
Sweden

**TOBACCO
INDUSTRY
INTERFERENCE
INDEX
2023**

Background and Introduction

In Sweden, cigarette smoking has decreased steadily since the early eighties. Today somewhere between six and ten percent of the adult population is smoking on a daily or regular basis. The decrease in smoking prevalence is the ultimate proof that tobacco control works.

In 1979, Non-Smoking Generation, a non-government organization, was founded and started an important knowledge dissemination work to raise awareness about tobacco health risks to prevent youth smoking. We have jointly worked with the Public Health Agency, the Swedish Heart-Lung Foundation, the Swedish Cancer Society, and many other organizations for the effective implementation of tobacco control initiatives in accordance with the WHO Framework Convention on Tobacco Control (FCTC) guidelines.

In 1989 Sweden implemented a marketing ban on all tobacco products. In 1993 the smoke free workplace was implemented and in 1997 an 18 years age limit for buying tobacco products. Furthermore, in 2005 it was legislated that restaurants should be smoke free and finally, in 2019 smoke free outdoor seats were implemented. Along with the excise duty on tobacco, these tobacco control initiatives have brought Sweden to today's relatively low smoking prevalence among adults.

In 2016 the Swedish tobacco industry launched the so-called "tobacco-free" white snus (nicotine pouches). By calling it tobacco free they could circumvent and wipe out years of effective tobacco control in Sweden. In the blink of an eye, social media, popular podcasts, TV and radio were flooded with commercials targeting the youth with the promise of a great nicotine kick without any health risks or bad side effects like bad breath or discolored teeth. Popular influencers were hired to reach out to young people and promote these new products through enticing new flavors, designs and glamorous effects. Free samples were just one click away or handed out in different launch events, music festivals, and even outside school premises. Thousands of teenagers got their first fix for free and now struggle with a strong nicotine addiction. Not only have the tobacco industry circumvented the marketing ban but also the ban on flavors, age limit for buying and smoke free areas. By calling their new products "tobacco-free" they also managed to circumvent tobacco taxation. These products have a low nicotine tax which makes them even more affordable to price sensitive teenagers.

Despite many cautionary warnings, policymakers failed to take control and implement an immediate or interim regulation that would protect children from the tobacco industry's tactics. The white snus contains high amounts of nicotine extracted from tobacco, so the question is how tobacco-free it is and why neither authorities nor policymakers did more to protect the health of children and young people? Maybe part of the explanation is a naive desire for a quick and easy solution to a large and serious problem. It sounds like a nice and easy solution, if millions of smokers' lives could be saved simply by switching into a new and less harmful alternative to the lethal cigarette. But maybe more importantly because of the tobacco industry's economic power and the lack of implementation of article 5.3 of the WHO FCTC. Swedish policymakers and members of the parliament have had meetings with tobacco industry lobbyists, and the industry has been busy

creating new “independent” think tanks like Environment and Public Health Institute (EPHI) and organizing “post-tobacco/public health” seminars in the past years. Through these so-called independent think tanks, the industry can recruit and engage former medical practitioners, researchers and “public health experts” to promote their agenda and lobby for so-called harm reduction. Policymakers and the public health community need to be informed that the intention behind these efforts is not to enhance global health, but to legitimize the industry’s existence and influence the public health policies.

Swedish Match is the largest producer of snus, a smokeless tobacco product that is placed between the upper lip and gum. While it is popular in Sweden, it is banned in many other countries in Europe. The company also makes ZYN (nicotine pouches), Longhorn (moist snuff), Onico (pouch products with neither tobacco nor nicotine), America's Best Chew (chewing tobacco), Thunder (chew bags), Oliver Twist (tobacco bits), White Owl (HTL, homogenized tobacco leaf cigars) and Game (natural leaf cigars).¹ In 2021, the company made about \$1.8 billion in sales.² In November 2022, Philip Morris paid US\$16 billion to acquire Swedish Match.³

This is Sweden’s first Tobacco Industry Interference Index to assess how the country has responded to tobacco’s attempts to undermine health policy and the government’s effort to protect these policies from the industry. Sweden has scored 61 points.

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 prior incidents that still have relevance today.

