



PROGGA *Knowledge for Progress*



BANGLADESH

TOBACCO INDUSTRY INTERFERENCE INDEX 2025:

Report on implementation on FCTC article 5.3 in
Bangladesh

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REPORT ON IMPLEMENTATION OF FCTC ARTICLE 5.3 IN BANGLADESH



Date of Publication: November, 2025

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Suggested Citation:

Shahriar MH, Hasan MM, Zubair ABM. Bangladesh Tobacco Industry Interference Index 2025. PROGGA. Dhaka, Bangladesh. Nov 2025.

Acknowledgements:

This report is made possible with support from Bloomberg Philanthropies. We acknowledge Mary Assunta for her technical advice in the preparation of this Index.

The information from this report will form part of the Global Tobacco Industry Interference Index, a global survey of how public health policies are protected from the industry's subversive efforts, and how governments have pushed back against this influence. The Tobacco Industry Interference Index was initiated by the South-East Asia Tobacco Control Alliance (SEATCA) as a regional report, is now part of a global publication of the Global Centre for Good Governance in Tobacco Control (GGTC). We also wish to extend our thanks to Anti-Tobacco Media Alliance (ATMA) for their support and advice.

About PROGGA:

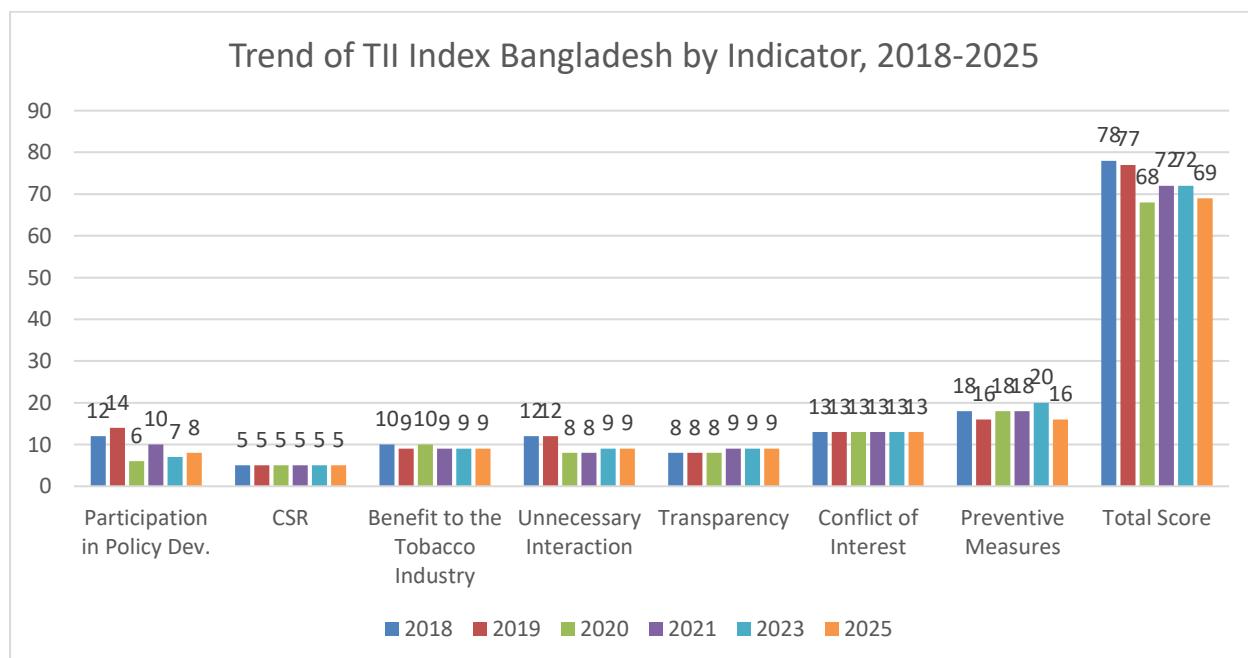
PROGGA - Knowledge for Progress is a Bangladeshi non-profit organization research, advocacy, communication, campaign and capacity building that started its journey in 2008. 'Tobacco Control' is one of the key initiatives of PROGGA, which the organization has been implementing with support from the Campaign for Tobacco Free Kids (CTFK) since 2009. PROGGA also works as the secretariat of Anti-Tobacco Media Alliance (ATMA), a network of 350 members in different chapters all over Bangladesh. The Center for Research and Advocacy to Fight Tobacco (CRAFT), a Bangladeshi tobacco industry monitoring center, is another initiative of PROGGA established in January 2020 with support from the WHO FCTC Secretariat through its Knowledge Hub for Art 5.3, Global Center for Good Governance in Tobacco Control (GGTC).

