

United Kingdom

**TOBACCO
INDUSTRY INTERFERENCE
INDEX 2025**

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Key acronyms used in this document	
ACOBA	Advisory Committee on Business Appointments
ACS	Association of Convenience Stores
AWH	Action on World Health
APPG	All-Party Parliamentary Group
ASI	Adam Smith Institute
BAT	British American Tobacco
BEIS	Business, Energy, & Industrial Strategy
CCC	Consumer Choice Center
CMA	Competition & Markets Authority
CoC	Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment
CPTPP	Comprehensive and Progressive Agreement for Trans-Pacific Partnership
DBT	Department for Business & Trade
DCMS	Department for Culture, Media & Sport
DESNZ	Department for Energy Security and Net Zero
DEFRA	Department for Environment, Food & Rural Affairs
DHSC	Department of Health & Social Care
DSIT	Department for Science, Innovation and Technology
DUP	Democratic Unionist Party
ESG	Environment, Social and Governance
FCTC	Framework Convention on Tobacco Control
FOIA	Freedom of Information Act
GLD	Government Legal Department
GTNF	Global Tobacco & Nicotine Forum
HRA	Health Research Authority
HMRC	His Majesty's Revenue & Customs
HoC	House of Commons
HoL	House of Lords
IEA	Institute of Economic Affairs
IfG	Institute for Government
IPO	Intellectual Property Office
IPSA	Independent Parliamentary Standards Authority
ITPAC	Imported Tobacco Products Advisory Council
JTI	Japan Tobacco International
LGPS	Local Government Pension Scheme
MP	Member of Parliament
MRC	Medical Research Council
NHS	National Health Service
NFRN	National Federation of Retail Newsagents
OHID	Office for Health Improvement & Disparities
OPSS	Office for Product and Safety Standards
ORCL	Office of the Registrar of Consultant Lobbyists
PMI	Philip Morris International
RPC	Regulatory Policy Committee
SGF	Scottish Grocer's Federation
TMA	Tobacco Manufacturers' Association
UK	United Kingdom
UKTI	UK Tobacco Industry Interference Index (UKTI)
UKVIA	UK Vaping Industry Association
WHO	World Health Organization

Background and Introduction

This report aims to measure how well national governments in the UK protected public health policies from tobacco industry interference over the two-year period of March 2023-2025. Previous editions of the report, published in 2019, 2020, 2021 and 2023, can be accessed on the [Tobacco Control Research Group website](#).

The UK Tobacco Industry Interference Index (UKTI) forms part of the Global Tobacco Industry Interference Index (GTI) published by the Global Center for Good Governance in Tobacco Control (GGTC) and based on a methodology developed by the Southeast Asia Tobacco Control Alliance (SEATCA) and GGTC. It surveys how national governments protect public health policies from the industry's subversive efforts in line with Article 5.3 of the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC). It is part of a global publication. The UKTI was prepared by the Tobacco Control Research Group at the University of Bath following the methodology and scoring prescribed by GGTC (see below for more detail).

Note on the use of “government”: in line with the GTI protocol, this document applies the term “government” widely to cover not only the United Kingdom (UK) governments (including devolved administrations) and public officials, but also backbench politicians, political parties, All-Party Parliamentary Groups (APPGs) and local councils. Although these are not technically part of government / are not all areas over which the government has direct jurisdiction, they are included because of the important role they play in policy development and lawmaking in the UK's parliamentary system. Moreover, the implementation Guidelines of Article 5.3 are applicable to “government officials, representatives and employees of any national, state, provincial, municipal, local or other public or semi/quasi-public institution or body within the jurisdiction of a Party, and to any person acting on their behalf. Any government branch (executive, legislative and judiciary) responsible for setting and implementing tobacco control policies and for protecting those policies against tobacco industry interests should be accountable.”

As in previous years, the UKTI covers tobacco companies and associated organisations, while identifying some relevant incidents relating to electronic cigarette (e-cigarette) companies.

The Department of Health and Social Care (DHSC), as the “custodian of the FCTC for the UK government”, has provided guidance to all UK Government officials on what they should do to adhere to Article 5.3. These guidelines may be found on the [UK government website](#).

Methodology

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance. There are 20 questions based on the 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 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**, but also includes incidents prior to **April 2023** if they were not identified in previous editions of the Index but still have relevance today (e.g. related to an MP who was active during the timeframe of this report).

Summary Findings

I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The tobacco industry and associated organisations are permitted to submit responses to public consultations and calls for evidence, including on issues of tobacco control. The DHSC's guidance states that "[w]hen undertaking a consultation on tobacco policy, respondents should be asked to declare any direct or indirect links to, or funding received from, the tobacco industry." This Index identified one instance of a consultation not including this question, and multiple instances of evidence calls not including this question. A lack of consistency in information about how industry responses would be dealt with was also identified - some consultations and calls for evidence provided no information on how industry responses would be dealt with, while others stated that industry submissions would be considered, and others stated that such submissions would not be considered as part of the Government's policy response.

There was also significant interaction between parliamentarians and the tobacco industry on issues of policy development. Transparency records of multiple government departments - His Majesty's Revenue & Customs (HMRC), Medical Research Council (MRC), Department for Business & Trade (DBT), Department for Energy Security and Net Zero (DESNZ) - identified meetings with industry representatives. Detailed minutes of these meetings are not provided, with only limited details being publicly available.

Further, the Scottish Parliament lobbying register shows many of the recorded lobbying meetings related to numerous relevant policy issues including, but not limited to, a ban on disposable vape (e-cigarette) products, and the 2023/24 and 2024/25 UK Tobacco and Vapes Bill.

2 INDUSTRY CSR ACTIVITIES

Multiple historical examples of individuals who held Parliamentary roles within the timeframe of this edition of the Index receiving hospitality from the industry were identified, as were various instances of industry hospitality being accepted by Parliamentarians.

Multiple Members of Parliament (MPs), across multiple Parties, sponsored parliamentary receptions and events for tobacco companies such as Philip Morris International (PMI), Japan Tobacco International (JTI), and Forest. MPs featured as panellists on Institute of Economic Affairs (IEA)¹ (see Appendix A) and JTI-sponsored events. One MP also wrote an article in LabourList, which was sponsored by JTI during his time in Parliament. Several MPs reportedly attended a lunch hosted by Forest. Parliamentary Staff were emailed an invitation to attend a JTI-hosted 'Parliamentary Staff Christmas Drinks' event at a cricket club in London. A PR firm representing British American Tobacco (BAT) invited members of the House of Lords (HoL) to an informal lunch, hosted by a Lord. Other instances included MPs in the Conservative, Labour, and Reform UK Parties providing comment on an [Adam Smith Institute](#) (ASI) report for a press release, JTI continuing to be listed as a corporate supporter of the British Museum, and two members of the HoL continuing to serve as directors of a tobacco industry-funded company set up to tackle the problem of smoking-related litter.

¹ Tobacco Tactics, [Institute of Economic Affairs](#), 2024, accessed April 2025

3 BENEFITS TO THE INDUSTRY

The UK Government applies 0% duty on imports of cigars, cheroots and cigarillos, containing tobacco for multiple countries, including those within the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). The major tobacco companies have continued to pay very low levels of corporation tax in the UK, although low levels of corporation tax payments are not unique to the tobacco industry and/or the UK.^{2 3 4} Calls for an audit of HMRC conduct on this matter in the previous four UK Tobacco Industry Interference Index (UKTI) reports have not been heeded.

4 UNNECESSARY INTERACTION

A wide range of unnecessary interactions were recorded between Parliamentarians and Government departments with the tobacco industry and associated organisations. Further, industry participation at fringe/side events at party conferences was frequent. Evidence was also found of several local council pension funds investing in the tobacco industry.

5 TRANSPARENCY

The Register of Consultant Lobbyists is a public list maintained by the Office of the Registrar of Consultant Lobbyists (ORCL) in the UK. While it aims to promote transparency by requiring professional lobbyists who are paid to communicate with senior government officials to register and disclose the clients they represent, its scope is limited to consultant lobbyists only and does not cover all regulated lobbying. Only Scotland has an official Lobbying Register in which all regulated (i.e. face-to-face) lobbying must be recorded.

The Ministerial Code requires government departments to publish details of ministers' gifts, hospitality, overseas travel and meetings on a quarterly basis. This requirement is reflected in the Central Government Corporate Transparency Commitments. Additionally, the DHSC guidance for adherence to Article 5.3 notes that all UK government departments or bodies should publish correspondence received from tobacco industry representatives, replies sent to tobacco industry representatives, and minutes of any meetings. Compliance with these requirements, specifically in relation to meeting minutes, appears to be lacking. For instance, HMRC regularly holds meetings with a wide range of tobacco industry stakeholders including JTI, Imperial Brands, BAT, PMI, and the Tobacco Manufacturers' Association (TMA), and information about attendees and issues discussed is updated quarterly. However, no meeting minutes or outcomes are publicly available.

6 CONFLICT OF INTEREST

There is no legislation prohibiting the tobacco industry from donating to political parties, candidates, or campaigns. There are general rules regulating political contributions and the disclosure of such contributions, with donations worth over £7,500 to national political parties needing to be declared. Several MPs received money or gifts from the tobacco industry and/or its associates, either during or prior to the timeframe under analysis. Further, a senior former MP obtained employment at BAT less than a year after leaving their role in Parliament.

² J.R. Branton and A.B. Gilmore (2019), [The Failure of the UK to Tax Adequately Tobacco Company Profits](#), *Journal of Public Health*.

³ Tax Justice Network, [Ashes to Ashes: How British American Tobacco avoids taxes in low and middle income countries](#), April 2019, accessed April 2025.

⁴ The Investigative Desk, [Big Tobacco, Big Avoidance](#), November 2020, accessed April 2025.

7 PREVENTIVE MEASURES

There are several policies across several different government departments which aim to regulate government interactions with the tobacco industry, as outlined in the previous edition of this Index. A positive development since the publication of the previous Index is the DHSC's guidance to all UK Government officials on what they should do to adhere to Article 5.3.

Recommendations

Recommendation 1: Create and maintain a legally binding and publicly accessible register that covers all lobbying and policy influence activity across UK administrations. Furthermore, make it a legal requirement for organisations involved in policy discussions to register and disclose their funding before lobbying. Ensure that organisations failing to register or fully declare funding are excluded from policy discussions.

Recommendation 2: Ensure consistency in application of Article 5.3 across all consultation and calls for evidence processes in the UK. Specifically, consultations relating to public health should identify, publish, and separate out tobacco industry responses, and outline measures in place to ensure that the commercial and other vested interests of the tobacco industry do not influence development of public health policy.

Recommendation 3: Prevent conflicts of interest by prohibiting the tobacco industry and vested interests from making contributions (monetary or otherwise) to political parties and public officials at all levels. Prohibit public officials from holding positions in, or being seconded to, the industry, or taking up posts with the industry for at least five years after leaving public positions (and vice versa).

Recommendation 4: Prevent the tobacco industry and vested interests from having opportunities to influence governments, including sponsoring events at political party conferences.

Recommendation 5: Ensure that procedures for publishing details of all meetings - including minutes, in line with DHSC's guidance - with the tobacco industry and vested interests are fully implemented across all government departments and levels, and that these meetings happen only when strictly necessary to effectively regulate the tobacco industry and tobacco products.

