
Bulgaria

**TOBACCO
INDUSTRY
INTERFERENCE
INDEX
2023**

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Authors:

Masha Gavrailova, MD, Smoke-Free Bulgaria Association

Gergana Geshanova, MD, Smoke-Free Life Coalition

Ass. Prof. Tonka Varleva, MD, PhD, National Research Institute, Medical University, Pleven

Anina Chileva, Chief Expert, National Center of Public Health and Analysis

Hristo Ivanov, Researcher, Smoke-free Life Coalition

Acknowledgements:

Mary Assunta, Global Center for Good Governance in Tobacco Control (GC GGTC)

Kris Schuerch, The Swiss Association for Tobacco Control (AT Switzerland)

Pavel Antonov, PhD, BlueLink Foundation

Endorsements:

Smoke-Free Life Coalition

Smoke-Free Bulgaria Association

BlueLink Foundation



Background and Introduction

Tobacco cultivation is regarded as a traditional or even autochthonous activity for the Balkans although this crop has been introduced in the Ottoman Empire around the end of the 16th century, and its production reached an industrial scale only at the end of the 19 century. Tobacco production in Bulgaria intensified during the Balkan and the World Wars and according to the American researcher Mary Neuburger “this cash crop had an “intensely destabilizing” influence over the national economy”.¹

During the years of the socialist regime, the importance of tobacco production grew even more. Under the umbrella of Bulgartabac, the state holding company, Bulgaria topped the world ranking in per capita tobacco production; the country was a world champion also in cigarette exports between 1966 and 1988 (rivalled only by the US). The operational model with a number of small-scale tobacco growers and a state-owned megastructure responsible for everything else – from tobacco seeds to cigarette branding – proved successful. Bulgartabac was an important source of hard currency for the regime.

After 1990, Bulgartabac sold separately many of its dozens production facilities, and the holding structure was finally privatized in 2011 for the sum of EUR 100.1 million.² The real identity of the interests that acquired Bulgartabac remains concealed to this day: behind the official buyer BT Invest – registered in Austria, namely for the sake of this privatization deal – lurked unknown firms from Lichtenstein and Dubai.³ After privatization Bulgartabac rapidly limited and eventually halted its production operations. In 2017 the company sold its well-known brands – “Victory”, “Eva Slim” and “GD”, among others – to British American Tobacco, for the price of EUR 100 million. Yet in 2019 the international buyer “killed” the purchased Bulgarian cigarette brands replacing them with its own global brands (mainly “Rothmans” and “Dunhill” produced in Romania).

According to Eurostat data, as of 2010 – that is, shortly before the final dismantling of Bulgartabac – there were in total 27 enterprises active in tobacco manufacturing in Bulgaria, with 4,647 persons employed, and an annual turnover of EUR 687.8 million, with EUR 92.2 million value added.⁴

Currently, the lion’s share of the cigarettes consumed in Bulgaria is being imported. This is a strange situation for the once leading cigarette producer and exporter in the world; nowadays Bulgaria satisfies more than 90% of the domestic market with imported tobacco products.

Now, there is only one producer of cigarettes in Bulgaria – the Plovdiv-based company KT International focused mainly on the economy price segment. Its main cigarette factory in Plovdiv was also a part of the old Bulgartabac holding but was privatized already in 2009. KT International has two major brands – “THE KING” (American blend) and “Merilyn” – and several lesser-known brands.

From more than 50 000 tobacco growers in the past, in 2021 their actual number was only 3,433. The affordability of tobacco products has steeply increased during the last decade, because of disposable income.

Tobacco smoking in Bulgaria remains high with 29.1 percent of adults being daily smokers, and 7.1 percent occasional smokers, according to the European Health Interview Survey (EHIS) from 2019, and Bulgaria had the highest share of smokers among member states of the EU.⁵ Manufactured cigarettes still remain the most popular tobacco product in Bulgaria – according to the 2020 Eurobarometer survey, 91% of Bulgarian current smokers use it on a daily basis, the same share as in 2017. Yet many Bulgarians are increasingly replacing cigarettes with novel tobacco products.⁶

A nationwide study of the health risk factors by the National Center of Public Health and Analyses (NCPHA) found in 2020 that 39.4% of Bulgarian adults (20+ years) used nicotine-containing products.⁷

WHO estimation of the tobacco prevalence in Bulgaria in 2020 was 39%.⁸ The study ascertained that Bulgaria counts among the leaders in tobacco prevalence – not only in Europe but also in the world. Bulgaria is second in tobacco prevalence in the European region (including 53 countries), only behind Serbia with an estimated 39.8% tobacco prevalence. But also on the global scale, there are very few countries with higher tobacco prevalence – namely, Kiribati, Nauru, Myanmar, and Papua New Guinea.

The WHO report estimated that the number of smokers in Bulgaria was 2.034 million as of 2020; of them roughly 45% were women. According to the WHO model, the tobacco prevalence in Bulgaria did increase between 2018 and 2020 albeit by only 0.1 percentage point. This is a third confirmation that national prevalence levels are not only very high but also growing.

According to HBSC (2018) 9% of the girls and 8% of the boys aged 11 in Bulgaria were current smokers – that is, they have smoked in the last 30 days.⁹ Among the 15-year olds, this percentage increased to alarming levels: 38% for the girls and 26% for the boys, or 32% for both sexes. In practice, the share of smoking 15-year-old girls in Bulgaria is the highest in Europe, with Bulgarian boys being second to Lithuania in this infamous ranking.

The average life expectancy in Bulgaria is 71.4 years, as of 2021, which is the lowest value in the EU (the average life expectancy for the EU is 80.1 years). Bulgaria's crude death rate as of 2020 was the highest in the world, according to the World Bank: 18 per 1000 people (mirrored only by Serbia's 17/1000 death rate).¹⁰ The 2021 national census confirmed an even higher crude death rate of 22 per 1000 people. The latest data on mortality due to smoking in Bulgaria were published in 2008.¹¹

Yet this “satisfaction” is notorious in itself: Bulgaria has the highest tobacco prevalence among the EU countries, along with lowest life expectancy at birth, and the highest mortality in the world.

Meanwhile Bulgaria is experiencing a lasting controversy over corruption and rule of law. Reformist political parties have been challenging a power status quo dominated by former Prime Minister Boyko Borisov, which, among other problems, had brought tobacco control to an almost complete stagnation.

Meanwhile PMI and other TI are aggressively imposing their interests in policy making, using think tanks, charities, patient organisations, media, and prominent public figures. This was exposed by a STOP-funded investigation by the Smoke Free Life Coalition.¹²

Parliament elections were held 3 times in Bulgaria during 2021. For the time being the country has been ruled primarily by caretaker governments, appointed by President Rumen Radev - a moderate left-wing figure, occasionally criticising TI interference and smoking as major problems.

The only brief exception was a 6 months-long period following the November 2022 elections, when a reformist government was assembled. Its finance minister and co-leader of “Prodaljavame Promyanata” political party Assen Vassilev backed an increase of tobacco taxes, which happened by the end of 2022.

Another snap election took place on April 2, 2023, with occasional mentions of tobacco taxation and control by reformist candidates during the campaign.

Nowadays Bulgaria has good experts on public health in the Ministry of Health. The minister Prof. Dr. Hristo Hinkov was an ex-Director of the National Center of Public Health and Analysis and big friend and supporter of TC. And one of the vice ministers – Ass. Prof. Dr. Michail Okoliyski – was

a head of WHO Office in Bulgaria. We hope that even though the external pressure from many sides - political, economical, etc., is very high the implementation of FCTC recommendations will go forth much stronger and visible. We also hope that this government will stay longer enough to secure the changes.

Mass media interest in tobacco control and taxation remains stable but insufficient to raise the issue's profile. Public communications are dominated by pro-industry messages (e.g. presenting heated products as "less harmful") and overall denial of the need for increased taxation.

The holding of five parliamentary elections within two years led to political and economic instability. The country was governed by four caretaker cabinets, without engagement in long-term strategic policies. During this period, tobacco control was greatly neglected, with responsibility for implementing the requirements of the WHO FCTC being transferred from ministry to ministry. This benefited the tobacco companies, who were able to negotiate with the Ministry of Finance a smooth and predictable increase in excise taxes. No changes were adopted to include e-cigarettes and heated tobacco products in the total ban on smoking in public places. Aggressive advertising, especially of new products, continued. No National Tobacco Control Board was established. For years, no Law on Lobbying was adopted. Although Bulgaria ratified the WHO FCTC in 2005, the state administration is not aware of and does not apply Art. 5.3 of the FCTC.

This analytical report highlights the government's failings and the steps it needs to take to reduce the tobacco industry's influence on public health and tobacco control decision-making on policy. Bulgaria has scored 72 points indicating a high level of interference.

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 - 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 includes information on incidents from January 2020 to March 2023, but also includes earlier events that are still relevance today.

Summary Findings

I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

During the months of June and December 2022, the Ministry of Finance, together with the tobacco industry, developed changes to the Excise Duties and Tax Warehouses Act, introducing an excise calendar until 2026 with a smooth and predictable increase in excise duty. The official procedure was broken by considering only the proposals of the tobacco industry.

In 2021, during the discussions on the creation of a National Council for Tobacco Control, the Ministries of Economy, Agriculture and Finance insisted that representatives of the tobacco industry be included in it. In 2022, the creation of this council failed.

No representatives of the tobacco industry are included in the official delegations of Bulgaria for COP 8 and 9.

2 INDUSTRY CSR ACTIVITIES

In Bulgarian legislation, sponsorship/CSR by the tobacco industry is not prohibited. This makes it possible to finance beach clean-up campaigns, long-term entrepreneurship programs, summer activities for children in tobacco-growing areas, preventive examinations for the elderly and other events.

During the COVID-19 pandemic, the PMI Bulgaria donated through an intermediary organization a large sum for the purchase of protective equipment and medicines.

3 BENEFITS TO THE INDUSTRY

The tobacco industry has won itself a three-month delay until the updated excise calendar enters into force. The Government and Parliament did not commit to equalizing the excise duty on e-cigarettes and heated tobacco products with that of conventional cigarettes. Another advantage is the absence of a ban on the use of these products in closed public places and their advertising.

Unlike many other European countries, Bulgaria allows the maximum amount of duty-free tobacco products to be imported into the country, which is to the benefit of TI.

Bulgaria continues to provide national transitional aid for tobacco producers until 2030.

4 UNNECESSARY INTERACTION

The president, ministers from various offices participate in public awards (Annual Responsible Business Awards organized by Bulgarian Business Leader Forum), at health conferences, at the international conference - Green Transition. In most of these cases the events are sponsored by the tobacco industry.

The Prime Minister, ministers, heads of the "Customs" Agency and other services legitimize the study of the tobacco industry to determine the level of smuggling and accept the results of their study of "empty packages".

5 TRANSPARENCY

The government provides no transparency on interactions with the tobacco industry. No official meetings of any ministries with the industry are disclosed on their websites, nor are the minutes disclosed. No order, directive or other type of document has been issued to regulate the public disclosure of meetings or other types of interactions with the tobacco industry. In Bulgaria, there is no law, regulation, or other document that requires transparency of these relationships. Most of the meetings only came to light because of parliamentary requests for information, by request under the Access to Public Information Act, from the media, or by chance.

For the timeframe of this report, Bulgaria did not have a Law on lobbying or lobby register. Three or four attempts to pass such a law failed, despite insistence by the EU.

6 CONFLICT OF INTEREST

The Political Parties Act and the Election Code prohibit the financing by legal entities and sole traders of parties and election campaigns.

No data was found on the participation of retired senior civil servants in the management of tobacco companies.

It was established that civil servants from the Ministries of Education and Science, Finance and Justice are currently in positions of responsibility in Philip Morris - Bulgaria and BAT Bulgaria.

7 PREVENTIVE MEASURES

From the answers to questions asked under the Access to Public Information Act to the Council of Ministers, the Ministries of the Economy, Finance, Health, it was established that the government has not introduced a procedure for disclosing records of interaction with representatives of the tobacco industry.

There is an adopted Code of Conduct for employees of the state administration, but there are no specific texts related to the tobacco industry.