Introduction

Bangladesh has, very recently, seen an intensification of tobacco industry interference and influence, intended to thwart the ongoing amendment process of the tobacco control law, initiated by the Ministry of Health and Family Welfare (MoHFW). The 2025 Global Tobacco Industry Interference Index placed Bangladesh at the very bottom among its South Asian peers. The high level of industry interference contradicts with the Bangladesh's two-fold commitment regarding tobacco control: Firstly, Bangladesh ratified the WHO Framework Convention on Tobacco Control (FCTC) in 2004, passed a tobacco control law based on the Framework in 2005 (amended in 2013) and adopted the FCTC Article 5.3 Guidelines in 2008 which provides specific measures to protect public health policies with respect to tobacco control from commercial and other vested interests of the tobacco industry. Secondly, Target 3.a of Sustainable Development Goals urges countries to strengthen the implementation of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC).

The Tobacco Industry Interference Index is a global report conceptualized and initiated by the Southeast Asia Tobacco Control Alliance (SEATCA) to promote the implementation of Article 5.3 of the WHO FCTC. There are 20 questions based on 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 the 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 April 2023 up to March 2025.

With a view to assessing how the government of Bangladesh was responding to the tobacco industry's tactics by using the FCTC Article 5.3 Guidelines, PROGGA (Knowledge for Progress), in 2018, released the Tobacco Industry Interference Index, the first report of its kind in Bangladesh. The 2025 Tobacco Industry Interference (TII) Index is the sixth country report on Bangladesh since 2018.



An analysis of the country's scores in the six TII Index reports done so far (78/100 in 2018, 77/100 in 2019, 68/100 in 2020, 72/100 in 2021, 72/100 in 2023 and 69/100 in 2025) shows fluctuation within a limited range. Overall, this indicates that Bangladesh failed to make any significant progress and appears to be stuck in policy stagnation to countering tobacco industry interference and implementing WHO FCTC Article 5.3 and effective tobacco control measures.

The recent findings of the 2025 TII Index are based on pieces of evidence gathered between April 2023 and March 2025. This year, the score for Bangladesh stands at 69, slightly lower than that of the previous report. This progress, albeit little, stems from the Ministry of Health and Family Welfare and the Ministry of Railway's recent initiative to adopt "*Guidelines for the implementation of FCTC Article 5.3*" for employees of the respective ministries and subordinate directorates, departments, and agencies. Sensitization of other ministries and government bodies regarding FCTC Article 5.3 obligations and adoption of a similar comprehensive guideline for government employees may help bring exponential change in safeguarding the country's public health policies.

Some emerging issues were noted during the reporting period:

Proliferation of International Third-Party Actors to Thwart TC Law Amendment

As a continuation of the 2023 report, majority of the incidents of tobacco industry interference during the reporting period were focused on thwarting the initiative to amend the tobacco control law by the Ministry of Health and Family Welfare (MoHFW). There has also been a proliferation of third-party involvement incidents, intended to influence the policymakers and mass media, and shift the public support against the draft amendment, particularly against the proposed ban on the manufacturing, import, promotion and marketing of e-cigarettes, vaping and other Electronic Nicotine Delivery Systems (ENDS) products.

