
Paraguay

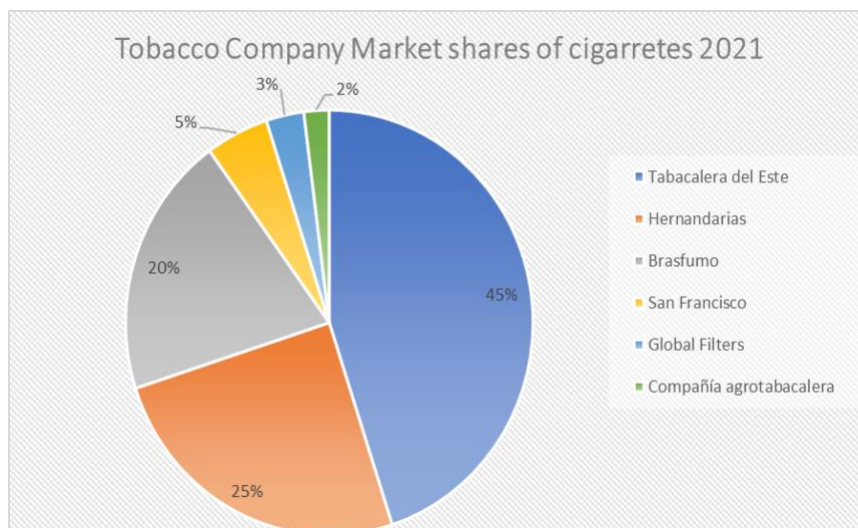
**TOBACCO
INDUSTRY
INTERFERENCE
INDEX
2023**

INTRODUCTION

A study conducted in 2016 reports that 3,354 people die each year in Paraguay as a result of smoking. 19% of deaths are from ischemic heart disease, 15% from stroke. 77% of deaths from chronic obstructive pulmonary disease and 83% from lung cancer are attributable to smokingⁱ

Although Paraguay ratified the WHO Framework Convention on Tobacco Control in 2006, we still face many challenges implementing the treaty. For example, despite the executive's efforts to achieve a small increase in the tobacco tax in recent years, the tax burden on the tobacco industry remains the lowest in the region.

Although steps were taken towards the formalization of the economy and the prevention of money laundering, these have been determined by internal struggles in the government party, personal and sectarian interests. Tabacalera del Este SA (Tabesa) continues to be the largest tobacco company in the country, and its overproduction is linked to illicit cigarette trafficking abroad. Tabesa, owned by the Cartes group, leads the Paraguayan cigarette market followed by Tabacalera Hernandarias. Tabesa, owned by the Cartes group, leads the Paraguayan cigarette market followed by Tabacalera Hernandarias.



However, the approval of the protocol for the illicit trade in tobacco products is the apex of an unprecedented advancement in Paraguay. In addition, progress has been made in relation to the labeling law, with the recent signing of a protocol for plain packing by the health minister.

On the other hand, the law on smoke-free public places, although it is incipient, began to generate support on part of public opinion in favor of protecting public spaces from tobacco smoke and vapors.

Despite the positive development, there still remain challenges from the tobacco industry as reflected in the close ties between the industry and some government departments.

The challenge will be to create mechanisms to enforce these laws, in an unfavorable context, taking into account the results of the last general elections, in which the sector of

the Colorado party linked to former president Horacio Cartes, has its own majority in parliament.

This is Paraguay's second report on Tobacco Industry Interference Index and Paraguay has scored 66 points, which is only slightly improved compared to 69 points in 2021.

This 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. The report includes information on incidents from April 2021 to March 2023, but also includes earlier incidents that are still relevant.

SUMMARY FINDINGS

1 INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Compared to the 2021 tobacco industry interference rate, despite the parliamentary majority in favor of pro-industry policies, this period saw a reduction in industry interference in public policy development. In this framework, the promulgation of the protocol for the elimination of the illicit trade of tobacco products, can be considered an iconic victory to achieve traceability, which seeks to combat cigarette smuggling.