United Kingdom

Tobacco Industry Interference Index 2025

Results and Findings

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INDICATOR 1: Level of Industry Participation in Policy-Development						
I. The government ⁵ 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 ⁶ in setting or implementing public health policies in relation to tobacco control ⁷ (Rec 3.4)		1				
<u>Executive branch allowing the industry to participate in public health policies development and / or implementation.</u> <u>Through consultations</u> The UK runs public consultations for inputs to policies and regulations. All such consultations accept submissions from the tobacco industry and individuals and organisations interacting with it. As noted on the government's website: "When undertaking a consultation on tobacco policy, respondents should be asked to declare any direct or indirect links to, or funding received from, the tobacco industry."⁸ The tobacco industry's opinions are generally included in the consultation summaries and reporting of outcomes, but language regarding how industry responses contribute to the government's response to consultations differ by consultation, indicating a lack of consistency on this point across the consultations. Consultations conducted during the period of analysis include: <i>'Creating a smokefree generation and tackling youth vaping consultation' (October 2023)</i> - included a mandatory question where all respondents were asked to disclose whether they have any direct or indirect links to, or receive funding from, the tobacco industry. 307 respondents disclosed links to the tobacco industry, with the government analysing these alongside the other responses, while noting that "In line with the requirements of article 5.3 of the FCTC, throughout this consultation response we summarise the views of respondents with disclosed links to the tobacco industry, we have not considered these views when determining our policy response due to the vested interests of the tobacco industry." The consultation did not directly ask if respondents were affiliated with e-cigarette and other nicotine product companies.⁹ In January 2025, the Health and Social Care Committee of the Welsh Senedd launched a targeted consultation to stakeholders on the Legislative Consent Memorandum for the						

⁵ 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.

⁶ The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

⁷ "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour.

⁸ DHSC, [Guidance for government engagement with the tobacco industry](#), February 2025, accessed April 2025.

⁹ DHSC, [Creating a smokefree generation and tackling youth vaping consultation: government response](#), February 2024, accessed April 2025.

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Tobacco and Vapes Bill, with the list of approached organisations including the Association of Convenience Stores (ACS), National Federation of Retail Newsagents (NFRN), UK Vaping Industry Association (UKVIA), and PMI, with Philip Morris Ltd. providing a response.¹⁰ <i>‘Mandating quit information messages inside tobacco packs: consultation’ (August 2023)</i> - 13 respondents disclosed industry links. The consultation included the same mandatory question about industry funding as above, but did not state that industry-funded responses were not considered as part of the government’s policy response, with the government response instead stating that: “In line with article 5.3 of the WHO FCTC, we have documented tobacco industry comments as part of this analysis. We give the responses for each question as the total responses, including those from people with links to the tobacco industry. We also outline the tobacco industry-related responses separately.”¹¹ <i>Draft Environmental Protection (Single-Use Vapes) (Scotland) Regulations 2024 (February 2024)</i> - A Scottish Government consultation where respondents were required to disclose any direct or indirect links to the tobacco industry. 86 respondents submitted to the consultation, 11 of which had direct links to the tobacco industry and 8 of which had indirect links. The consultation outcome stated that, “In accordance with the requirements of article 5.3 of the FCTC, we have not considered the views of those with links to the tobacco industry when determining our policy response and amendments to the draft Regulations”.¹² <i>‘Vaping products duty’ (March 2024)</i> - Included the same mandatory question about industry funding, but the government’s response provided no information on if industry responses were considered or made any effort to present industry-linked responses separately from others.¹³ Several roundtables were held jointly by the Treasury and HMRC during the consultation period, including attendees from BAT, imperial, JTI, and PMI.¹³ The government response to the consultation listed multiple tobacco industry bodies as having contributed and stated that, “The government is grateful to” respondents.¹³ <i>The Environmental Protection (Single-Use Vapes) (England) Regulations 2024 draft SI (March 2024)</i> - Department for Environment, Food & Rural Affairs (DEFRA) invites comments on draft regulations relating to prohibiting the sale of single-use vapes, noting that: “The UK is a party to the World Health Organization Framework Convention on Tobacco Control and so has an obligation to protect the development of public health policy from the vested interests of the tobacco industry. To meet this obligation, we ask all respondents to disclose whether they have any direct or indirect links to, or receive funding from, the tobacco industry.”¹⁴						

¹⁰ Health and Social Care Committee of the Welsh Senedd, [Letter from Chair Health and Social Care Committee to Stakeholders](#), January 2025, accessed May 2025.

¹¹ OHID, [Mandating quit information messages inside tobacco packs: government response](#), November 2024, accessed April 2025.

¹² Tobacco Tactics, [Tobacco Industry Responses to Public Consultations in the UK](#), 2024, accessed April 2025.

¹³ HM Treasury, [Vaping Products Duty: Consultation response](#), October 2024, accessed April 2025.

¹⁴ DEFRA, [The Environmental Protection \(Single-use Vapes\) \(England\) Regulations 2024 draft SI](#), March 2024, accessed April 2025.

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A full list of respondents is not available, however the ACS and the [Consumer Choice Center](#) (CCC) published their responses on their websites.^{15 16}

'Implementing the prohibition of the sale and supply of single-use vapes in Scotland: your views' (April 2024)

- A Scottish Government consultation where respondents were required to disclose any direct or indirect links to, or funding from, the tobacco industry, and to explain what these were. Out of 45 responses, four declared such links (BAT, Imperial, ACS, [Scottish Grocers' Federation](#) (SGF)). The government's response to the consultation process stated that the views of those with links to the tobacco industry were considered neither when determining policy responses, nor when amending the draft regulations.¹⁷

'Additional Compliance Measures for Vaping Products Duty' (October 2024)

- HM Treasury's summary of this technical consultation lists multiple industry bodies as respondents and states that "The government is grateful" to all respondents.¹⁸

Environmental Protection (Single-Use Vapes) (Scotland) Regulations 2024 - fixed penalty notice amendment: consultation (December 2024)

- A Scottish Government consultation which makes no mention of how industry affiliated actors should respond to the consultation, or of Article 5.3, instead stating that "all responses will be analysed and considered along with any other available evidence to help us."¹⁹ The consultation received 25 responses, 23 of which have been published, with the ACS being among the respondents.²⁰

Meetings with industry

- HMRC holds meetings with tobacco stakeholders including JTI, Imperial Brands, BAT, PMI, the TMA, and the Imported Tobacco Products Advisory Council (IPAC).

While HMRC's role in the administration and collection of taxes and related matters likely requires some interactions with the industry, the available information on such meetings is insufficient to determine if all the interactions were strictly necessary. Information about attendees and issues discussed is updated quarterly but no meeting minutes or outcomes are publicly available and information on the discussed topics is minimal.

The topic discussed most frequently was 'track and trace', but other topics included the Vaping Products Duty consultation, potential IT services for a new vaping duty, the single

¹⁵ ACS, [ACS Submission - UK Disposable Vapes Ban Draft Regulations](#), May 2024, accessed May 2025.

¹⁶ Consumer Choice Center, [Response to the Single-Use Vapes prohibition](#), May 2024

¹⁷ Tobacco Tactics, [Tobacco Industry Responses to Public Consultations in the UK](#), 2024, accessed April 2025

¹⁸ HM Treasury, Consultation outcome: Response to consultation on additional compliance measures for Vaping Products Duty 2025, accessed June 2025.

¹⁹ Scottish Government, [Environmental Protection \(Single-Use Vapes\) \(Scotland\) Regulations 2024 - fixed penalty notice amendment: consultation](#), December 2024, accessed June 2025.

²⁰ Scottish Government, [Published responses](#), undated, accessed April 2025

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trade window, forestalling, and duty deferment.²¹ No data on meetings that have taken place in 2025 were available at the time of writing.

- According to the Department for Business and Trade (DBT) records, within his role as Minister of State for Enterprise, Markets and Small Business, Kevin Hollindrake, a current MP, had frequent roundtable events featuring, as well as 1-to-1 meetings with, ACS representatives throughout the period of analysis.^{22 23} ACS represents convenience retailers. Minutes of these meetings are not provided, with short descriptions of the meeting being available stating that they were to “discuss retail and hospitality”. Some of these sessions also involved other MPs, such as Chris Philip²⁴.

In May 2024, Dominic Johnson, Baron Johnson of Lainston, who served under Rishi Sunak as a Minister of State in the DBT, met with a number of organisations, including Philip Morris UK, to “discuss regulatory reform”.²⁵

- DESNZ records also show roundtables and 1-to-1 meetings with DESNZ and ACS representatives between July-September 2023.²⁶
- A FOIA request to The Regulatory Policy Committee (RPC) identified multiple instances of tobacco company representatives submitting emails with views on the analysis featured in the impact assessment relating to the Tobacco and Vapes Bill. In one instance (with Farrants), such contact extended into a Microsoft Teams meeting. According to the RPC, in each of these instances the views shared “were considered in finalising the RPC’s opinion.”²⁷

Industry lobbying of MSPs

A search of the Scottish Parliament’s lobbying register for the time period of this analysis revealed the following activities:

- BAT reported lobbying MSPs on 3 occasions - with Craig Hoy on illicit vaping²⁸, Oliver Mundell on ‘the role of vapes to help existing adult smokers transition away from combustible tobacco’,²⁹ and Gillian MacKay on ‘a range of relevant issues relating to vaping, specifically seeking to address concerns around environmental impact and underage vaping.’³⁰
- Imperial reported lobbying MSPs on 15 occasions, with topics covered including the proposed ban on disposable vapes and their environmental impact, youth vaping, the UK Tobacco and Vapes Bill, the illicit market of both tobacco and vapes, and the company additionally “enquired about constituents’ concerns on vape use and whether vape products are an effective smoking cessation aid” with several MSPs.³¹

²¹ HMRC, [HMRC officials’ meetings with tobacco stakeholders. Meetings held in 2023](#), January 2025, accessed April 2025.

²² DBT, [DBT’s ministerial meetings. April to June 2023](#), October 2023, accessed April 2025.

²³ DBT, [DBT’s ministerial meetings. January to March 2024](#), August 2024, accessed April 2025.

²⁴ DBT, [DBT’s ministerial meetings. July to September 2023](#), February 2024, accessed April 2025.

²⁵ DBT, [DBT’s ministerial meetings. April to June 2024](#), November 2024, accessed April 2025.

²⁶ DESNZ, [DESNZ ministerial meetings. July to September 2023](#), December 2023, accessed April 2025.

²⁷ Regulatory Policy Committee, [Emailed response released under Freedom of Information Act](#), accessed April 2025.

²⁸ The Scottish Parliament, [Lobby Register. British American Tobacco UK \(12/11/2024\)](#), undated, accessed April 2025.

²⁹ The Scottish Parliament, [Lobby Register. British American Tobacco UK \(03/05/2023\)](#), undated, accessed April 2025.

³⁰ The Scottish Parliament, [Lobby Register. British American Tobacco UK \(04/09/2023\)](#), undated, accessed April 2025.

³¹ The Scottish Parliament, [Lobby Register. British American Tobacco UK \(23/10/2023\)](#), undated, accessed April 2025.