During the reporting period, local and international front groups and third-party actors were found to be working in unison, holding roundtable discussions, press meetups, online sign petitions, social media campaigns to promote as well as normalize ENDS products and turn the tide against the proposed ban on Emerging Tobacco Products (ETPs). For example, Policy Exchange Bangladesh organized a roundtable discussion titled 'Policy for Progress towards Harm Reduction" in May 2024 which was attended by Dr. Konstantinos Farsalinos, a so-called expert and a crucial figure in the controversial "harm reduction trio",¹ as dubbed by SEATCA Tobacco Watch, making circuit in Southeast Asian nations to pave the way for policies favoring so-called harm reduction products. The event was also attended by three former vice-chancellors of the country's three topmost public universities, Directors of leading private medical colleges, and a former NBR member. The juxtaposition of local influential intellectuals and industry-affiliated foreign advocates in such events lend the vape-friendly messages of the industry a false sense of legitimacy. It should be noted that almost all of these events were organized in collaboration with local popular national dailies for wide circulation.

Foundation for a Smoke-free World (FSFW) [rebranded as Global Action to End Smoking (GAES) in May 2024], a PMI-funded organization, was also found to be hyperactive in its efforts to normalize and promote ENDS and influence the policymakers against the proposed

¹ The 'harm reduction trio' peddle a harmful message, SEATCA, 14 September 2019, <https://tinyurl.com/yasttf8j>, [Accessed on 05 July 2025]

ban. The UK-based Centre for Substance Use Research (CSUR), a FSFW grantee, partnered with a local private medical college, owned by an influential political figure, for conducting research on the adverse impact of smoking in Bangladesh.

Another PMI-funded front group, *Global Action to End Smoking (GAES)* (former FSFW) provided grants to *Bangladesh Blind Mission (BBM)*, an NGO, to organize journalists' workshops on cigarette harm reduction. BBM also previously attempted to organize a workshop on Tobacco Cessation jointly with the Non-Communicable Disease Control Program of the Directorate General of Health Services (DGHS), which was later foiled by protests from the National Tobacco Control Cell (NTCC) and anti-tobacco organizations.

Tobacco Harm Reduction Dot Net, another front group, also released a report, co-authored by GAES (formerly FSFW) President Derek Yach, in October 2023 urging Bangladesh to adopt vape-friendly policy. Mr. Yach also participated in at least two harm reduction related events that took place in Dhaka, Bangladesh in May 2023, i.e., a roundtable discussion organized by the Asia Harm Reduction Alliance (AsHRA) and the Bangladesh THR Summit 2023, organized by the Asia Harm Reduction Alliance (AsHRA) and Voice of Vapers Bangladesh respectively. It should be noted that the latter event was attended by high officials from Ministries of Industries, Finance, Commerce, Home Affairs, and other key government institutions, such as Bangladesh Investment Development Authority (BIDA).

In January 2025, the US-based *International Trademark Association (INTA)*, a highly controversial front group known for countering tobacco control measures all over the world, sent a letter addressed to the Finance Advisor of the current Interim Government, opposing several provisions included in the draft amendment. In a different letter, another organization, namely We Are Innovation, run by Global Advocacy Group and closely associated with PMI-funded GAES, also urged the government to consider vaping, e-cigarettes, nicotine pouches and other innovative tobacco products as 'safe alternatives' to traditional tobacco products.

Voice of Vapers (VoV) Bangladesh, official partner of BAT-funded World Vapers Alliance, was also found to be in an overdrive, running petition sign events, press conferences, webinars and Facebook campaigns.