¹ Market Screener. <https://www.marketscreener.com/quote/stock/SWEDISH-MATCH-AB-PUBL-6492173/news/Swedish-Match-Company-presentation-2023-43253468/>

² <https://vaping360.com/vape-news/118669/pmi-controls-swedish-match/>

³ Mannes M. Reuters. 8 Nov 2022 <https://www.reuters.com/markets/deals/philip-morris-wins-83-stake-swedish-match-goes-ahead-with-16-bln-takeover-2022-11-07/>

Summary Findings

I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

The authorities/government invites and allows the tobacco industry to provide its views and influence legislation in the country.

Sweden has no existing policy in regard to implementation of the FCTC Article 5.3. This allows the tobacco industry lobbyists to freely request meetings with policymakers and spread disinformation about their products. In Sweden the tobacco industry has successfully delayed and weakened the regulation of the nicotine portions, resulting in youth addiction.

The government and Swedish member of parliament in the EU openly support the tobacco industry instead of relying on independent scientific evidence.

2 INDUSTRY CSR ACTIVITIES

The Swedish tobacco industry presents itself as a responsible company and promotes their new products are “less harmful” and sustainable alternatives to tobacco smoking.

The tobacco industry has been actively funding think tanks presented as “independent” and recruiting former medical practitioners to support their harm reduction strategies even though significant independent scientific evidence tells us otherwise.

High-ranking policymakers and sustainability experts have been misled into attending seminars and conferences under false pretensions. The tobacco industry borrows the reputation of serious NGOs to initiate various CSR projects. For example, Swedish NGO “Keep Sweden Clean” is cooperating with several tobacco companies, engaging children in cleaning up cigarette butts and tobacco litter.

3 BENEFITS TO THE INDUSTRY

It took the government six years to regulate the nicotine snus (nicotine portions) that inadequately failed to protect youth from the harmful effects of nicotine addiction. Sweden still lacks a proper tobacco taxation on all the heated tobacco products, allowing the industry to market its products to be accessible and affordable to the youth.

4 UNNECESSARY INTERACTION

Top-level government officials, including the prime minister, are showing their support to the tobacco industry on social media. The Swedish tobacco industry have also effectively teamed up with the Convenience Stores – Sweden to market and normalize tobacco products. Top-level government officials are supporting the industry in different ways, framing snus is yet another “food product” with the potential of saving millions of smokers’ lives.

5 TRANSPARENCY

There is no register or rules for transparency. The government does not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists.

6 CONFLICT OF INTEREST

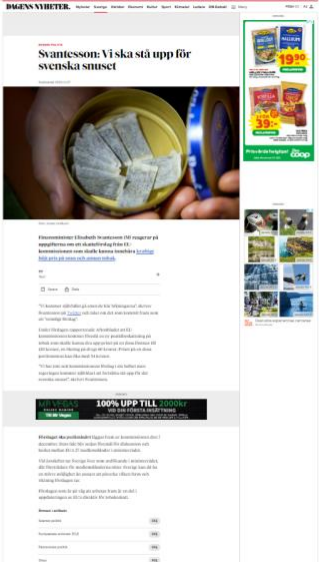
The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions.

7 PREVENTIVE MEASURES

The government has not 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

Sweden

Tobacco Industry Interference Index 2023 Results and Findings

	0	1	2	3	4	5
INDICATOR I: Level of Industry Participation in Policy-Development						
I. The government ⁴ 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. ⁵ in setting or implementing public health policies in relation to tobacco control ⁶ (Rec 3.4)						5
<p>Sweden has no policy to support implementation of the WHO FCTC article 5.3. This gap allows the tobacco industry lobbyists to freely request meetings with policymakers and spread disinformation on the harms of their products. The government regularly invites the tobacco industry to provide input into the final legislation of new or amended legislation concerning tobacco and/or health policies.</p> <p>The tobacco industry has successfully delayed and weakened the regulation of the nicotine content, resulting in youth addiction. Moreover, many Swedish policymakers have openly declared their support for the Swedish tobacco industry: Svantesson Swedish finance minister “We should stand up for the Swedish snus”⁷</p>  <p>Swedish MEP Johan Nissinen: Sweden should do more for snus in the EU https://snusforumet.se/en/swedish-mep-johan-nissinen-sweden-should-do-more-for-snus-in-the-eu/2023-11-02</p>						