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- PMI reported lobbying MSPs on 15 occasions, 6 of which were arranged by PR firm Halogen Communications. Conversations often focused on “the company’s smoke-free vision through its portfolio of smoke-free products, including heated tobacco and electronic cigarettes” and discussion of the “Scottish Government’s consultation on e-cigarette advertising, setting out Philip Morris Limited’s position on the matter, as well as its approach towards tobacco harm reduction in light of the publication of the Scottish Government’s Tobacco and Vaping Framework.”³² - The SGF reported lobbying MSPs on 85 occasions. <u>Other incidents</u> - It was reported in November 2024 that Mark Fullbrook – whose links to the industry as a former lobbyist were outlined in the prior edition of this Index - had access to Parliament for 18 months via a Parliamentary pass that should have been deactivated but was not due to an “administrative error”. Fullbrook is reported to have been seen around the Westminster estate during this period.³³ - The civil service commissioners’ register of interest for January 2025 includes a declaration from Lea Paterson, a Civil Service Commissioner and Board Member at the Independent Parliamentary Standards Authority (IPSA), that her husband has an interest in BAT (specific details beyond this are not provided).³⁴						
2. The government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. (Rec 3.4)			2			
<u>Though consultations</u> As outlined in #1, the ‘Vaping products duty’ (March 2024) consultation process appears to have taken into account industry contributions, and the Scottish Government’s ‘Environmental Protection (Single-Use Vapes) (Scotland) Regulations 2024 - fixed penalty notice amendment: consultation’ (December 2024) made no mention of how industry affiliated actors should respond to the consultation, or of Article 5.3, and stating that “all responses will be analysed and considered along with any other available evidence to help us.”³⁵ <u>Through calls for evidence</u> - Several relevant calls for evidence were released during the period analysis: ‘Youth vaping’ (April 2023) and ‘Standardised packaging for all tobacco products’, (November 2024). The Office for Health Improvement & Disparities (OHID) summary of the Youth vaping evidence call noted that “In line with Article 5.3 of the FCTC, we have documented tobacco industry comments as part of this analysis. However, we will not consider these comments when formulating actions to reduce the number of children vaping”. The summary also noted that, “We received 16 responses to the online form from people who identified that they had links to or receive funding from the tobacco industry”.³⁶ The standardised packaging evidence call from DHSC stated that “In accordance with Article						

³² The Scottish Parliament, [Lobby Register: British American Tobacco UK \(13/12/2023\)](#), undated, accessed April 2025.

³³ C. Neilan, [Lobbyist had access to parliament for 18 months due to “administrative error”](#), Tortoise, November 2024, accessed May 2025.

³⁴ Civil Service Commission, [CIVIL SERVICE COMMISSIONERS REGISTER OF INTERESTS - January 2025](#), April 2025, accessed May 2025.

³⁵ Scottish Government, [Environmental Protection \(Single-Use Vapes\) \(Scotland\) Regulations 2024 - fixed penalty notice amendment: consultation](#), December 2024.

³⁶ OHID, [Youth vaping call for evidence analysis](#), October 2023, accessed April 2025.

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5.3 of the WHO FCTC, all responses given by the tobacco industry to this call for evidence will be published”, but did not outline how/if industry-linked responses would be considered by government.³⁷ - Further, the Public Bill Committee put out a call for evidence on the Tobacco and Vaping Bill in April 2024 – neither the initial call³⁸, nor the House of Commons guide for witnesses giving written or oral evidence³⁹, made any mention of respondents being required to disclose their interests nor of how industry-associated responses would be treated. The Committee received written evidence from all four transnational tobacco companies, as well as numerous other industry stakeholders, including the Australian Association of Convenience Stores.⁴⁰ - In May 2024, the Scottish government held evidence sessions relating to the Tobacco and Vapes Bill, which the Scottish Grocers’ Federation was invited to contribute to.⁴¹ <u>Other</u> - In 2025, Greenbutts – a company producing biodegradable cigarette filters- and the political news platform parliamentnews.co.uk backed a campaign called Plastic Free Butt, which aimed to obtain an amendment to the UK government’s 2024/25 Tobacco and Vapes Bill which would require cigarette manufacturers to use biodegradable filters. Greenbutts has multiple links to the tobacco industry, including its chief strategy officer having previously had a long-standing career with BAT.⁴² - Ultimately, an amendment to the Tobacco and Vapes Bill, which would have required cigarette manufacturers to use plastic free biodegradable alternatives, was tabled by Dame Caroline Dinenage, MP, and backed by a cross-party group of other MPs.⁴³ During debates around the amendment, Ashley Dalton, Parliamentary Under-Secretary of State for Public Health and Prevention stated that the amendment “could lead to greenwashing, improving the reputation of tobacco manufacturers while not necessarily improving environmental outcomes”.⁴⁴ The amendment was ultimately rejected (137 ayes to 304 noes).⁴⁵						
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)			2			
In Scotland, the cross-party group on Independent Convenience Stores, involves participants from organisations with direct tobacco industry connections, such as SGF (which serves as the group’s secretariat) and the Scottish Wholesale Association (SWA).⁴⁶						

³⁷ DHSC, [Standardised packaging for all tobacco products. Tobacco industry declaration](#), November 2024, accessed April 2025.

³⁸ UK Parliament, [Tobacco and Vaping Bill: call for evidence](#), April 2024, accessed February 2025.

³⁹ House of Commons, [Guide for witnesses giving written or oral evidence to a House of Commons select committee](#), February 2016, accessed February 2025.

⁴⁰ Parallel Parliament, [Tobacco and Vapes Bill 2023-24](#), undated, accessed April 2025.

⁴¹ Tobacco Tactics, [Tobacco Industry Interference with Endgame Policies](#), December 2024, accessed April 2025.

⁴² TobaccoTactics, [Cigarette Filters](#), 23 April 2025, accessed 28 April 2025.

⁴³ Parliament News, [New campaign aims to eradicate the most common form of plastic rubbish in the world](#), February 2025, Accessed April 2025.

⁴⁴ UK Parliament, Hansard, [Tobacco and Vapes Bill Volume 764: debated on Wednesday 26 March 2025, 2025](#), accessed August 2025

⁴⁵ Parallel Parliament, [Tobacco and Vapes Bill \(Limited Text - Ministerial Extracts only\)](#), Wednesday 26th March 2025, accessed July 2025.

⁴⁶ The Scottish Parliament, [Independent Convenience Stores](#), 2025, accessed April 2025.

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The Ministerial Working Group on Tobacco Control, which was active until 2024, and provided advice to the Scottish government on tobacco control, featured representatives from the SGF and the NFRN. Further, all Big Four transnational tobacco companies were corporate members, alongside JUUL Labs, the UKVIA, and Republic Technologies (producer of roll-your-own accessories). As of March 2025, Gallaher Ltd (JTI) and Imperial Brands were listed as associate members of the UK APPG for Responsible Business.⁴⁷ No financial contributions from these companies appear in the group's register during the period under analysis.⁴⁸ The Independent British Vape Trade Association acts as the 'responsible vaping' APPG's, secretariat and "pays Capital Counsel to assist them in that role".⁴⁹ According to the Office of the Registrar of Consultant Lobbyists (ORCL), Capital Counsel was affiliated with the APPG up to June 2024 and its managing director Giles Roca – director of the TMA until 2019⁵⁰ ⁵¹ In September 2023, Adam Afriyie, MP until May 2024, and former Deputy of the APPG, received funding from the industry-funded Global Tobacco and Nicotine Forum (GTNF) to attend and present at the event, which took place in South Korea that year.⁵² From June 2016 to May 2023, BAT donated over £25,000 to the 'Corporate Governance' APPG (now defunct).⁵³						
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) (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.		I				
No such incidents were identified.						
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 ⁵⁴ (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: excludes enforcement activities as this is covered in another question				3		

⁴⁷ APPG, [Members of the APPG for Responsible Business](#), 2025, accessed April 2025.

⁴⁸ UK Parliament, [Register Of All-Party Parliamentary Groups. Responsible Business](#), February 2025, accessed April 2025.

⁴⁹ UK Parliament, [Register Of All-Party Parliamentary Groups. Responsible Vaping](#), November 2024, accessed April 2025.

⁵⁰ [Giles Roca](#), [LinkedIn](#), accessed April 2025.

⁵¹ Office of the Registrar of Consultant Lobbyists, [Capital Counsel Limited](#), undated, accessed April 2025.

⁵² They Work For You, [Changes to the Register of Members' Interests The Register of Members' Interests, 4 August 2024](#), undated, accessed April 2025.

⁵³ Parallel Parliament, [Corporate Governance APPG](#), May 2024, accessed April 2025.

⁵⁴ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions.

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Engagement in industry-affiliated events						
According primarily to UK Parliament sponsored events booking data^{55 56} (data up to July 2024 were available at the time of writing), numerous instances within the time-period of this Index were identified: - Philip Davies, Conservative MP from 2005-2024, sponsored an evening reception with Philip Morris in January 2023 and an event titled “Nanny State of the Nation” by FOREST in February 2024. Reportedly, Giles Watling, MP until May 2024, stepped in at the last minute to host the event as Davies was unable to attend.⁵⁷ Watling also sponsored an event by JTI titled “Smoking Alternatives: Innovating For Tomorrow” in March 2023. - Mary Glindon, Labour MP, sponsored an event titled “Japan Tobacco International Illegal And Non-Compliant Vapes” May 2023.⁵⁸ - In November 2023, Craig Whittaker, MP until May 2024, was a panelist on an IEA event titled “Prohibition 2.0: The Future of UK Tobacco Policy”.⁵⁹ - BAT were reported to be sponsoring a roundtable due to be hosted by MP Graham Brady on behalf of the Centre for Policy Studies in December 2023 to “discuss the Government’s smokefree ambitions, what policies could support the goal, and what a Conservative approach to public health should look like.”^{60 61} - In January 2024, John Glen, MP for Salisbury, and Minister for the Cabinet Office and Paymaster General from 2023 to 2024, hosted a roundtable with thinktanks including the IEA, “to discuss civil service reform ahead of Minister Glen's speech at the (<i>Institute for Government</i>) IfG annual conference”.⁶² - Virendra Sharma, Labour MP from 2007-2024, sponsored a JTI event about illegal tobacco in January 2024. In March 2024, Sharma – who was previously a member of the APPG for Vaping (now defunct) – also wrote an article in LabourList which was sponsored by JTI.⁶³ 64 - Ian Paisley Jr, Democratic Unionist Party (DUP) MP from 2010-2024, sponsored a JTI event titled “53 Billion and Counting: The Illegal Tobacco Black Market” in February 2024.’ - Mark Logan, Conservative MP from 2019-2024, sponsored a lunch with PMI in March 2024. - Current Conservative MPs Mark Garnier and Richard Fuller have each individually sponsored events by the APPG on Corporate Governance (see 3) throughout 2023-24.						

⁵⁵ House of Commons, [Sponsored Events Data 2023-24](#), November 2024, accessed March 2025.

⁵⁶ House of Commons, [Sponsored Events Data 2022-23](#), November 2024, accessed March 2025.

⁵⁷ M. Chapman, [Revealed: Big Tobacco's campaign to undermine UK generational smoking ban](#), *The Examination*, June 2024, accessed March 2025.

⁵⁸ Parallel Parliament, [Vaping APPG](#), November 2023, accessed April 2025.

⁵⁹ Institute of Economic Affairs, [Prohibition 2.0: the future of UK tobacco policy 29.11.23](#), *EventBrite*, November 2023.

⁶⁰ Tobacco Tactics, [Tobacco Industry Interference with Endgame Policies](#), December 2024, accessed April 2025.

⁶¹ R. Vaughan, [The British MPs tobacco firms love to work with](#), *The i Paper*, December 2023.

⁶² Cabinet Office, [Cabinet Office ministerial meetings](#), January to March 2024, August 2024, accessed April 2025.

⁶³ Tobacco Tactics, [Japan Tobacco International](#), April 2025, accessed April 2025.

⁶⁴ V. Sharma, [The Tory's generational smoking ban is a gimmick – unlike Labour's plan for a smoke-free Britain](#), *Labour List*, March 2024, accessed April 2025.