2 INDUSTRY CSR ACTIVITIES

Despite the intense activity of the industry in propaganda terms (especially in a line of defense of jobs and contribution to the treasury) it did not achieve the levels of interference verified in previous years. This, if we take into account the data extracted post-pandemic, in which a series of open interactions between the industry and the State were verified, in the modalities of assistance, agreements and donations.

3 BENEFITS TO THE INDUSTRY

The most important evidence of the benefits of the tobacco industry in Paraguay ,continues to be the fact that it is the country with the lowest tax burden in the region. Current taxes only cover about 20% of the expenses it generates in terms of public health.

4 UNNECESSARY INTERACTION

Corruption rates among government officials is growing. There is compelling evidence of bribery or political campaign financing in exchange for policies favorable to the tobacco industry. This has recently compromised the integrity of the institutions, to the point of weakening confidence in the country's democratic system.

5 TRANSPARENCY

The transparency of the government has been harmed by a hard struggle within the government party, which has made a dent in the institutionality, since there is evidence of a defense of sectarian interests, despite the fact that the executive has ruled in favor of minimizing the undue influence of the tobacco industry in the development of policies that may affect public health.

6 CONFLICT OF INTEREST

Despite the executive's efforts to reduce conflicts of interest between the government and the industry (which is evidenced in measures such as the increase by decree of the tobacco tax), the parliamentary force of the ruling party linked to

the current president-elect of the government party, Horacio Cartes, directly influences decisions favorable to the tobacco industry.

7 PREVENTIVE MEASURES

According to the 2021 tobacco industry interference index, there are important advances at the legal level. However, there are no mechanisms capable of making these reforms effective to comply with current laws. The prevention of measures to avoid the interaction of the industry with the State is a pending matter, since there are no internal mechanisms that provide for this situation, which allows all kinds of irregularities.

RECOMMENDATIONS

RECOMMENDATION 1

Implement policies that prohibit interaction between public officials and the tobacco industry. This may include restrictions on the acceptance of gifts, financing or any other form of industry influence.

RECOMMENDATION 2

Generate mechanisms that make possible to avoid the participation of the tobacco industry or its representatives in the formulation of public policies related to tobacco, in accordance with article 5.3 of the Framework Agreement for Tobacco Control.

RECOMMENDATION 3

Carry out educational and awareness campaigns from the Ministry of Education, on the health risks associated with the consumption of tobacco and nicotine devices, in order to counteract the influence of the industry and empower society to make informed decisions.

RECOMMENDATION 4

Strengthen collaboration with other countries and international organizations, to share best practices and experiences in combating tobacco industry interference. Coordination at the global level can strengthen individual efforts and build a common front against industry influence.

RECOMMENDATION 5

Support strong anti-tobacco policies from civil society, health organizations, local communities and consumer advocacy groups, as it is a fact that the greater the public support for these policies, the less influence tobacco industry have.

PARAGUAY

Tobacco Industry Interference Index 2023

Results and Findings

	0	1	2	3	4	5
INDICATOR I: Level of Industry Participation in Policy-Development						
1. The government ⁱⁱ 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. ⁱⁱⁱ in setting or implementing public health policies in relation to tobacco control ^{iv} (Rec 3.4)		1				
No evidence of interaction was found in the public domain to illustrate interaction between government officials and the tobacco industry that they accepted or endorsed assistance from the industry to implement public health policy. However we note that the parliamentary majority has a pro-tobacco industry stance.						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)					4	
The Chamber of Deputies proposed a project that sought to adapt control mechanisms to all areas of the national economy, in order to prevent money laundering from illegal activities, in addition to extending the control of the Secretariat for the Prevention of Money Laundering o Goods (SEPRELAD), to tobacco companies. However, a sector linked to the movement led by former President Horacio Cartes eliminated the article that urged to report directly to the Seprelad on the activity of tobacco distributors. The law was approved with this modification introduced by the sector. ^{v vi vii viii ix x xi xii xiii xiv xv xvi xvii}						

	0	1	2	3	4	5
delegates. (i.e. COP 4 & 5, INB 4 5, WG) ^{xx} (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.						