Apart from FSFW President Dr. Derek Yach and Dr. Konstantinos Farsalinos, several other individuals with industry affiliations repeatedly appeared during the reporting period advocating for tobacco harm reduction as a viable policy option for Bangladesh. These include Dr. Delon Human, President of Health Diplomat with long-term connections with multinational tobacco giants; Dr Marewa Glover, one of the known figures of the controversial "harm reduction trio"; and Michael Landl, Director of BAT-funded World Vapers' Alliance (WVA).

Use of Non-Health Ministries to Interfere in Tobacco Control Policies

A widely used tactic in tobacco industry playbook, the reporting period saw BATB, JTI and other industry-affiliation organizations, using non-health ministries and government bodies to interfere in tobacco control policies. On October 2024, with a view to thwarting the amendment process of the tobacco control law, British American Tobacco Bangladesh (BATB) and Japan Tobacco International (JTI) sent letters addressed to the Honorable Advisors of the Ministry of Finance and the Ministry of Law, opposing the amendment proposals put forth by the Ministry of Health and Family Welfare (MoHFW). Copies of the letters have also been sent to the Honorable Advisors of the Ministry of Industries, the Ministry of Labour and Employment,

the Cabinet Secretary, the Senior Secretary of the Ministry of Industries, the Secretary of the Finance Division and the Chairman of the National Board of Revenue (NBR).

Besides, BATB, JTI, Locally Owned Cigarette Manufacturers Association and Bangladesh Bidi Factory Owners' Association also met the NBR Chairman in pre-budget meetings and raised demands for lower taxes, a continuation of previous trend. In addition, ahead of the declaration of national budgets during the reporting period, Bangladesh Bidi Workers' Federation, a controversial front group, continued to hold human chain and protest events demanding lower taxes, similar to previous years.

BATB Abusing Sustainability Issues to Promote Brand Image

As a repetition of previous years, BATB continued to portray itself as a key contributor to the government's efforts to achieve Sustainable Development Goals (SDGs). In 2023, BATB published its second Environmental, Social and Governance (ESG) report, titled "*Roadmap to Sustainability*", where the company claimed that it supports 08 (eight) SDGs integrated across value chain. The reporting period also saw BATB receiving the country's first SDG Brand Champion Awards, launched by Bangladesh Brand Forum (BBF) in association with Aspire to Innovate (a2i), a special program by ICT Division. BATB also continued to organize special CSR events on sustainability-related global occasions, such as World Environment Day and World Water Day.

Vulnerable Government Bodies

The report reveals a number of government bodies to be particularly vulnerable to tobacco industry interference. The National Board of Revenue (NBR) tops the list of such govt. bodies. Other ministries that find themselves as the target of TI interferences are Ministry of Finance (MoF); Ministry of Law, Justice and Parliamentary Affairs; and Bangladesh Labor Welfare Foundation (BLWF). Autonomous professional bodies under the Ministry of Commerce (MinCom), i.e., the Institute of Chartered Accountants of Bangladesh (ICAB), the Institute of Cost and Management Accountants of Bangladesh (ICMAB), and the Institute of Chartered Secretaries of Bangladesh (ICSB) have been particularly vulnerable to TI interferences, working as a gateway for unnecessary interaction between policymakers and the industry.

Some Moves to the Positive

Throughout the reporting period, the government adopted a number of policy moves that strengthened the country's tobacco control measures and bolstered implementation of FCTC Article 5.3. The Ministry of Health and Family Welfare (MoHFW) and the Ministry of Railway formulated "Guidelines for the implementation of FCTC Article 5.3" in March 2025 and in June 2023 respectively for employees of the ministries and subordinate directorates, departments, and agencies. The government also imposed a ban on the import of electronic cigarettes. In June 2024, the Ministry of Environment, Forest and Climate Change issued a circular that enlists 17 categories of single-use plastic, including cigarette filters and thin plastic covers of cigarette packs, as '*hazardous*'.

Summary Findings

Bangladesh scored 69 in the latest Tobacco Industry Interference Index which is slightly lower than the score (72) in the previous index, indicating minor improvement in how the country

deals with tobacco industry interference and safeguards its public policies by advancing the implementation of WHO FCTC.