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- In May 2024, Forest held an event titled “Beat The Ban: Fight For Choice - A Prohibition Lunch” at a London restaurant.⁶⁵ Reportedly, invitees included Conservative MPs, tobacco representatives of the IEA, the ASI, and the ITPAC. Alexander Stafford- then parliamentary private secretary to Kemi Badenoch, and current MP, Andrew Rosindell, were reported to have attended the lunch, with Philip Davies having been due to appear but was not in attendance.^{66 67} - In October 2024, Christopher Chope, current MP, invited MPs to a parliamentary reception “examining the growing issue of illegal tobacco and vapes in the UK”, hosted by Japan Tobacco International (JTI).⁶⁸ - In January 2025, the ASI released a report titled “19 Million Years of Life: The case for real tobacco harm reduction policy”.⁶⁹ In an ASI press release for the report, which included comments on the report from a number of MPs, specifically, Rupert Lowe MP, Reform UK Member of Parliament for Great Yarmouth, Greg Smith MP, Conservative Member of Parliament for Mid Buckinghamshire, and Mary Glindon MP, Labour Member of Parliament for Newcastle upon Tyne East and Wallsend and Chair of the APPG for Responsible Vaping.⁷⁰ - In January 2025, VPZ – which took a loan from PMI in 2018 – sent letters to MPs regarding the tobacco and vapes bill.⁷¹ During the first sitting of the Tobacco and Vapes Bill Committee (January 2025), Jack Rankin, MP, referred to the letters, stating that they refer to a partnership between VPZ and “NHS in Essex, which had put out to tender for a process to help people successfully quit.”. Rankin also stated that “I might contend to the Minister that that is exactly the kind of thing we want responsible, legitimate vaping companies to do”⁷², though it should be noted that this claim was contested during the debate, with the then-Health minister Andrew Gwynne, going on to state that “It should never have been the case that addictive nicotine and vaping products could be legally handed out for free.”⁷³ - In February 2025, Atticus Partners Ltd, which currently lists BAT as a client on its ORCL entry⁷⁴, invited members of the House of Lords to an informal lunch hosted by the Rt Hon. Lord Brady of Altrincham, and taking place at a restaurant in Westminster. The event was described as “an opportunity to discuss the Bill in greater detail, and hear from Members of Parliament who have been involved in the scrutiny of the Bill and gain their insights on where the legislation gets the regulations right, and how it could be improved.”⁷⁵ - In April 2025, the ASI hosted a House of Lords event titled “Nicotine Innovation: Bridging the Gap Between Policy and Industry”.⁷⁶						

⁶⁵ S. Clark, [Beat the Ban - a Prohibition lunch](#), *Taking Liberties*, May 2024, accessed April 2025.

⁶⁶ M. Chapman, [Revealed: Big Tobacco's campaign to undermine UK generational smoking ban](#), *The Examination*, June 2024, accessed February 2025.

⁶⁷ R. Davies and M. Chapman, [Revealed: how Sunak dropped smoking ban amid lobbying from tobacco firms](#), *The Guardian*, June 2024, accessed April 2025.

⁶⁸ Personal correspondence.

⁶⁹ M. Marlow and M. Oates, [19 Million Years of Life: The Case for Real Harm Reduction Policy](#), January 2025, accessed March 2025.

⁷⁰ Adam Smith Institute, [Safer Alternatives to Cigarettes Could Save 19 Million Years of Life and Billions of Pounds by 2030](#), *undated*, accessed April 2025.

⁷¹ M. Taylor, [VPZ issues stark warning to government over proposed bill](#), *Deadline*, January 2025.

⁷² House of Commons, [PBC121 Tobacco 1st-8th Compilation](#), January 2025, accessed March 2025.

⁷³ House of Commons, [PBC121 Tobacco 1st-8th Compilation](#), January 2025, accessed March 2025.

⁷⁴ Office of the Registrar of Consultant Lobbyists, [Atticus Partners Ltd](#), *undated*, accessed April 2025

⁷⁵ Personal correspondence.

⁷⁶ Personal correspondence.

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<u>Other instances</u> Ian Paisley, current MP for North Antrim,⁷⁷ is chairman of the Gallaher Trust, a charitable trust started by a £5 million donation from JTI in 2017, following the closure of a local JTI factory (Gallaher has been a subsidiary of JTI since 2007).^{78 79} Two members of the House of Lords (David Maclean, Baron Blencathra, and Lord Porter (Gary Andrew Porter)) serve as directors of the community interest company CleanStreets CIC, which was set up to tackle smoking-related litter in the UK. It appears to be directly and wholly funded by the TMA and/or its members.⁸⁰ As of March 2025, the British Museum – non-departmental public body sponsored by the Department for Culture, Media & Sport (DCMS) – lists JTI as a corporate supporter on its website.⁸¹ During the timeframe of this Index, the BM had repeated contact with JTI, as well as two companies working on JTI's behalf (Carnstone, a management consultancy; and Word on the Street, an events company).⁸² The authors of this report have heard via personal correspondence that the British Museum's Trustees have decided not to renew their partnership with JTI when the current arrangement ends in September 2025. In response to a FOIA request, one council disclosed that council representatives had a conference call with BAT representatives in July 2023, labelled as an "Update on (<i>Environmental, Social and Governance</i>) ESG matters". Further, a meeting with council representation and the Imperial Brand's Investor Relations Team occurred in November 2023 and one with BAT's Investor Relations Team, "organised by Capital Access", took place in September 2024.⁸³						
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)		I				
No such incidents were identified.						
7. The government gives privileges, incentives, tax exemptions , subsidies , financial incentives , or benefits to the tobacco industry (Rec 7.3)				3		
International travellers can bring duty-free into UK 200 cigarettes, 100 cigarillos, or 50 cigars.⁸⁴ The UK Government applies 0% duty on imports of cigars, cheroots and cigarillos containing tobacco for multiple countries, including those within the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). The UK Government allows export of such products to most countries, with restrictions in place for Belarus, North Korea, Russia, and Syria. For more information on UK tariff rates for tobacco-related products, see: https://www.trade-tariff.service.gov.uk/find_commodity.⁸⁵						

⁷⁷ UK Parliament, [House of Lords Minute. Register Of Members' Financial Interests as of 26 June 2023](#), June 2023, accessed April 2025.

⁷⁸ The Gallaher Trust, [About Us](#), 2022, accessed April 2025.

⁷⁹ Japan Tobacco International, [Our UK History](#), 2023, accessed April 2025.

⁸⁰ Clean Streets CIC, [Who we are](#), 2025, accessed April 2025.

⁸¹ The British Museum, [Current Corporate supporters](#), 2025, accessed April 2025.

⁸² British Museum, 10 April 2025, FOI_25029, Emailed response released under Freedom of Information Act.

⁸³ Bradford City Council, 26 March 2025, Emailed response released under Freedom of Information Act.

⁸⁴ Gov.uk, [Bringing goods into the UK for personal use](#), accessed May 2025.

⁸⁵ Gov.uk, [UK Integrated Online Tariff. Commodity 2402100000](#), April 2025, accessed April 2025.

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The major tobacco companies continued to pay very low levels of corporation tax in the UK, although low levels of corporation tax payments are not unique to the tobacco industry and/or the UK.^{86 87 88} Calls in the previous four UKTI reports for an audit of HMRC conduct on this matter have not been heeded. In the UK's Party report on WHO FCTC Implementation for the 2023 reporting cycle, when asked to please provide details on how the government has raised awareness of Article 5.3, avoided entering partnerships with the industry, has introduced measures to limit interactions with the industry, and how the government "have not granted any incentives, privileges, benefits or preferential tax exemptions to the tobacco industry to establish or run their business; etc.)", the following response was provided: "The UK Government has developed guidance to support adherence to Article 5.3 for all government departments and government officials. This will be published imminently. The Scottish Government does not engage with the tobacco industry. The Scottish consultation on vaping in 2022 include a declaration of interest for all respondents to ensure that industry returns were correctly notified. Work is on-going over the commitment to undertake an audit of Article 5.3, which was impacted by the covid pandemic. In introducing standardised packaging in Jersey Public Health Officers restricted all communications on the practicalities of implementation and the final standardised packaging regulations with the tobacco industry by email. In Gibraltar, the Tobacco Control Regulations 2020 state that the focal point for tobacco control must ensure that policies are not influenced by commercial or other vested interests of the tobacco industry. Guernsey does not meet with tobacco manufactures, accept any sponsorship or canvas their views."⁸⁹ In March 2023, the UK extended its ratification of the WHO FCTC to the territory of the Cayman Islands.⁹⁰ As of March 2025, no such extension has been made regarding the Protocol to Eliminate Illicit Trade in Tobacco Products.⁹¹						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ⁹²) 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)			2			
No instances of top-level government officials meeting with or fostering relations with tobacco companies were identified. However, numerous instances relating to Parliamentarians and Political Parties were identified and are outlined below, as are instances of government department engagements with industry. <u>Concerning MPs, Lords and Government Departments</u> Previously unreported incidents which relate to MPs who served within the timeframe of the Index were identified:						

⁸⁶ J.R. Branston and A.B. Gilmore (2019), [The Failure of the UK to Tax Adequately Tobacco Company Profits](#), *Journal of Public Health*.

⁸⁷ Tax Justice Network, [Ashes to Ashes: How British American Tobacco avoids taxes in low and middle income countries](#), April 2019, accessed April 2025.

⁸⁸ The Investigative Desk, [Big Tobacco, Big Avoidance](#), November 2020, accessed April 2025.

⁸⁹ WHO FCTC, [2023 – Core Questionnaire of the WHO FCTC](#), undated, accessed April 2025.

⁹⁰ United Nations, [Status of Treaties - WHO Framework Convention on Tobacco Control](#), March 2025, accessed April 2025.

⁹¹ United Nations, [Status of Treaties – 4.a Protocol to Eliminate Illicit Trade in Tobacco Products](#), March 2025, accessed April 2025.

⁹² Includes immediate members of the families of the high-level officials.

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- In 2019, the IEA hosted an event for Robert Jenrick, MP at the Tory party conference.⁹³
- Steve Baker, MP, featured in an IEA event at the 2021 Conservative Party Conference.⁹⁴

Incidents that occurred during the timeframe of this Index are as follows:

- In October 2023, then Minister of State for Enterprise, Markets and Small Business, and current MP Kevin Hollindrake, presented the Raj Aggarwal Trophy – an award given by the ACS to retailers.^{95 96 97}
- In December 2023, Penny Mordaunt (Conservative MP until 2024), “met in social capacity” with Mark Littlewood, Director General, IEA.⁹⁸
- In January, 2024, John Glen, MP, participated in an “Official roundtable with major thinktanks involved in modernisation and reform work to discuss civil service reform ahead of Minister Glen's speech at the IfG annual conference” which included the IEA.⁹⁹ Also in January 2024, Freya Guinness, the Director General for Corporate Services and Chief Operating Officer at the Department for Science, Innovation and Technology (DSIT), attended a “Half day away day event on Shared Services” which included “experiences from BAT with Q&A”.¹⁰⁰
- In February 2024, Malcom Offord, The Lord Offord of Garvel, disclosed receiving “lunch during a roundtable meeting” from [FTI Consulting](#)- a public relations group with a long history of collaboration with tobacco companies.^{101 102}
- In July 2024, Steve Baker, Minister of State for Northern Ireland between 2022 and 2024, and current MP Jack Rankin, appeared on an IEA panel titled ‘The Future of the Right’.¹⁰³
- In 2024, Nigel Farage, MP, and leader of the Reform UK party co-founded Action on World Health - a campaign critical of the WHO with the aim to “reform or replace” it. Its co-founder’s (David Roach) consultancy firm has previously represented companies involved in the nicotine industry.¹⁰⁴ As of November, 2024, Roach has claimed that Action on World Health (AWH) does “not currently work with any vaping companies but I imagine most novel nicotine companies would support AWH’s aims to reform or replace the WHO given its misguided approach to reduced-risk products”.¹⁰⁵ AWH does not publicly disclose its members. Its webpage lists Andrew Rosindell, MP, Greg Smith, MP,

⁹³ J. Doward, [Peers call on Jenrick to explain opposition to smoke-free zones](#), *The Guardian*, September 2020, accessed February 2025.

⁹⁴ IEA, [IEA Think Tank event with Steve Baker MP reported by The Telegraph](#), October 2021, accessed April 2025.

⁹⁵ ACS, [Raj Aggarwal Trophy](#), 2025, accessed April 2025.

