

TANZANIA

2020

TOBACCO
INDUSTRY
INTERFERENCE
INDEX

Acknowledgement

This report is an update of the Tanzania Tobacco Industry Interference Index which formed part of the Global Tobacco Industry Interference Index (GTI) 2019 Report. The GTI is a global survey on how public health policies are protected from the industry's subversive efforts, and on governments' efforts to push back against this influence. The Tobacco Industry Interference Index was initiated by the South-East Asia Tobacco Control Alliance (SEATCA), as a regional report, with support from the Bill and Melinda Gates Foundation. The Global Tobacco Industry Interference Index is part of a global publication of the Global Centre for Good Governance in Tobacco Control (GGTC) at the School of Global Studies in Thammasat University and the Stopping Tobacco Products and Organisations (STOP) project with support from Bloomberg Philanthropies. The survey covers the period between 2017 and 2019.

Background and Introduction

Tanzania is facing increasing tobacco production and use translated into the increasing burden of non-communicable diseases (NCDs).¹ According to the Global Adult Tobacco Survey (GATS) of 2018, 8.7% (2.6million adults), 14.6% of men and 3.2% of women currently used tobacco (smoking and/or smokeless tobacco). In addition, the GATS Survey indicated that, adult individuals were exposed to second hand smoke (SHS) as follows; 32.9% at workplaces, 13.8% at home, 31.1% at restaurants, 77.0% at bars and 15.3% at universities.² Tobacco use is reported to cause over 14,700 deaths per year, almost 4% of all deaths in the country¹

Tanzania enacted the Tobacco Products (Regulation) Act 2003 (TPRA, 2003),³ whose main objective is to reduce tobacco use and its consequent harm by “Protecting persons under 18 and other non-smokers from inducements to use tobacco products”. Additionally, Tanzania ratified the WHO Framework Convention on Tobacco Control (FCTC)⁴ in April 2007. However, implementation of the treaty has been weak and obligations under the treaty are not reflected in the current tobacco control legislation which is flawed and not in line with the requirements of the Convention and, hence, incapable of protecting people against tobacco-related hazards. Ten years after ratification, efforts to have a new law to replace the flawed one have so far failed.

Despite the many studies that have established significant health, economic, social and environmental losses due to tobacco farming and use in Tanzania that far outweigh the meagre income,⁵ the tobacco business continues to flourish. Tanzania Cigarette Company (TCC) is the major cigarette producer in Tanzania and has a 90% share of the domestic market. TCC was founded in 1961 as East African Tobacco Company; nationalised in 1975 and later privatised, whereby Tanzania government sold 75% share of the company to Japan Tobacco International (JTI). TCC produces approximately 8 billion cigarette sticks, the bulk (5 billion sticks) of which are smoked within the country by Tanzanians.⁶ Currently, there are nine operating tobacco companies selling more than 10 brands of tobacco products.⁷

¹Tanzania Steps Survey Report (2013). Ministry of Health and Social welfare and National Institute for Medical Research in collaboration with World Health Organisation.

https://www.who.int/ncds/surveillance/steps/UR_Tanzania_2012_STEPS_Report.pdf

²Tanzania Global Adult Tobacco Survey. <http://ghdx.healthdata.org/record/tanzania-global-adult-tobacco-survey-2018>

³Tobacco Products (Regulation) Act,

2003. <https://www.google.co.tz/search?ei=MnegXJ7iOdHuxgOLtqzoDw&q=the+tobacco+products+regulation+act+2003+->

⁴WHO Framework Convention on Tobacco Control; 21 May 2003.

https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IX-4&chapter=9&clang=en

⁵Tanzania Tobacco Industry Interference Index.

https://exposetobacco.org/wp-content/uploads/2019/10/GlobalTIIndex_Report_2019.pdf

⁶ TCC Local Market Share. <https://africanfinancials.com/company/tz-tcc/>

⁷ Mapping of the Tobacco Industry in Tanzania (2018). Technical Report to the African Tobacco Control Alliance (ATCA)

Article 5.3 of the WHO FCTC obligates Parties to protect public health policies with respect to tobacco control policies from commercial and other vested interests of the tobacco industry. Unfortunately, this important article has not been effectively utilised, paving way to the tobacco industry to interfere thence jeopardising tobacco control efforts.

