
Montenegro

**TOBACCO
INDUSTRY
INTERFERENCE
INDEX
2023**

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Background and Introduction

Montenegro ratified the Framework Convention on the Control of Tobacco Products (WHO FCTC) in October 2006¹, followed by the Protocol to Eliminate Illicit Trade in Tobacco Products in 2017. The current Law on Limiting Use of Tobacco Products came into force on August 1, 2019², while the Tobacco Law³, regulating the production, processing, and trade of tobacco and tobacco products, was adopted in 2008 and amended in 2011 and 2015. The Excise Law, last amended in 2022, governs excise taxes on tobacco products.

In 2019⁴, the smoking prevalence among adults in Montenegro was 40.7% (40.2% for men and 40.7% for women), with high second-hand exposure among both children and adults. Daily smoking initiation occurs at an early age, with 55.7% of adult smokers starting daily smoking between 18 and 24 years old. Tobacco-related causes account for over 2,000 deaths annually in Montenegro, with 50% of cases being premature mortality⁵. In 2019, Montenegro had the highest percentage of female deaths attributed to tobacco use worldwide, with nearly 22% of all female deaths in the country linked to tobacco use⁶.

Smoking prevalence in Montenegro remains high and shows an increasing trend. In 2017⁷, over a third (35.4%) of adult residents aged 15 to 64 actively smoked, compared to 31% in 2012. Smoking prevalence was higher among men (36.2%) than women (34.5%). While the number of smokers is increasing, the average number of cigarettes smoked per day has slightly decreased. In 2017, almost half of active smokers consumed 10 to 20 cigarettes per day, while over a third (33.4%) smoked more than 20 cigarettes per day.

According to the Global Youth Smoking Survey (GYTS), 9.9% of students in Montenegro currently use tobacco products, with higher rates among boys (11.6%) than girls (8.1%). Among these users, 8.7% of students use tobacco, 6.0% use cigarettes, and 2.2% use smokeless tobacco. Approximately one-third of students (27.8%) have experimented with tobacco at some point in their lives.

In 2022, legal tobacco sales in Montenegro amounted to \$95 million⁸, while the illicit market accounted for 27.9% of tobacco consumption, according to a survey conducted by the Global Initiative Against Transnational Organized Crime (GIATC). Although the illicit market is relatively large compared to other countries in the region, it has been shrinking, with the share of the illicit cigarette market decreasing from 51% in 2019 to between 22.1% and 26% in 2022.

¹ Note: Neither in the official newspapers of Montenegro nor on the website of the Parliament of Montenegro is there a ratified text of the convention, nor a corresponding law on ratification. The State Union of Serbia and Montenegro signed the WHO FCTC in 2004, and the Law on Ratification adopted by the State Union of SCG entered into force on December 2, 2005. The decision on the independence of Montenegro from June 3, 2006 states that Montenegro will continue to apply all international agreements that do not conflict with its constitution and legal order. With all of the above in mind, I used the version of the text that is available (ratified text from 2005 available at http://www.podaci.net/gCGO/zakoni/Zakon_o_ratificiji_Okvirne_konvencije_Svetske_zdravstvene_organizacije_o/u6a6z8.html)

² Official Gazette of Montenegro No. 046/19 from 07.08.2019 and No. 048/19 from 21.08.2019, Available at:

<http://www.aduvan.co.me/Dokumenti/Zakoni/Zakon%20o%20ogranicavanju%20upotrebe%20duvanskih%20proizvoda.pdf>

³ Official Gazette of Montenegro, No 48/08 from 11.08.2008, 76/08 from 12.12.2008, 40/11 from 08.08.2011, 42/15 from 29.07.2015. Available at: <http://www.aduvan.co.me/Dokumenti/Zakoni/Zakon%20o%20duvanu%20PDF.pdf>

⁴ Survey on Tobacco Consumption in SEE Countries. *STC-SEE 2020 for Montenegro (Adult Tobacco Use in Montenegro)*. <https://tobaccotaxation.org/research.php?plD=221&lng=srb>

⁵ Statement made by Mina Brajovic WHO Representative in Montenegro. Available at:

<https://www.ijzcg.me/me/novosti/konferencija-za-medije-svjetski-dan-bez-duvanskog-dima>

⁶ <https://www.statista.com/statistics/279458/female-death-percentage-from-tobacco-use/>

⁷ "Investigation of the quality of life, lifestyles and health risks of the inhabitants of Montenegro in 2017 (IPH, 2017)

⁸ Vorotnikov V. A never ending fight. Tobacco Reporter. Available at: <https://tobaccoreporter.com/2023/03/01/a-never-ending-fight/>

The registered tobacco trade in Montenegro has shown an increasing trend, rising from 530 tons in 2018 to 1,059 tons in 2022⁹. Montenegro Tobacco Company is the only tobacco producer in the country, with 11 registered importers, 9 registered exporters of tobacco products, and 7 companies registered as wholesale traders. There are approximately 2,000 retailers of tobacco products in Montenegro, primarily concentrated in Podgorica. All major global tobacco companies, including Philip Morris International (PMI), British American Tobacco (BAT), and Japan Tobacco International (JTI), are present in Montenegro, although PMI is not listed in any register of tobacco trading companies.

E-cigarettes and heated tobacco products are allowed in Montenegro. In January 2023, Montenegro increased the excise duty on cigarettes, tobacco, and e-cigarettes. The duty for cigarettes rose from €44 (\$46.71) to €47.50 per 1,000 cigarettes. Cut tobacco duty increased to €55 from €50, and smokeless tobacco duty rose to €145 from €100¹⁰. The proportional component of the excise duty was lowered to 24.5% from 26%, while the specific component increased to €47.50 (\$50.20) per thousand.

This is Montenegro's first report on the Tobacco Industry Interference Index which is an assessment of how the country is implementing WHO FCTC Article 5.3. For this year's Index, Montenegro garnered an overall score of 46/100 indicating lack of transparency and preventive measures to protect itself from tobacco industry interference in national policymaking.

The findings suggest some interaction between the tobacco industry and the government during the legislative process. However, tobacco industry representatives do not directly participate in setting public health policies or official delegations related to tobacco control.

Montenegro does not have a comprehensive ban on tobacco sponsorship or corporate social responsibility activities. While government agencies or officials have not engaged in activities described as socially responsible by the tobacco industry, donations from the tobacco sector to the national hospital, the Clinical Center of Montenegro, have been recorded.