⁴ 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

⁵ The term, “tobacco industry’ includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

⁶ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

⁷ <https://twitter.com/ElisabethSvan/status/1596790866441543682>

<https://www.dn.se/sverige/svantesson-vi-ska-sta-upp-for-svenska-snuset/>

In 2018 for example the conference “Rökfritt Sverige 2025” was organized by the Public Health Agency of the Swedish government. At the conference, representatives from the Swedish tobacco industry participated.⁸

The conference Smokefree Sweden 2025

- 2018 the Swedish public health department organized the conference Smokefree Sweden 2025
- At the conference were representatives from the Swedish tobacco industry



2. The government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. (Rec 3.4) 5

The tobacco industry has successfully delayed and weakened the regulation of the nicotine snus. For instance, all tobacco prevention organizations and independent researchers requested a complete ban on all forms of marketing and a ban on flavors for all the new nicotine products. Instead, the parliament chose to listen to the tobacco industry’s claims for harm reduction

The investigation prior to the new law and all of the answers, both from health- and tobacco preventing organizations as well as the tobacco industry.⁹

Swedish policymakers as well as other government departments deem it necessary to consult and discuss with all stakeholders regarding tobacco control policies. However, in the recent consultation for new tobacco taxes, the tobacco industry and its front groups were invited but the Swedish Cancer Society was not even on the list of invited stakeholders.

⁸ For a smoke-free Sweden in 2025. *Snusforumet*. Accessed from <https://tinyurl.com/2sex4k29> last on 7 July 2023,
⁹ <https://www.regeringen.se/remisser/2021/04/remiss-sou-202122—hardare-regler-for-nya-nikotinprodukter/>

Remiss av promemorian Höjd skatt på alkohol och tobak

Remissinstanser

- 1 A non smoking generation
- 2 Alkoholpolitiskt forum
- 3 British American Tobacco Sweden AB
- 4 Centralförbundet för alkohol- och narkotikaupplysning, CAN
- 5 Centrum för socialvetenskaplig alkohol- och drogforskning på Stockholm universitet, SORAD
- 6 Convenience Stores Sweden
- 7 Folkhälsomyndigheten
- 8 Förvaltningsrätten i Falun
- 9 Hjärt-lungfonden
- 10 IOGT-NTO
- 11 JTI Sweden AB
- 12 Kammarrätten i Sundsvall
- 13 Kommerskollegium
- 14 Konkurrensverket
- 15 Konsumentverket
- 16 Läkare mot Tobak
- 17 Myndigheten för ungdoms- och civilsamhällesfrågor
- 18 Naturvårdsverket
- 19 Philip Morris AB

Telefonväxel: 08-405 10 00
Webb: www.regeringen.se

Postadress: 103 33 Stockholm
Besöksadress: Jakobsgatan 24
E-post: fi.registrator@regeringskansliet.se

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) Never 5 Yes							
---	--	--	--	--	--	--	--

No information gathered to show that the government has allowed or invited the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy.

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) ¹⁰ (Rec 4.9 & 8.3)							
---	--	--	--	--	--	--	--

¹⁰ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

	0	1	2	3	4	5
For non-COP year, follow the previous score of COP year. For non-Parties, apply a score of '0'						

The government does not allow tobacco industry representatives or allies to participate in the official Swedish delegation to the COP. ¹¹

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 ¹² (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

- A) The Swedish organisation “Håll Sverige Rent” (Keep Sweden Clean) collaborates and is funded by Philip Morris and a number of other big tobacco companies. This organisation is also funded by the government. Members of the parliament has been attending and supporting a number of seminars and green-wash or health-wash campaigns of the NGO.¹³

Less harmful and sustainable alternatives?