The tobacco industry as a whole received endorsement from the Honorable President himself when on 26 April 2019, he was in Malawi and joined his counterpart the President of Malawi to open the Lilongwe auction market.⁸ Later in November, the Minister of Agriculture promoted tobacco as the second exchange earner crop for Tanzania and said his ministry is not ready to ban the crop because of its importance to the economy.”⁹

This Index is an updated civil society report from that of 2019⁵, on how the government has responded to or addressed the tobacco industry’s tactics and promotion of its business as outlined in FCTC Article 5.3 guidelines. The report identifies more incidences of tobacco industry interference and how the Tanzania Government continues to lag in instituting effective measures to safeguard public health. It is conceivably true tobacco control measures have been undermined or delayed due to industry interferences.

Tanzania has scored a total of 73 points, indicative of continuing interference from the tobacco industry while it also continues to lag behind other sub-regional countries that have effective FCTC compliant tobacco control legislations, while Tanzania lacks one.

⁸ Terry Mabbett. Malawi Tobacco- Everything up except farm gate price. Tobacco Journal International. August-September 2019

⁹ “I’m not ready to issue ban on tobacco”, says Tanzanian minister. <https://www.thecitizen.co.tz/news/l-m-not-ready-to-issue-ban-/1840340-5368588-iggxuu/index.html>

Summary of Findings

1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The Tobacco Products (Regulations) Act 2003 and Tobacco Products Regulations 2014 are not compliant with the WHO Framework Convention on Tobacco Control. Efforts to update the law these past years have been delayed due to accommodating tobacco industry's concerns. In 2017, the Ministry of Health proposed to table a tobacco control bill but to date this has not materialised.

2. INDUSTRY CSR ACTIVITIES

Tobacco related CSR activities are not banned. Government officials and members of parliament participate in these tobacco related activities and commend the industry for its 'enormous economic and social contribution to the country'.

3. BENEFITS TO THE INDUSTRY

Tanzania Cigarette Company (TCC) attributed its good performance partly to the decision of the government not to increase excise duty of cigarettes in the budget speech of the 2018/19 financial year, as per their request. The delay of tabling the tobacco control bill in Parliament has benefited the tobacco industry to increase cigarette sales.

4. UNNECESSARY INTERACTION

Article 5.3 guidelines indicates interaction between government officials and the tobacco industry to be only when strictly necessary, however this is not the case with industry activities on the ground. The TCC commended the government for "holding regular private-public dialogue (PPD) to discuss private sector concerns". In March 2018, the Tanzania President inaugurated the US\$30-million cigarette factory, stating: "I would like to assure investors that the government will protect them because their industries are providing ready market for farmers and they are also creating jobs

5. TRANSPARENCY

The government has not put in place a procedure to disclose its meetings with the tobacco industry. While tobacco companies are required to register, there is no registry for tobacco industry affiliated organizations, and individuals acting on their behalf such as lobbyists.

6. CONFLICT OF INTEREST

Finance, Investment and Planning Manager at Tanzania Standard Newspapers (TSN), a government owned paper was appointed to the Board of Directors of TCC on April 23, 2018 representing the Government of the United Republic of Tanzania. The government does not prohibit contributions from the tobacco industry.

7. PREVENTIVE MEASURES

The government does not have a program or plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. The government has not

formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry.

The government does not require the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and other activity such as philanthropy. The government has not put in place a policy to disallow the acceptance of all forms of contributions/gifts from the tobacco industry.

Recommendations

Lack of an FCTC compliant tobacco control law has given a leeway to the tobacco industry to operate freely In Tanzania. Since 2018, tobacco advertising especially at points of sale and promotion has increased exponentially targeting particularly the youth.

Guiding Principles of Article 5.3 of the WHO FCTC requires Parties to observe the following;

- i) Establish measures to limit interaction with the tobacco industry and ensure transparency of those interactions that occur;
- ii) Reject partnerships and non-binding or non-enforceable agreements with the tobacco industry;
- iii) Avoid conflict of interest for government officials and employees.

To fulfil its obligations under the WHO FCTC, the government needs to table in Parliament an FCTC-compliant tobacco control bill as soon as possible, to protect the public, in particular children and vulnerable sectors of society from the damages emanating from tobacco use.

Tobacco related CSR activities must be banned, as stated in the FCTC and, to ensure transparency, there must be clearly documented procedures for government officials to record all interactions where strictly necessary with the tobacco industry.