Under the Tobacco and Related Products Act, tobacco companies are required to provide product-specific information, but there are no requirements to provide information on market share, marketing expenditures, lobbying and philanthropy.

The state administration is not familiar with the Framework Convention on Tobacco Control and especially its Article 5.3. The specifics of the tobacco industry's activities are also unknown, and no special rules are adopted to protect health policies from the influence of the industry and its allies.

Recommendations

1. To develop a National Tobacco Control Strategy, with an Action Plan (provided with a defined timetable, measurable performance indicators, responsible agencies and adequate funding) to ensure the implementation of all recommendations of the WHO FCTC.
2. To create a state body to coordinate activities for the implementation of the national strategy, without the participation of representatives of the tobacco industry.
3. To develop measures protecting the public health policies from the TI interference:
 - The Government should adopt a program to increase the awareness of the state administration regarding the policies related to Art. 5.3. of the FCTC and the Guidelines for its implementation.
 - In the texts of the Rules for the Organization and Activities of the National Assembly¹³ and the Code of Conduct for Civil Servants in the State Administration¹⁴, special requirements which they must comply with in their dealings with the TI to be included.
 - The Parliament to adopt a Law on lobbying and a lobby register, with mandatory disclosure of funding and specific lobbying purposes.
 - The Parliament to adopt a comprehensive Ban on sponsorship and donations by TI.
 - The Government to fund non-governmental organizations to monitor TI interference and to raise public awareness of this. The allocation of public funds to non-governmental organisations for health projects to be conditional on them not accepting donations/sponsorship from TI.

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BULGARIA

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Results and Findings

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INDICATOR 1: Level of Industry Participation in Policy-Development						
I. The government ¹⁵ 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. ¹⁶ in setting or implementing public health policies in relation to tobacco control ¹⁷ (Rec 3.4)						5
<p>In 2010, under the influence of MPs with interests in the tobacco industry and tobacco products trade, the total ban on smoking in indoor public places, which was due to come into force on 1 June 2010, was withdrawn. This aroused public anger and discontent. During this period, the two largest non-governmental organizations were created, which are still fighting for TC - Smoke-Free Life Coalition and Smoke-Free Bulgaria. Many protests were held under the slogans "Bring back the ban" and "Don't lead us backwards, but forwards!". (Pics 1,2,3, Appendix 4) In 2012, the ban was reinstated, but even today in Health Act, under the influence of TI and its front groups, there are loopholes - there is no definition of "smoking", "closed place", there is a restriction in the control bodies on the ban, which greatly reduces their ability to exercise the necessary control. All this is a consequence of the powerful influence of TI and its front groups on the decision-making deputies. With the help of our civil organizations, a conflict of interest was found in one of the deputies and he was released from his post.</p> <p>In 2012, 2013 the total smoking ban came under fierce attack by TI and its front groups (restaurant owners). The Government and Parliament were almost inclined to make concessions under its influence. Many meetings, open letters, media discussions, protests were held and the ban survived. The citizen petition "'No' to the return of cigarette smoke in establishments" from 2012, with its 73,661 signatures, remains to this day the most popular expression of public opinion in the history of petitions in Bulgaria.¹⁸ (Pic. 4, App. 4)</p> <p>In 2016, civil society rose up against the permitted outdoor advertising of tobacco products with different campaigns. Our partners The Smarts' video "Forbid them to see it? Or forbid it to exist?" became a hit and won international fame and many awards.¹⁹ (Pics. 5,6,7 App. 4) Deputies introduced a project to change the Tobacco Act, but the tobacco industry strongly attacked this proposal. At a meeting with MPs in Parliament, attended by representatives of all tobacco companies, as well as manufacturers and traders, they came with a big string of tobacco leaves and put it on the table. (Pics 8,9 - Mr. Filev, Head of Tobacco Growers Association, App.4). MPs were asked to withdraw their proposal and they did. To this day, Bulgaria remains one of the last countries in Europe where there is no comprehensive ban on outdoor advertising of tobacco products on streets, boulevards and highways. The direct advertising of tobacco products is prohibited as well as the ads on radio and TV and there are restrictions on the participation of children. (Pics. 10-13 App. 4)</p> <p>These are just some old examples of the strong dependence of the state on the influence from the TI and its front groups and how this dependence affects the decision making related to health policies.</p> <p>This is also illustrated by the very close relations and collaborations with TI, in the past but still continue today, and tobacco control remains weak.</p>						

The government accepts help from the tobacco industry to determine the level of smuggling.

For several years the tobacco industry has informally been aiding the government in measuring the amount of illegal cigarettes trade in Bulgaria using the "empty pack" method. This research is entirely commissioned by the tobacco industry, but the results are accepted and shared by the government. It does this under the name of the campaign 'Initiative against illegal trade'. It was launched in 2010. British American Tobacco Trading Bulgaria Ltd, Japan Tobacco International Bulgaria Ltd, Imperial Tobacco Bulgaria Ltd and Philip Morris - Bulgaria Ltd participate in it, and its main goal is to assist law enforcement authorities in Bulgaria in the fight against the illegal trade in cigarettes through data exchange and other activities. The study is assigned to an independent research agency by the 4 tobacco companies and has been carried out annually for over a decade, using the method of analysis of empty cigarette packs collected in 20 large cities of the country with over 47% of the population in Bulgaria.^{20,21} "As a result of the dialogue between the companies, the Ministry of Finance, the Customs Agency and the Ministry of the Interior, additional joint initiatives related to the fight against the illegal trade in tobacco products are planned."²² PMI-IMPACT funded Center for Study of Democracy to do research in illicit trade in 2016 and Center for Liberal Studies in 2017.²³

Their research is regularly presented and discussed in front of officials from the Ministry of Finance, Ministry of Economy and "Customs" Agency^{24,25}. Ex-Prime Minister Boyko Borisov has on more than one occasions used their data to boost his image by personally presenting the positive data (and in doing so validating the work/research of the industry) which places Bulgaria among the countries with the lowest levels of illegal trade in the EU.²⁶

Here's a more comprehensive list of participants in such meetings:

2019 - Prime Minister, Chief Prosecutor, Minister of Internal Affairs, Director of the "Customs" Agency, Chief Secretary of the Ministry of Internal Affairs.²⁷ There are also photos published in the media.^{28,29}

2021 - Representatives of the Ministry of Finance, of the Supreme Cassation Prosecutor's Office, of the Ministry of Internal Affairs (Main Directorate "Combating Organized Crime" and Main Directorate "National Police").³⁰

2022 - Representatives of the Ministry of Finance, "Customs" Agency, Economic Police, General Directorate Fighting Organized Crime (GDFOC) and Ministry of Economy.³¹

2023 - Representatives of the Ministry of Finance, the "Customs" Agency, the Ministry of Internal Affairs (Main Directorate "Combating Organized Crime", Main Directorate "National Police") and the Supreme Cassation Prosecutor's Office.^{32,33,34}

Another similar case is described in **question 2** - The help and cooperation accepted by the Ministry of Finance from the tobacco industry in developing the changes to the Excise and Tax Warehouses Act and the introduction of the excise calendar 2023-2026.

2. The government accepts, supports or endorses <u>policies or legislation drafted by or in collaboration with the tobacco industry.</u> (Rec 3.4)						5
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A categorical example of joint discussion and satisfaction of the demands of the tobacco industry for changes in legislation is the adoption of a four-year excise calendar in December 2022.

In Bulgaria the excise duty on tobacco products has not been changed in the period 2018-2022. An unsuccessful attempt was made in June 2022 with the Amendments and Supplements Act on the State Budget for 2022. From the transcript of the meeting of the Committee on Budget and finances in the Parliament, held on 06.09.2022, it is clear that the increase in excise duties was actively

discussed with the tobacco industry.³⁵ "For quite a long time the Ministry of Finance, the experts and the "Customs" Agency and the industry discussed the upcoming increase in excise rates," says Verzhinia Dzhevelekova, president of the Bulgarian Association of the Tobacco Industry. The tobacco industry was not satisfied with the short deadline and asked for a three-month extension, which the finance minister agreed to. The discussions are summarized in the Report of the Committee on Budget and Finance for the first vote: "In response to the concerns expressed by the representatives of the Bulgarian Association of the Tobacco Industry - Verzhinia Dzhevelekova and of "British American Tobacco Bulgaria" Kiril Georgiev, that the tobacco industry will not be in able to apply the new excise rates from July 1st, due to technical operational time for registering the new cigarette prices, the Deputy Prime Minister and Minister of Finance Asen Vasilev agreed to extend the deadline to September 1, 2022."³⁶

The debates surrounding the introduction of the excise calendar for tobacco products continued during the meeting of the Committee on Budget and Finance, held on 27.06.2022. It is clear from the speech of the Chairman of the Bulgarian Association of the Tobacco Industry (BATI) that "the calendar which was developed over perhaps four to five months period with numerous meetings, exchanges of information, letters and any other communication with the experts, it was already ready in the month of April and then the deadline of July 1, 2022, was real, but now it is unacceptable. We ask you to determine a reasonable, normal period of two to three months for this calendar to be in effect."³⁷

In the plenary hall, the draft law on changes to the Excise Duties and Tax Warehouses Act was not adopted.

On 30.09.2022, the Ministry of Finance published on the Strategy.bg Public Consultation Portal a draft Law on Amendments and Supplements to the Tax Act and Insurance Procedural Code³⁸, which does not contain texts related to changes in excise taxes on tobacco products, but there is an opinion from the Bulgarian Association of the Tobacco Industry.³⁹ It states: "It is in the interest of the state budget and business to have maximum predictability of the tax and regulatory environment and for changes in them to be smooth in order to avoid shocks and unwanted consequences for business, fixed income and consumers. In this regard, we reckon it appropriate to consider the idea of introducing a calendar for the increase of excise duties on tobacco products in the following years, starting from 2023, in order for Bulgaria to prepare for the upcoming increases in the EU. We also propose that the calendar enter into force 3 months after its promulgation in the State Gazette, so that the market has time to prepare for its application".

This gives reason to the Ministry of Finance to include changes in the Tax-Insurance Procedure Code and changes in the Excise Taxes and Tax Warehouses Act, proposing almost the same texts that were not adopted in June. The bill has not been announced for public consultation, and no opinion has been received from the Ministry of Health on the health effects of the excise tax increase. This is clear from the statement of the Deputy Minister of Finance during a meeting of the Committee on Budget and Finance of the Parliament, held on 17.11.2022.⁴⁰

The Ministry of Finance has considered that after the bill has been discussed repeatedly with all companies from the tobacco industry, it is not necessary to present it for public discussion. This is a violation of Art. 26 of the Law on Normative Acts.⁴¹ The excise calendar was also adopted in the plenary hall, meeting the demands of the tobacco industry.

3. The government allows/invites the tobacco industry to sit in the government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8) Never 5 Yes		1				
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From 2002 to 2014, there was a Council for the Limitation and Prevention of Smoking in the Republic of Bulgaria, approved by a Decree of the Council of Ministers.⁴² The Chairman of the

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Council was the Minister of Health, and the members were representatives of ministries and departments. The Council did not include representatives of the tobacco industry. The council closed in 2014.⁴³

In 2021, the Ministry of Health started a new procedure for establishing a National Council for coordinating the implementation in the Republic of Bulgaria of the Framework Convention on Tobacco Control of the World Health Organization (Council). The working group for the creation of the Council received proposals from the Ministry of Agriculture, the Ministry of Finance, the Institute of Tobacco and Tobacco Products to include representatives of branch organizations of tobacco producers and the tobacco industry. Referring to Art. 5.3 of the FCTC, the Ministry of Health manages to defend the thesis that representatives of the tobacco industry cannot participate in the Council.

The official opinion of the Ministry of Economy and Industry (obtained under the Access to Public Information Act) states: "The members of the Advisory Council should also include representatives of the branch organizations of producers and traders of tobacco and tobacco products and of persons carrying out industrial processing of tobacco."⁴⁴

The draft of the Decree was discussed at a meeting of the Council of Ministers on 04.06.2022 but was returned for re-coordination between the ministries. To date, no act of the Council of Ministers has been adopted to confirm this Council.