- The tobacco industry presents its new products as harm reduction
- In 2021 the conference "Post Tobacco" is organised by "Environment and public health institute" run by former MEP Christofer Fjellner
- Several members of the Swedish parliament attends in seminars and 1 to 1 meetings with the tobacco industry
- The tobacco Industry initiate various CSR projects and borrow the reputation of serious NGO:s

Post Tobacco
Recreational nicotine and society

- Market development and trends
- Regulatory development
- Health implications
- Research and development
- Investment and sustainability

ephi In cooperation with: **The Brussels Times**

PROGRAM
Day One: Monday the 11th October
12:00-13:00 Registration and Lunch
13:00-13:10 Welcome/Introductions, Christofer Fjellner - Managing Director EPHI
13:10-13:30 Science Based Policy or Policy Based Science? Moderator: Christofer Fjellner, Managing Director EPHI, Clive Bates - Director Counterfactual Consulting
13:30-14:00 Moving from Tobacco to Nicotine - A Health Threat or opportunity? Moderator: Christine Muenche, Societal Trends, David Sinden, PhD economics, Sushantha Patwardhan, MD and Director of Policy for the Centre for Health Research and Education, Joseph Magers, Managing Director Campaign for Saker Alternatives

Post Tobak - En hälsa och samh
Det senaste decenniet ha tobakens nikotinprodukt från konsumenterna på n kligger ner nedjorden för lagstiftningen hänger info
Från lunch måndagen den oktober samlas forskare, i Stockholm på TA TheWall för tobakens nikotinprodukt Konferensen fokuserar på i lagstiftning. Konferensen i samarbete med Brussels T
Läs mer och anm

Anette Rosengren
VD, Philip Morris Nordics

Moderator Marie Söderqvist, Johanna Ragnartz, vd för Håll Sverige Rent, Joar Forsell, riksdagsledamot för L, Anette Rosengren, vd för Philip Morris Nordic och Martin Ellström, vd för Sturecompagniet.

¹¹ WHO FCTC. CoP9 List of Participants. Accessed from <https://tinyurl.com/4mmehk9> last 7 July.

¹² political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

¹³ <https://via.tt.se/pressmeddelande/hall-sverige-rent-inleder-samarbete-med-philip-morris-international?publisherId=352820&releasId=3275996&lang=sv>

- As in the rest of the world the Swedish tobacco industry is eager to present itself as responsible and their new products as less harmful and sustainable alternatives.
- In 2021 the conference "Post Tobacco" was organised by "Environment and Public Health Institute" run by former MEP Christofer Fjellner who was known to sell snus at his office in the European parliament headquarters in Brussels
- The tobacco industry use the reputation of NGOs to initiate various CSR projects. Swedish NGO "Keep Sweden Clean" is cooperating with several tobacco companies, engaging children in cleaning up cigarette butts and tobacco clutter.

B) The tobacco industry is also buying its way into the youth associations to try to influence Swedish law. Swedish Match has for instance engaged the Moderate Youth League which is the official youth branch of the Moderate Coalition Party (the conservative party) to hand out free samples of the nicotine snus (nicotine portions) at different events and even at school yards. Philip Morris been active and last year the chairman of CUF, the youth organization of the Centre Party in Sweden (liberal, green and market liberal organization), Reka Tonai, who went on an invitational trip to the company's research center in Switzerland in July: - I try to prioritize industries or companies that in one way or another are active in issues that we run, she says. Reka Tonai, since she took over the post of chairman of the Centre's youth association last year, has positioned herself as an ardent advocate of liberal Swedish tobacco legislation. "Sweden should be a country where it is allowed to smoke in outdoor restaurants and light a joint while your friend drinks a beer," she says.

In a survey conducted by Tobaksfakta, everyone in youth unions among the parties in the government, right wing parties, answered that they don't see any problems that policymakers meet with lobbyists from the tobacco industry.^{14 15}

Vårt 2022

CUF:s ordförande åkte på bjudresa – finansierad av tobaksjätte

Av Marcus Bonnilé Lenné | 27

PUBLICERAD: 9 AUGUSTI | UPPDATERAD: 9 AUGUSTI

NYHETER

Tobaksjätten Philip Morris uppväktar borgerliga ungdomsförbund i Sverige för att försöka påverka svensk lag.

En som har nagpat är CUF:s ordförande Reka Tolnai som i juli åkte på en bjudresa till företagets forskningscenter i Schweiz.

– Jag försöker prioritera branscher eller företag som på ett eller annat sätt är verksamma inom frågorna som vi driver, säger Reka Tolnai.

Reka Tolnai har sedan hon förtro åkt tog över ordförandesposten i **Centralspartiets ungdomsförbund** positionerat sig som en krigsförskrädd för en liberalare svensk tobakslagstiftning.