The government has made changes in excise taxes on tobacco products without providing special conditions to the industry. It also has partial ownership in a tobacco factory, grants duty-free import allowances, and offers subsidies to tobacco producers.

While there are registers and public access to certain tobacco-related information, there is no specific provision for disclosing meetings or interactions with the tobacco industry, and some required reports are not readily available.

High-ranking government officials have interacted with tobacco companies, attending industry-organized events and participating in discussions that could influence tobacco taxation. The government has not accepted assistance from the industry and has taken measures to combat tobacco smuggling.

There is no explicit requirement for public disclosure of government interactions with the tobacco industry. While some registration requirements exist for tobacco entities, there is no specific disclosure requirement for affiliated organizations or lobbyists. Limited reports are available on the Ministry of Finance Tobacco Agency's website.

⁹ Data from the Ministry of Finance, Available at: <http://www.aduvan.co.me/proizvodjaci.php>

¹⁰ Jajcanin D. Montenegro raises excise duty on cigarettes. 3 Jan 2023. <https://seenews.com/news/montenegro-raises-excise-duty-on-cigarettes-810170>

In summary, Montenegro lacks a procedure for disclosing records of interactions with the tobacco industry, and there is no specific code of conduct for public officials regarding their dealings with the industry.

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance (SEATCA). 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 report covers information on incidents from 2020 up to March 2023, but also includes earlier incidents that still have relevance today.

Summary Findings

I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Current Law on Limiting Use of Tobacco Products, or any other regulation, has no explicit provisions to limit government interaction with the tobacco industry and ensure transparency if there is interaction between the tobacco industry and government officials.

We were not able to notice that the government has accepted or endorsed any offers for assistance from the tobacco industry or entities furthering its interests in setting or implementing public health policies related to tobacco control.

The Government has legal obligation to organise discussions with various stakeholders, including business associations in which tobacco companies are members, during the drafting of legislation. Some proposed amendments by tobacco companies were accepted in the Law on Limiting Use of Tobacco Products in 2019.

No evidence was found of the government inviting or allowing the tobacco industry to participate in official inter-agency committees or advisory groups that shape health policy. However, representatives of business associations, including the Chamber of Economy and Union of Employers, hold memberships in government advisory bodies related to different sectors.

The government does not nominate representatives from the tobacco industry to delegations attending the Conference of the Parties (COP) or subsidiary bodies. Tobacco industry representatives were not part of the delegation to the ninth session of COP in 2021, and the listed participants were government officials and representatives involved in tobacco control.

2 INDUSTRY CSR ACTIVITIES

There is no comprehensive ban on tobacco sponsorship or corporate social responsibility (CSR) activities in Montenegro. There are no cases of government agencies or officials participating in activities described as socially responsible by the tobacco industry.

There have been several recorded donations from the tobacco sector to the national hospital, the Clinical Center of Montenegro (KKCG), which is the biggest national public clinical center. The donations include medical equipment and financial support.

3 BENEFITS TO THE INDUSTRY

The government of Montenegro has implemented changes in excise taxes on tobacco products, but there were no special conditions or longer time frames granted specifically for the tobacco industry. The government has partial ownership in the tobacco factory NDKP, and there have been changes in ownership and investments in the company. Duty-free import allowances for tobacco products exist for international travellers. The government provides subsidies to agricultural producers of tobacco as part of its agricultural policy and budget.

4 UNNECESSARY INTERACTION

Top-level government officials in Montenegro have been involved in interactions with tobacco companies, including attending events organized by the tobacco industry. This

includes the Prime Minister participating in an event organized by the American Chamber, where discussions were led by an executive from Philip Morris Montenegro. Additionally, traditional summits have taken place where tobacco industry representatives and high state officials discussed tax policies, potentially influencing decisions related to tobacco taxation.

There is no evidence of the government accepting assistance or offers of assistance from the tobacco industry for enforcement activities or policies related to tobacco control.

The government implemented a ban on the storage of tobacco products in the Port of Bar Free Zone to combat tobacco smuggling in 2021. There were discussions about the possibility of selling confiscated cigarettes to increase public revenues, but the proposal was not adopted, and the decision was made to destroy the confiscated goods. High-level criminal cases have been opened, including the arrest of a Head of Customs Administration allegedly involved in the theft of confiscated cigarettes.

5 TRANSPARENCY

The government of Montenegro is not explicitly required to publicly disclose meetings or interactions with the tobacco industry. The Law on Free Access to Information states that information with an overriding public interest should be provided upon request, but it does not specifically address tobacco industry interactions.

The government requires registration of tobacco manufacturers, producers, wholesale distributors, and importers/exporters. The Directorate for Issuing Approvals for Production, Processing, and Trade of Tobacco Products maintains public registers of these entities on its official website. However, there is no specific requirement for the disclosure or registration of tobacco industry affiliated organizations, or lobbyists.

Regarding tobacco products and electronic cigarettes, they must be registered with the Ministry of Health, and these registers are publicly accessible on the Ministry's website.

In terms of reports required by the Law on Limiting Use of Tobacco Products, which should be published on the Ministry of Finance Tobacco Agency's website, no available reports were found.

6 CONFLICT OF INTEREST

Montenegro does not prohibit contributions from the tobacco industry or entities working in its favour to political parties, candidates, or campaigns. Although the Law on Limiting Use of Tobacco Products restricts tobacco industry sponsorship of certain activities, it does not specifically address political parties or campaigns.

There is no available data suggesting that retired senior government officials in Montenegro are involved in the tobacco industry.

There is no available data indicating that current government officials or their relatives hold positions in the tobacco business or work as consultants. The Law on the Prevention of Corruption prohibits public officials from occupying specific positions in companies.

7 PREVENTIVE MEASURES

Montenegro does not have a specific procedure in place for disclosing records of interactions with the tobacco industry, including agendas, attendees, minutes, and outcomes. However, the Law on Free Access to Information is applicable to all government interactions with companies, including those from the tobacco industry.

There is no formulated, adopted, or implemented code of conduct specifically for public officials regarding their dealings with the tobacco industry. While there are codes of conduct for MPs, higher executive branch officials, and civil servants and employees, these codes define general rules and do not have specific articles addressing the tobacco industry.

The code of conduct for MPs includes provisions related to conflict of interest and gifts, while the Code of Ethics for Civil Servants and Employees sets ethical standards and rules of conduct but does not specifically address the tobacco industry.