⁹⁶ DBT, [DBT's ministerial meetings, October to December 2023](#), March 2024, accessed April 2025.

⁹⁷ DBT, [DBT's ministerial meetings, April to June 2024](#), November 2024, accessed April 2025.

⁹⁸ Cabinet Office, [Leader of the House of Commons and Whips' ministerial meetings, October to December 2023](#), March 2024, accessed April 2025.

⁹⁹ Cabinet Office, [Cabinet Office ministerial meetings, January to March 2024](#), August 2024, accessed April 2025.

¹⁰⁰ DSIT, [DSIT senior officials' meetings, January to March 2024, September 2024](#), accessed April 2025.

¹⁰¹ Tobacco Tactics, [FTI Consulting](#), October 2024, accessed April 2025.

¹⁰² DBT, [DBT's ministerial hospitality, January to March 2024](#), August 2024, accessed April 2025.

¹⁰³ IEA, [The Future of the Right](#), July 2024, accessed April 2025.

¹⁰⁴ R. Mason, [Nigel Farage's anti-WHO campaign has link to nicotine products industry](#), *The Guardian*, November 2024, accessed April 2025.

¹⁰⁵ Action on World Health, [Action on World Health](#), 2025, accessed April 2025.

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Richard Tice, MP, Sammy Wilson, MP, Christopher Chope, MP, Baroness Foster of Oxon, Lord Moylan, and Lord Strathcarron as supporters.¹⁰⁶

- According to LabourList.org, between 29 July-1 September 2024, 102 Labour MPs participated in a “Survation poll carried out on behalf of Japan Tobacco International” which asked them to rank proposed bills by priority status.¹⁰⁷
- Lord Vaisey of Didcot visited Philip Morris International’s research and development centre in Lausanne, Switzerland, from 31 March to 1 April 2025, with his flights and accommodation being paid for by Philip Morris International.¹⁰⁸
- Throughout the time period covered by this index the DHSC has sent response letters or emails to tobacco companies with differing mentions and language around Article 5.3. For instance, in some instances, letters or emails would acknowledge Article 5.3 while also appearing to respond to some points raised by the companies in the initial correspondence,^{109 110 111 112} whereas other response letters and emails, noted that due to Article 5.3 requirements, “the Department will not be responding to the issues you have raised in your correspondence and will be publishing both this and your correspondence.” This wording was used in responses to BAT and PMI^{113 114} and other tobacco companies, including McChrystal’s¹¹⁵, the Association of Independent Tobacco Specialists,¹¹⁶ the ITPAC¹¹⁷, Barkers of Harrogate¹¹⁸, and Oettinger Davidoff.¹¹⁹

In several instances (responses to Imperial Tobacco and BAT UK alongside [Nicoventures Trading](#)), the response stated that, due to Article 5.3, “we are responding to the points related to process raised in your letter and will not be responding on issues related to public policy.”^{120 121}

Acknowledgment of Article 5.3 was also found in government responses to legal threats from the industry during the period of analysis. In April 2024, the Government Legal Department (GLD) sent a letter to a law firm representing Imperial Brands, Imperial Tobacco, and Fontem Ventures, in response to a “letter before claim” sent by the firm to DHSC¹²². The response criticised the proposed challenge, while acknowledging that all current and future correspondence on this issue would be published, in line with Article 5.3 requirements. The GLD also stated that:

“When it came to the determining the policy response, a lawful decision was made to then discount the known views of respondents linked to the tobacco industry in order to comply with the UK’s obligations under the FCTC to protect public health policy from the commercial and

¹⁰⁶ Action on World Health, [Our Supporters](#), 2025, accessed April 2025.

¹⁰⁷ J. Moules, [Top legislative priorities of Labour MPs revealed in poll](#), *Labour List*, September 2024, accessed April 2025.

¹⁰⁸ UK Parliament, MPs and Lords: Lord Vaisey of Didcot, *undated*, accessed March 2025.

¹⁰⁹ OHID, [Letter from BAT UK and Imperial Tobacco](#), March 2024, accessed April 2025.

¹¹⁰ DHSC, [Response to letter to Jonathan Marron from BAT dated 5 April 2023](#), April 2023, accessed April 2025.

¹¹¹ A. Leadsom, [Response from Minister Leadsom to ACS](#), January 2024, accessed April 2025.

¹¹² DHSC, [Letter from DHSC to BAT UK and Imperial Tobacco](#), March 2024, accessed April 2025.

¹¹³ DHSC, [Email from DHSC to Philip Morris](#), July 2024, accessed April 2025.

¹¹⁴ A. Gwynne, [Letter from Minister Gwynne to Philip Morris](#), October 2024, accessed April 2025.

¹¹⁵ A. Gwynne, [Letter from DHSC to McChrystal's](#), October 2024, accessed April 2025.

¹¹⁶ AITS, [Email from AITS to DHSC](#), August 2024, accessed April 2025.

¹¹⁷ A. Leadsom, [Response from Minister Leadsom to ITPAC](#), April 2024, accessed April 2025.

¹¹⁸ A. Leadsom, [Letter from DHSC to Barker's of Harrogate](#), May 2024, accessed April 2025.

¹¹⁹ A. Leadsom, [Letter from Andrea Leadsom to Oettinger Davidoff](#), May 2024, accessed April 2025.

¹²⁰ A. Leadsom, [Response from Minister Leadsom to Imperial](#), December 2023, accessed April 2025.

¹²¹ A. Leadsom, [Letter from Minister Leadsom to HSE](#), December 2023, accessed April 2025.

¹²² Ashurst, [Letter from Ashurst to Secretary of State for Health and Social Care](#), April 2024, accessed April 2025.

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other vested interests of the tobacco industry... It was entirely reasonable, rational, lawful and procedurally fair for the Secretary of State, having carefully taken into account the full range of Consultation responses including those from the tobacco industry, to decide that the final decisions ought not to be influenced by the views of the tobacco industry."¹²³

Similar correspondence was sent from the GLD to Philip Morris' legal representation following a proposed legal challenge from that company also.¹²⁴

Some instances of DHSC correspondence with the industry which did not appear to recognise Article 5.3 were identified during the period of analysis. In September 2024, the DHSC sent response letters to letters sent by BAT and PMI. Both initial responses to the companies made no mention of Article 5.3 or the DHSC guidance, and asked the companies to "Please consider contributing to the Government's ten-year plan for health which will launch later in the autumn." In December 2024, DHSC sent further follow up letters to both companies, mentioning Article 5.3 and stating that, in light of those requirements, "our previous response was sent in error".¹²⁵

¹²⁶

One instance where correspondence with the industry took place and was deemed necessary by the government was identified. In February 2025, DHSC sent a letter to multiple tobacco companies, including BAT (Germany), Imperial, Japan Tobacco, and Philip Morris, suggesting that the companies engage with a service provider contracted by the Government to provide information about the current UK tobacco and HRT market. The letter states that this process will be part of efforts to include health and quit-focussed pack inserts into such products, and mentions Article 5.3 before stating that:

"We consider your input important for the quality and success of this service, which will inform the implementation of the pack inserts to cigarette and HRT packaging in the UK. Therefore, the Department deems this consultation necessary to ensure the effective regulation of these products."¹²⁷

Awareness of Article 5.3 was also identified in other government departments. Examples include:

- In April 2023, on behalf of the Department for Environment Food & Rural Affairs (DEFRA), Rebecca Pow sent a letter to the TMA in response to a letter sent to them in November 2022 about TMA anti-litter activities. The letter notes that "In line with previous correspondence between the Government and the tobacco industry on this issue, and the World Health Organization's Framework Convention on Tobacco Control, this letter will be made available on GOV.UK."¹²⁸
- In August 2023, PMI contacted the Jenni Minto, MSP, Minister for Public Health and Women's Health to provide input into the Scottish Government's Tobacco Control Action Plan. In September Minto responded, without engaging with the contents of PMI's letter, stating that the Scottish Government is committed to Article 5.3.
- In July 2023, Pow again sent a response letter to the TMA, this time in response to an email sent to Trudy Harrison MP, again about TMA anti-litter activities. The response letter stated that:

¹²³ Government Legal Department, [Response from Government Legal Department to Ashurst](#), April 2024, accessed April 2025.

¹²⁴ Government Legal Department, [Letter from GLD to Reed Smith](#), December 2023, accessed April 2025.

¹²⁵ A. Gwynne, [Letter from Minister Gwynne to BAT](#), December 2024, accessed April 2025.

¹²⁶ DHSC, [Letter from DHSC to Philip Morris](#), December 2024, accessed April 2025.

¹²⁷ DHSC, [Letter from DHSC to tobacco industry re tobacco inserts](#), February 2025, accessed April 2025.

¹²⁸ R. Pow, [Letter to Tobacco Manufacturers Association](#), April 2023, accessed April 2025.

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“As you will be aware, the Government is committed to upholding the World Health Organization’s Framework Convention on Tobacco Control which recommends that parties do not endorse or support activities of the tobacco industry that might be considered socially responsible.”¹²⁹

- In July 2024, JTI UK wrote to the First Minister of Northern Ireland, expressing concerns about the legality of the Tobacco and Vapes Bill. In August, Health Minister, Mike Nesbitt responded, stating that “under WHO FCTC Article 5.3 the Department would not be responding to the issues raised in the request and will make the response public on request.”¹³⁰

Concerning political parties

- The 2023 Conservative Party Conference featured fringe events ran by the IEA and the Taxpayers’ Alliance,¹³¹ including an IEA event titled ‘Nanny State vs Consumer Choice’ where MP Philip Davies appeared as a panelist alongside a JTI representative.^{132 133} Several events were also sponsored by Atos- a company that was involved in the development and promotion of the tobacco industry’s Codentify system.^{134 135}
- The 2024 Conservative Party Conference featured an event “in partnership with Philip Morris”, titled “No one left behind: how do we accelerate the UK’s smokefree future for everyone?” which featured Philip Morris’ Director of External Affairs, as well as Steve Baker, former MP and Cabinet Office Minister.¹³⁶ The conference also featured multiple IEA events including “Torch of Liberty: Can the Conservative Party rediscover its love of freedom?”, with panelists including Lord David Frost and MP, Esther McVey. The TaxPayers’ Alliance also hosted an event at the conference which featured representatives from Forest and the ASI, as well as MPs Andrew Rosindell and Caroline Johnson. IEA and ASI representatives also featured in several other events at the conference.¹³⁷
- The 2024 Labour Party conference, held in September 2024, featured Fringe events including a panel sponsored by JTI, titled “Voices from the Shop Floor: The reality of life as a retailer in 2024”. Panelists included Tracey Gilbert, MP for Edinburgh North and Leith, Fabian Hamilton, MP for Leeds North East, and representatives of the [ACS](#) and the [Federation of Independent Retailers](#).¹³⁸ as well as a JTI-sponsored event titled ‘The Leader’s Speech, supported by JTI’.¹³⁹
- Reform UK’s party conference, which took place in September 2024, reportedly included an event titled “The Bully State: How Nanny is taking over Britain”, which featured the head of UK public affairs at JTI, representatives of the IEA, ASI, Taxpayers’ Alliance (TPA) and Reform UK MP, James McMurdock.¹⁴⁰

¹²⁹ R. Pow, [Letter to Tobacco Manufacturers Association](#), June 2023, accessed April 2025.

¹³⁰ Department of Health (NI), 27th March 2025, [Emailed response released under Freedom of Information Act](#).

¹³¹ R. Lott-Lavigna, [Opaque think tanks, landlords and the arms industry dominate Tory conference](#), *Open Democracy*, October 2023

¹³² IEA, [Nanny State vs Consumer Choice | #ThinkTent23](#), undated, accessed April 2025.