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) ⁴⁵ (Rec 4.9 & 8.3) For non-COP years, follow the previous score of the COP year. For non-Parties, apply a score of '0'		1				
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In both the 8th⁴⁶ and the 9th⁴⁷ Sessions of the countries that ratified the FCTC (COP), the official delegations of Bulgaria did not include representatives of the tobacco industry.⁴⁸

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" or "sustainable". For example, environmental programs. (Rec 6.2) B. The government (its agencies and officials) receives CSR contributions ⁴⁹ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests during the pandemic. (Rec 6.4) <i>NOTE: exclude enforcement activities as this is covered in another question</i>						5
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5.1. "So What?"⁵⁰

An example of "good cooperation" with the tobacco industry is the support of the Ministry of Environment and Water (MoEW) for the implementation of the information campaign of the Bulgarian Association of the Tobacco Industry (BATI) for the prevention of pollution with cigarette butts and tobacco products under the motto "So what?"^{51,52} (Pics. 14,15, App.4) The aim of the campaign is to raise awareness of the negative impact of tobacco products filters pollution on the environment, awakening the personal responsibility of smokers to change their behaviour, calling on them to dispose of their butts only in designated places.

In response to a question under the APIA, the Ministry of Environment and Water replied that "the Ministry did not receive any funds or other benefits for the information campaign". (see App. 3)

5.2. "Change the picture: 2022"⁵³

"Change the picture" is a long-time ecological CSR campaign by Philip Morris aiming to reduce the amount of litter caused by cigarette butts.^{54,55,56} The campaign involves cleaning of beaches and public spaces with the help of volunteers.⁵⁷ In the last campaign (2022) there has been a collaboration between artists and students resulting in a series of exhibitions on the same topic in the major cities of Bulgaria - Sofia, Plovdiv, Stara Zagora, Varna, Dobrich. These exhibitions have been realized with the support of the local municipalities, reported by PMI Facebook pages and the media alike^{58,59}. Because the use of open exhibition areas in the centre of the cities are allowed only through official request and approval of the municipality. In addition, during an official event/presentation of the campaign a local official part of a Health Committee to the Plovdiv municipality - Veselka Hristamyan - has readily participated and promoted the event on Facebook, explicitly mentioning Phillip Morris, and has thus validated it. The municipality websites have not officially posted information about the initiative and the posters themselves don't contain the name of Phillip Morris but a click/QR scan is quickly leading the user to the website where the brand is posted.

5.3. Donation by Philip Morris during COVID-19 pandemic

On the website www.svobodnaevropa.bg, from 03.06.2020 in the section "Chronicle of goodness. Donors during a pandemic" the following piece can be read: "Philip Morris - Bulgaria donated BGN 320 000 (approx. 160 000 Euro) to the BCause Foundation in order to overcome the consequences of the coronavirus. The funds will be used to purchase medicines and protective equipment."⁶⁰

BGN 28 000 (approx. 14 316 Euro) of these funds were donated to the Municipal hospital "St. Mina" in Plovdiv. Plovdiv Municipality gives a certificate to BCause Foundation for a donation of 28 thousand leva for the construction of an oxygen system in the "St. Mina" Municipal hospital needed for the treatment of patients with COVID-19. The money has been provided by Philip Morris - Bulgaria. The information is published on the official website of the Plovdiv Municipality and explicitly mentions Phillip Morris company.^{61,62}

From a publication on the website of the Bulgarian Donor Forum, it is clear that "The money is aimed at the urgent delivery of protective equipment for medical specialists and people on the front line in the fight against COVID-19, for medicines and for social support for people in need, for high class of masks for the staff of Municipal hospitals, for social homes for children and the elderly, for the police, customs and other state institutions at risk."⁶³

5.4. JTI's CSR activity supported by the Municipality of Karlovo

In September 2022 JTI Bulgaria conducted a cleaning-up in the villages in the Karlovo area affected by the rains. This activity was supported by the local municipality.⁶⁴

5.5 "Fun Summer, Caring Autumn":

The "Fun Summer, Caring Autumn" program has been implemented since 2015 by the BCause Foundation with the financial support of Philip Morris Bulgaria, as part of the company's corporate social responsibility initiatives (CSR) and in the implementation of its sustainable development strategy. Its aim is to support tobacco-producing regions in several directions: summer

educational academies for children, training for teachers in non-formal education methods, medical care for the elderly and support for local entrepreneurs to start and develop businesses.

From the website of the Foundation, we learn that "for the past 8 years, the program covered a total of 3,671 children between the ages of 7 and 14 and 129 teachers. 9,792 medical examinations of elderly people were carried out in 25 small settlements of 11 municipalities from 6 tobacco-producing regions in the districts: Silistra, Kardjali, Haskovo, Blagoevgrad and Shumen. Of the more than 350 business ideas that applied, 78 entrepreneurial teams went through training, and 25 of them received grant funding. Philip Morris Bulgaria invested about 1.7 million BGN (about 869 196 Euro) in the program over the seven years of its implementation.^{65,66}

The foundation works mainly with the mayors of the settlements and the principals of the schools. The mayors provide the premises and collect those who wish to undergo preventive examinations, and the principals of the schools ensure that the students who wish to join the educational-adventure academies.

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
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Bulgaria does not have an omnibus Tobacco Control Act. Regulation of tobacco is spread across several separate legislations and these are not FCTC complaint: Requirements for tobacco products, their packaging, advertising, promotion and sponsorship, distribution, combating illegal trade, etc. are regulated in the **Tobacco and Related Products Act**.⁶⁷ The requirements related to smoking, the ban on smoking in public places, prevention, and policies to limit smoking are set out in the **Health Act**.⁶⁸ Prevention of smoking among children and adolescents is regulated in the **Child Protection Act**.⁶⁹ The amount of excise duties is specified in the **Excise Duties and Tax Warehouses Act**.⁷⁰ The prohibition of all forms of commercial messages and product placement of cigarettes, other tobacco products and electronic cigarettes, or sponsorship of media services or broadcasts, is regulated in the **Radio and Television Act**.⁷¹

In the period from 01 January 2020 to 31 March 2023:

- Only one change was made in the **Tobacco and Related Products Act**, on which the tobacco industry did not submit an opinion and did not request an extension of the deadline.
- In the **Health Act**, no proposals were made for changes in texts related to smoking.
- In the **Child Protection Act** in November 2020, changes were adopted by the Parliament, adding "and smoking products other than tobacco products" to the text "The use of alcoholic beverages, tobacco and related products by children is prohibited". As of 08.05.2022, another addition to this text comes into force, adding a ban on the use of "nitrogen oxide (heavenly gas)". The tobacco industry has not commented on these changes. They have entered into force immediately, and no longer term has been set.
- In December 2020, Parliament adopted changes to the **Radio and Television Act**, adding "electronic cigarettes and refillable containers" to the prohibitions on commercial messages, product positioning and sponsorship of tobacco and related products. The tobacco industry has not submitted an opinion on the bill, and it has not made a proposal to extend the deadline. The changes entered into force from the date of publication of the law in the State Gazette - without a transitional period.

- The changes to the **Excise and Excise Warehouses Act** are detailed in the answer to question 2. In June 2022, the tobacco industry is demanding an extension of the deadline for introducing a new excise calendar by 3 months. The late submission of the bill to the Parliament, the lengthy discussion of the entire bill, which is also related to the adoption of the Law on the State Budget, mean that there are only a few days for the organization of the introduction of the new excise tax. This generally leads to a refusal to accept the excise calendar. With the re-introduction of the changes related to the excise calendar in the month of November 2022, the request of the tobacco industry for a three-month grace period has been satisfied. The draft law was adopted on 08.12.2022, and the first changes entered into force on March 1st, 2023.

These three months give the tobacco companies the opportunity to sell their available quantities of tobacco products with a lower excise tax, to calmly organize the printing of the new prices on the packages.

Despite the increase in excise duty on cigarettes by about 4-5%, they continue to be affordable. Their prices remain almost the same as in 2018, unlike the prices of dairy products, for example, which have almost doubled.

The increase in the prices of tobacco products (by about BGN 0.2-0.3, equal to 0.10-0.15 Euro) is much lower than the annual inflation, which according to the National Statistical Institute is 16.4% (calculated for January 2023 compared to January 2022).⁷²

There is no local legislation on such issues. National legislation is observed everywhere in the country.

7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)				4	
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7.1 Tax benefits for the HTP, 2018

In the scientific report published in 2022 by the Smoke-Free Life Coalition "Toxic Addiction. How the industry shapes tobacco control policies to its advantage" followed in detail the discussion on increasing the excise duty on heated tobacco products in 2018.⁷³

This case reveals how under the influence of the tobacco industry and organizations funded by it, changes in legislation are reached, related to tobacco products. A major role is played by the Institute of Market Economics (IME), which is currently implementing the project "Law and Economics of Illegal Trade in Tobacco Products in Bulgaria", supported by PMI Impact - a global initiative of Philip Morris International to provide financial support to organizations, developing and implementing projects to combat illegal trade and related crimes.

At the same time, PMI Impact financed two more Bulgarian projects.^{74,75} One is implemented by the Center for the Study of Democracy "The illegal trade of tobacco products along the Balkan route: addressing institutional gaps and corruption", and the other by the University of National and World Economy - "Contraband and counterfeit risk identification and World Economy business process analysis and spatial aspect". The last project was financed with 799,150 US dollars (According to the Letter of Consent of the Rector of the University Prof. Dr. Dimitar Dimitrov, obtained under APIA).⁷⁶

During the next Second Funding Round, another Bulgarian think tank received funding from PMI Impact - Center for Liberal Strategies EFN.^{77,78}

The arguments of the IME, in 2018 are stated in the position published on 12.07.2017:

"New excise framework for innovative heated tobacco products."⁷⁹ The Position says: "Given that these products are yet to enter the Bulgarian market, the initial tax burden should be as low as possible - on the one hand to test the market, and on the other to the introduction of less harmful alternatives to cigarettes is stimulated. Given the fact that there is a future harmonization of the excise tax for heated tobacco products in the EU after 2018, the most pragmatic approach for Bulgaria is to set a zero rate for heated tobacco products in the short term."

As a result, in 2017 the Excises and Tax Warehouses Act was supplemented with a definition of a heated tobacco product (Article 12a), the tax base for taxation with excise duty was determined based on the amount of tobacco contained in the product, measured in kilograms (Art. 29, para. 3) and an excise tax rate of BGN 152 (about 78 Euro) per kilogram (Art. 38, para. 2). The adopted changes in the law take effect from January 1, 2018. Although not zero, the excise rate is relatively low. With 20 cigarettes in one box, with a box weight of 6.1 grams and a price of BGN 5.50 (about 2.8 Euro) per box, it is BGN 0.93 (0.46 Euro). For comparison, if the cigarette excise rate is applied to these heated tobacco products, the amount of excise duty should be BGN 3.54 (1.8 Euro) per box. On 29.06.2018, a large group of people's representatives (64 MPs) from the governing party GERB introduced a bill for changes to the Excise Taxes and Tax Warehouses Act with the aim of increasing budget revenues. They propose a change in the tax rate on heated tobacco products in view of the increase in their market share. The main changes are related to equalizing the excise duty on heated tobacco products with that of cigarettes in order to prevent losses for the budget. The tax base for excise duty on a heated tobacco product changes from the amount of tobacco contained in the product, measured in kilograms, to the number of pieces, as is the case with cigarettes.

In the debates in the Budget and Finance Committee of the Parliament, the statements of the IME and the National Patient Organization are also considered, and they fully support the thesis of the PMI, widely advertised in various articles and interviews, using them as their front groups in the promotion of "reduced harm" of heated tobacco products. Thus, together with the representatives of the "United Patriots" parliamentary group, they managed to change the initial proposal, and finally the report from the meeting of the Committee on Budget and Finance ended as follows: "As a result of the discussion, the members of the Committee expressed their support for the bill in principle, but point out that its further discussion should take into account the comments of industry organizations and make changes to the bill, reducing the proposed increase in the excise duty on heated tobacco products from 100 percent to 40 percent of the excise duty on cigarettes, in order to promotion to be carried out more smoothly."