No representative of the tobacco industry was accredited to join the delegation to the COP meetings.^{xxi}

INDICATOR 2: Industry CSR activities

5. A. Government agencies or their officials endorse, support, form partnerships with or participates in activities of the tobacco industry described as socially responsible. For example, environmental programs. (Rec 6.2)						
B. The government (its agencies and officials) receives CSR contributions ^{xxii} (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>					4	

On September 27, 2022, Tabacalera del Este SA (TABESA) donated 72 hospital beds to the Hernandarias District Hospital, with the presence of the director of the Tenth Health Region representing the Ministry of Public Health.^{xxiii} ^{xxiv} The governor of Alto Parana thanked the Health Minister who made the arrangements so that the beds can be received.^{xxv}



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)				3		
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Although there is no legal framework that directly benefit the industry, politically, Paraguay's role in facilitating illicit trade in tobacco in Latin America is well documented^{xxvi} and the need for the country to ratify the Protocol is established. According to the chairman of the Committee on Industry, Commerce and Tourism of the Upper House, the "Protocol for the Elimination of

the Illicit Tobacco Trade" was approved after years of delays and obstacles by sectors related to the industry. The abandonment of the plenary to leave the treatment without a quorum and the systematic attempts to modify the international agreement, were some of the maneuvers that can be pointed out in this regard.^{xxvii xxviii xxix xxx}

7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)						4
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If the tax burden that falls on the industry is taken into account and we compare it with the region, the tax privileges of the industry are evident, despite minimal increases applied in 2021 and 2022. The current rate was established by Law No. 6380 / MODERNIZATION AND SIMPLIFICATION OF THE NATIONAL TAX SYSTEM, in response to the rejection of a law that proposed taxing tobacco from 30% to 40%.

The law establishes a minimum rate of 18% and a maximum of 24%, and the amount may be established by decree. However even with this increase, the amount established by law has not been reached.^{xxxi xxxii xxxiii xxxiv}



International travelers can bring duty-free into Paraguay 400 cigarettes or 50 cigars or 500 grams of tobacco.

INDICATOR 4: Forms of Unnecessary Interaction						
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8. Top level government officials (such as President/ Prime Minister or Minister ^{xxxv}) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)	0					
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No evidence of interaction to foster relations with the tobacco companies was found in the public domain.

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				3		
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	0	1	2	3	4	5
minors. (including monetary contribution for these activities) (Rec 4.3)						
<p>Paraguay is a part of the Tri-Border Area of Argentina-Brazil-Paraguay study and training program on illicit trade sponsored by Philip Morris.^{xxxvi} PMI-IMPACT's 2022 report states the project conducted by the International Relations Institute of University of São Paulo (IRI-USP) developed a course for police officers from the Brazil-Paraguay-Argentina Tri-Border and provided training for police officers from these 3 countries.^{xxxvii} Although, there is evidence of a donation of furniture from Phillip Morris to Paraguay National Police.</p>						
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>						5
<p>In April 2021, TABESA and the Ministry of the Environment and Sustainable Development (MADES), entered into an agreement, by which the tobacco company is recognized and certified for environmental services within the framework of Law 3001/06 "Assessment and compensation for environmental services. In it, 7,000 of the 10,000 hectares of land belonging to TABESA are certified as areas for environmental services.^{xxxviii}</p>						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)				3		
<p>There is no procedure to disclose meetings and interactions between the government and the industry.</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)			2			
<p>There is evidence, through resolutions of the Ministry of Health and Social Security, of the existence of a registry of Companies that exploit tobacco and derived products. The resolution 237 establishes the mandatory registration of natural or legal persons engaged in the manufacture, import and export of tobacco products^{xxxix xl} However there is no registry of lobbyist or other representatives of the tobacco industry.</p>						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) 1 Never 5 Yes						5
<p>Despite the existence of a political financing law, which regulates transfers from different entities to political parties, congressmen have repeatedly stated and confirmed that they have received, in particular, money transfers from the country's main tobacco shareholder, Horacio Cartes, in support of their candidacies. ^{xli xlii}</p>						