¹³³ R. Lott-Lavigna, [Opaque think tanks, landlords and the arms industry dominate Tory conference](#), *Open Democracy*, October 2023

¹³⁴ Conservative Home, [Conservative Party Conference 2023](#), October 2023, accessed April 2025.

¹³⁵ A.W.A. Gallagher, A.B. Gilmore and M. Eads (2020), [Tracking and tracing the tobacco industry: potential tobacco industry influence over the EU’s system for tobacco traceability and security features](#), *Tobacco Control*.

¹³⁶ Conservative Home, [No one left behind: how do we accelerate the UK’s smoke-free future for everyone?](#), YouTube, September 2024, accessed April 2025.

¹³⁷ CPC24, [Conservative Party Conference 2024 Handbook](#), September 2024, accessed April 2025.

¹³⁸ Party Conference, [Voices from the Shop Floor: The reality of life as a retailer in 2024](#), September 2024, accessed April 2025.

¹³⁹ Party Conference, [Total Politics presents The Leader’s Speech, supported by JTI](#), September 2024, accessed April 2025.

¹⁴⁰ S. Bright, [Tufton Street Descends on Reform UK Conference](#), *DeSmog*, September 2024, accessed April 2025.

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- According to the ORCL, between October-December 2024, Imperial Tobacco was a client of SME4Labour– a lobby organisation which claims to “support constructive and informed discussion within the Labour movement on issues impacting on SMEs” including organising “meetings for Labour Parliamentarians and others”.¹⁴¹ <u>Concerning government-approved awards and certification</u> - BAT utilises award recognition or government equality-based certification in its promotional material, noting that: “We are proud to retain our UK government-backed accreditation Disability Confident Leader (Level 3) status which remains valid until 2026. This accolade acknowledges our efforts in attracting, developing, and supporting individuals with disabilities and long-term conditions.”¹⁴²						
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)			3			
- In May 2023, Trading Standards officers and the Illicit Tobacco Partnership published Guidance to support Trading Standards in complying with Article 5.3 of the WHO Framework Convention on Tobacco Control, which was endorsed by the Chartered Trading Standards Institute.¹⁴³ - The Intellectual Property Office (IPO) conducted its annual survey of Trading Standards Officers’ work on intellectual property (IP) crime for the period April 2023 to March 2024, with the survey including questions about collaboration with industry. The survey saw “increased cooperation between Trading Standards Officers, other law enforcement agencies and industry partners”¹⁴⁴ than in previous years, with the top industry body engaged with from 2019-2024 being the Anti-Counterfeiting Group, of which Imperial and Philip Morris UK are full members.¹⁴⁵ - Multiple local councils confirmed having had contact with the industry during the time period covered in this Index, relating to identifying if seized products were counterfeit and/or providing evidence in legal cases.^{146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161}						

¹⁴¹ Office of the Registrar of Consultant Lobbyists, [Imperial Tobacco](#), undated, accessed April 2025.

¹⁴² BAT, [Combined Annual and Sustainability Report](#), February 2025, accessed March 2025.

¹⁴³ Trading Standards and Illicit Tobacco Partnership, [Protecting policies from the tobacco industry: Guidance to support Trading Standards in complying with Article 5.3 of the WHO Framework Convention on Tobacco Control](#), May 2023, accessed March 2025.

¹⁴⁴ Intellectual Property Office, [Trading Standards IP Crime survey and Successes 2023 to 2024](#), November 2024, accessed April 2025.

¹⁴⁵ ACG, [BRAND Members](#), 2025, accessed April 2025.

¹⁴⁶ Barnsley Metropolitan Borough Council, 25 March 2025, [Emailed response released under Freedom of Information Act](#).

¹⁴⁷ Bournemouth, Christchurch and Poole Council, 15 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁴⁸ Brent Borough Council, 7 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁴⁹ Caerphilly County Borough Council, 11 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁰ Doncaster Borough Council, 10 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵¹ City of York Council, 31 March 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵² East Sussex County Council, 25 March 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵³ Glasgow City Council, 10 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁴ Knowsley Council, 7 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁵ Croydon Borough Council, 18 March 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁶ Doncaster Borough Council, 10 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁷ Moray Council, 4 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁸ Lincolnshire County Council, 9 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁵⁹ Midlothian Council, 18 March 2025, [Emailed response released under Freedom of Information Act](#).

¹⁶⁰ Kent County Council, 4 April 2025, [Emailed response released under Freedom of Information Act](#).

¹⁶¹ Hull City Council, 7 April 2025, [Emailed response released under Freedom of Information Act](#).

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162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191						
192 193 194 195 196 197						
- Several local councils also acknowledged receiving intelligence from tobacco companies (JTI, PMI), resulting from test purchases that the companies conducted, with this intelligence being kept by the councils.^{198 199} In one instance, an email from a local council to JTI stated “We would welcome any intelligence/information regarding illicit tobacco and vapes that you can provide as it may shape our future operational plans”.²⁰⁰ - Further, some councils received additional information from tobacco companies via unsolicited email and either noted the information provided or, in one instance, appeared to disseminate that material to staff members, specifically a “How to Spot illicit tobacco infographic” from Imperial Tobacco was “circulated to officers”.^{201 202 203} In one case, via a telephone call, Imperial Tobacco provided intel to a local council on “the sale of illicit tobacco from a premises” which was then “logged” by the council.²⁰⁴ - Several local councils also referred to meetings with industry representatives at Anti-Counterfeiting Group conferences, with one of these conversations relating to the						

¹⁶² Gloucestershire County Council, 28 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶³ Greenwich Borough Council, 16 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁴ Gloucestershire County Council, 28 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁵ Dumfries and Galloway Council, 13 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁶ East Ayrshire Council, 13 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁷ Essex County Council, 14 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁸ North Lincolnshire Council, 26 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁶⁹ North Somerset Council, 7 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁰ Nottinghamshire County Council, 25 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷¹ Peterborough City Council, 9 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷² Oldham Metropolitan Borough Council, [Emailled response released under Freedom of Information Act.](#)

¹⁷³ Perth and Kinross Council, 27 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁴ Pembrokeshire County Council, 28 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁵ Portsmouth City Council, 11 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁶ London Borough of Redbridge, 20 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁷ Scottish Borders Council, 24 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁸ Sheffield City Council, 28 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁷⁹ Solihull Metropolitan Borough Council, 14 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁰ Southend-on-Sea City Council, 25 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸¹ South Ayrshire Council, 10 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸² Sunderland City Council, 16 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸³ Vale of Glamorgan Council, 19 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁴ Walsall Metropolitan Borough Council, 14 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁵ Waltham Forest Borough Council, 27 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁶ Warwickshire County Council, 9 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁷ Wiltshire Council, 29 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁸⁹ Highland Council, 9 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁰ North Tyneside Metropolitan Borough Council, [Emailled response released under Freedom of Information Act.](#)

¹⁹¹ North Lanarkshire Council, 9 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹² North East Lincolnshire Council, 27 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹³ Sefton Borough Council, 28 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁴ Milton Keynes Council, 19 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁵ Cornwall Council, 19 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁶ Redcar and Cleveland Borough Council, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁷ Middlesbrough Council, 16 April 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁸ Coventry City Council, 27 March 2025, [Emailled response released under Freedom of Information Act.](#)

¹⁹⁹ Essex County Council, 14 March 2025, [Emailled response released under Freedom of Information Act.](#)

²⁰⁰ Glasgow City Council, 10 April 2025, [Emailled response released under Freedom of Information Act.](#)

²⁰¹ Glasgow City Council, 10 April 2025, [Emailled response released under Freedom of Information Act.](#)

²⁰² Gloucestershire County Council, 28 March 2025, [Emailled response released under Freedom of Information Act.](#)

²⁰³ West Dunbartonshire Council, 4 April 2025, [Emailled response released under Freedom of Information Act.](#)

²⁰⁴ Stockton-on-Tees Council, 10 April 2025, [Emailled response released under Freedom of Information Act.](#)

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process for submitting items for trademark examination, another relating to “spotting illicit products etc.” and no details on other exchanges being provided. ^{205 206207 208 209}						
- The Scottish Anti-Illicit Trade Group – “a membership of representatives from the public sector (including law enforcement and government departments), private sector and industry” sharing a “common goal in tackling illicit trade in Scotland, including Intellectual Property (IP) crime and infringement” – includes the SGF and the TMA as members.²¹⁰						
10. The government accepts, supports, endorses, or enters into partnerships or non-binding agreements with the tobacco industry or any entity working to further its interests. (Rec 3.1) NOTE: This must not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.				3		
Local councils meet the broad definition of government utilized in this report, as outlined in the methodology, and so are included within this answer. <u>Local council pension funds</u> Most local council pension funds did not disclose their stance on investing in the tobacco industry, and ones that did appeared to have differing policies. For instance, the Oxfordshire pension fund “includes highly specific activity-based exclusions for tar-sands (also known as oil-sands) extraction; thermal coal extraction; the manufacture of controversial weapons where there is a risk of severe, systemic, and structural violations of international human rights norms; and tobacco production”²¹¹ whereas the Norfolk Pension Fund: “does not operate a divestment or exclusion policy with regards to any company, asset class, geography, or sector. <i>Local Government Pension Scheme</i> (LGPS) funds receive regular calls from lobby groups to divest from a range of sectors – fossil fuel, tobacco, mining, and defense companies have all been the subject of past campaigns. While the NPF Pensions Committee can and does take these views into account, it must ultimately give primacy to its fiduciary duties”.²¹² As of September 2024, the Brunel pension partnership - one of eight national LGPS pools, of which the Avon, Buckinghamshire, Cornwall, Devon, Dorset, Environment Agency, Gloucestershire, Oxfordshire, Somerset, and Wiltshire pension funds are clients of,²¹³ invests in BAT and Imperial.²¹⁴ The Gloucestershire Pension Fund states that it has been: “working with Brunel and partner funds in the introduction of activity based exclusions policy ... These exclusions... will set partnership agreed percentage parameters or limits for thermal coal & oil sands extraction revenues, together with controversial weapons and tobacco production revenues. Once formally adopted by Brunel the activity based exclusions policy will apply to the Gloucestershire Pension Fund.”²¹⁵						

²⁰⁵ Greenwich Borough Council, 16 April 2025, [Emailed response released under Freedom of Information Act](#).

²⁰⁶ Scottish Borders Council, 24 March 2025, [Emailed response released under Freedom of Information Act](#).

²⁰⁷ Gloucestershire County Council, 28 March 2025, [Emailed response released under Freedom of Information Act](#).

²⁰⁸ London Borough of Redbridge, 20 March 2025, [Emailed response released under Freedom of Information Act](#).

²⁰⁹ Worcestershire County Council, 26 March 2025, [Emailed response released under Freedom of Information Act](#).

²¹⁰ Intellectual Property Office, [The Scottish Anti-Illicit Trade Group](#), 28 April 2025, accessed 28 April 2025.

²¹¹ Oxfordshire Pension Fund, [Oxfordshire County Council Pension Fund Responsible Investment Policy](#), September 2024, accessed April 2025.

²¹² Norfolk Pension Fund, [Statement on Divestment/Exclusion & ESG \(Environmental, Social & Governance\) Aspects of Investment Strategy](#), March 2024, accessed April 2025.

²¹³ Brunel Pension Partnership, [Our Clients](#), 2025, accessed April 2025.

²¹⁴ Brunel Pension Partnership, [Library](#), 2025, accessed April 2025.

²¹⁵ Gloucestershire County Council, [Gloucestershire Pension Fund Responsible Investment Policy](#), June 2024, accessed April 2025.

