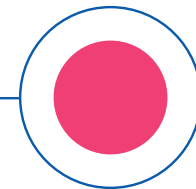


Lebanon



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SUMMARY OF FINDINGS

1. Industry Participation in Policy Development

Given the current economic crisis and war in the country, with priorities shifted away from tobacco control to basic needs, no major changes occurred in tobacco control.

In several events, some policymakers expressed support for the state-owned enterprise, the Regie, which consistently sought support. The Ministry of Public Health (MoPH) proposed increasing tobacco taxation, which was opposed by tobacco industry (TI) lobbyists who raised arguments of patriotism and sectarianism whenever the issue was discussed. The MoPH also faced a lack of support from other public officials, as its recommended tax increase on tobacco products was not approved and was ultimately reduced in the national budget.

2. Industry CSR Activities

Several officials visited the Regie's headquarters and praised it for development achievements and efforts to combat illicit trade, while also honoring ministers and parliamentarians. The Regie also conducted corporate social responsibility (CSR) activities focusing on child labor, environmental sustainability, renewable energy, and humanitarian aid. Activities ranged from support to employees and local communities through financial and in-kind donations to farmers and municipalities.

3. Benefits to the Industry

The Regie implemented a pricing strategy that resulted in nearly a 50 percent reduction in the real value of retail prices, providing significant advantages to transnational tobacco companies. As of this report, the strategy remains in place and unchallenged.

Support and protection for the TI and farmers were evident during the war, involving coordination among the Parliament Speaker, army intelligence, the Lebanese Army commander, and UNIFIL forces.

4. Unnecessary Interaction

There were multiple visits from the Regie's administration to the Speaker of Parliament to provide updates on development and financial performance and to discuss challenges faced during the war. These visits aimed to ensure revenue sustainability for the treasury and secure government support. The Speaker of Parliament praised the Regie, considering it a role model among public administrations.

Additional visits were made to the President, the Minister of Finance, and the Central Bank Governor to present the Regie as an asset to the government and seek continued support. The Lebanese Army also supported the Regie's anti-smuggling unit on several occasions.



5. Transparency

There is no procedure in place to ensure transparency when the government meets with the TI. There are no government rules for disclosure or registration of TI entities.

6. Conflict of Interest

Besides the Regie being a state enterprise supported by the government, no other evidence of conflicts of interest was found. However, despite the prohibition on accepting contributions from the TI, breaches have been documented through CSR activities undertaken by the Regie.

7. Preventive Measures

Lebanon does not have an official plan for implementing Article 5.3 of the WHO FCTC. The government has not formulated or adopted a code of conduct for public officials to guide them in their interactions with the TI.

In March 2025, a joint initiative by the MoPH, WHO, the FCTC Convention Secretariat, and the United Nations Development Program recommended adopting WHO FCTC tobacco control policies and measures, including Article 5.3. The aim of this collaboration was to encourage the development of preventive measures to safeguard public health from TI influence.

RECOMMENDATIONS

1. Increase tobacco taxes to reduce affordability, as this is the most cost-effective measure to reduce tobacco consumption in Lebanon.
2. Enforce the prohibition on contributions from profit-making public institutions by disallowing all monetary or in-kind support from the Regie or similar entities, in line with Article 32 of the 2020 Budget.
3. Adopt preventive measures in line with Article 5.3 of the WHO FCTC, including a government-wide code of conduct to guide officials when interacting with the TI, led by the MoPH.
4. Require the Regie, as a state-owned tobacco enterprise, to disclose all operations, including profits, financial data, board meeting minutes, production, market share, marketing expenditures, revenues, lobbying, philanthropy, and political contributions.
5. Raise awareness of Article 5.3 across government departments through coordinated activities led by the MoPH's National Tobacco Program in collaboration with civil society and academic institutions.