	0	1	2	3	4	5
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)						5
The majority shareholder of Tabacalera del Este S.A. (TABESA), Horacio Cartes, held the position of President of the Republic of Paraguay in the period 2013-2018. As a former President, he is still influential and has the ability to have an impact on policy development. ^{xliii}						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)					4	
Erico Galeano, current representative in the Chamber of Deputies, is a shareholder of a firm dedicated to the tobacco industry. It is currently being investigated for alleged illegal acts related to international money laundering ^{xliv} .						
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
There is currently no such procedure.						
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>					4	
In 2020, the government in their report to the COP reported that they are developing a code of conduct It is currently unknown that there is any code of ethics for interaction with the tobacco industry and there is no further information on the status of this code. ^{xlv}						
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)			2			
The government requires partial information from the tobacco industry on production but there is no requirement for the industry to submit information on marketing expenditures, revenues and other activity, such as lobbying, philanthropy and political contributions. Since 2022, the Protocol to Eliminate Illicit Trade in Tobacco Products (production, shipment, receipt, possession, distribution, sale or purchase of tobacco products) law aims to eliminate all forms of illicit trade, through of a set of measures to be taken by countries acting in cooperation with each other. ^{xlvi xlvi xlvi}						

						0	1	2	3	4	5
											
19. The government has a program / system/ plan to consistently ^{xlix} raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)											5
<p>The government does not have a program, system or implementation plan that regulates the interaction of rulers with agents of the tobacco industry. Attached is the document drawn up by the Pneumology Society of Paraguay, advocating for the cessation of the industry's meddling within the national parliament. The exchanges took place in the context of the debate for the approval of the Illicit Tobacco Trade Control Protocol.^l</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)											5
There is no evidence of its existence											
TOTAL						70					

ANNEX A: SOURCES OF INFORMATION

TOBACCO INDUSTRY ACTIVITY

LOCAL TOBACCO COMPANIES

Top 5 Tobacco Companies/distributors	Market Share and Brands	Source
TABACALERA DEL ESTE S.A. (TABESA)	Kentucky, Palermo, San Marino	https://www.tabesa.com.py/
Palermo S.A	Palermo	https://www.palermo.com.py/
Tabacalera Hernandarias	Fox, Euro, Eco, Bill	http://www.th.com.py/es/productos.html
Distribuidora Gloria	Marlboro, Philip Morris, Chesterfield	https://www.distrigloria.com.py/

TOBACCO INDUSTRY FRONT GROUPS

Top 5 Tobacco Industry Representative	Type (Front Group/ Affiliate/ Individual)	URL
José Ortiz	Individual	
Unión Industrial del Paraguay	Affiliate	https://www.uip.org.py
El Repasador	Front Group	

NEWS SOURCES

Top 5 Newspaper/Dailies	Type (Print/Online)	URL
La Nacion	Print-online	https://www.lanacion.com.py
Ultima Hora	Print-online	https://www.ultimahora.com
Abc color	Print-online	https://abc.com.py
Hoy	Online	https://www.hoy.com.py
El independiente	Online	https://independiente.com.py