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Information on relevant investments from individual local councils is as follows:						
- As of March 2024, the West Yorkshire Pension Fund invested in BAT and Philip Morris.²¹⁶ - As of March 2024, the Essex Pension Fund invested in Imperial as the fourth-largest equity holding in its portfolio.²¹⁷ - As of September 2024, the Dorset pension fund invested in Altria, BAT, ITC, Imperial, JTI, KT&G, and PMI.²¹⁸ - As of the fourth financial quarter of 2024, the Wiltshire Pension Fund invested in ITC.²¹⁹ - As of September 2024, the Lothian Pension Fund invested in Altria, BAT, Imperial, JTI, and KT&G.²²⁰ - As of December 2024, the Fife pension fund invested in Altria, BAT, Imperial, JTI, and KT&G.²²¹ - The Royal Borough of Kensington and Chelsea Fund invests in the MSCI World Global Equity passive index pooled fund, which includes PMI, Altria, BAT, Japan Tobacco and Imperial Brands.^{222 223}						
<u>Other instances</u>						
The Foreign Commonwealth Development Office (FCDO) has contracted the Adam Smith Institute - a global advisory company that emerged from the Adam Smith Institute – to play a role in the delivery of the Malawi Trade and Investment Programme (MTIP).²²⁴ In 2022-2023, via this program, the Adam Smith Institute funded the Royal United Services Institute (RUSI). RUSI is an independent thinktank with a focus on defence and security, which has received funding from both PMI and JTI as well as several UK government departments and agencies, within the last 5 years.^{225 226}						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)			2			
The Ministerial Code requires government departments to publish details of ministers' gifts, hospitality, overseas travel and meetings on a quarterly basis. This requirement is reflected in the Central Government Corporate Transparency Commitments. Additionally, the DHSC guidance for adherence to Article 5.3 notes that:						

²¹⁶ West Yorkshire Pension Fund, [Asset allocation as of 31 March 2024](#), March 2024, accessed April 2025.

²¹⁷ Essex Pension Fund, [Annual Report & Accounts 2023/2024](#), February 2025.

²¹⁸ Dorset County Pension Fund, [Dorset County Pension Fund Holdings Report 30th September 2024](#), January 2025, accessed April 2025.

²¹⁹ Wiltshire Pension Fund, [Stewardship](#), 2025, accessed April 2025.

²²⁰ Lothian Pension Fund, [Listed Investments](#), January 2025.

²²¹ Fife Pension Fund, [LIST OF INVESTMENTS as at 31st December 2024](#), January 2025.

²²² MSCI, 31 March 2025, [MSCI World Tobacco index \(USD\)](#), accessed 25 April 2025.

²²³ Royal Borough of Kensington and Chelsea, 10 April 2025, [Emailed response released under Freedom of Information Act](#).

²²⁴ ASI, [The Strategic Advisor – Policy and Enabling Environment](#), 2025, accessed April 2025.

²²⁵ ASI, [The Strategic Advisor – Policy and Enabling Environment](#), 2025, accessed April 2025.

²²⁶ Royal United Services Institute, [Funding](#), 2025, accessed April 2025.

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“Occasional interactions with the tobacco industry will be required to effectively regulate the tobacco industry and tobacco products. If interactions are required, these should be conducted with maximum transparency to demonstrate compliance with the FCTC... To ensure transparency in interactions with the tobacco industry, all UK government departments or bodies should publish: correspondence received from tobacco industry representatives, replies sent to tobacco industry representatives, minutes of any meetings”²²⁷

While the DHSC has measures in place to adhere to this guidance, such as publishing all correspondence between the tobacco industry and the department, compliance with these requirements, specifically in relation to meeting minutes, appears lacking across multiple government departments. For instance, HMRC regularly holds meetings with a wide range of tobacco industry stakeholders including JTI, Imperial Brands, BAT, PMI, and the TMA and information about attendees and issues discussed is updated quarterly. However, no meeting minutes or outcomes are publicly available. Similarly, the Office for Health Improvement and Disparities (OHID), as opposed to publishing meeting minutes, instead published a short note featuring discussion points of a virtual meeting between OHID representatives, Nada Ltd. and GN Tobacco, which took place in May 2024.²²⁸

Since March 2013, the Treasury has not published a list of its officials’ meetings with the tobacco industry and topics of discussion. Instead, it publishes a list of all ministers’ meetings with external organisations. Some data is also not provided regularly, for example, as of March 2025, parliamentary data on functions and hospitality covered only the period to July 2024.²²⁹

In response to a FOIA request, British International Investment, the government’s development finance institution, found 60,141 emails within the period of this Index which mentioned tobacco or tobacco companies, while noting that their search system “is unable to distinguish whether this is correspondence where it is directly with these companies or where these names appear in emails that BII receives, such as newsletters and alerts”.²³⁰

Certain organisations did not provide information on interactions with the industry in response to FOIA requests. For instance:

- the Competition & Markets Authority (CMA) neither confirmed nor denied whether it holds such information, claiming that such information is exempt from the FOIA under the Enterprise Act 2002.²³¹
- The IPO stated that “From a business perspective it appears the only contact we would’ve had... is in regards to any of their registered intellectual property. Any of this information would be exempt from disclosure under Section 40(2) of the FOIA.”²³²
- The Medicines & Healthcare products Regulatory Agency stated that “Bearing in mind that MHRA deals with product notifications from tobacco companies under the e-cigarette and vape products notification scheme, there are potentially hundreds of

²²⁷ DHSC, [Guidance for government engagement with the tobacco industry](#), February 2025, accessed April 2025.

²²⁸ DHSC, [Meeting note Nada GNTobacco and OHID](#), May 2024, accessed March 2025.

²²⁹ UK Parliament, [Commercial Events Booking Data](#), 2025, accessed April 2025.

²³⁰ British International Investment, 9 April 2025, [Emailed response released under Freedom of Information Act](#).

²³¹ Competition & Markets Authority, 9 April 2025, [Emailed response released under Freedom of Information Act](#).

²³² Intellectual Property Office, 14 March 2025, [Emailed response released under Freedom of Information Act](#).

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regulatory communications during that time period, as they are part of our statutory customer base for the notification of e-cigarette and vape products.”²³³ - The Office for National Statistics stated that “The Office for National Statistics collects statistical data from a variety of small, medium and large businesses across all industries... As part of this business data collection process, we are regularly in contact with thousands of UK businesses to response chase questionnaires and query and validate the data that is collected via our business surveys. The tobacco businesses will be contacted alongside all other UK industries.”²³⁴ - A FOIA request to the Gene Therapy Advisory Committee identified 3 email exchanges with PMI Life Sciences and the Health Research Authority (HRA) that were not previously publicly available. The interactions, which took place in April and June 2023, related to PMI investigating the “process for lodging an appeal to the Research Ethics Committee (REC) following an unfavourable opinion from the initial REC review” and information on the HRA website.²³⁵						
12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)					4	
The government does not set out comprehensive rules on full disclosure or registration of tobacco industry entities and there continues to be no requirement for the tobacco industry and affiliated entities to register with the government. A voluntary lobbying register has existed in the UK since 2011.²³⁶ The Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act, which came into force on 1 April 2015, requires any person (corporate or natural) who carries out “the business of consultant lobbying” to be entered in the Register of Consultant Lobbyists.²³⁷ The act only requires the registration of consultant (professional) lobbyists who are VAT registered.²³⁸ The Register of Consultant Lobbyists is a public list maintained by the Office of the Registrar of Consultant Lobbyists (ORCL) in the UK. Only Scotland has an official Lobbying Register in which all regulated (i.e. face-to-face) lobbying must be recorded. Since 2018 Scotland has required regulated lobbying to be recorded in an official Lobbying Register. Regulated lobbying is defined as “lobbying which takes place face-to-face with MSPs, members of the Scottish Government, Special Advisers or Permanent Secretary and which relates to Scottish Government or Parliamentary functions.”²³⁹						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) / Never 5 Yes						5
There is no legislation prohibiting the tobacco industry from donating to political parties, candidates, or campaigns. There are general rules regulating political contributions and the disclosure of such contributions. Donations worth over £7,500 to national political parties must						

²³³ Medicines & Healthcare products Regulatory Agency, 9 April 2025, request-1254162, [Emailed response released under Freedom of Information Act](#).

²³⁴ Office for National Statistics, 10 April 2025, [Emailed response released under Freedom of Information Act](#).

²³⁵ Gene Therapy Advisory Committee, 11 April 2025, [Emailed response released under Freedom of Information Act](#).

²³⁶ UK Lobby Register, [UK Lobbying Register](#), 2023, accessed April 2025.

²³⁷ Office of the Registrar of Consultant Lobbyists, [Office of the Registrar of Consultant Lobbyists](#), 2025, accessed April 2025.

²³⁸ UK Government, [Transparency of lobbying, non-party campaigning and trade union administration act 2014](#), 2014, accessed February 2025.

²³⁹ The Scottish Parliament, [Lobbying](#), undated, accessed April 2025.

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be declared.²⁴⁰ Although such payments are permitted under UK legislation, WHO FCTC Article 5.3 implementation guidelines state that “Payments, gifts and services, monetary or in-kind, and research funding offered by the tobacco industry to government institutions, officials or employees can create conflicts of interest”.²⁴¹ 2 backbench MPs declared receiving gifts/benefits/hospitality from tobacco companies between April 2023-March 2025: - Giles Watling (Clacton) disclosed a business lunch (£57.26) from JTI in January 2024, as well as a tour and dinner at the British Museum (£293.78), also from JTI in March 2024, that he was unable to attend.²⁴² - Nigel Adams (Selby and Ainsty) declared receiving “Two concert tickets at the O2 Arena including hospitality, value £500” from JTI in April 2023.²⁴³ - 5 members of the House of Lords (Lord Dixon-Smith, Earl of Lindsay, Lord Eames, Lord Geddes, Earl of Liverpool) declared being members of the Lords and Commons Cigar Club, with members receiving “regular hospitality and invitations to events which during the course of the calendar year together amount to more than £300 in value and all of which are paid for by the Tobacco Manufacturers’ Association.”²⁴⁴						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)				3		
In October 2024, HG Innovation – which reportedly has Capital Counsel as a client (see #3)²⁴⁵- announced that it has created an advisory board, with members including Steve Bennett, former director of investigations at the National Crime Agency and Rt. Hon George Eustice, former MP and secretary of state for the department of environment, food and rural affairs. In December 2024, Penny Mordaunt, Lord President of the Council and Leader of the House of Commons from 2022 to 2024 (with her losing her seat as an MP in July 2004), received advice from the Advisory Committee on Business Appointments (ACOPA), relating to a potential paid appointment as a member of BAT’s Transformation Advisory Board. ACOPA’s advice was that Mordaunt “should have no direct engagement with government on behalf of the company, as to do so would raise significant risks under the government’s Rules” and included a range of stipulations for Mordaunt, such as that she should not disclose any privileged information from her time in office and should not lobby the government on behalf of BAT within two years of her last day in office. ACOPA contacted BAT to learn more about the potential employment, with BAT stating in a published response that Mordaunt’s role would abide by ACOPA’s criteria, with ACOPA noting that the “Committee considered this confirmation by your employer as significant to its consideration”. Mordaunt took up the appointment in January 2025.²⁴⁶						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)			2			

²⁴⁰ The Electoral Commission, [Political parties report £12.5m donations and loans in Q2 2022](#), September 2022, accessed April 2025.

²⁴¹ WHO FCTC Secretariat, [Guidelines for implementation of Article 5.3](#), 2013, accessed February 2025.

²⁴² UK Parliament, [REGISTER OF MEMBERS’ FINANCIAL INTERESTS Updates 19 March – 15 April 2024](#), April 2024, accessed April 2025.

²⁴³ UK Parliament, [REGISTER OF MEMBERS’ FINANCIAL INTERESTS as at 17 April 2023](#), April 2023, accessed April 2025.

²⁴⁴ UK Parliament, [Lord Stoddart of Swindon](#), undated, accessed April 2025.