Sverige borde vara ett rökigare land, uppger Reka Tolnai exempelvis i en **Aftonbladet**intervju i juni, där det ska vara tillåtet att röka på uterveranger och tänka en joint medan ens kompis dricker en öl.



Bild från en film på CUF:s Twitter, publicerad förra året.

¹⁴<https://www.facebook.com/mufsw/photos/a.163134293743930/2350708764986461/?type=3>

¹⁵ <https://www.aftonbladet.se/nyheter/a/8Qe04E/philip-morris-bjud-reka-tonai-pa-bjudresa-till-schweiz>

	0	1	2	3	4	5
The Swedish tobacco industry have also effectively teamed up with Convenience Stores – Sweden to widely sell and normalize tobacco products to make it appear like a responsible company. ¹⁶						
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
The government took six years to regulate the nicotine snus (nicotine portions) and the result was an inadequate law that fails to protect youth from a harmful nicotine addiction. Also, we still lack a proper tobacco taxation on all new heated tobacco products, allowing the industry to market its products at an affordable price to the youth.						
7. The government gives privileges, incentives, tax exemptions or benefits to the tobacco industry (Rec 7.3)						5
The taxation is lower for the heated tobacco products than for cigarettes and other tobacco products.						
The tobacco industry is allowed to lure youth into nicotine addiction with candylike flavors. Moreover, the tobacco industry is also allowed to market heated tobacco products in the streets and they are also allowed to market online towards persons above the age of 25. Since it is impossible to say who is behind a screen, this policy is completely useless. ^{17,18,19}						
The government allows international travelers to duty-free import into the country tobacco products of up to 800 cigarettes or 400 cheroots or 200 cigars or 1 kilogram of pipe/cigarette tobacco. ²⁰						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ²¹) 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)						5
The Instagram account Mjölbypartiet (over 180,000 followers) shows stereotypical humor of a country guy with snuff, cap and alcohol. Mjölbypartiet is popular among all the party leaders and his influences that advocate snus. With the party leaders, they talk about snuff and nonsense, and all the party leaders have warmed up to his humour and the so-called Mjölby walk, a type of walk that shows how a person who lives in Mjölby walks.						

¹⁶ <https://conveniencestores.se/tidningsartiklar/2787-seminarium-om-tobaksbranschens-transformation>.

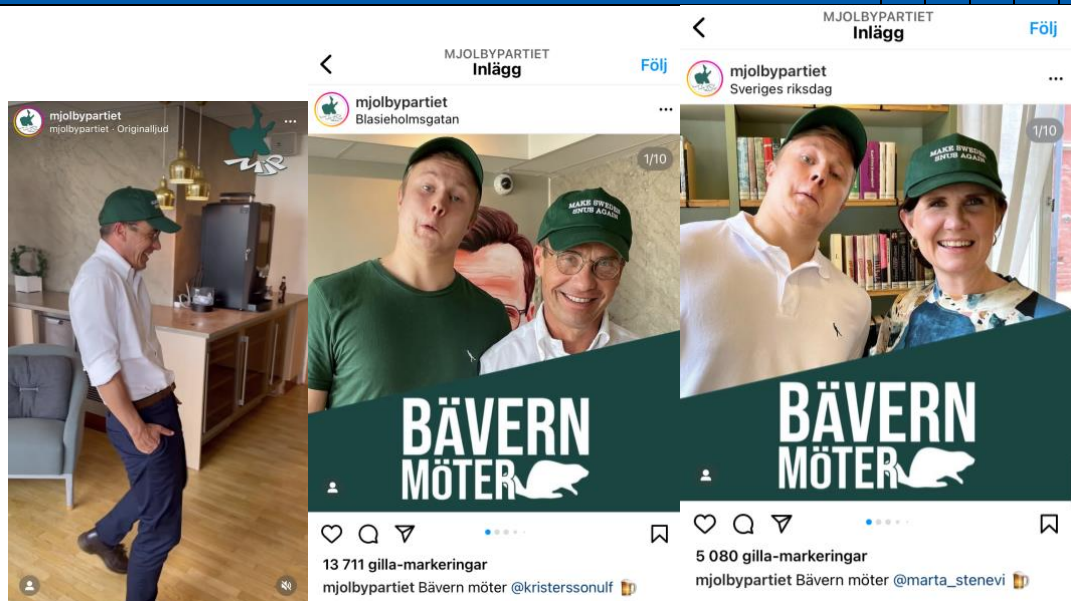
¹⁷ <https://nonsmoking.se/unga-avslojar-allvarliga-brister-i-den-nya-lagen/>