Recommendations

Strengthening government policies is crucial to address the issue of tobacco industry interference. It is essential to establish explicit provisions in the law that limit interactions with the tobacco industry and ensure transparency. Government agencies and officials should refrain from participating in industry-driven initiatives.

Enhancing monitoring and regulation is vital. Stronger regulations need to be in place to minimize unnecessary interaction between government officials and tobacco companies. Accepting assistance from the industry should be strictly prohibited. It is equally important to combat tobacco smuggling and strengthen enforcement mechanisms.

To prevent undue influence, increasing transparency and disclosure is crucial. Governments could introduce legal requirements for the public disclosure of meetings, interactions, and records of government officials with the tobacco industry. Specific regulations should also be established for the disclosure and registration of industry entities, affiliated organizations, and lobbyists. Additionally, it is important to improve ethical standards providing guidance to public officials in their interactions with the tobacco industry.

Implementing these measures will help safeguard public health policies from industry interference and prioritize the well-being of the population.

RECOMMENDATION 1

Strengthen Government Policies:

- Establish explicit provisions in the law to limit government interaction with the tobacco industry and ensure transparency in all interactions.
- Prohibit accepting or endorsing offers for assistance from the tobacco industry in setting or implementing public health policies related to tobacco control.

RECOMMENDATION 2

Prohibit Tobacco Industry Sponsorship and CSR Activities:

- Implement a comprehensive ban on tobacco sponsorship and corporate social responsibility activities to prevent tobacco companies from influencing public opinion or promoting their products through social initiatives.
- Prohibit government agencies and officials from participating in activities described as socially responsible by the tobacco industry to maintain public health objectives.

RECOMMENDATION 3

Enhance Monitoring and Regulation:

- Strengthen regulations to prevent unnecessary interaction between government officials and tobacco companies, including attending events organized by the tobacco industry.
- Strictly prohibit government officials from accepting or seeking assistance from the tobacco industry for enforcement activities or tobacco control policies.
- Continue efforts to combat tobacco smuggling, enhance monitoring and enforcement mechanisms, and ensure the proper disposal and destruction of confiscated tobacco products.

RECOMMENDATION 4

Increase Transparency and Disclosure:

- Introduce legal requirements for the public disclosure of meetings, interactions, and records of government officials with the tobacco industry, including agendas, attendees, minutes, and outcomes.
- Enhance legal framework to explicitly address interactions with the tobacco industry and ensure transparency and public accountability.
- Establish specific regulations for the disclosure and registration of tobacco industry entities, affiliated organizations, and lobbyists, enhancing transparency and preventing undue influence.

RECOMMENDATION 5

Incorporate in the Law articles specifically addressing the dealings of public officials with the tobacco industry, outlining ethical standards, conflicts of interest, and measures to prevent undue influence.

Montenegro

Tobacco Industry Interference Index 2023

Results and Findings

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government ¹¹ 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. ¹² in setting or implementing public health policies in relation to tobacco control ¹³ (Rec 3.4)	0					
No evidence was found of the government accepting or endorsing any offer for assistance from the tobacco industry or any entity working to further its interest.						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)			2			
<p>According to the Regulation on the Procedure and Method of Conducting a Public Discussion in the Process of Preparing a Law¹⁴, the government must officially call public to give recommendations on all legislation during the drafting procedure. That means that all interested parties may propose amendments to drafted document. Business associations, whose members are tobacco companies, usually propose changes and amendments to the legislation in the drafting procedure.</p> <p>Case 1 During the drafting of the Law on Limiting Use of Tobacco Products in 2019, the public Discussion was organized, as for any other law that is prepared. Two companies submitted amendments to the draft Law, Philip Morris Montenegro (PMM) and Japan Tobacco International, representative in Bosnia and Hercegovina, as well as some NGOs¹⁵. For example, out of 6 amendments of PMM, 4 were accepted, out of which 2 referred to measures for reduction and restriction of use of tobacco products. Report on public hearing of this Law is publicly available¹⁶.</p> <p>Case 2 The Ministry of Finance conducted a public discussion on the Draft Law on Amendments to the Tobacco Law in 2022. A remark/suggestion received after the deadline for public discussion by the executive director of Philip Morris Montenegro, Ms. Svetlana Vuksanovic, was related to the article that regulates restrictions on the sale of tobacco products. Although, the suggestion was received after the deadline the Government considered it and at the end rejected it providing explanation.</p>						

¹¹ 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

¹² The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

¹³ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

¹⁴ Government of Montenegro, Official Gazette No 12/2012 from 24.02.2012. Available at: <http://sluzbenilist.me/pregled-dokumenta-2/?id=%7B16F45D1E-4AA0-4C69-A589-2C4432EC8F77%7D>

¹⁵ Government of Montenegro, Draft Law on Limiting Use of Tobacco Products with the report from public hearing (2019), Available at: https://www.euprava.me/eparticipacija-archive/lista-javnih-rasprava/min_z/774/IZVJEStAJ-o-javnoj-raspravi-u-pripremi-Predloga-zakona-o-ogranicavanju-upotrebe-uvankasih-proizvoda.html

¹⁶ Government of Montenegro, Draft Law on Limiting Use of Tobacco Products with the report from public hearing (2019), Available at: https://www.euprava.me/eparticipacija-archive/lista-javnih-rasprava/min_z/774/IZVJEStAJ-o-javnoj-raspravi-u-pripremi-Predloga-zakona-o-ogranicavanju-upotrebe-uvankasih-proizvoda.html