During the discussion in the hall, it becomes clear that the partner in the governing coalition also does not agree with the increase in the excise rate. The opinion of the coalition partner provoked Prime Minister Boyko Borisov to state on 07.04.2018 that he would ask GERB to withdraw the bill on heated cigarettes: "With the adoption of the bill, the budget would earn at least BGN 30 million (about 15 339 000 Euro) more, which now go into the pocket of the manufacturers of these devices. If those who criticize the bill, including the patriots, want us to withdraw it, so be it."⁸⁰ The MP who has initially suggested the changes did not withdraw the bill, but under the influence of the Prime Minister, the coalition partner, the pressure from the branch organizations, the opinions of the IME, the National Patient Organization and the opposition, adopted a compromise option, which is expressed in a radical change of the original proposals. They renounced the imported texts, as a result of which the excise rate for heated tobacco products increased from BGN 152 (about 78 Euro) to BGN 233 (119 Euro) per kilogram, which represents about 40% of the excise rate for cigarettes.⁸¹

The relatively low increase in excise duty on tobacco products in 2022 is detailed in the answer to question 2. Still, the excise duty on e-cigarettes and heated tobacco products remains far below the

excise duty on conventional cigarettes, which can be defined as an incentive for manufacturers of these products.

7.2. Benefits from Duty-free shops

Pursuant to Article 4c of the Regulations for the Implementation of the Excise Taxes and Tax Warehouses Act tobacco products purchased in another member state of the European Union by natural persons for personal use, which are exempt from excise duty, may be imported into Bulgaria in quantities no greater than of: 800 cigarettes, 200 cigarillos, 400 cigars and 1 kilogram of smoking tobacco.^{82,83}

For comparison, in France⁸⁴, Belgium⁸⁵, Great Britain⁸⁶, even in Serbia⁸⁷, these quantities are respectively: 200 cigarettes, 100 cigarillos, 50 cigars and 250 grams of smoking tobacco.

This allows the tobacco industry to realize greater profits from duty-free tobacco products in Bulgaria. This also contributes to smuggling and encourages greater consumption.⁸⁸

7.3. Benefits for tobacco growers

In Bulgaria, the state also provides special support to tobacco producers, using the financial instrument "Transitional National Assistance". The amount determined under this measure should decrease every year by 5%, and in 2030 this percentage is expected to be zero. For 2022, about BGN 70 million (about 35 790 000 Euro) have been allocated to 38,206 tobacco producers, while as of September of the same year, only 3,433 were officially registered with the Ministry of Agriculture. In this regard, in the article "Will Bulgaria stop giving millions to farmers phantoms?" asks this valid question, to which the author answers: "No doubt politics can always be taken into account as well - and especially elections and the need to stimulate a particular electorate in some way. For years."⁸⁹

"With the decision of the European Commission, laid down in the Strategic Plan of Bulgaria, the old reference frame 2007-2009 is replaced by a new one - 2016-2018. Bulgarian tobacco producers get one more privilege - to choose and indicate the most profitable for them from the three years when calculating the specific amount of their aid. The new year indicated by them will be a reference until 2027.

From 2023, to participate in this scheme, tobacco producers must be "active farmers". They must be registered as farmers or be entered in the Register of Tobacco Growers every year, and they must do so for 5 consecutive years. Each year in which they intend to apply for the "Transitional National Aid for Tobacco" scheme, they must also be registered in the Register of Tobacco Growers in that year. Otherwise, they will not be allowed by the system to participate in the scheme.

Another privilege has been adopted with changes to the Act on Assistance to Agricultural Producers.⁹⁰ It enables all those who failed to register in the period 2016-2018, but have the necessary set of documents and actually grew tobacco, to do so until March 1, 2023.⁹¹

Other cases of privileges, incentives and benefits for the tobacco industry were not found. Such were not found in the financial report of Philip Morris - Bulgaria.⁹²

INDICATOR 4: Forms of Unnecessary Interaction

8. Top level government officials (such as President/ Prime Minister or Minister ⁹³) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or									5
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organized by the tobacco companies or those furthering its interests. (Rec 2.1)						
<p>8.1. Annual Responsible Business Awards</p> <p>Tobacco companies have regularly been nominated for Annual Responsible Business Awards organized by the Bulgarian Business Leader Forum. In 2021 during the ceremony the Minister of Economy Kiril Petkov and Minister of Finance Assen Vasilev are responsible for handing the awards to the winners. Among them is Philip Morris - Bulgaria which gets an award in the 'Best social policy of a small and medium-sized enterprise category'⁹⁴. In addition, the company is also one of the main partners for the realization of the event. On the 14th of March 2023, the jubilee Awards Ceremony for 2022 Responsible businesses the awards were handed by the president of Bulgaria - Rumen Radev. No awards are handed by to the tobacco industry but again a silver sponsor of the event is JTI.⁹⁵</p> <p>8.2. Medical conference sponsored by TI</p> <p>Vice President Iliyana Yotova attends and opens a medical conference organized by the Bulgarian Medical Association. Contrary to the legal requirements of the Framework Convention on Tobacco Control (FCTC) of the WHO, and all human moral and ethical norms of medicine, heads of the medical profession together with the Vice President and the Minister of Health, Dr. Asen Medzhidiev stood under the logo of a tobacco company sponsoring the event on October 16, 2022.^{96,97}</p> <p>8.3. International conference - Green Transition 2022</p> <p>Bulgarian President Rumen Radev attends and opens an international conference - Green Transition 2022, about innovation, investments and transition towards green solutions which is co-sponsored by Phillip Morris.⁹⁸ Among the guests and speakers and were also Deputy Prime Minister and Minister of Environment and Water - Borislav Sandov, Mayor of Sofia - Yordanka Fandakova, the resigned ministers Grozdan Karadjov (Deputy Prime Minister for Regional Development and Public Works and Minister of Regional Development and Public Works) and European Commissioner Maria Gabriel (innovation, scientific research, culture, education and youth), European Commissioner Paolo Gentiloni (economy), Deputy Prime Minister and Minister of Finance Asen Vassilev, as well as Minister of Innovation and Growth Daniel Laurer participated via video link. The event took place on the 10th of June 2022.</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)						5
<p>Examples of conducted joint campaigns:</p> <p>9.1. Campaign 2015</p> <p>A campaign against the smuggling of tobacco products, organized by the Bulgarian tobacco company "Bulgartabac" and the National Association of Tobacco Producers, with the support of the Ministry of Finance and the "Customs" Agency in 2015. (Pic. 15, App.4) The campaign received a strong response in social networks. Citizens appealed to the Ethics Commission of the National Council for Self-Regulation, which recommended that the campaign be stopped.⁹⁹ The finance minister at the time responded to a question related to the campaign posed by two MPs by saying: "If anyone is worried about smuggling, I am ready to give the logo of the Ministry of Finance to any company dealing with excise goods to make anti-smuggling advertisements."¹⁰⁰</p>						

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9.2. Campaign 2018

The 2018 campaign is a continuation of this campaign, but this time supported by the Ministry of the Interior and the “Customs” Agency. In a publication dated August 15, 2018, on the website of the Ministry of the Interior, the beginning of a national information campaign to fight against the illegal trade in cigarettes was announced.¹⁰¹ The article states: "The result of the joint efforts of government institutions and the industry is the positive trend over the last few years of the decline of illegal cigarette trade, which reached its lowest levels of about 7% in the second quarter of 2017. Information campaign against illegal trade in tobacco products, initiated by the Bulgarian Association of the Tobacco Industry (BATI), with the participation of British American Tobacco Trading Bulgaria, Bulgartabac Holding, Japan Tobacco International Bulgaria, Imperial Tobacco Bulgaria, Karelia Bulgaria and Philip Morris - Bulgaria starts today. The campaign is carried out in partnership with the Ministry of Internal Affairs, the “Customs” Agency and the Center for the Study of Democracy. For yet another year, government institutions, the non-governmental sector and the tobacco industry are joining forces to solve the problem of the illegal trade in cigarettes."

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) <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>		1				
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According to an official inquiry to the Ministry of Health, Ministry of Finance, Ministry of Economy, Ministry of Environment and Waters, and Ministry of Agriculture, received under the Access to Public Information Act (APIA) no partnerships and agreements have been made with the tobacco industry.¹⁰²

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
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In Bulgaria, various meetings are held between senior government officials and representatives of the tobacco industry, in cases where such interactions are strictly necessary for regulation. Meetings are also held that are not strictly necessary. Some meetings are public, others are learned about after they are held, and there is no information about others.

An example of public meetings (but not strictly necessary) are the almost regular contacts between representatives of the authorities and tobacco companies from the "Initiative against illegal cigarette trade". These meetings are widely covered in the media and some are broadcast live on television. (See answer to question 1). Similar almost regular meetings were held until 2021 between government representatives and tobacco producers who received state aid for their activities. The Prime Minister and ministers also took part in them.^{103,104,105}

There are meetings about which information is obtained subsequently, from external sources or in random circumstances - for example, in connection with the proposal to increase the excise duty on tobacco products at the end of 2022.¹⁰⁶ Deputy Minister of Finance Lyudmila Petkova also spoke about the holding of these meetings - recorded in the transcript of the discussion of the excise calendar in the Committee on Budget and Finance, in the month of November 2022. (The case is discussed in detail in the answer to question 2.)

There may have been other meetings between government officials and representatives of the tobacco industry, but no information was found about them.

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<p>More important in the case of "transparency" is that no order, instruction, or other type of document has been issued in any ministry to regulate the public disclosure of meetings or other types of interactions with the tobacco industry. In Bulgaria, there is no law, regulation, or other document that requires transparency of these relationships. The government does not publicly announce the meetings with the tobacco industry when such interactions are necessary for regulation.</p> <p>Such are the identical answers of the Ministry of Finance, the Ministry of Economy and Industry, the Ministry of Health, the Ministry of the Environment, the Ministry of Agriculture, which were received in response to the question posed under the Access to Public Information Act.¹⁰⁷ The response of the Ministry of Finance also states: "During the calendar year 2022, on the initiative of the Bulgarian Association of the Tobacco Industry, meetings were held in the building of the Ministry of Finance with the aim of presenting their proposals for the introduction of an excise calendar to increase excise rates on cigarettes and tobacco products. Minutes and records of the meetings were not kept, as they were conducted in a working format."</p>						
<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)</p>						5
<p>Currently, there is no legislation in place in Bulgaria to regulate relations of the persons entrusted with top executive functions or even executive bodies with lobbyists and other third parties seeking to influence legislation and government policies.</p> <p>The idea of regulating lobbying activity in Bulgaria first appeared at the end of the 1990s, but these first attempts ended in failure. The lack of specific rules to regulate this activity created conditions for the intertwining of lobbying practices with corruption activities. For this reason, the first National Strategy for transparent governance and for prevention and counteraction of corruption adopted in 2001 (Project of the Center for the Study of Democracy¹⁰⁸) did not include lobbying.</p> <p>The first attempt to create a Lobbying Act (Lobbying Publicity Act) dated back to 2002 (39 NA) and it was a national adaptation of the American legal model for the regulation of lobbying, because in Europe at that time there were not even the beginnings of such a regulation, outside nebulous theories about the role of "pressure groups" on politicians. But this bill was not adopted. Since then, three more attempts to create such a law have been made (40 and 43 NAs).^{109, 110, 111} All draft laws proposed creating a public register of people and organizations engaged in lobbying, but all attempts have failed.</p> <p>In January 2023, GRECO – (Group of States against Corruption) the political format of the Council of Europe, which monitors the corruption environment in individual member states, specifically recommended that Bulgaria has to adopt a Law on Lobbying.¹¹²</p> <p>In "Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies", Evaluation Report for Bulgaria, Fifth Evaluation Round¹¹³ it is written:</p> <p>"The absence of rules on the interaction of the persons entrusted with top executive functions (PTEFs) - Prime Minister, ministers, secretaries general, chiefs of political cabinets, advisers, experts etc., with lobbyists and other third parties seeking to influence government policies does little service to transparency and the accountability of the executive vis-à-vis the public. Even though declarations of property, assets and interests are submitted by PTEFs, and an authority in charge of verifying them is in place, verification is ineffective as it is limited to a desk analysis and cross-checking against information contained in other state databases. Increased transparency as regards all members of political cabinets, their remuneration and ancillary activities, etc, would appear necessary. A key factor for increasing public trust, would be to prevent impunity at the top executive</p>						

level by enhancing the effectiveness of the criminal justice response to corruption offenses involving PTEFs.” (p.4)

“The Recovery and Resilience Plan for Bulgaria (approved in April 2022), envisages the adoption of legislative measures regulating lobbying activities for the third quarter of 2023. That said, the current absence of any rules on PTEFs interaction with lobbyists and other third parties aiming to influence the legislative process needs to be remedied urgently.” (p. 24)

The Recommendations of the Report were:

“(i) rules to be introduced on how persons entrusted with top executive functions engage in contacts with lobbyists and other third parties who seek to influence the government’s legislative and other activities; and (ii) sufficient information about the purpose of these contacts be systematically disclosed, as well as the identity of the person(s) with whom (or on whose behalf) the meeting(s) took place and the specific subject matter(s) of the discussion. (p.25, 64)

But despite these EU recommendations, the law on lobbying is not yet on the agenda.