¹⁸ <https://skatteverket.se/foretag/skatterochavdrag/punktskatter/nikotinskatt.4.41f1c61d16193087d7fc7fe.html>

¹⁹ <https://skatteverket.se/foretag/skatterochavdrag/punktskatter/nikotinskatt.4.41f1c61d16193087d7fc7fe.html>

²⁰ IATA Travel Center. Sweden. Accessed from <https://tinyurl.com/4b6txzk8> last 7 July 2023.

²¹ Includes immediate members of the families of the high-level officials



Swedish Prime Minister and Leader of the Green Party were recorded in Mjölbypartiet’s Instagram account wearing a cap in support of the slogan “Make Sweden Snus Again.”²²

The Swedish tobacco company Skruf is the second largest snus manufacturer in the Nordics, employing over 300 employees and having an export share of 64 percent. During the Food Companies Associations’ annual event, Skruf received the ‘Food Exporter of the Year’ Award for their successful export in the Norwegian market. Minister for Rural Affairs Peter Kullgren and CEO of Livsmedelsföretagen (The Food Companies Association) Björn Hellman presented the award to Skruf’s general counsel Joakim Högberg Jacobsson.²³



<p>9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)</p>	<p>0</p>					
---	----------	--	--	--	--	--

²² Mjölbypartiet. Instagram. Accessed from <https://tinyurl.com/ycsevnfp> last 7 July 2023.

²³ <https://www.livsmedelifokus.se/skruf-ar-arets-livsmedelsexportor/>
<https://www.livsmedelsforetagen.se/nyheter/skruf-snus-ar-arets-livsmedelsexportor-2023-en-exportsucce-med-potential-att-bli-ett-folkhalsomirakel/>

	0	1	2	3	4	5
No recorded evidence in the public domain on government accepting 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.						
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>	0					
The Swedish tobacco industry have also effectively teamed up with Convenience Stores – Sweden to widely sell and normalize tobacco products to make it appear like a responsible company. ²⁴						
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)			2			
There is no register or rules for transparency when meeting with the tobacco industry. Members of the parliament do not decline meetings with the tobacco industry. However, the government has a legislation on public access to information and secrecy ²⁵ which contains provisions on the right to access official documents, which is a manifestation of the principle of public access to information.						
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)						5
The government does not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists.						
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
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.						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	0					

²⁴ <https://conveniencestores.se/tidningsartiklar/2787-seminarium-om-tobaksbranschens-transformation>.

²⁵ Government Offices of Sweden. Ministry of Justice. Public Access to Information and Secrecy: The Legislation in Brief. Accessed from <https://tinyurl.com/f6ymy3kn> last 7 July 2023.

	0	1	2	3	4	5
No evidence found in the public domain of retired senior government officials forming part of the tobacco industry.						
15. Current government officials and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	0					
No evidence found in the public domain current government officials and relatives holding positions in the tobacco business including consultancy positions.						
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 no such procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives.						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which 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
The government has not formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry.						
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)	0					
No evidence of this.						
19. The government has a program / system/ plan to consistently ²⁶ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
There is no program / system/ plan to consistently raise awareness within government 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			

²⁶ 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.

	0	1	2	3	4	5
The general rules to curb bribery and corruption is installed to prohibit government officials from accepting any forms of contributions/ gifts. However, there is no policy specifically formulated for disallowing contributions, monetary or otherwise, from the tobacco industry.						
TOTAL SCORE	61					

Annex A: Sources of Information

	TOP TOBACCO COMPANIES/ DISTRIBUTORS	MARKET SHARE	BRANDS	SOURCE
1				
2				
3				
4				
5				

	TOP MEDIA/ NEWSPAPERS	URL
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		

	MAIN TOBACCO INDUSTRY ALLIES/ FRONT GROUPS	TYPE (FRONT GROUP, LOBBY GROUP, INDIVIDUAL)	SOURCE
1			
2			
3			
4			
5			
6			