1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Compared to the previous report, tobacco industry interference and influence in policy development intensified between April 2023 and March 2025. Nearly all incidents of tobacco industry interference were focused on thwarting the Ministry of Health and Family Welfare's initiative to amend the tobacco control law. There has also been a proliferation of third-party involvement incidents, intended to influence the policymakers and mass media, and shift the public support against the draft amendment, particularly against the proposed ban on the manufacturing, import, promotion and marketing of e-cigarettes, vaping and other Electronic Nicotine Delivery Systems (ENDS) products.

For example, Policy Exchange Bangladesh, a non-governmental organization, in collaboration with a renowned national daily, organized a roundtable discussion on the controversial issue of Tobacco Harm Reduction, an event that was attended by influential physicians, government officials and so-called experts affiliated with Philip Morris International (PMI) and PMI-funded Foundation for Smoke-Free World (FSFW) [Rebranding as Global Action to End Smoking (GAES) in May 2024]. Throughout the period, Bangladesh Electronic Nicotine Delivery System Traders Association (BENDSTA) held numerous press conferences and similar events, voicing opposition regarding the proposed ban on ETPs. We are Innovation, another so-called international network of NGOs, also unsolicitedly inserted itself in the debate and pushed industry agenda.

Apart from interference related to amendment of tobacco control law, Bidi industry owners also organized a series of human chains and submitted memorandums to the National Board of Revenue (NBR) demanding a reduction of taxes on bidi during this period.

2. INDUSTRY CSR ACTIVITIES

The number of Corporate Social Responsibility (CSR) events and programs related to tobacco industry decreased during the reporting period, which is a continuation of previous trend. However, British American Tobacco Bangladesh (BATB) held several events under its flagship CSR programs such as *BONAYAN* (sapling distribution) and *PROBAHO* (safe drinking water projects). There has been at least one event where a Member of Parliament (MP) attended inauguration of safe drinking water booths, funded by PROBAHO program. Besides, Bangladesh Sustainability Excellence Awards, launched by CSR Window and a renowned English daily in December 2023, was also found to be carrying British American Tobacco's global company slogan "*A Better Tomorrow*".

3. BENEFITS TO THE INDUSTRY

Compared to the previous Bangladesh TII Index, no substantial progress is visible in this indicator as the score remains the same between April 2023 and March 2025. The legal limbo surrounding graphic health warning (GHW) on the upper half of tobacco packs continued to prevent the lawful implementation of GHW related guidelines. However, in 2023, NBR formed an inquiry committee to investigate the Tk 2,054 crore tax waiver its Large Taxpayer Unit (LTU-VAT) granted to BATB, as the grant allegedly violated the due process of the law.

Bangladesh Export Processing Zone Authority (BEPZA) also inked deal with Prime Leaf Processing Company Ltd. to establish factories in the country's EPZs.

4. UNNECESSARY INTERACTION

As the continuation of previous trend, the current reporting period has seen different non-health government offices partnering with BATB on sustainability issues and showering tobacco companies with accolades. The score for this category has remained the same (09) compared to the previous report.

Autonomous Bodies: Two autonomous professional bodies under the Ministry of Commerce honored BATB on at least two separate occasions during the reporting period. On 01 November 2023, the Institute of Chartered Accountants of Bangladesh (ICAB) awarded BATB for the "Best Presented Annual Report" for the 8th consecutive time. The then Commerce Minister handed over the award. On 04 December 2024, the Institute of Cost and Management Accountants of Bangladesh (ICMAB) awarded "ICMAB Best Corporate Award 2023" to BATB which was handed over to the company by the Finance and Commerce Advisors.

NBR: On 20 December 2023, the National Board of Revenue (NBR) once again awarded the owner of a 'Jarda' company and a multinational tobacco company BAT Bangladesh as top taxpayers.