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<p>Case 3 In 2021, Government (Ministry of Finance) organized consultations during the preparation of the Budget Law for 2022. Initially, Government planned 2022 budget based on the proposed increase of excise duties on different product, including tobacco. After public consultations with business community (including AmChem, Chamber of Economy and Union of Employers) Government reduced the initially proposed increase in excise taxes. Even the Minister stated to media “We have shown once again that we take special care of the voice of the public” ¹⁷.</p>						
<p>3. The government allows/invites the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. (Rec 4.8) I Never 5 Yes</p>		I				
<p>No evidence was found that government does invite or allow the tobacco industry to sit in official inter-agency committees or advisory group body that sets health policy.</p> <p>There is a number of business associations in Montenegro. However, several are most active in advocating interest of business community. Chamber of Economy which is national chamber and in which all companies are members, including those from TI. Union of Employers, which also represents a significant number of companies, including TI companies. AmCham president is Svetlana Vuksanovic, who is executive of Philip Morris Montenegro.</p> <p>Montenegrin Union Of Employers is listed as Organization in Support of Tobacco Industry's Arguments Against Plain Packaging (2019)¹⁸</p> <p>Representatives of these associations, most often Chamber of commerce and Union of employers hold membership in different bodies of the government (privatization and capital investments, sustainable development, competition, etc). Representative of Union of employers is member of the governing board of Health Fund¹⁹, the body that implements mandatory health insurance and participates in the implementation of health policy in connection with mandatory health care. however, we did not find information confirming that representatives of some companies from TI are representatives in these bodies on behalf of business associations.</p>						
<p>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)²⁰ (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.</p>		I				
<p>No tobacco industry representative participated in the delegation to the ninth session of COP in 2021.²¹</p> <p>The list of participants per COP session is listed below²²:</p> <p>9th session:</p>						

¹⁷ Daily paper Vijesti, 03.06.2021, Available at: <https://www.vijesti.me/vijesti/ekonomija/544793/ministarstvo-pokazali-smo-jos-jednom-da-posebno-vodimo-racuna-o-glasu-javnosti>

¹⁸ GGTC, Organization in Support of Tobacco Industry's Arguments Against Plain Packaging (2019), Available at: <https://ggtc.world/library/organizations-in-support-of-tobacco-industrys-arguments-against-plain-packaging-2019>

¹⁹ Parliament of Montenegro, 2021, Available at: <https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/335/2694-16085-28-2-21-4-17.pdf>

²⁰ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

²¹ FCTC, List of Participant of Ninth Session of the Conference of the Parties to the WHO Framework Convention on Tobacco Control (2021), Available at: <https://fctc.who.int/publications/m/item/cop-9-div-1-list-of-participants>

²² According to the list of participants available at web site of FCTC, late visited on 25.05. 2023.

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<p>Chief Delegate (Head of delegation) Ambassador S. Milacic Permanent Representative Deputy Chief Delegate (Accredited representative) Prof. A. Ljaljevic</p> <p>Focal point for tobacco control Delegate (Accredited representative) Ms M. Schmidt Gutzat, First counsellor</p> <p>8th session 2018: H.E. Mr M. Šćepanovic Ambassador, Permanent Representative, Permanent Mission, Geneva</p> <p>Mr N. Ražnatovic First Secretary, Permanent Mission, Geneva Ms M. Schmidt Gutzat First Counsellor, Permanent Mission, Geneva</p> <p>7th sesssion in 2016: Miss J. Burzan Acting Director General for Multilateral Affairs</p> <p>6th session in 2014: Ms B . Bozovic, Director of Tobacco Agency Ms J.Gogić , advisor Tobacco Agency</p> <p>4th session in 2010: Ms B . Bozovic, Director of Tobacco Agency Ms J.Gogić , advisor Tobacco Agency</p>						
INDICATOR 2: Industry CSR activities						
<p>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)</p> <p>B. The government (its agencies and officials) receives CSR contributions²³ (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></p>				3		
<p>A: Montenegro does not have a comprehensive ban on tobacco sponsorship and so-called CSR²⁴. No cases of participation of Government agencies or their officials in activities of the tobacco industry described as socially responsible.</p> <p>B: Several cases of donations from the tobacco sector to the national hospitals are recorded. List of all donations to the Clinical Center of Montenegro (KCG- providing health care at the secondary</p>						

²³ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

²⁴ GGTC, Tobacco toxic plastics -a global outlook, 2022, Available at: <https://tobaccoplastics.ggtc.world>

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level for Podgorica, Kolasin and Danilovgrad covering more than 65% of health services ²⁵ and the only health care centre providing tertiary health care) is publicly available.						
Case 1 KKCG signed a contract with Philip Morris Montenegro on 20.05.2020 and received a donation from Philip Morris Montenegro in value of approx. 50.000 for in medical equipment needed due to COVID-19 pandemic ²⁶ .						
Case 2 KKCG received donation from Bar Kod company which is exclusive distributor for Philip Morris Montenegro amounted 38.720 Euros in 2020.						
Case 3 KKCG signed a contract with Philip Morris Montenegro on 16.08.2021 and received a donation from Philip Morris Montenegro in value of approx. 24.000 USD dedicated to support Center for Autism ²⁷ .						
Case 4 Donation of furniture (no amount specified but obviously on micro scale- one office table, one book shelf and 3 photo frames) to KKCG Clinic for Dermatovenerology by Milasevic Zoran person who represent DMD Delta which is one of the largest importers/distributors of tobacco ²⁸ .						
INDICATOR 3: Benefits to the Tobacco Industry						
6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)	0					
During the period that report covers several changes of the excise tax were implemented. For all changes there were no special conditions for tobacco excise duties. For example, Excise taxes were last time increased in February 2023, but the implementation of the Law was scheduled for Jun 1st 2023.						
7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)				3		
The tobacco factory, Novi Duvanski Kombinat Podgorica (NDKP) was taken over by the Government of Montenegro and the Capital City of Podgorica, after the old tobacco factory went bankrupt in 2001. ²⁹ According to the latest reports from the company's web site the Government has 1.16% shares, while Grand International FZ-LLC, UAE has 96.97% ownership and NDKP has 1.86% ownership. In July of 2021, the company <i>Grand International FZ-LLC</i> bought part of the shares in the tobacco plant from the Capital City for slightly more than two million euros. ³⁰ Although NDKP announced closing in 2021, newest data on their web site are from 2023 ³¹ . According to data from the financial statement submitted to the Tax Administration, the new tobacco plant had						

²⁵ Parliament of Montenegro. Committee on health labour and social welfare holds its 37th meeting. 20 Jun 2022. Available at: <https://www.skupstina.me/en/articles/committee-on-health-labour-and-social-welfare-holds-its-37th-meeting>

²⁶ Clinical Centar of Montenegro, Agreement on donation, Available at: <https://kccg.me/wp-content/uploads/2022/03/Donacije-opreme-za-2020.-godinu.pdf>

²⁷ Clinical Centar of Montenegro, Agreement on donation, Available at: <https://kccg.me/wp-content/uploads/2022/02/Ugovor-o-donatorstvu-Philip-Morris-Montenegro-doo-Podgorica.pdf>