The cost-benefit of tobacco business is that more people suffer and die from tobacco use than any benefit it is believed to bring to the economy. People's health must be protected. Therefore, the tobacco industry should not be given any benefit to increase its business.

Finally, a Code of Conduct must be developed for government officials, to provide guidance on dealing with the tobacco industry when strictly necessary. The Code will stop government officials from endorsing tobacco related activities and the tobacco industry.

Results and Findings

The Table below indicates the level of the Tanzania government's compliance to Article 5.3 of the WHO FCTC. Lower score indicates strong implementation of Article 5.3 of the WHO FCTC, leading to limiting tobacco industry interference.

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ¹⁰ accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry ¹¹ in setting or implementing public health policies in relation to tobacco control ¹² (Rec 3.1)				3		
<p>The situation has not changed since 2018. Although Ministry of Health, Community Development, Gender Elderly and Children (MoHCDGEC) is supposed to take lead in setting public health policies, other ministries do take lead in specific issues. For example, MoHCDGEC in collaboration with WHO, Ministry of Finance and Planning (MOFP) and Tanzania Revenue Authority (TRA) carried out tobacco taxation studies since October 2017, to-date, the report remains with the MOFP, it is not known when the proposed tax rates will be released. Likewise, National Bureau of Statistics (NBS) was commissioned to carry out studies on Global Adult Tobacco Survey (GATS)² in 2018, unofficial results were presented to technical experts but the report is yet to be launched officially.</p>						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)						5
<p>The situation remains the same as in 2018. The long-awaited WHO FCTC⁴ compliant tobacco control law is yet to be enacted and, tobacco advertising at points of sale and promotion of tobacco products continues as allowed for in the Tobacco Products (CAP 121) Regulations of 2014,¹³ which in most parts favours the tobacco industry.¹¹</p>						
3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8)		1				
<p>There is no law that allows government to sit with the tobacco industry to set public health policies; however, meetings between government officials and the industry are normal and sometimes even reported though no details are provided.</p>						
4. The government nominates or allows representatives from the tobacco industry (including State-owned) in the delegation to the						5

¹⁰ 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

¹¹ The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

¹² "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour

¹³ The Tobacco Products Act (Cap. 121) Regulations.

<https://www.tobaccocontrolaws.org/files/live/Tanzania/Tanzania%20-%20Tobacco%20Products%20Regs%202014%20-%20national.pdf>

	0	1	2	3	4	5
COP or other subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ¹⁴ (Rec 4.9 & 8.3)						
The situation remains the same as in 2018. It is not yet clear as to who will represent government at COP9 but Prime Minister's Office seems to be taking lead again. Preparations are ongoing.						
INDICATOR 2: Industry CSR activities						
5. A. The government agencies or its officials endorses, supports, forms partnerships with or participates in so-called CSR activities organized by the tobacco industry. (Rec 6.2)						5
B. The government (its agencies and officials) receives contributions ¹⁵ (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)						
<p>Although Tanzania ratified the WHO FCTC⁴ in 2007, the country has done very little in terms of its implementation. Government continues to partner with the tobacco industry which has also greatly intensified its CSR activities, to justify its existence, re-inventing its image and influencing politicians.</p> <p>In their 2018 Annual Report¹⁶, TCC reported that it continued to support the community under the guise of "Giving back to communities". Focus was on three pillars: People - poverty alleviation, older persons, adult education, and people with disabilities; Arts and Culture - cultural heritage; visual and performing arts; and, natural environment". The Company continued to support unique local arts and culture through Vipaji Foundation and traditional dancers in Bagamoyo College of Arts (BCA) to learn to develop and benefit from their talent. TCC also collaborated with Tanzania Federation of Disabled People's organization's (SHIVYAWATA) and Small Industries Development Organization (SIDO) to support local manufacturing of quality assistive devices at affordable prices for people with disabilities¹⁷</p> <p>Minister launches trolley push carts project On 11/12/2018, government commended TCC for investing more than TZS 350m on trolley push carts to empower street vendors countrywide to enable them to increase their earnings and improve their lives. The project was launched in Dodoma by the Minister of State in the Prime Minister's Office for Policy, Parliament, Labour, Youth, Employment and the Disabled, Jenista Mhagama. The minister said that she was impressed by the project that will target mostly the disabled and women. "This is quite commendable and my ministry fully supports the project 100% as the intention is good and sustainable" the minister said. She lauded TCC for being among the best employer in 2018/19¹⁸.</p>						