And because there is no law on lobbying in Bulgaria, the tobacco companies carry out their role undisturbed, to influence the representatives of the authorities. In order to be more united and stronger, they created the association "Bulgarian Association of the Tobacco Industry" (BATI), in which members are BAT, Philip Morris - Bulgaria, Imperial Tobacco Bulgaria, Japan Tobacco International.¹⁴ This organization is in very close connection and interaction with the "National Association of Tobacco Producers".

To a question asked under the Access to Public Information Act: “If the government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists?” the Ministry of Economy and Industry answered: “We do not have such information and there is no data on its whereabouts.” The answers of the Ministry of Finance, Ministry of Health, Ministry of Environment and Water, Ministry of Agriculture were identical.

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		I				
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13.1. Requirements for Political Parties

According to Art. 23 of the Political Parties Act¹⁵, the main income of parties is formed from membership fees, own real estate, donations and bequests from individuals. By Decision of the Constitutional Court No. 5 of 2021, (promulgated in SG No. 37 of 2021) donations from legal entities and sole traders are declared unconstitutional. In addition, the state subsidy, interest on cash deposits in banks and income from securities, as well as income from publishing, copyrights, use of intellectual property, as well as from the sale and distribution of printed, audio- and audio-visual materials, are recognized as income, with party-propaganda content and others.

Political parties cannot receive: anonymous donations in any form; funds from legal entities and sole traders; from religious institutions; by foreign governments or by foreign state-owned enterprises, foreign commercial companies or foreign non-profit organizations. In addition, they cannot receive movable and immovable property for free use, as well as free services in any form. The political party creates and maintains a public register, which is announced on its website and in which are entered: the names of the donors, the type, amount, value and purpose of the donation or bequest

made, as well as declarations of the origin of the funds, in cases where the donation is in an amount above one minimum wage.

Control of compliance with these and many other requirements is carried out by the Audit Office. By March 31st each year, political parties submit a financial report to the Audit Office in paper and electronic format. A model declaration containing a list of individuals who made donations is attached to it.¹¹⁶

13.2. Requirements in the Election Code

Almost the same are the requirements with which the income and expenses of political parties during election campaigns are regulated in the Election Code.¹¹⁷ A party that has registered candidates can finance its election campaign with: the party's own funds; candidate funds and donations from individuals. With the same decision of the Constitutional Court, financing by legal entities and sole traders was declared unconstitutional. The same rules apply to coalitions and initiative committees.

The total amount of funding for each election campaign of the parties, coalitions and initiative committees is regulated, which cannot exceed the amount specified in the law. Article 168 states that a party, coalition or initiative committee in connection with the election campaign may not receive: anonymous donations in any form; funds from legal entities and sole traders; from religious institutions; by foreign governments or by foreign state-owned enterprises, foreign commercial companies or foreign non-profit organizations.

When the total amount of the donation from an individual, candidate or member of an initiative committee exceeds one minimum wage, the donor submits a model declaration on the origin of the donated funds. The financing of the income and expenses related to the election campaign, worth more than BGN 1,000, is done via bank transfer.¹¹⁸ When the amount of donated or provided funds is over BGN 1,000, the Audit Chamber performs a compliance check between the amount of donated or provided funds for the relevant election campaign and the amount of the person's income.

Control of compliance with the requirements of the Election Code is carried out by the Audit Chamber.

A unified public register of the parties, coalitions and initiative committees registered for participation in the relevant type of election is created in the Audit Chamber, which is maintained from the opening of the pre-election campaign until the next elections of the same type. In this register are entered the names of the donors, the type, purpose, amount or value of the donations made, as well as declarations about the origin of the donated funds, etc.

Within 30 working days after the election day, a paper and electronic statement of income, expenses and payment obligations in connection with the election campaign, accompanied by a statement from the bank account, shall be submitted to the Audit Office. The relevant declarations are also attached to the report.

After each election, the Audit Office prepares and publishes on its page an audit report¹¹⁹.

14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0				
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For the moment the evidence that retired senior government officials are part of the tobacco industry in Bulgaria are not found. The Bulgarian tobacco industry has been significantly changed for

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the last 12 years, since the biggest tobacco products producer Bulgartabac has been privatized and sold out.						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)				3		
<p>In a 2021 article on the Capital.bg website, it is stated that Dilyana Yakova, who is the manager of regulations and sustainable development of the company Philip Morris - Bulgaria, is a lawyer and an expert in sustainable development with over 12 years of professional experience in the corporate world. Before joining Philip Morris - Bulgaria, Dilyana Yakova worked in the Ministry of Education and Science as a legal consultant, as well as in the consulting company KPMG.¹²⁰</p> <p>On 16.06.2022, in a message from the Bulgarian Telegraph Agency, it is stated that Petya Petkova is taking over the position of head of "Scientific Affairs" at Philip Morris - Bulgaria.¹²¹ She will be responsible for promoting the scientific activity of Philip Morris International, which is the basis of the development of the company's smokeless products. She will maintain relations with the scientific community in the country and will take care of the expansion of opportunities and access to the studies that the company develops. Before that, she worked in addition to British American Tobacco for Bulgaria, in Unilever Bulgaria, in the Bulgarian Association of International Business, but also in the Ministry of Justice, where she was responsible for the convergence of Bulgarian legislation with the law of the European Union.</p> <p>Kiril Georgiev started his career in the field of public relations at the Ministry of Finance, after which he joined the team of British American Tobacco Bulgaria. He continued his career at leading companies in management positions in the area of corporate affairs, including Heineken Zagorka. In mid-2017 he returned to BAT, where he held the position of Legal and External Affairs Manager. Now he is a Regulatory Engagement Manager at British American Tobacco.^{122,123}</p> <p>Other information about current government officials and relatives giving positions in the tobacco business was not found.</p> <p>Another striking case of mixing state power with TI is the case of the MP from the DPS party - Delyan Peevski - an entrepreneur, media magnate and politician. Together with his mother, Irena Krasteva, he managed print publications and television stations. Krasteva is a co-owner of the largest printing house in Bulgaria - IPC "Rodina". (Pic. 17,18, App.4)</p> <p>In 2005 (only 25 years old and with no experience) Peevski was appointed Deputy Minister of State Policy for Disasters and Accidents. There he oversees the State Agency "State Reserve and Wartime Stockpiles" and also becomes a member of the interdepartmental commission that issues arms trade licenses.</p> <p>Peevski is a member of parliament from the civil quota of the DPS. He has been a MP since July 14, 2009 and since that time he is a member of the 41st, 42nd, 43rd, 44th, 47th, 48th and now in the 49th National Assembly.</p> <p>Since July 29, 2009, he has been a member of the Committee on Internal Security and Public Order, and since January 20, 2010, a member of the Committee on Legal Affairs.</p> <p>On the proposal of Prime Minister Plamen Oresharski, on June 14, 2013, with the votes of 116 people's representatives, Delyan Peevski was elected chairman of the State Agency for National Security (DANS). Under the pressure of the subsequent protests against this appointment and expressed distrust by representatives of Euro-Atlantic partners, the National Assembly unanimously revoked this decision on June 19 of the same year. The case became known throughout Europe.</p>						

In May 2014 he was elected MEP from the DPS list in the European Parliament elections, but gave up his seat. In the elections for the European Parliament in 2019, the DPS again nominated the candidacy of Delyan Peevski, together with the chairman of the party, Mustafa Karadai. The two were elected as deputies in the future European Parliament, but renounced their mandates.

In August 2015, Peevski officially acquired the entire shares of the newspapers "Telegraf", "Monitor", "Politika", "Meridian Match" and "Europost". In the same year, he formalized his minority share of ownership in the tobacco giant Bulgartabac (which is about 5% of the company's shares). In fact, who and with what share is the owner of Bulgartabac Holding, privatized in 2011 (after a 10-year privatization attempt), remains mysteriously unclear to the public to this day. ^{124,125,126}

On June 2, 2021, the Office of Foreign Assets Control of the US Department of the Treasury imposed sanctions on Delyan Peevski and others. for their significant role in corruption in Bulgaria, as well as their networks covering 64 companies. They are sanctioned under Executive Order 13818, which complements and implements the Magnitsky Global Act on Accountability for Human Rights Violations and targets perpetrators of gross human rights abuses and corruption worldwide. ^{127,128,129,130}

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
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This question was addressed to the Council of Ministers, Ministry of Economy, Ministry of Health, Ministry of Finance, Ministry of Environment and Water and Ministry of Agriculture under the Access to Public Information Act.

The responses of the ministries are that there is no such procedure in place. Meetings are not recorded, the agenda is not announced in advance, minutes are not kept or they are not public. The results of the meetings are not announced either. The response of the Ministry of Finance shows complete ignorance of the FCTC and its art. 5.3. They state that "protocols and records of the meetings were not kept, as they were conducted in a working format". It is precisely such workshops that require the strict keeping of minutes and their announcement to the public. The Ministry of Environment and Water and the Ministry of Agriculture did not respond to the questions.

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>1 for whole of government code; 2 for Yes but partial if only MOH</i>							5
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According to Art. 28 of the Civil Servant Act¹³¹ and the introduced Code of Conduct for Civil Servants in the State Administration¹³² - civil servants, in the performance of their official duties and in their public life, are obliged to behave in a way that does not damage the prestige of the civil service and conforms to the requirements of the Code on the behaviour of employees in the state administration. The Code was adopted by Resolution No. 57 of the Council of Ministers dated 04.02.2020. The texts in the Code are general and refer to the relations of civil servants with all representatives of business and society (individuals, legal entities and organizations), as there are no special requirements which they must comply with in their dealings with the tobacco industry.

In their relationships with legal entities and other organizations, public administration employees must observe the following principles of conduct: legality, loyalty, good faith, impartiality, equality, responsibility, political neutrality, integrity, confidentiality, accountability, collegiality and courtesy.