²⁸ Clinical Centar of Montenegro, Agreement on donation, Available at: <https://kccg.me/wp-content/uploads/2022/03/Ugovor-o-donaciji-Beiersdorf-doo-Beograd-predstavnik-DMD-Delta-Podgorica-namjestaj.pdf>

²⁹ Monitor Online. Agapi Gace Tobacco Plant. 3 Dec 2021. Available at: https://www-monitor-co-me.translate.goog/arapi-gase-duvanski-kombinat-glavni-grad-pohitao-da-proda-svoje-akcije/?_x_tr_sl=sr&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc

³⁰ gradski. Novi Duvanski Kombinat Podgorica EUR 1.34 million in loss 11 April 2021. Available at: <https://gradski.me/gubitak-ndkp-134-miliona-eur/>

³¹ NDK <https://www.novidk.me/obavjestenja>

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<p>an average of 23 employees in 2022 and sales revenue in the amount of over 1.5 million euros. A year earlier, in 2021, it had an average of 58 employees, and an income of over 8 million euros (8,247,792), while in 2020 and 2019 it had an income of over 17 million euros. In 2020 Novi Duvanski Kombinat Podgorica (NDKP) planned to construct a €12 million (\$14.2 million) primary tobacco processing plant in Montenegro which would employ 30 people and have a production capacity of 900 tons per month.³² However, this investment was never realised.</p> <p>The government allows international travellers to duty-free import 200 cigarettes or 50 cigars or 100 cigarillos (max. 3 grams per piece) or 250 grams of tobacco into the country.³³</p> <p>The Government provide subventions (grant) to agricultural producers of tobacco, as part of the agriculture policy and out of Ago-Budget. For example, in 2021, 24 producers received subventions, that amounted in total 16000 Euros³⁴.</p>						
INDICATOR 4: Forms of Unnecessary Interaction						
<p>8. Top level government officials (such as President/ Prime Minister or Minister³⁵) 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)</p>			2			
<p>Case 1 Prime minister, Mr Dritan Abazovic, participated in annual event of AmChem called “Openly with Prime Minister”. Discussions were led by the president of American Chamber Svetlana Vuksanovic, who is executive of Philip Morris Montenegro. Mr Vuksanovic didn’t directly or indirectly appear in form of PMM during this event, nor PMM was by any means visible during the event.³⁶</p> <p>Case 2 According to press reports, until 2018, the government in Montenegro had organized traditional summits which were essentially meetings of tobacco industry representatives and high state officials that made decisions on tax policies.³⁷</p> <p>Regional summit bringing together finance ministers, governors and directors of tax administrations of the region has been organized every year in Montenegro, in hotel “Splendid” by the Union of Economist of Serbia, under the auspices of the Ministry of Finance and Central Bank of Montenegro. In 2018, one of the summit participants was the director of corporate affairs and communications of Japan Tobacco International (JTI) for the Western Balkans, Goran Pekez. In his speech Mr Pekez emphasized that revenues from excise taxes on tobacco products are significantly lower and that a revision of the excise calendar is necessary to reduce illegal trade. This was also one of messages that was aired to the media from the Summit, according to the statements of some NGOs that</p>						

³² Tobacco Reporter. Processing factory planned in Montenegro. 2020. Available at: <https://tobaccoreporter.com/2020/08/10/processing-factory-planned-in-montenegro/>

³³ IATA Travel Center. Montenegro. Available at: <https://www.iatatravelcentre.com/ME-Montenegro-customs-currency-airport-tax-regulations-details.htm#Import%20regulations>. Accessed last 8 July 2023

³⁴ Government of Montenegro. 14. 10. 2021. Available at: <https://www.gov.me/clanak/zavrshena-realizacija-agrobudzetske-mjere-direktna-placanja-za-proizvodnju-duvana>

³⁵ Includes immediate members of the families of the high-level officials

³⁶ AmChem, news from 02. 06.2022., Available at: <http://www.amcham.me/2022/06/amcham-montenegro-openly-with-the-prime-minister-june-6-2022/>

³⁷ Emerging Europe. 24 Nov 2020. Available at: <https://emerging-europe.com/news/why-culture-makes-smoking-a-hard-habit-for-the-western-balkans-to-kick/>

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<p>closely flowed happening at the Summit.³⁸ They believe that this opportunity was used to lobby for the reduction of taxes, which actually happened few months after, in September 2018³⁹. Summits were organised in 2019, 2022 and 2023. In 2023, Mr Pekez also participated at the summit⁴⁰. In his speech Mr Pekez welcomed the decision of the Government of Montenegro to close the Port of Bar as it contributes to the fight against illicit trade.</p> <p>Case 3 In the same year, 2018, representatives of Government of Montenegro and capital Podgorica, institutions that, at that time, were shareholders of the Novi Duvanski Kombinat Podgorica (NDKP), publicly supported opening of the factory.</p>						
<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)</p>	0					
We were not able to detect such interactions.						
<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></p>						5
<p>During 2022, AmChem signed memorandums of cooperation⁴¹ with the Ministry of Finance, the Ministry of Agriculture, the Ministry of Tourism and the Ministry of Economic Development. the goal of the memorandum is stronger cooperation between state authorities and AmChem, with the aim of creating a predictable business environment that affirms equal conditions for all market participants, necessary for the successful implementation of existing, but also attracting new investments, as well as the fight against the grey economy. Memorandum was signed by the president of American Chamber Svetlana Vuksanovic, who is executive of Philip Morris Montenegro</p> <p>Government of Montenegro in 2022 decided to ban storage of tobacco products in the Port of Bar Free Zone. Government invited owners of tobacco stored in the free zone to takeover within the deadline to avoid confiscation. Decision aimed to put an end on tobacco smuggling which made Montenegro famous since 1990. After the confiscation the Government, on one of the sessions, discussed possibility to sell confiscated cigarettes in order to increase public revenues⁴². Montenegro's Law on Customs says confiscated goods may be sold in public auctions, but, if they cannot be sold for security or health reasons, they must be destroyed. The sale proposal was never adopted by the Government, but the decision to destroy them was made. Out of a total of nine cases that were formed following an appeal by the owner of cigarettes confiscated in the Free Zone, seven cases were resolved, while the resolution of the remaining two is ongoing, according to the latest publicly available data from august 2022.⁴³</p>						