¹⁴ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

¹⁵ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

¹⁶ TCC 2018 Annual Report. <https://www.dse.co.tz/sites/default/files/TCC%20Plc%20Annual%20Report-%202018.pdf>

¹⁷ TCC supports SHIVYAWATA. <https://dailynews.co.tz/news/2019-05-025cca9ed19596d.aspx#>

¹⁸ Minister launches trolley push cart project by TCC. <https://www.dailynews.co.tz/news/2018-12-115c0f4c5d6836e.aspx#>



Minister of State in the Prime-Minister Office launched TCC sponsored push cart programme in Dodoma

ARISE empowers over 560 women in Tabora

On 8 March 2019, during International Women’s Day celebrations, Japan Tobacco International (JTI) in collaboration with government, Winrock International (WI) and other stakeholders claimed to have empowered over 560 women in Tabora Region to achieve their economic potentials through ARISE programme. Winrock International Tanzania ARISE Director, Magawa Abdallah claimed that, “The programme has so far trained 17 village agents who are the Community Based Trainers as the move to enhance VSLA concept in rural communities” He further claimed that “Achieving Reduction of Child Labour in Support of Education (ARISE) is a programme that aims to empower rural communities to fight child labour”¹⁹.

Tobacco firm supports construction of Tabora girls’ dormitories

On 30 March 2020, Alliance One Tobacco Tanzania Limited (AOTTTL) donated building materials worth 24m/-to the Tabora Regional Commissioner (RC), Aggrey Mwanri to support construction of girls’ secondary school dormitories in the region. Speaking at the handing over occasion, AOTTTL Agronomy Director, David Mayunga said the materials will be allocated to four secondary schools namely Idete and Nsimbo in Uyui District and Ndevelwa and Itonjanda in Tabora municipality.



Tabora Regional Commissioner thanked AOTTTL for the support it gave to education of girls

¹⁹ ARISE empowers over 560 women in Tabora. <https://dailynews.co.tz/news/2019-03-115c86137c986a9.aspx>

	0	1	2	3	4	5
<p>Tabora Regional Commissioner (RC), Aggrey Mwanri thanked the AOTTL for the support as it will significantly accelerate their efforts toward abolishing truancy, early pregnancy and childhood marriage among their students. Tabora and Uyui District Commissioners Komanya Kitwala and Gift Msuya applauded a good job done by the tobacco company for reinforcing their efforts towards construction of dormitories in all secondary schools.²⁰</p>						
INDICATOR 3: Benefits to the Tobacco Industry						
6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)						5
<p>The FCTC compliant tobacco control law that was supposed to have been tabled in Parliament in November 2009 and enacted by February 2010 has not been tabled to date (April 2020). Delays of more than 10 years have benefited the tobacco industry enabling it to increase cigarette sales.</p> <p>A study on tobacco taxation was carried out by MoHCDGEC, WHO, MOFP and TRA in 2017 and proposals for tax increase were presented to MOFP, to-date the report is still with MOFP unattended.</p>						
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)						4
<p>The situation remains unchanged since 2018.</p> <p>In the 2018 Annual Report, TCC CEO Paul Makanza reported that, profit after tax for TCC Plc increased by 5.7% to TZS 47.9 billion in the year to December 2018 as compared to the previous year. The company attributed the good performance partly by the government not to increase excise duty of cigarettes in the budget speech of 2018/19 as requested¹³.</p> <p>Differing levels of taxation for tobacco products also benefit the tobacco industry. According to a tobacco industry report²¹, the Finance Minister had proposed an excise duty on cigarettes with filter tips and containing domestic tobacco more than 75 per cent at TZS 29,392 (USD 12.80) per thousand cigarettes while all the other cigarettes will be taxed an increased excise duty of TZS 55,845 (USD 24.32) up from TZS 53,204 (USD 23.17). He had also proposed an increase in the levy on cut rag or cut filler from TZS 26,866 (USD 11.70) to 28,221 (12.29) per kilogramme while the excise duty on cigars in Tanzania would remain at 30 per cent.</p>						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ²²) meet with/ foster relations with the tobacco companies such as attending social functions and other events						4

²⁰ Tobacco firm supports construction of Tabora girls' dormitories. <https://www.dailynews.co.tz/news/2020-03-305e81f84a1cdb7.aspx>