²⁴⁵ A. Ralph, [Tory peer tabled questions about vaping before working for manufacturer](#), *The Times*, October 2024, Accessed April 2025.

²⁴⁶ Gov UK, [Mordaunt, Penny - Lord President of the Council and Leader of the House of Commons - ACOPA Advice](#), March 2025, accessed April 2025.

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Within the index timeframe, no evidence was found of government officials working directly for the tobacco industry while simultaneously working in government. However, there are various instances of involvement of senior government figures with the tobacco industry and industry-associated organisations, both directly and indirectly, all of which relate to Sunak's government. The following list includes all public officials, in post during the index timeframe, for whom evidence was found of current or former connections with the tobacco industry and/or industry-affiliated organisations. <u>Concerning members of the House of Lords</u> As of March 2025, according to the register of interests, 7 members of the House of Lords held current or recent tobacco industry shares: Lord Ashton of Hyde, Viscount Camrose, Lord Donoughue, and Lord Sassoon hold shares in BAT. Lord Fink and Lord Glendonbrook both hold shares in Altria. Lord Glendonbrook also holds shares in Imperial and PMI and Lord Lupton holds shares in Imperial. Baroness Brady's register entry described "Consultant providing non-political consulting services to Philip Morris Limited in UK on their commercial and business strategy to deliver a smoke free future" as remunerated employment. Lord Blencathra and Lord Porter are directors to the tobacco industry funded Clean Streets (see #5).²⁴⁷ <u>Concerning former industry officials holding positions of government influence</u> - The Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment (CoC) is part of a trio of scientific advisory committees that provide independent advice to government departments on the potential health risks of chemicals found in pharmaceuticals, pesticides and consumer products.²⁴⁸ In November 2024, it was reported that the CoC had appointed a former director at PMI – Ruth Dempsey. Dempsey spent 28 years at PMI before joining the CoC and reportedly owns PMI shares and receives a pension for the company. Since taking the position in February 2020, Dempsey has continued to be paid by PMI for work including authoring a sponsored paper relating to heated tobacco products. As noted in press coverage: "Dempsey is believed to have been appointed to the committee following an evaluation and interview conducted by a three-person panel, including a Department of Health and Social Care (DHSC) official, after stepping down from her full-time role with PMI to establish her own toxicology consultancy in the summer of 2019."²⁴⁹ Following press coverage around the appointment, the Committee Chair announced that Dempsey would no longer be part of the committee.						
INDICATOR 7: Preventive Measures						

²⁴⁷ UK Parliament, [Register of Interests - Members of the House of Lords](#), 2025, accessed April 2025.

²⁴⁸ Gov UK, [Committee on Carcinogenicity of Chemicals in Food, Consumer Products and the Environment](#), 2025, accessed April 2025.

²⁴⁹ S. Das and D. Cox, [Revealed: ex-director for tobacco giant advising UK government on cancer risks](#), November 2024, accessed April 2025.

	0	1	2	3	4	5
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)		1				
- DHSC's guidance to all government departments on interactions with the tobacco industry include detailed instructions on how government officials should deal with meetings involving the industry, noting that: "While every effort will be made to avoid face-to-face meetings with the tobacco industry, on rare occasions a meeting may need to be held." The guidance states that minutes of any meetings with the industry "should be recorded and published online", that "UK government officials should not attend conferences or events which are organised by the tobacco industry. Officials are permitted to attend non-tobacco industry funded events where there are tobacco industry representatives in attendance" in specific circumstances such as "enabling effective regulation".²⁵⁰ - Further, in June 2023, Neil O'Brien, MP, and then Parliamentary Under-Secretary of State for Primary Care and Public Health stated that implementation of the Government's guidance on preventing industry policy interference would be "monitored, including through the United Kingdom's rank on the Global Tobacco Index which has been consistently high. Breaches will be assessed on a case-by-case basis."²⁵¹						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Rec 4.2); <i>Yes – for whole of government code; Yes but partial if only MOH</i>		1				
- DHSC has provided guidance to all government departments on interactions with the tobacco industry.²⁵² During a Parliamentary debate on the Tobacco and Vapes Bill, Andrew Gwynne, MP and then Parliamentary Under-Secretary of State at the Department of Health and Social Care, stated that: - "On engagement with the tobacco industry and the vape industry, the UK is party to the World Health Organisation framework convention on tobacco control, so we have an obligation to protect the development of public health policy from the vested interests of the tobacco industry. We take that commitment incredibly seriously and, in line with the requirements of article 5.3 of the FCTC, we summarise the views of respondents with disclosed links to the tobacco industry when responding to consultations."²⁵³						
18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other TAPS activities such as CSR or EPR (COP10), as well as on tobacco industry entities, affiliated organizations and individuals acting on their behalf, and tobacco industry funded groups and their research and marketing activities (Rec 5.2, 5.3, and COP9 and IO Decision)			2			
The UK government requirements focus on tobacco industry obligations to report in detail the data on ingredients and emissions of tobacco products. ²⁵⁴ HMRC and DHSC collect data from						

²⁵⁰ DHSC, [Guidance for government engagement with the tobacco industry](#), February 2025, accessed April 2025.

²⁵¹ UK Parliament, Hansard, [Tobacco, Question for Department of Health and Social Care UIN 190523, tabled on 21 June 2023](#), June 2023, accessed April 2025.

²⁵² DHSC, [Guidance for government engagement with the tobacco industry](#), February 2025, accessed April 2025.

²⁵³ [Tobacco and Vapes Bill \(Sixth sitting\)](#), UK Parliament website, accessed August 2025.

²⁵⁴ [Explanatory memorandum to the Tobacco and Related Products regulations 2016](#), UK legislation website, accessed April 2025.

	0	1	2	3	4	5
tobacco manufacturers on profits, taxes paid, and product prices. ²⁵⁵ While data on ingredients and emissions is made publicly available, sales and marketing data is not published.						
19. The government has a program / system/ plan to consistently ²⁵⁶ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)			2			
Despite improvements since the previous edition of the Index (see number 17), this report provides evidence that more needs to be done to raise awareness of Article 5.3.						
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			
In November 2024, a new Ministerial Code was introduced which featured new transparency requirements and clear principles governing the acceptance of gifts and hospitality ²⁵⁷ , specifically that: “Ministers should not accept any gift, hospitality or service which would, or might reasonably appear to, compromise their judgement or place them under any obligation to people or organisations that might try inappropriately to influence their work in government. The same principle applies if gifts etc are offered to a member of their family.” ²⁵⁸ Such interactions are also governed by the UK’s broader anti-corruption regulation. ²⁵⁹						
TOTAL			45			

ADDITIONAL QUESTIONS

Based on COP9 and COP10 Decisions highlighting Article 5.3 recommendations

A. LIABILITY: Government has adopted or enforced mandatory penalties for the tobacco industry in case it provided false or misleading information (Rec 5.4)
[5.4 Parties should impose mandatory penalties on the tobacco industry in case of the provision of false or misleading information in accordance with national law.]

The Tobacco and Related Products Regulations 2016 and the Health Act 2009 include rules relating to tobacco product marketing, including prohibiting misleading health claims and requiring packaging to be clear about the health risks of smoking.

The Competitions and Markets Authority (CMA) requires that businesses comply with competition laws and consumer protection regulations. Its role includes preventing anti-competitive behaviour and enforcing fair trading practices.

²⁵⁵ [Consumer Protection: The Tobacco and Related Products Regulations 2016](#), UK legislation website, accessed April 2025.

²⁵⁶ 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.

²⁵⁷ Cabinet Office and Independent Advisor on Ministerial Standards, [New Ministerial Code to set out standards in public life and restore transparency](#), November 2024, accessed April 2025.

²⁵⁸ Cabinet Office, [Ministerial Code \(HTML\)](#), November 2024, accessed April 2025.

²⁵⁹ UK government, [United Kingdom Anti-Corruption Strategy 2017-2022](#), December 2017, accessed April 2025.

Additionally, the government has the power to enforce penalties for any breaches of public health laws, which could result in significant legal and financial consequences for companies in breach of such laws. If passed into the law, the Tobacco and Vapes Bill that is currently moving through government would expand existing tobacco control legislation, including measures to phase out the sale of tobacco products.

B. KH RESOURCE DATABASE: Government adopted and implemented measures to ensure public access to information on TI activities
[5.5 Parties should adopt and implement effective legislative, executive, administrative and other measures to ensure public access, in accordance with Article 12(c) of the Convention, to a wide range of information on tobacco industry activities as relevant to the objectives of the Convention, such as in a public repository.]

The UK government requirements focus on tobacco industry obligations to report in detail the data on ingredients and emissions of tobacco products.²⁶⁰ HMRC and DHSC collect data from tobacco manufacturers on profits, taxes paid, and product prices.²⁶¹ While data on ingredients and emissions is made publicly available, sales and marketing data is not published.

²⁶⁰ [Explanatory memorandum to the Tobacco and Related Products regulations 2016](#), UK legislation website, accessed April 2025.

²⁶¹ [Consumer Protection: The Tobacco and Related Products Regulations 2016](#), UK legislation website, accessed April 2025.

Annex A: Sources of Information

	TOP MULTINATIONAL TOBACCO GROUPS	MARKET SHARE (Cigarettes, 2023, global-excluding China)	BRANDS	SOURCE
1	Philip Morris International (PMI)	23%	Marlboro, Parliament, Chesterfield	Euromonitor International
2	British American Tobacco (BAT)	21%	Dunhill, Lucky Strike, Pall Mall	Euromonitor International
3	Japan Tobacco International (JTI)	18%	Winston, Camel, Mevius	Euromonitor International
4	Imperial Brands	6%	Davidoff, West, Gauloises Blondes	Euromonitor International

	TOP LOCAL TOBACCO GROUPS	MARKET SHARE (Cigarettes, 2023)	BRANDS	SOURCE
1	Imperial Brands	45.3%	Lambert & Butler, Embassy, Rizla	Euromonitor International
2	Japan Tobacco International (JTI)	35.8%	Benson & Hedges, Mayfair, Silk Cut	Euromonitor International
3	British American Tobacco (BAT)	8.2%	Dunhill, Lucky Strike, Rothmans	Euromonitor International
4	Philip Morris International (PMI)	7.2%	Marlboro, Chesterfield, L&M	Euromonitor International

	TOP TOBACCO INDUSTRY ALLIES/ FRONT GROUPS (alphabetized)	TYPE	SOURCE
1	Adam Smith Institute (ASI)	Think-tank	https://www.tobaccotactics.org/article/adam-smith-institute/
2	Association of Convenience Stores (ACS)	Retailer representative	https://www.tobaccotactics.org/article/association-of-convenience-stores/
3	Consumer Choice Centre (CCC)	Lobby organisation	https://www.tobaccotactics.org/article/consumer-choice-center/
4	Forest	Industry-funded “smoker’s rights” group	https://www.tobaccotactics.org/article/forest/
5	Imported Tobacco Products Advisory Council (IPAC)	Trade association	https://www.lobbyfacts.eu/datacard/the-imported-tobacco-products-advisory-council?rid=68037164462-39&sid=108013
6	Institute of Economic Affairs (IEA)	Think tank	https://www.tobaccotactics.org/article/institute-of-economic-affairs/
7	Federation of Retailers (formerly National Federation of Retail Newsagents) (NFRN)	Trade association	https://www.tobaccotactics.org/article/federation-of-independent-retailers-nfrn/
8	Scottish Grocers’ Federation (SGF)	Trade association	https://www.tobaccotactics.org/article/scottish-grocers-federation/
9	Scottish Wholesale Association (SWA)	Trade association	https://www.tobaccotactics.org/article/scottish-wholesale-association/
10	Tobacco Manufacturers' Association (TMA)	Trade association	https://www.tobaccotactics.org/article/tobacco-manufacturers-association/