³⁸ Daily paper Vijesti. 21.06. 2018. Available at: <https://www.vijesti.me/vijesti/drustvo/29245/na-samitu-lobirali-protiv-efikasnih-mjera-za-kontrolu-duvana>

³⁹ GGTC, Tobacco Industry Response To Tobacco Tax Hikes The Case Of Montenegro, 2020. Available at: <https://ggtc.world/library/tobacco-industry-response-to-tobacco-tax-hikes-the-case-of-montenegro>

⁴⁰ https://www.linkedin.com/posts/jti-srbija_samit-u-bećicama-maj-2023-activity-7070027702073798656-Be7c/

⁴¹ Daily paper Vijesti, from 07.07.2022. Available at: <https://www.vijesti.me/vijesti/ekonomija/612264/povoljan-poslovni-ambijent-stvara-se-kroz-blagovremen-dijalog>

⁴² Kajosevic S. Montenegro mulls filling budget by selling confiscated tobacco. 22 Jul 2022. BalkanInsight. Available at: <https://balkaninsight.com/2022/07/22/montenegro-mulls-filling-budget-by-selling-confiscated-tobacco/>

⁴³ Daily paper Vijesti from 03.08.2022. Available at: <https://www.vijesti.me/vijesti/crna-hronika/615992/upc-cigarete-u-slobodnoj-zoni-luke-bar-zakonito-oduzete>

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<p>The first-instance decisions of the customs authority were confirmed as legal, and the Ministry of Finance determined that the first-instance authority correctly carried out the procedure for confiscating cigarettes, and that the decisions of the customs authority were based on the law, as well as that there were no violations of the procedural rules that could lead to a different decision regarding these administrative matters. However, several high-level criminal cases were opened in recent period (since end of 2022), including the arrest of Head of customs administration, who was allegedly involved in theft of cigarettes confiscated after the 2022 ban and planned to be destroyed⁴⁴.</p>						
INDICATOR 5: Transparency						
<p>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)</p>		1				
<p>The legislation does not directly require the government to publicly disclose meeting/interactions with the tobacco industry.</p> <p>The transparency of the government representatives is regulated by the Law on Free Access to Information⁴⁵. According to this Law all information that have an overriding public interest must be provided on the request to the third party. “And overriding public interest has information or data that reasonably indicate: 1) corruption, non-compliance with regulations, illegal use of public funds or abuse of authority in the exercise of public function; 2) suspicion that a criminal offense has been committed or the existence of reasons for challenging the court decision; 3) illegal obtaining or spending of funds from public revenues; 4) jeopardizing public safety; 5) endangering life; 6) jeopardizing public health and 7) endangering the environment.”</p> <p>There are Guidelines for Strengthening the Ethics and Integrity of Senior Officers of the Executive Authority.⁴⁶ The guidelines apply to the Prime Minister, Deputy Prime Minister, members of the Government, State Secretaries in Ministries, advisers to the President and Deputy Prime Minister, heads of administrative bodies (hereinafter referred to as "high-ranking officials of the executive branch") and persons who have ceased to hold the said office two years after the end of their office. The Guidelines do not prescribe specific requirements regarding the public disclosure of the meetings, only that public official should “try to encourage and promote any measure that increases openness towards the public” and “encourage all measures aimed at improving the media coverage of his work”.</p> <p>We were not able to detect any interactions that were not publicly disclosed.</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>					4	
<p>The Tobacco Law requires legal registration of the tobacco manufacturers and producers, and licence holders for the whole sale distribution, and export and import of tobacco. The Directorate for Issuing Approvals for Production, Processing and Trade of Tobacco Products (organisational part of Ministry of Finance), within its jurisdiction, is required to keep those registers. All registers are publicly available at the official web page of the Directorate⁴⁷</p>						

⁴⁴ BlakanInsight, December 2022, Available at: <https://balkaninsight.com/2022/12/22/montenegro-former-customs-chief-arrested-over-tobacco-theft/>

⁴⁵ Government of Montenegro, 2021, Available at: <https://www.gov.me/dokumenta/f9dcdea6-e2b9-4b1a-a80c-e243a073d7b4>

⁴⁶ Government of Montenegro, 2021, Available at: <https://www.gov.me/dokumenta/1364a8ea-1c98-4dc2-9770-75c7d0f7b615>

⁴⁷ Ministry of Finance. About Us. Available at <http://www.aduvan.co.me/o-nama.php>. Accessed last 8 July 2023.

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Also, Tobacco Law requires legal registration of tobacco brands, and this register is also available at the website of the Directorate ⁴⁸.

Both registers provide basic data on companies which produce/import and distribute this tobacco products but no disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyist. The only general regulation (not specific for tobacco industry) is one for lobbying activities as described in more details in answer for Q 18.

In addition, The Law on Limiting Use of Tobacco Products requires that all” new tobacco products as well as electronic cigarettes are registered withing the Ministry of Health. These registers are also publicly available and accessible via Ministry of Health website ^{49 50}

In regard to the required reports in accordance to the Law on Limiting Use of Tobacco Products, Article 31 (explained in details in Q 18), the Ministry should publish data on its website. However, no available reports at Ministry of Finance Tobacco Agency web pages.

INDICATOR 6: Conflict of Interest

13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) / Never 5 Yes						5
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The Law on Limiting Use of Tobacco Products states that “Manufacturers or importers of tobacco products for smoking, electronic cigarettes and refill containers, with the aim of covertly or openly encouraging their use, may not sponsor radio programs, events or activities, as well as events or activities of an international character.” The Law does not make any specific reference to political parties or political campaigns.

According to the Law on the Financing of Political Parties and Election Campaigns⁵¹, political subjects can receive from private sources a maximum of 2,000 euros from an individual, or 20,000 euros from a legal entity, while the total income from private sources cannot exceed the amount of funds allocated from the state budget to finance part of the costs of the election campaign.