²¹ Shem Oirere. Tobacco Trade Wars in East Africa. Tobacco Journal International. February-March 2020

²² Includes immediate members of the families of the high-level officials

	0	1	2	3	4	5
sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)						
<p>The situation has not changed since 2018, government continues to support the tobacco industry.</p> <p>TCC tops manufacturers in OSHA awards On 2 May 2019, Tanzania Cigarette Public Limited Company (TCC Plc) was named number one in the Manufacturing sector and presented with the Award for Occupational Safety and Health (AOSH). The award was presented on World Health and Safety Day which was nationally marked in Mbeya and led by the Minister of State in the Prime Minister's Office for Policy, Parliament, Labour, Youth, Employment and the Disabled, Jenista Mhagama.²³</p>						
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)		1				
<p>Japan Tobacco reports it has a collaboration with the Police and have found the collaboration to be beneficial. JTI also reported its close collaboration with the customs authorities to exchange knowledge, skills and intelligence on combating illicit trade.²⁴</p>						
10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) <i>NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>	0					
<p>There is no recorded incidence of the government being in partnership with the tobacco industry in Tanzania. However, the lack of such information does not guarantee absence of such partnerships because there are no established guidelines prohibiting such partnerships.</p>						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)						5
<p>There is no recorded incidence of the government being in partnership with the tobacco industry. However, the lack of such information does not guarantee absence of such partnerships because there are no established guidelines prohibiting such partnerships.</p>						
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)				3		
<p>Registration rules exist for all organisations/companies,²⁵ in addition, tobacco companies are</p>						

²³ TCC tops manufacturers in AOSH awards <https://dailynews.co.tz/news/2019-05-025cca9ed19596d.aspx>

²⁴ Tanzania Cigarette Public Limited Co. Anti- illicit challenge. <https://www.jti.com/our-views/anti-illicit-challenge>

²⁵ The Companies Act 2002. www.ilo.org/dyn/natlex/docs/ELECTRONIC/86530/97745/.../TZA86530.pdf

	0	1	2	3	4	5
<p>also required to register with Tanzania Bureau of Standards (TBS).²⁶ There is also the Tobacco Industry Act of 2001²⁷ that requires, among other things, registration/deregistration of tobacco farmers and registration of tobacco processing factories. The Act also establishes the Tanzania Tobacco Board.²⁸ Basically the Act serves the interests of the tobacco industry. Moreover, there is no registry for tobacco industry affiliated organizations, and individuals acting on their behalf such as lobbyists.</p>						
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)						5
The government does not prohibit contributions from the tobacco industry.						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					
There was no evidence of retired government officials being part of the tobacco industry. However, lack of such information does not guarantee absence of such possibilities. Rampant secrecy within the tobacco industry could be the reason behind.						
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			
Baraka Jonathan Katemba is the Finance, Investment and Planning Manager at Tanzania Standard Newspapers (TSN), a government owned paper. He joined the Board of Directors of TCC on April 23, 2018 representing the Government of the United Republic of Tanzania ¹³ . TSN newspapers especially the English Daily News and Kiswahili Habari Leo are quite popular with wide coverage; Katemba's presence on the TCC Board could ensure protection of the company's interests within government and positive reporting of the tobacco industry news.						
INDICATOR 7: Preventive Measures						
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)						5
The government has not put in place a procedure for disclosing records of the interaction between the tobacco industry and its representatives.						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which						5

²⁶ Standards Act, 2009 (No. 2 of 2009) <https://www.ecolex.org/details/legislation/standards-act-2009-no-2-of-2009-lex-faac097550/>

²⁷ The Tobacco Industry Act, 2001. <http://extwprlegs1.fao.org/docs/pdf/tan34186.pdf>

²⁸ Tanzania Tobacco Board. <https://www.directory.co.tz/businesses/Tanzania-Tobacco-Board>

	0	1	2	3	4	5
they should comply in their dealings with the tobacco industry. (Rec 4.2)						
The government has not formulated, adopted or implemented a code of conduct for public officials, prescribing the standards to which they should comply in their dealings with the tobacco industry. Public officials openly meet with tobacco industry officials.						
18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)						5
The government does not require the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities.						
19. The government has a program / system/ plan to consistently ²⁹ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
The government does not have a program/system/plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines.						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)						5
The government has not put in place a policy to disallow the acceptance of all forms of contributions from the tobacco industry						
TOTAL					73	

²⁹ 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.