According to Art. 11 of the Code, employees in the state administration:

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<ul style="list-style-type: none"> - Must not allow behaviour that involves them in corruption and counteracts such manifestations and other illegal actions in the state administration. - Must not allow themselves to be placed in economic and other dependence, as well as ask to accept gifts, services, money, benefits or other benefits that may affect the performance of their official duties. - Cannot accept gifts or benefits for performing work that is part of their official duties, nor perform activities outside their competence. - Cannot accept a benefit or a promise of a benefit in order to influence the decision-making of other officials in connection with the performance of their official duties. - Cannot mediate the receipt of a benefit from another in order to perform an official act. <p>When asked whether the standards in relations with the tobacco industry, set by the Access to Public Information Act, are being followed, the Council of Ministers, the Ministry of Economy and Industry, the Ministry of Finance, the Ministry of Health, the Ministry of Environment and Water and the Ministry of Agriculture answer, that they comply with the above-cited Civil Servant Act and the Code of Conduct for Public Administration Employees. No response mentions any special rules regarding the tobacco industry.¹³³</p>						
<p>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)</p>						5
<p>According to various texts of the Law on Tobacco and Related Products, the tobacco industry is obliged to provide detailed information on tobacco products, new products, electronic cigarettes and refillable containers during the registration of the relevant product.¹³⁴ These are requirements related to ingredients, emissions, scientific research on toxicity, risk of addiction, expected consequences when starting and stopping the use of tobacco products, as well as predictions related to consumer perception.</p> <p>For example, for e-cigarettes, information is required on the volume of sales for each brand and for each type of product, on the preferences of different consumer groups, including young people, non-smokers and the main types of smokers, on the ways in which the products are sold, aggregated estimates of market studies.</p> <p>These and other similar data are provided to the Ministry of Economy and Industry and entered into public registers. The Institute of Tobacco and Tobacco Products, which is subordinate to the Ministry of Agriculture, is provided with data on the ingredients, toxicological data on the ingredients in burned or unburned form, including their impact on the health of consumers, taking into account all addictions properties as well as information on all methods used to measure emissions from tobacco products.</p> <p>Regarding the income and expenses of the relevant companies from the tobacco industry, the tax legislation applies, which also applies to every single company operating on the territory of Bulgaria.</p> <p>To date, there is no legislation obliging the tobacco industry to periodically provide the state with information on its production volume, market share, marketing costs, revenues and any other activity, including lobbying, philanthropy, contributions to political parties, etc.</p> <p>Bulgaria has not yet adopted a law on lobbying.</p>						

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19. The government has a program / system/ plan to consistently ¹³⁵ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
<p>In response to this question under the Access to Public Information Act, the Ministry of Health, the Ministry of Finance, the Ministry of Economy and Industry, the Ministry of Environment and Water, the Ministry of Agriculture responded that they do not have a program to consistently raise awareness about the policies related to the guidelines under Art. 5.3 of the FCTC.¹³⁶ The government does not have such a program.</p> <p>With a lot of effort and with the support of the WHO Regional Office in Bulgaria and the Institute of Public Administration, the Smoke-Free Life Coalition organized in March 2021 an online seminar for civil servants on the implementation of Art. 5.3 of the FCTC. Representatives of the Ministries of Health, Economy, Internal Affairs, Justice, Foreign Affairs, Tourism, Youth and Sports, the “Customs” Agency, the Consumer Protection Commission, etc. participated in the seminar. Keynote speakers are Ian Gray and Paul Hooper, Co-Directors of the Coordinating Center for Tobacco Control, Environment and Health, UK. Participants were provided with materials on the subject, but this remains the only training. The Ministry of Health made no effort to include the topic in the calendar of the Institute of Public Administration, where employees from the state administration are trained.</p>						
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			
<p>There is no such policy specifically introduced either by the Government or by any individual Ministry. When asked whether there is such a policy in relation to the tobacco industry, set under the Access to Public Information Act, the Council of Ministers, the Ministry of Economy and Industry, the Ministry of Finance, the Ministry of Health, the Ministry of Environment and Water and the Ministry of Agriculture responded, that they comply with the Civil Servant Act and the Code of Conduct for Civil Servants.¹³⁷ No response mentions any special rules regarding the tobacco industry.</p> <p>In the month of December 2021 and in October 2022, at the start of the activities of the 47th and 48th National Assembly, respectively, the Smoke-Free Life Coalition submitted to the Parliament's secretariat proposals for changes to the Regulations for the Organization and Activities of the National Assembly, referring to the Framework convention on tobacco control. The proposals suggest that each member of the parliament:</p> <ul style="list-style-type: none"> - Must not accept, support or approve any proposal by the tobacco industry relating to a change in legislation related to the fight against the use of tobacco and related products. - Must declare if he/she has any direct interests related to the tobacco industry. - Does not to receive gifts or accept favors in any form from the tobacco industry. <p>Proposals not accepted.</p>						
TOTAL SCORE					73	

I. Annex A: Sources of Information

	TOP TOBACCO COMPANIES/ DISTRIBUTORS	MARKET SHARE	BRANDS	SOURCE
1	British American Tobacco Trading Ltd	37.5	Dunhill, Vogue, Lucky Strike, Rothmans, Glo, Vuse	https://www.bat.bg/group/sites/BAT_A3PKHG.nsf/vwPages/WebLive/DO9T5K3S?opendocument
2	Karelia Bulgaria Ltd	17.7	Ome, Karelia Slims, Karelia Blue	https://www.karelia.gr/en/schektika-me-emas/
3	Philip Morris Bulgaria Ltd	17.2	Marlboro, Parliament, Muratti, L&M, ICOS	https://www.pmi.com/markets/bulgaria/bg
4	Japan Tobacco International Bulgaria Ltd	10.2	Camel, Winston, Sobranie, LD, More, Old Holborn	https://www.jti.com/europe/bulgaria
5	KT international	7.3	The KING, CORSET	https://ktinternational.eu/#global-brands
6	Imperial Tobacco Bulgaria Ltd	6.9	Davidoff, West, Paramount, Golden Gate, Lambert & Butler, Superkings and tobacco Golden Virginia.	https://www.imperialbrandsplic.com/

	TOP MEDIA/ NEWSPAPERS	URL
1	Dnevnik.bg	https://www.dnevnik.bg
2	Bulgarian national radio	https://bnr.bg
3	Offnews.bg	https://offnews.bg/
4	Standartnews.com	https://www.standartnews.com
5	Svobodnaevropa.bg	https://www.svobodnaevropa.bg
6	Mediapool.bg	https://www.mediapool.bg
7	Investor.bg	https://www.investor.bg
8	Medicalnews.bg	https://medicalnews.bg
9	Dnes.dir.bg	https://dnes.dir.bg
10	24chasa.bg	https://www.24chasa.bg/
11	Manager.bg	https://manager.bg
12	Agri.bg	https://agri.bg
13	Banker.bg	https://banker.bg
14	Capital.bg	https://www.capital.bg
15	Bulgarian National Agency	https://www.bta.bg

	MAIN TOBACCO INDUSTRY ALLIES/ FRONT GROUPS	TYPE (FRONT GROUP, LOBBY GROUP, INDIVIDUAL)	SOURCE
1	Bulgarian Hotel and Restaurant Association	Front group	https://www.bhra-bg.org/
2	Bulgarian Association of Restaurants	Front group	https://baz.postr.eu/
3	National Patients Organisation	Front group	https://npo.bg/
4	National Association of Tobacco Growers 2010	Front group	http://www.nat2010.bg/
5	BCause Foundation	Front group	https://www.bcause.bg/

References:

- ¹ Neuberger M. C. (2013). *Balkan Smoke: Tobacco and the Making of Modern Bulgaria*. Ithaca and London: Cornell University Press.
- ² About \$132 932 800. See Exchange rate, Jan. 2011, Available at: https://commission.europa.eu/funding-tenders/procedures-guidelines-tenders/information-contractors-and-beneficiaries/exchange-rate-inforeuro_en
- ³ Natov, E. (2018). "The majority owner sold its stakes in Bulgartabac Holding", Banker.bg, July 16, 2018 (in Bulgarian).
- ⁴ Eurostat. (2012). "Manufacture of tobacco products statistics – NACE Rev. 2". Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Archive:Manufacture_of_tobacco_products_statistics_-_NACE_Rev._2&oldid=90710
- ⁵ European health interview survey, BG, EHIS wave 3 - 2019, Final data. Available at: <https://www.nsi.bg/en/content/18876/final-data>
- ⁶ Eurobarometer, 2020, Attitudes of Europeans towards tobacco and electronic cigarettes, Country Factsheets in English. Available at: <https://europa.eu/eurobarometer/surveys/detail/2240>
- ⁷ Teolova, E., Tzolova, G., Dimitrov, P. (2022). "Distribution of smoking among the population at the age of 20 years and older in the Republic of Bulgaria". In: National Survey on Risk Factors for Population's Health in Bulgaria. Bulgarian Journal of Public Health, Vol. 14 No 2. Supplement. pp. 121-134. Available at: <https://ncpha.government.bg/uploads/pages/3166/2-2022-SUPPLEMENT+.pdf>
- ⁸ World Health Organization. (2021). "WHO global report on trends and prevalence of tobacco use 2000-2025, fourth edition". World Health Organization. Available at: [WHO global report on trends in prevalence of tobacco use 2000-2025, fourth edition](https://www.who.int/publications/m/item/who-global-report-on-trends-and-prevalence-of-tobacco-use-2000-2025-fourth-edition)
- ⁹ World Health Organization. (2020). "Spotlight on adolescent health and well-being. Findings from the 2017/2018 Health Behaviour in School-aged Children (HBSC) survey in Europe and Canada". Volume 2: Key Data. Copenhagen: WHO Regional Office for Europe. Available at: <https://apps.who.int/iris/bitstream/handle/10665/332104/9789289055017-eng.pdf?sequence=1&isAllowed=y>
- ¹⁰ World Population Review. (2022). Death rate by country 2022. Available at: <https://worldpopulationreview.com/country-rankings/death-rate-by-country>
- ¹¹ G. Tzolova, N. Vasilevski, P. Dimitrov. Mortality attributable to smoking. General medicine. No. 2/2008; 21-27. Available at: <https://rzi-targovishte.bg/doc/Mariana/NPOT.pdf>
- ¹² Toxic Dependence. How the industry shapes tobacco control policies to its advantage. Available at: https://coalicia.bezdim.org/images/pdf/Toxic-Dependence_EN.pdf
- ¹³ Rules for the Organization and Activities of the National Assembly. Available: <https://www.parliament.bg/bg/podns>
- ¹⁴ Code of conduct for employees in the state administration. Available: <https://lex.bg/bg/laws/ldoc/2137201712>
- ¹⁵ 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
- ¹⁶ The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.
- ¹⁷ "Offer of assistance" may include draft legislation, technical input, recommendations, overseas study tour
- ¹⁸ A civil petition against the return of smoking in establishments! Available at: https://www.peticia.com/ne_na_cigarite_v_zavedeniata
- ¹⁹ Forbid them to see it? Or forbid it to exist? Video clip. Available at: <http://bezdim.org/notaps/wp-content/themes/bezdim-reklama/assets/images/bez-dim-promo.mp4>
- ²⁰ Public Awareness Campaign to Combat Illicit Cigarettes Trade Starts. Available at: <https://bnt.bg/news/public-awareness-campaign-to-combat-illicit-cigarettes-trade-starts-128485news.html>
- ²¹ "We are moving forward with 100 years of experience behind us", 10.02.2020. Available at: <https://www.economic.bg/bg/a/view/we-are-moving-forward-with-100-years-of-experience-behind-us-114034>
- ²² Initiative against illegal trade, 14.03.2023. Available at: <https://www.standartnews.com/biznes/initsiativa-sreshchu-nezakonnata-trgoviya-519246.html>
- ²³ 2022 PMI IMPACT Report. Available at: <https://www.pmi-impact.com/content/dam/pmi-impact/docs/2022-pmi-impact-report.pdf>
- ²⁴ "Tobacco companies continue to report a low share of illegal consumption". Available at: https://www.dnevnik.bg/biznes/2022/03/22/4327411_tjutjunevite_kompanii_produljavat_da_otchitat_nisuk/
- ²⁵ "2.4% is the share of illegal cigarettes on the Bulgarian market at the end of 2021". Available at: <https://customs.bg/wps/portal/agency/media-center/news-details/22-03-2022-izsledvane-cigari>