Law prescribes obligation (of political parties, candidates) to submit and publish reports on funding. The political entity is obliged to prepare a report on the origin, amount and structure of funds collected and spent from public and private sources for the election campaign and submit it to the Montenegro’s Anti-corruption Agency, with accompanying documentation, within 30 days from the date of the election. The reports show the total funds collected, separately for budget funds and funds from private sources. The Agency is obliged to publish the above-mentioned reports on its website within seven days from the day of receipt. All reports are available on their website⁵²:

⁴⁸ Ministry of Finance. Register of brands of tobacco products. Available at <http://www.aduvan.co.me/robne-marke.php>. Accessed last 8 July 2023.
⁴⁹ Ministry of Health. Register of New Tobacco Products. Available at <https://www.gov.me/clanak/registar-novih-duvanskih-proizvoda>. Accessed last 8 July 2023.
⁵⁰ Ministry of Health. Register of Electronic Cigarettes. Available at <https://www.gov.me/clanak/registar-elektronskih-cigareta-2>. Accessed last 8 July 2023.
⁵¹ Government of Montenegro, Available at:<https://dik.co.me/wp-content/uploads/2021/04/Zakon-o-finansiranju-politickih-subjekata-i-izbornih-kampanja.pdf>
⁵² Anti-corruption Agency. Available at <https://www.antikorupcija.me/me/registri/>. Accessed last 8 July 2023

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The only visible connection is news from 2019 which explain case of 2016 donation for then ruling party DPS by Ranko Jovović owner of Comp commerce, related to companies NTC Logistics and NTC d.o.o Niksic company registered for tobacco import and distribution ⁵³ .						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					
No available data in the public domain that points to retired senior government officials forming part of the tobacco industry.						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)		1				
No available data to support.						
In Montenegro, in accordance with the Law on the Prevention of Corruption ⁵⁴ public officials are not allowed to be the president, authorized representative or member of a management body or supervisory body, nor an executive director or a member of management in a company.						
Reports on annual income of public officials contain some information on income of their wife/husband and children, but it is not specified in which company they are employed, and for contracts there are some general remarks as” private company” thus not allowing to find out more details.						
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)					4	
No such procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives exist in Montenegro.						
However, the Law on Free Access to Information, is applicable to all interactions of the government with companies, including those that are from tobacco industry.						
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
There is no code of conduct for public officials (neither for whole of government nor only MOH), prescribing the standards with which they should comply in their dealings with the tobacco industry. During 2022 multisector consultations on this matter were conducted and a consensus was reached to include a provision regulating this issue in the upcoming changes to the Law on Limiting Use of Tobacco Products states.						

⁵³ Daily paper Vijesti, 2019, Available at: <https://www.vijesti.me/vijesti/politika/383909/demokrate-jovovic-mimo-zakona-donirao-pare-dps-u-vlada-mu-namjestala-ugovore>

⁵⁴ Government of Montenegro, Available at: https://www.antikorupcija.me/media/documents/Zakon_o_sprjecavanju_korupcije.pdf

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<p>There are code of conducts for a) MPs⁵⁵; b) higher executive branch officials⁵⁶ and c) code of conduct for civil servants and employees⁵⁷. All documents define general rules and do not have any particular article that refers to the tobacco industry specifically.</p> <p>The code of conduct for MPs defines, among other things, that a deputy is obliged to comply with regulations related to the prevention of conflicts of public and private interest. In addition, an MP who participates in the decision-making in a matter in which he or a person related to him has a legal interest, is obliged to make a statement to the Committee for Human Rights and Freedoms about the existence of a private interest. Also, the MP may not ask for, receive or allow another person to receive on his behalf or for his benefit, nor give a gift, provide any service, hospitality or any other type of benefit in connection with the exercise of his function, except for occasional and protocol gifts of minimal value.</p> <p>In July 2018, the Government of Montenegro adopted the Code of Ethics for Civil Servants and Employees. It establishes the ethical standards and rules of conduct of civil servants and employees in the government and other administrative bodies, services of the President of Montenegro, the Parliament of Montenegro, the Government of Montenegro, the Constitutional Court, the court and the state, state funds, agencies, as well as employees in other bodies, regulatory and independent bodies, if this is prescribed by a special law.</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>			2			
<p>The government requires the tobacco industry to periodically submit information on tobacco production, manufacturing, market share, marketing expenditures, and revenues in regard to Law on Limiting Use of Tobacco Products (Articles 29, 20, 31, 32, 33 and 34) and Law on Lobbying ⁵⁸. However, information on lobbying, philanthropy, political contributions and all other activities are not required.</p> <p>According to the Law on Limiting Use of Tobacco Products, manufacturers and importers of tobacco products are obliged to submit to the Ministry of Finance in electronic form, by January 15 of the current year, for the previous year:</p> <ol style="list-style-type: none"> 1) all studies on the market research of tobacco and other products on the preferences of different groups of respondents (in relation to gender, education, social structure, etc.), including young people and smokers; 2) all studies on ingredients and substance emissions of tobacco products; 3) summaries of all market research conducted before placing the tobacco product on the market; 4) reports on the amount of tobacco products sold, by brand and type, expressed per cigarette or kilogram; 5) other available data of importance for the sale of tobacco products; and 6) a list of data representing a business secret in the production process. 						

⁵⁵ Parliament of Montenegro, 2019, Available at: <https://api.skupstina.me/media/files/1605829356-eticki-kodeks-poslanika.pdf>

⁵⁶ Government of Montenegro, 2021, Available at: <https://www.gov.me/dokumenta/1364a8ea-1c98-4dc2-9770-75c7d0f7b615>

⁵⁷ Government of Montenegro, 2018, Available at: <https://www.gov.me/dokumenta/1b60309b-7065-449e-b331-f46c37d9c901>

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19. The government has a program / system/ plan to consistently ⁵⁹ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
The government does not have a program / system/ plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines.						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)		2				
There is regulation, Law on Prevention of Corruption, ⁶⁰ which restrict public officials to receive gifts, donations and sponsorships. In accordance with this Law, public officials, as well as their spouses and children, may only accept protocol gifts and gifts worth up to 50 euros. Also, they may not conclude a sponsorship contract or receive donations on behalf of the authority in which he/she performs public functions, which affect or could affect the legality, objectivity and impartiality of the work of the authority. All gifts, donations and sponsorships must be recorded, and those records submitted to Montenegro's Anti-corruption Agency Anti-corruption.						
There is no explicit restriction related to donations or sponsorships from tobacco industry.						
TOTAL						46

⁵⁹ 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.

