco / nicotine industry. Finland was among the first to sign the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) agreement in June 2003, and it became binding for Finland on April 24, 2005, following ratification by the Parliament (Treaties of Finland 27/2005). When it became apparent that lobbying by the nicotine industry had influenced the preparation of the Tobacco Act (former Minister of Education), the law was sent back for re-drafting. In October 2024, after the Tobacco Act was approved, concerns were raised that the regulation on the flavors of nicotine pouches may have favored a single company. The government proposal suggested that characteristic scents and flavors, with the exception of menthol, mint, tea, ginger, rosemary, and wood, should be banned for nicotine pouches and other smokeless nicotine products. In October 2024, the government decided that the law would not be presented to the President for approval, and instead, the preparation of the law would be restarted to ensure fair and open competition and the equitable and non-discriminatory treatment of entrepreneurs. (Ref 3.)						
3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8)		1				
The government does not allow /or invite the tobacco / nicotine industry to sit in government multisectoral committee that sets public health policy.						

¹ The term "government" refers to any public official whether or not acting within the scope of authority as long as cloaked with such authority or holding out to another as having such authority

² The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

³ "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour

	0	1	2	3	4	5
4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ⁴ (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.		I				
The government does not nominate and does not allow tobacco / nicotine industry representatives or allies to participate in the official Finnish delegation to the COP WHO FCTC (Ref 4).						
INDICATOR 2: Industry CSR activities						
5. A. Government agencies or their officials endorse, support, form partnerships with or participates in activities of the tobacco industry described as socially responsible . For example, environmental programs. (Rec 6.2) B. The government (its agencies and officials) receives CSR contributions ⁵ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests (eg political, social, financial, educational, community or other contributions (Rec 6.4) including environmental or EPR activities (COP10 Dec)). NOTE: exclude enforcement activities as this is covered in another question				3		
National (A) In Finland, government agencies and officials do not cooperate with the tobacco / nicotine industry in matters related to public health policy and adhere to the principles of Article 5.3 of the WHO Framework Convention on Tobacco Control. Regardless in the past, the tobacco industry has been allowed to participate in planning of the national implementation of the SUP Directive. While preparing the report used as a basis for legislative drafting, Philip Morris's Päivi Mononen-Mikkilä was also interviewed. The section of the report concerning tobacco and nicotine products supports the harm reduction strategy promoted by Philip Morris and the introduction of new products to the market. <i>Reference 5.</i> In years 2024-2025 when drafting the government proposal to Parliament for the amendment of the Waste Act, Article 5.3 of the WHO Framework Convention on Tobacco Control was explicitly mentioned in the government proposal, and the government proposal also explained how this was taken into consideration in the preparatory process. (Ref 6.) Provincial level (B) There is no information indicating that government agencies or officials in Finland have received corporate social responsibility (CSR) contributions - monetary or otherwise - from the tobacco industry or entities acting on its behalf. Regardless, two members of parliament from the Social Democratic Party were lobbied by tobacco giant Philip Morris in Switzerland, even though according to the WHO Framework Convention, decision-makers should decline such free trips. (Ref 7.) Finland is committed to Article 5.3 of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC), which requires Parties to protect public health policies from the commercial and other vested interests of the tobacco industry. A-B) The restriction of tobacco industry influence should be incorporated into Finland's Tobacco Act by reference to Article 5.3 of the World Health Organization Framework Convention on						

⁴ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

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

	0	1	2	3	4	5
Tobacco Control (WHO FCTC). It is beneficial that the Ministry of Social Affairs and Health (STM) has given advice for public officials on how to implement Article 5.3 of the FCTC. These guidelines include: 1) Avoiding collaboration with the tobacco industry, 2) Not accepting donations or sponsorships. 3) Reporting all contacts transparently. (Ref 8.)						
INDICATOR 3: Benefits to the Tobacco Industry						
6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)	0					
No evidence, even though standardized packaging and appearance for nicotine pouches were given a one-year transition period, which is relatively long.						
7. The government gives privileges, incentives, tax exemptions, subsidies, financial incentives, or benefits to the tobacco industry (Rec 7.3)			2			
Finland will increase tobacco taxes by nearly 30 percent between now and 2027 (Ref 9). The raises will take place in six increments and eventually drive the price of a pack of cigarettes above 13 euros. Tobacco taxes will be raised twice a year until July 2027, for a total increase of 27,1 percent. (Ref 10-11.) Taxes on nicotine pouches and e-cigarettes will be increased by 30 million euros in years 2026 – 2029 (Ref 12). The sale of swedish smokeless tobacco (Snus) is banned in the EU, but it is allowed with an exemption in Sweden, which shares a border with Finland. Swedish smokeless tobacco (Snus) has had an exceptionally large passenger import quota for a long time, and in the future, nicotine pouches will have a large passenger import quota as well. The large number of snus users in Finland can be attributed to a great extent to the failure of Finnish tobacco policy. Permitting bringing into the country up to 1000 grams of snus per 24 hours and the sale of snus on daily ferries between Finland and Sweden does not communicate to the public that use is discouraged. (Ref 13.)						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ⁶) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)	0					
There is no general information suggesting that Finnish ministers, the Prime Minister, or the President participate in events organized by tobacco or nicotine companies. But two members of parliament from the Finns Party went on a lobbying trip to Switzerland in December 2024, paid for by the tobacco company Philip Morris. (Ref 14). Politicians have received invitations from the tobacco giant to Christmas parties, river cruises, and trips to Switzerland, according to an investigation by MTV News. The lobbying register reveals almost nothing about lobbying activities by the tobacco industry. “This is clearly the kind of activity that should be visible in the register,” says the National Audit Office of Finland (VTV) (Ref 15). “This is outrageous,” said Professor Pekka Puska, Chair of ASH Finland, in response to the MPs’ trip paid for by a tobacco company (Ref 16). The National Audit Office of Finland is launching an investigation into lobbying by tobacco companies. Lobbying by the tobacco / nicotine industry has remained hidden from the transparency register (Ref 17).						
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)	0					
No evidence found to back this blame.						

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

	0	1	2	3	4	5
19. The government has a program / system/ plan to consistently ⁷ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)		1				
There is no program / system/ plan to consistently raise awareness within government departments on policies relating to FCTC Article 5.3 Guidelines. But, the Tobacco and Nicotine Policy Development Working Group of the Ministry of Social Affairs and Health has proposed adding a third paragraph to Section I of the Tobacco Act, concerning Article 5.3 of the Framework Convention on Tobacco Control: Public actions regarding smoking and the use of nicotine products should be protected from the commercial and other interests of the industry (Ref 29).						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)			2			
The general rules to curb bribery and corruption is installed to prohibit government officials from accepting any forms of contributions/ gifts. There is no policy specifically formulated for disallowing contributions, monetary or otherwise, from the tobacco or nicotine industry, but the same general rules exists.						
TOTAL	34					

⁷ For purposes of this question, “consistently” means: a. Each time the FCTC is discussed, 5.3 is explained. AND b. Whenever the opportunity arises such when the tobacco industry intervention is discovered or reported.

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