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- ²⁶ “Borisov is pleased with the decline in illegal cigarettes”. Available at: <https://www.dnes.bg/obshtestvo/2020/10/29/borisov-dovolen-ot-spada-na-nelegalnite-cigari.467758>
- ²⁷ “Illegal cigarettes fall to 3.8% in the first quarter of 2019”. Available at: <https://customs.bg/wps/portal/agency/media-center/news-details/03-07-cigari-prouchvane>
- ²⁸ “Record low cigarette smuggling - 3.4 percent” (Overview). Available at: <https://www.24chasa.bg/biznes/article/7725760>
- ²⁹ “Poll finds fall in illegal tobacco trade in Bulgaria”, 08.08.2018. Available at: https://bnr.bg/en/post/101005146/poll-finds-fall-in-illegal-tobacco-trade-in-bulgaria?forceFullVersion=1&page_1_4=27
- ³⁰ “1.6% is the share of cigarettes without paid taxes for the second quarter of 2021”. Available at: <https://customs.bg/wps/portal/agency/media-center/news-details/02-11-tabacco-q2>
- ³¹ “2.4% is the share of illegal cigarettes on the Bulgarian market at the end of 2021”. Available at: <https://offnews.bg/obshtestvo/2-4-e-delat-na-nelegalnite-tcigari-na-bal-garskia-pazar-kam-kraia-na-2-772919.html>
- ³² “The share of illegal cigarettes in our country has decreased to a record low of 1.5%”. Available at: <https://manager.bg/%D0%B8%D0%BA%D0%BE%D0%BD%D0%BE%D0%BC%D0%B8%D0%BA%D0%B0/delat-na-nelegalnite-cigari-u-nas-e-namalat-do-rekordno-niskite-1-5-v-kraia-na-2022-g->
- ³³ Initiative against illegal trade. Available: <https://www.standartnews.com/biznes/initiativa-sreshchu-nezakonnata-trgoviya-519246.html>
- ³⁴ Cigarette smuggling levels in Bulgaria reach record low, 15.03.2023. Available at: <https://www.euractiv.com/section/politics/news/cigarette-smuggling-levels-in-bulgaria-reach-record-low/>
- ³⁵ Transcript of the meeting of the Budget and Finance Committee of the Parliament, held on 06/09/2022. Available at: <https://www.parliament.bg/bg/parliamentarycommittees/2948/steno/6837>
- ³⁶ Report of the Committee on Budget and Finance of the Parliament, first vote, 09.06.2022. Available at: <https://www.parliament.bg/bg/parliamentarycommittees/2948/reports/13973>
- ³⁷ Transcript of the meeting of the Committee on Budget and Finance of the Parliament, held on 27.06.2022. Available at: <https://www.parliament.bg/bg/parliamentarycommittees/2948/steno/6880>
- ³⁸ Council of Ministers, Public Consultation Portal. Available at: <https://strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=7137>
- ³⁹ *ibid*
- ⁴⁰ Transcript of the meeting of the Committee on Budget and Finance of the Parliament, held on 17.11.2022. Available at: <https://www.parliament.bg/bg/parliamentarycommittees/3122/steno/7007>
- ⁴¹ Law on normative acts. Available at: <https://lex.bg/index.php/laws/ldoc/2127837184>
- ⁴² Decree No. 214 of the Council of Ministers of 2002 on the establishment of a Council for Limiting and Preventing Smoking in the Republic of Bulgaria (promulgated, SG No. 93 of 2002; amended, No. 78 of 2005, No. 79 and 93 of 2009 and No. 62 of 2013). Available at: <https://www.ciela.net/svobodna-zona-darjaven-vestnik/document/2135458319/issue/2437/postanovlenie-%E2%84%96-214-ot-16-septemvri-2002-g-za-sazdavane-na-savet-za-ogranichavane-i-predotvratyavane-na-tyutyunopusheneto-v-republika-balgariya>
- ⁴³ Decree No. 86 of 17.04.2014 on the closure of Advisory Councils under Art. 21, para. 1 of the Law on Administration ((promulgated, SG No. 36 of 25.04.2014). Available at: <https://lex.bg/bg/laws/ldoc/2136173094>
- ⁴⁴ See Appendix 1 - Opinion of the Ministry of Economy No. 04-13-103 of 26.07.2021
- ⁴⁵ Please annex a list since 2009 so that the respondent can quantify the frequency. Available at: <http://www.who.int/fctc/cop/en/>
- ⁴⁶ FCTC/COP/8/DIV/1 List of Participants. Available at: <https://fctc.who.int/publications/m/item/fctc-cop-8-div-1-list-of-participants>
- ⁴⁷ Ninth Session of the Conference of the Parties to the WHO Framework Convention on Tobacco Control. Available at: <https://untobaccocontrol.org/downloads/cop9/additional-documents/COP9-List-of-Participants.pdf>
- ⁴⁸ See Appendix 2 - List of official delegations from Bulgaria from Third to Ninth Session of the Conference of the Parties to the WHO Framework Convention on Tobacco Control
- ⁴⁹ Political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions
- ⁵⁰ The MoEW supports the “So what” campaign against pollution with filters from tobacco products. Available at: <https://www.moew.government.bg/en/the-moew-supports-the-so-what-campaign-against-pollution-with-filters-from-tobacco-products/>
- ⁵¹ There is a campaign against cigarette butts on the ground, “24 hours”. Available at: <https://www.24chasa.bg/bulgaria/article/13261097>
- ⁵² “What So” national campaign against cigarette filter pollution, XNEWS. Available at: <https://www.xnews.bg/nacionalna-kampanija-kakvo-tolkova-sreshtu-zamarsjavaneto-s-filtri-ot-cigari/>
- ⁵³ Official website of the ‘Changed the picture’ campaign. Available at: <https://promenikartinkata.bg/>
- ⁵⁴ Our world is not an ashtray. Available at: <https://promenikartinkata.bg/vkluchi-se/>

- ⁵⁵ Cigarette Butts – A Global Issue. Available at: <https://www.worldnoashtray.com/en/>
- ⁵⁶ Every third person throws away their cigarette butts on the street or on the beach (with photos). Available at: <https://bnr.bg/varna/post/101661020/vseki-treti-chovek-si-izhvarla-cigarenite-fasove-na-ulicata-ili-na-plaja>
- ⁵⁷ “Cleaning initiative in Blagoevgrad part of Change the picture campaign”. Available at: <https://bnr.bg/blagoevgrad/post/101531524/promeni-kartinkata-v-blagoevgrad>
- ⁵⁸ “Can we change the picture?”. Available at: <https://offnews.bg/obshtestvo/mozhem-li-da-promenim-kartinkata-776519.html>
- ⁵⁹ “Change the picture provokes with an exhibition”. Available at: <https://www.standartnews.com/balgariya-obshtestvo/promeni-kartinkata-provokira-s-izlozhba-492672.html>
- ⁶⁰ “Chronicle of goodness. Donors in a Pandemic”, June 3, 2020. Available at: <https://www.svobodnaevropa.bg/a/30497388/lbi0lbi200485.html>
- ⁶¹ Article on the website of the municipality of Plovdiv. Available at: <https://www.plovdiv.bg/%D0%BE%D1%89%D0%B5-%D0%B1%D0%BB%D0%B8%D0%B7%D0%BE-28-000-%D0%BB%D0%B2-%D0%B4%D0%B0%D1%80%D0%B8%D1%85%D0%B0-%D0%B7%D0%B0-%D0%BA%D0%B8%D1%81%D0%BB%D0%BE%D1%80%D0%BE%D0%B4%D0%BD%D0%B0%D1%82%D0%B0-%D0%B8/>
- ⁶² “St. Mina” received a donation of BGN 28,000 for an oxygen installation”. Available at: <https://podtepeto.com/novini/sv-mina-poluchi-28-000-leva-darenie-za-kislorodna-instalaciya/>
- ⁶³ “I million and a lot of trust”, published on the website of the Bulgarian donor forum. Available at: <https://dfbulgaria.org/2021/silata-na-parite/>
- ⁶⁴ JTI Bulgaria. Available at: <https://amcham.bg/2022/10/06/jti-bulgaria-supports-the-affected-villages-in-karlovo-area/>
- ⁶⁵ “Fun summer, caring autumn” with new fascinating stories in 2022. B.Cause Foundation Web. Available at: <https://www.bcause.bg/news/news-communities/904-zabavno-lyato-grizhovna-esen-s-novi-zavlyavashiti-istorii-prez-2022-godina.html>
- ⁶⁶ “Fun Summer, Caring Autumn” - with communities in mind and ideas that change tobacco regions. Mediapool.BG. Available at: <https://www.mediapool.bg/zabavno-lyato-grizhovna-esen---s-misal-za-obshtnostite-i-ideite-koito-promenyat-tyutyunoproizvoditelnite-regioni-news334772.html>
- ⁶⁷ Tobacco and Related Products Act. Available at: <https://lex.bg/bg/laws/ldoc/2133117441>
- ⁶⁸ Health law. Available at: <https://lex.bg/laws/ldoc/2135489147>
- ⁶⁹ Child Protection Act. Available at: <https://lex.bg/laws/ldoc/2134925825>
- ⁷⁰ Law on excise duties and tax warehouses. Available at: <https://lex.bg/laws/ldoc/2135512728>
- ⁷¹ Law on Radio and Television. Available at: <https://lex.bg/laws/ldoc/2134447616>
- ⁷² National Institute of Statistics, Inflation and Consumer Price Indices for January 2023. Available at: <https://www.nsi.bg/bg/content/20077/%D0%BF%D1%80%D0%B5%D1%81%D1%81%D1%8A%D0%BE%D0%B1%D1%89%D0%B5%D0%BD%D0%B8%D0%B5/%D0%B8%D0%BD%D1%84%D0%BB%D0%B0%D1%86%D0%B8%D1%8F-%D0%B8-%D0%B8%D0%BD%D0%B4%D0%B5%D0%BA%D1%81%D0%B8-%D0%BD%D0%B0-%D0%BF%D0%BE%D1%82%D1%80%D0%B5%D0%B1%D0%B8%D1%82%D0%B5%D0%BB%D1%81%D0%BA%D0%B8%D1%82%D0%B5-%D1%86%D0%B5%D0%BD%D0%B8-%D0%B7%D0%B0-%D1%8F%D0%BD%D1%83%D0%B0%D1%80%D0%B8-2023-%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D0%B0>
- ⁷³ “Toxic addiction. How the industry shapes the policies to limit the use of tobacco products to its advantage”, pp. 45-50. Available at: <https://coalicia.bezdim.org/bg/research.html>
- ⁷⁴ 2022 PMI Impact Report, Combating Illegal Trade, Together, p.5. Available at: <https://www.pmi-impact.com/content/dam/pmi-impact/docs/2022-pmi-impact-report.pdf>
- ⁷⁵ PMI Impact, Selected Projects: First Funding Round. Available at: <https://www.pmi-impact.com/funding/firstfundinground/>
- ⁷⁶ Press Conference about the Three Bulgarian Projects Won Funding by the PMI Impact Global Initiative, 30.10.2017. Available at: <https://www.unwe.bg/en/news/12404/press-conference-about-the-three-bulgarian-projects-won-funding-by-the-pmi-impac.html>
- ⁷⁷ 2022 PMI Impact Report, Combating Illegal Trade, Together, p.17. Available at: <https://www.pmi-impact.com/content/dam/pmi-impact/docs/2022-pmi-impact-report.pdf>
- ⁷⁸ PMI Impact, Selected Projects: Second Funding Round. Available at: <https://www.pmi-impact.com/funding/secondfundinground/>
- ⁷⁹ “Position: New excise duty framework for innovative “heated” tobacco products”. Available at: <https://ime.bg/bg/articles/poziciya-nova-akcizna-ramka-za-inovativnite-nagrevaemi-tyutyunevi-izdeliya/>
- ⁸⁰ “Boyko Borisov will ask GERB to withdraw the bill on smokeless cigarettes”. Available at: <https://www.investor.bg/biudjet-i-finansi/333/a/boiko-borisov-shte-poiska-gerb-da-iztegli-zakonoproektaza-bezdimnite-cigari-264104/>