⁶⁰Government of Montenegro, 2014, https://www.antikorupcija.me/media/documents/Zakon_o_sprjecavanju_korupcije.pdf

Annex A: Sources of Information

	TOP MULTINATIONAL TOBACCO GROUPS	MARKET SHARE	BRANDS	SOURCE
1	KARELIA TOBACCO COMPANY INC, Athinon Avenue, 24 100 Kalamata, Grčka	n.a.	« Karelia Slims » « Karelia Slims Blue » « Karelia Slims Crem Color » « Karelia White » « Karelia Blue » « Karelia Red » « Karelia Blue 100 S » « Karelia White 100 S » « Karelia Yellow 100 S » « Georg Karelia & Sons » « Georg Karelia & Sons Smoother Taste » « Georg Karelia & Sons Hard Pack » « Georg Karelia & Sons Hard Pack Blue » « Karelia Ome » « Karelia Ome (Yellow) » « Karelia Ome (White) » « American Legend » « American Legend White »	http://www.aduvan.com/e/Dokumenti/RegistarMarki/Pregled-robnih-marki-cigareta.pdf
2	Philip Morris Operations a.d. , DOO Montenegro Philip Morris Polska S.A., Al. Jana Pawla II 196, 31-982, Krakow, Poljska Phillip Morris Operations A.D. Niš, Bulevar 12 februar 74, Niš - Srbija	n.a.	« L&M Blue Label » « L&M Red Label » « L&M Loft Blue » « L&M Loft Black » « L&M Loft Sea Blue » « L&M Loft Blue XL » « L&M Loft Sea Blue XL » « L&M Loft Sea Black XL » « Marlboro (RED) » « Marlboro (RED, 100's) » « Marlboro (RED SOFT PACK) » « Marlboro (Gold) » « Marlboro (Gold, 100's) » Marlboro Touch XL (plavi) » « Marlboro Fine Touch XL (svijetlo plavi) » « Marlboro Touch (plavi) » « Marlboro Fine Touch (svijetlo plavi) » « Parliament Aqua Blue » « Parliament Soho (Silver Blue XL)» « Parliament Soho (Aqua Blue XL)» « Parliament Silver Blue » « Parliament Soho Aqua Blue KS RCT 20 SLI » «Parliament Soho Silver Blue RCT 20 SLI » « Muratti Ambassador (crveni) » « Muratti Ambassador (plavi) » « Muratti Ambassador (srebrni) » « L&M Slims Violet » « L&M Slims Pink »	http://www.aduvan.com/e/Dokumenti/RegistarMarki/Pregled-robnih-marki-cigareta.pdf

3	British American Tobacco A.D., Stefana Prvovenčanog 209, Vranje, Srbija	n.a.	« Dunhill Fine Cut Swiss Blend » « Dunhill Fine Cut Master Blend » « Dunhill Fine Cut Blonde Blend » « Lucky Strike Original » « Lucky Strike Amber » « Pall Mall Blue » « Pall Mall Red » « Pall Mall Extra Cut Black 100s » « Pall Mall Plus Vibrant Blue » « Pall Mall Plus Blue » « Pall Mall Extra Cut Blue 100s » « Ronhill Wave Black » « Ronhill Wave Gold » « Lucky Strike Compact Amber » « Lucky Strike Compact Blue » « Lucky Strike Compact + Amber » « Lucky Strike Compact + Blue » « Drina Denifine »	http://www.aduvan.co.m e/Dokumenti/RegistarMarki/Pregled-robnih-marki-cigareta.pdf
5	JT INTERNATIONAL AD, Subotički drum 17, 24 400 Senta, Srbija	n.a.	« LD Pink Super Slims » « LD Violet Super Slims » « LD Club Compact Blue » « LD Club Compact Silver » « LD Blue » « LD Red » « Winston 100 S Red » « Winston 100 S Blue » « Winston Blue » « Winston Classic » « Winston Silver » « Winston Blue Super Slims » « Winston Silver Super Slims » « Winston Xstyle Blue » « Winston Xstyle Silver » « Winston Xstyle Long Blue » « Winston Xstyle Long Silver » « Sobranie Black Refine » « Sobranie White Refine » « Sobranie Black Russian » « Sobranie Color »	http://www.aduvan.co.m e/Dokumenti/RegistarMarki/Pregled-robnih-marki-cigareta.pdf
6	KT International SA, Rogoshko shose 1, 4003 Plovdiv, Bugarska		« Una Slims silver » « Una Slims Gold »	
7	PETRO LLC, Saint Petersburg, Ruska Federacija		« Sobranie Superslims Black » « Sobranie Superslims Pink » « Winston Xstyle Long Red » « Sobranie Black » « Sobranie Gold »	

	TOP LOCAL TOBACCO GROUPS	MARKET SHARE	BRANDS	SOURCE
1	PLUS d.o.o	Japan Tobacco International, China Tobacco International Europe, Slance Stara Zagora, Fabrika Duhana Udbina i Monus. 40 %	PETER ELEZOVIĆ (100,00%), Osnivač Zastupnik PROKOPIJE PERIĆ, Izvršni direktor Zastupnik NIKOLIN NULLESHI, Ovlašćeni zastupnik	
2	DRUŠTVO ZA VELETRGOVINU, USLUGE, EXPORT- IMPORT "DMDELTA" D.O.O. PODGORICA		Zoran Milašević	
3	Tobacco S press		Vesko Nikolić	
4	Artek doo		Pavličević Marko	
5	Indego		Danko Gospić	
6	Smart lux		Ivan Milić	
7	Buena vista habano		Nikola Radunović	
8	Barkod			
9	Neregelia			
10	E JOY Mne			

	TOP TOBACCO INDUSTRY ALLIES/ FRONT GROUPS	TYPE (FRONT GROUP, AFFILIATE, INDIVIDUAL)	SOURCE
1	Association of Tourism and Catering Association of the Chamber of Commerce, Dragan Ivančević	Trade group	https://www.total-montenegro-news.com/politics/4341-smoking-ban-montenegro-revenues?fbclid=IwARlCpn5L5YvhgCxeJnpZJdaAou-c2rhJoMjI-a5H76O7PYX9As26RomvVzc
2	Chamber of Commerce	National Business Chamber	https://www.vijesti.me/vijesti/ekonomija/544793/ministarstvo-pokazali-smo-jos-jednom-da-posebno-vodimo-racuna-o-glasu-javnosti
3	AmChem	American Chamber of Commerce	https://www.vijesti.me/vijesti/ekonomija/544793/ministarstvo-pokazali-smo-jos-jednom-da-posebno-vodimo-racuna-o-glasu-javnosti
4	Union of Employees	Business association	https://ggtc.world/library/organizations-in-support-of-tobacco-industrys-arguments-against-plain-packaging-2019