References

- ⁱ Available at: <https://doi.org/10.17843/rpmesp.2018.354.3708>
- ⁱⁱ 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
- ⁱⁱⁱ The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.
- ^{iv} “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour
- ^v <https://www.abc.com.py/politica/2022/06/27/cartistas-y-aliados-inventaron-que-el-mic-control-reportes-de-lavado-de-dinero/>
- ^{vi} <http://www.diputados.gov.py/index.php/noticias/archivan-propuesta-que-buscaba-extender-control-de-seprelad-tabacaleras-y-clubes-deportivos>
- ^{vii} <http://www.diputados.gov.py/index.php/noticias/dictamen-aconseja-que-tabacaleras-y-clubes-deportivos-sean-controlados-por-seprelad-y-no-por-el-mic>
- ^{viii} http://www.diputados.gov.py/7dias/7_dias_16_2022.pdf
- ^{ix} <http://www.diputados.gov.py/index.php/noticias/aprueban-con-modificaciones-proyecto-que-incluye-tabacaleras-y-al-deporte-profesional-como-sujetos-obligados>
- ^x <https://www.senado.gov.py/index.php/noticias/noticias-presidencia/9984-el-senado-se-ratifico-en-proyecto-que-incluye-a-tabacaleras-y-clubes-deportivos-como-sujetos-obligados-2022-07-07-20-44-47>
- ^{xi} <https://www.abc.com.py/politica/2022/06/23/oficialistas-y-plra-ayudan-a-hc-a-evitar-el-control-a-tabacaleras/>
- ^{xii} <https://www.ultimahora.com/liberan-las-tabacaleras-y-clubes-futbol-del-control-la-seprelad-n3008358.html>
- ^{xiii} <https://www.lanacion.com.py/politica/2022/06/28/jose-ortiz-se-puso-a-disposicion-de-la-cbi-y-pidio-contar-con-los-documentos-que-derivaron-en-la-convocatoria/>
- ^{xiv} <https://www.lanacion.com.py/politica/2022/05/19/jose-ortiz-estan-haciendo-esto-para-desacreditar-a-un-candidato/>
- ^{xv} <https://cdn-www.lanacionpy.arcpublishing.com/politica/2021/12/05/abogan-por-rechazo-del-proyecto-de-ley-de-protocolo-de-eliminacion-del-comercio-ilicito-del-tabaco/>
- ^{xvi} <https://www.rdn.com.py/2022/06/07/lea-tilda-de-imaginario-al-lavado-y-dice-que-contrabando-de-cigarrillos-no-es-problema/>
- ^{xvii} <https://www.lanacion.com.py/negocios/2022/02/18/denuncian-persecucion-y-presion-a-las-industrias-tabacaleras/>
- ^{xviii} <https://www.abc.com.py/nacionales/se-hace-el-desentendido-1683486.html>
- ^{xix} <https://www.ultimahora.com/aumento-del-impuesto-al-tabaco-beneficia-la-salud-n2986453.html#:~:text=Esta%20semana%20se%20elev%C3%B3%20el,selectivo%20al%20consumo%20de%20combustibles>
- ^{xx} Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/ctc/cop/en/>
- ^{xxi} Available at: Paraguay present at WHO Conference of the Parties in Geneva. Available at: <https://www.mspbs.gov.py/portal/24366/paraguay-presente-en-conferencia-de-las-partes-de-la-oms-en-ginebra.html>
- ^{xxii} political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions
- ^{xxiii} <https://www.abc.com.py/nacionales/2022/02/21/caso-de-fuga-de-lindomar-y-vinculos-con-tabesa-es-complejo-dice-fiscal-asiqnado/>
- ^{xxiv} <http://www.altoparana.gov.py/v0/index.php/noticias/949-recepcion-de-camas-para-el-pabellon-de-internados-de-hernandarias>
- ^{xxv} La Nacion. 9 Sep 2022. [La Nación / Hospital received 72 beds donated by Tabesa firm \(lanacion.com.py\)](https://www.lanacion.com.py)
- ^{xxvi} Masi F, Rodriguez- Iglesias G, Drope J. Tob Control 2022;31:s140–s145.
- ^{xxvii} <https://www.bacn.gov.py/leyes-paraquayas/9095/ley-n-6497-modifica-disposiciones-de-la-ley-n-10151997-que-previene-y-reprime-los-actos-ilicitos-destinados-a-la-legitimacion-de-dinero-o-bienes-y-su-modificatoria-ley-n-37832009>
- ^{xxviii} <https://www.ultimahora.com/cartismo-maniobra-trancar-ley-contra-el-contrabando-cigarrillos-n3009527.html>
- ^{xxix} <https://www.lanacion.com.py/politica/2021/12/16/postergan-tratamiento-del-protocolo-de-eliminacion-del-comercio-ilicito-del-tabaco/>