- ⁸¹ All values in question 7.1 can be converted to any currency see “Exchange rate”. Available at: https://commission.europa.eu/funding-tenders/procedures-guidelines-tenders/information-contractors-and-beneficiaries/exchange-rate-inforeuro_en
- ⁸² Regulations for the implementation of the Law on excise duties and tax warehouses. Available at: <https://lex.bg/bg/laws/ldoc/2135526226>
- ⁸³ Carrying alcohol and tobacco when travelling between EU countries. Available at: https://europa.eu/youreurope/citizens/travel/carry/alcohol-tobacco-cash/index_en.htm
- ⁸⁴ Volume- and value-based customs and tax allowances. Available at: <https://www.douane.gouv.fr/fiche/volume-and-value-based-customs-and-tax-allowances>
- ⁸⁵ Travel Wisely Useful Information for Travelers. Available at: https://finance.belgium.be/sites/default/files/Customs/Brochures/Reis/Brochure_Travel_Wisely_ENG_A5.pdf
- ⁸⁶ Warning for Travellers. Available at : <https://www.mfa.bg/bg/embassyinfo/united+kingdom>
- ⁸⁷ Customs requirements, Serbia. Available at: <https://www.mfa.bg/bg/embassyinfo/serbia>
- ⁸⁸ Tobacco: Banning the sale of duty-free cigarettes, a solution? Available at: <http://www.vapoteurs.net/bg/tabac-interdire-la-vente-de-cigarette-dans-les-duty-free-une-solution/>
- ⁸⁹ Bilyana Pancheva 13/09/2022 "Will Bulgaria stop giving millions to phantom farmers?", Agri.BG. Available at: <https://agri.bg/novini/shche-spre-li-blgariya-da-dava-milioni-na-fermeri-fantomi>
- ⁹⁰ Farmers Assistance Act. Available at: <https://lex.bg/laws/ldoc/2134406656>
- ⁹¹ Hristina Vasileva, 07.02.2023 Only "active farmers" will receive Transitional National Aid for Tobacco, Agri.BG. Available at: <https://agri.bg/novini/startira-vpisaneto-v-registra-na-tyutyunoproizvoditelite-za-2023-g>
- ⁹² Financial report of Philip Morris - Bulgaria. Available at: <https://portal.registryagency.bg/CR/Reports/ActiveConditionTabResult?uic=831152996>
- ⁹³ Includes immediate members of the families of the high-level officials
- ⁹⁴ “We have announced the winners of the 2020 Annual Responsible Business Awards”, Bulgarian Business Leaders Forum. Available at: <https://www.bblf.bg/bg/sabitiya/1563/obyavahme-pobeditelite-v-godishnite-nagradi-za-otgovoren-biznes-2020>
- ⁹⁵ “See the winners of the 2022 Anniversary Annual Awards for Responsible Business”, Bulgarian Business Leaders Forum. Available at : <https://www.bblf.bg/bg/sabitiya/1724/vijte-pobeditelite-v-prestijnite-godishni-nagradi-za-otgovoren-biznes-2022>
- ⁹⁶ “Medical error and the rules of good medical practice - focus of a meeting of the sector”, Medical News.bg. Available at: <https://medicalnews.bg/2022/10/15/%D0%BB%D0%B5%D0%BA%D0%B0%D1%80%D1%81%D0%BA%D0%B0%D1%82%D0%B0-%D0%B3%D1%80%D0%B5%D1%88%D0%BA%D0%B0-%D0%B8-%D0%BF%D1%80%D0%B0%D0%B2%D0%B8%D0%BB%D0%B0%D1%82%D0%B0-%D0%B7%D0%B0-%D0%B4%D0%BE%D0%B1%D1%80/>
- ⁹⁷ Bulgarian national radio. Available at: <https://bnr.bg/post/101727889>
- ⁹⁸ “The Green Deal - innovation, investment and a just transition” (video), “Dnes”. Available at: <https://dnes.dir.bg/obshtestvo/gledahte-na-zhivo-v-dir-bg-zelenata-sdelka-inovatsii-investitsii-i-spravedliv-prehod-video>
- ⁹⁹ The Self-Regulation Council recommended to stop the Bulgartabac campaign, Diary, 02.03.2015. Available at: https://www.dnevnik.bg/biznes/2015/02/03/2465632_suvetut_za_samoregulaciia_preporucha_da_bude_spriana/
- ¹⁰⁰ Answer to a question put to the Minister of Finance. Available at: <https://www.minfin.bg/bg/parlament/8865?print>
- ¹⁰¹ A national information campaign to fight against the illegal trade in cigarettes has been launched, website of the Ministry of the Interior, 15 August 2018. Available at: <https://www.mvr.bg/press/%D0%BD%D0%B0%D1%87%D0%B0%D0%BB%D0%BE/%D0%BF%D1%80%D0%B5%D0%B3%D0%BB%D0%B5%D0%B4/%D0%BD%D0%BE%D0%B2%D0%B8%D0%BD%D0%B8/%D1%81%D1%82%D0%B0%D1%80%D1%82%D0%B8%D1%80%D0%B0-%D0%BD%D0%B0%D1%86%D0%B8%D0%BE%D0%BD%D0%B0%D0%BB%D0%BD%D0%B0-%D0%B8%D0%BD%D1%84%D0%BE%D1%80%D0%BC%D0%B0%D1%86%D0%B8%D0%BE%D0%BD%D0%BD%D0%B0%D0%BA%D0%B0%BC%D0%BF%D0%B0%D0%BD%D0%B8%D1%8F-%D0%B7%D0%B0-%D0%B1%D0%BE%D1%80%D0%B1%D0%B0-%D1%81%D1%80%D0%B5%D1%89%D1%83-%D0%BD%D0%B5%D0%BB%D0%B5%D0%B3%D0%B0%D0%BB%D0%BD%D0%B0%D1%82%D0%B0-%D1%82%D1%8A%D1%80%D0%B3%D0%BE%D0%B2%D0%B8%D1%8F-%D0%BD%D0%B0-%D1%86%D0%B8%D0%B3%D0%B0%D1%80%D0%B8 ->
- ¹⁰² See Appendix 3 – Letters via APIA
- ¹⁰³ “Tobacco producers thanked Boyko Borisov for the reform in the tobacco sector”, “Agri.bg”. Available at: <https://agri.bg/agrosaveti/politika/tyutyunoproizvoditeli-blagodariha-na-boyko-borisov-za-reformata-v-tyutyuneviya-sektor>

-
- ¹⁰⁴ “Tobacco producers to Borisov: You are our hope, Mr. Prime Minister”, “Banker”. Available at: <https://banker.bg/2020/03/04/tiutunoproizvoditeli-kum-borisov-vie-ste-ni-nadejdana-g-n-premier/>
- ¹⁰⁵ “Tobacco producers receive up to BGN 85 million in transitional national aid”, Tobacco Magazine.net. Available at: <https://www.tbmagazine.net/statia/do-85-mln-lv-prehodna-nacionalna-pomoshch-poluchavat-tyutyunoproizvoditeli.html>
- ¹⁰⁶ “Business worried”, “24 hours”. Available at: <https://www.24chasa.bg/biznes/article/13032991>
- ¹⁰⁷ See Appendix 3 - Answers to questions put to ministries under the Access to Public Information Act
- ¹⁰⁸ Development of the Second National Anti-Corruption Strategy for Bulgaria. Available at: <https://csd.bg/bg/publications/publication/csd-brief-no-7-development-of-the-second-national-anti-corruption-strategy-for-bulgaria/>
- ¹⁰⁹ Law on Publicity of Lobbying Activities. Available at: <https://parliament.bg/bills/40/854-01-50.pdf>
- ¹¹⁰ Lobbying Publicity Act. Available at: <https://www.parliament.bg/bills/40/654-01-118.pdf>
- ¹¹¹ Lobbying Publicity Act. Available at: <https://parliament.bg/bills/43/554-01-53.pdf>
- ¹¹² GRECO urges European governments to increase transparency and accountability of lobbying. Available at: https://search.coe.int/directorate_of_communications/Pages/result_details.aspx?ObjectId=0900001680a6bb63
- ¹¹³ Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies, EVALUATION REPORT, Bulgaria. Available at: <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-ii/1680a9cab7>
- ¹¹⁴ Bulgarian Tobacco Industry Association. Available at: <http://www.nat2010.bg/docs/%D0%9F%D0%B5%D1%82%D0%B8%D1%86%D0%B8%D0%B8/%D0%91%D0%90%D0%A2%D0%98%20%D0%A0%D0%B5%D1%84%D0%B5%D1%80%D0%BD%D1%86%D0%B8%D1%8F%202016.pdf>
- ¹¹⁵ Law on Political Parties. Available at: <https://lex.bg/laws/ldoc/2135501352>
- ¹¹⁶ List of political parties whose annual financial statements for 2021 have been submitted to the Audit Office within the legal deadline - 31.03.2022 and meet the requirements for the form, content and manner of presentation of the report according to Art. 34 of the Law on Political Parties. Available at: <https://erik.bulnao.government.bg/egfonew/sl.aspx>
- ¹¹⁷ Election Code. Available at: <https://lex.bg/laws/ldoc/2136112596>
- ¹¹⁸ BGN 1000 is equal to 511,30 Euros or \$ 564,58 according to the European Central Bank, Eurosystem. Available at: https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_reference_exchange_rates/html/eurofxref-graph-usd.en.html
- ¹¹⁹ Audit report No. 0600101321 on the compliance audit of declared income and incurred expenses in connection with the pre-election campaign of the participants in the elections for representatives of the National Assembly held on 14.11.2021. Available at: https://www.bulnao.government.bg/media/documents/OD_izbori_NS_141121.pdf
- ¹²⁰ “Dilyana Yakova: Philip Morris will reduce plastic waste by 50% by 2025”. Available at: https://www.capital.bg/zelen-kapital/climate/2021/11/07/4275758_diliana_yakova_filip_moris_shte_namali_s_50/
- ¹²¹ “Petya Petkova becomes head of "Scientific Affairs" at "Philip Morris - Bulgaria". Available at: <https://www.bta.bg/bg/news/economy/282946-petya-petkova-stava-rakovoditel-nauchni-vaproshi-vav-filip-moris-balgariya->
- ¹²² Kiril Georgiev, Regulatory Engagement Manager at British American Tobacco, Linked In Profile. Available at: https://www.linkedin.com/posts/kigeorgiev_%D0%B8%D0%B7%D0%BF%D1%8A%D0%BB%D0%BD%D0%B8%D1%82%D0%B5%D0%BB%D0%BD%D0%B8%D1%8F%D1%82-%D0%B4%D0%B8%D1%80%D0%B5%D0%BA%D1%82%D0%BE%D1%80-%D0%BD%D0%B0-%D0%B1%D0%B0%D1%82-%D0%B1%D1%8A%D0%BB%D0%B3%D0%B0%D1%80%D0%B8%D1%8F-activity-6938046523930779650-gCnm/?originalSubdomain=bg
- ¹²³ Kiril Georgiev, BAT: The company marks the second annual week for stimulating sustainable development, 05.08.2022. Available at: <https://www.24chasa.bg/biznes/article/12203918>
- ¹²⁴ Delyan Peevski XLII National Assembly, Wikipedia. Available at: https://bg.wikipedia.org/wiki/XLII_%D0%BD%D0%B0%D1%80%D0%BE%D0%B4%D0%BD%D0%BE_%D1%81%D1%8A%D0%B1%D1%80%D0%B0%D0%BD%D0%B8%D0%B5
- ¹²⁵ Delyan Peevski, Wikipedia. Available at: https://bg.wikipedia.org/wiki/%D0%94%D0%B5%D0%BB%D1%8F%D0%BD_%D0%9F%D0%B5%D0%B5%D0%B2%D1%81%D0%BA%D0%B8
- ¹²⁶ Delyan Peevski, BTV News. Available at: <https://btvnovinite.bg/novite-izbori/kandidati/dps/deljan-peeovski.html>
- ¹²⁷ Peevski officially took a stake in "Bulgartabac", Capital. Available at: https://www.capital.bg/biznes/kompanii/2015/08/27/2598366_peeovski_oficialno_vze_dial_v_bulgartabak/

¹²⁸ The 10-year privatization of Bulgartabac, BNT News. Available at: https://bntnews.bg/bg/a/59431-10_godishnata_privatizacija_na_bulgartabak

¹²⁹ Bulgartabac Mafia: Peevski is gone, Bulgartabak is gone... the association with Buda remains, BIVOL. Available at: <https://bivol.bg/bulgartabak-mafia-5.html>

¹³⁰ The Bulgartabak Coalition: Pig, Falcon and Buddha. Miroslav Ivanov Blog. Available at: https://www.miroivanov.com/2015/02/blog-post_16.html

¹³¹ Civil Servant Law. Available at: <https://lex.bg/laws/ldoc/2134673408>

¹³² Code of conduct for employees in the state administration. Available at: <https://lex.bg/bg/laws/ldoc/2137201712>

¹³³ See Appendix 3

¹³⁴ Law on tobacco and related products. Available at: <https://lex.bg/bg/laws/ldoc/2133117441>

¹³⁵ 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.

¹³⁶ See Appendix 3

¹³⁷ See Appendix 3