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- xxx <https://www.abc.com.py/politica/2022/06/23/oficialistas-y-plra-ayudan-a-hc-a-evitar-el-control-a-tabacaleras/>
- xxxi <https://www.socialwatch.org/es/node/18299>
- xxxii <https://www.bacn.gov.py/leyes-paraquayas/9332/ley-n-6380-de-modernizacion-y-simplificacion-del-sistema-tributario-nacional>
- xxxiii <https://www.lanacion.com.py/negocios/2023/02/24/establecen-aumento-en-el-impuesto-selectivo-al-consumo-sobre-el-tabaco/>
- xxxiv <https://www.infobae.com/america/america-latina/2023/02/25/paraguay-aumento-a-un-22elimpuestoalconsumodetabaco/#:~:text=En%20febrero%20del%20a%C3%B1o%20pasado,elev%C3%B3%20en%20un%20%25%20adicional>
- xxxv Includes immediate members of the families of the high-level officials
- xxxvi PMI-IMPACT. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.pmi-impact.com/content/dam/pmi-impact/docs/2022-pmi-impact-report.pdf
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- xxxviii <https://www.mades.gov.py/wp-content/uploads/2021/04/RESOLUCI%C3%93N-N%C2%B0-103-DE-FECHA-16-DE-ABRIL-DE-2021.pdf>
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- xl <https://www.mspbs.gov.py/dnvs/14-Tabaco.html>
- xli <https://www.abc.com.py/politica/2023/01/27/estos-son-los-legisladores-que-admitieron-haber-recibido-dinero-de-horacio-cartes/>
- xlii <https://www.abc.com.py/politica/2022/12/24/cartes-puso-plata-para-todos-sus-candidatos-con-miras-a-las-internas-revelan/>
- xliiii <https://www.gazetadopovo-com-br.translate.google.com/mundo/como-horacio-cartes-ex-presidente-do-paraquai-se-tornou-o-maior-contrabandista-de-cigarro-para-o-brasil/? x tr sl=pt& x tr tl=es& x tr hl=es-419& x tr pto=sc>
- xliiv <https://www.ultimahora.com/alpina-y-galeano-recibieron-sumas-millonarias-del-tabaco-n3002295.html>
- xliv Paraguay Report to the COP. 2020. Available at: https://untobaccocontrol.org/impldb/wp-content/uploads/Paraguay_2020_WHOFACTCreport.pdf
- xlvi <http://www.diputados.gov.py/index.php/noticias/protocolo-que-busca-eliminar-comercio-ilicito-del-tabaco-fue-sancionado-por-diputados>
- xlvii https://www3.paho.org/hq/index.php?option=com_content&view=article&id=14484:protocol-to-eliminate-illicit-trade-in-tobacco-products-due-to-become-international-law-in-90-days&Itemid=0&lang=es
- xlviii <https://www.ultimahora.com/comision-bicameral-que-investiga-lavado-dinero-convoca-jose-ortiz-y-erico-galeano-n3008070.html>
- xlix 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.
- ¹ <http://odd.senado.gov.py/archivos/file/Carta%20Sociedad%20Py%20Neumo.pdf>