Partnership: BATB's previous partnership with the Department of Agriculture Extension continued throughout the report period. In addition, the Ministry of Industries (MoInd) partnered with BATB in a project to develop a "*sustainable model for sugarcane cultivation*".

5. TRANSPARENCY

Like previous years, the government maintained a policy of not disclosing meetings/ interactions with the tobacco industry. Rules for the disclosure or registration of tobacco industry entities, affiliated organizations/ individuals/ lobbyists also do not exist. Besides, NBR continued to conduct pre-budget meetings with BATB, Japan Tobacco International (JTI), Bangladesh Cigarette Manufacturers' Association (BCMA) and Bidi Industry Owners' Association (BIOA) during the reporting period where the company raised demands not to increase taxes on tobacco products.

6. CONFLICT OF INTEREST

Compared to the previous Bangladesh TII Index, no substantial progress is visible in this indicator as the score remains the same between April 2023 and March 2025. The government continued to hold investment in BATB, which is now 9.17% as of 30 April 2025. A number of current and former high government officials served as Independent and Non-Executive Directors of BATB.

7. PREVENTIVE MEASURES

Compared to previous report, this indicator has seen significant improvement as the Ministry of Health and Family Welfare (MoHFW) and the Ministry of Railway formulated a "*Guidelines for the implementation of FCTC Article 5.3*" for the employees of both ministries and subordinate directorates, departments, and agencies. These guidelines are in accordance

with Article 5.3 of the World Health Organization's Framework Convention on Tobacco Control (WHO FCTC). The government continued to require the tobacco industry to submit monthly revenue statements and monthly statements of health surcharge deposit.

However, the government did not have a comprehensive policy prohibiting all government officials from accepting contributions or gifts from the tobacco industry. There was not any policy in place to prohibit contributions from the tobacco industry. However, in general, election candidates required disclosing contributions received to bear election expense at the time of submitting nomination paper, according to section 44A of the Representation of the People Order, 1972.

Recommendations

- Expedite finalization of draft amendment of the Smoking and Tobacco Products Usage (Control) (Amendment) while keeping the process free of undue interference and influence of tobacco industry.
- Similar to the recent initiatives taken by the Ministry of Health and Family Welfare and the Ministry of Railway, the government should formulate a comprehensive FCTC Article 5.3 Guidelines for all its ministries and subordinate offices and should also undertake awareness raising of non-health sectors (particularly as Finance Ministry, Industries Ministry and Commerce Ministry) on Article 5.3 obligations.
- Bar the entry of new foreign and local tobacco companies and related investment into Bangladesh. Also deny the establishment of new tobacco related factories in the country's Special Economic Zones (SEZs) and Export Processing Zones (EPZs).
- Exclude cigarettes from the list of essential commodities by amending the Essential Commodity Act 1956.
- Divest investment from tobacco companies. To prevent conflict of interest, government officials must terminate their positions in tobacco companies.
- Formulate and implement a simple tobacco price and tax policy in line with the WHO FCTC Article 6 in order to reduce the demand for tobacco.

Bangladesh

Tobacco Industry Interference Index 2025

Results and Findings

INDICATORS	0	1	2	3	4	5
Level of Industry Participation in Policy-Development						
1. The government ² 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 , in setting or implementing public health policies in relation to tobacco control ³ (Rec 3.4)						4
<ul style="list-style-type: none">On 27 May 2023, in an effort to oppose the proposed ban on e-cigarettes and vape products in the draft amendment to the tobacco control law, the Asia Harm Reduction Alliance (AsHRA) and Voice of Vapers Bangladesh (VoV) jointly organized a THR summit.⁴ In the next day on 28 May 2023, Asia Harm Reduction Alliance (AHRA) also organized a roundtable discussion in association with a daily newspaper.⁵ These events were coordinated by grantees and representatives of the Foundation for a Smoke-Free World (FSFW), an organization widely recognized as a front group funded by Philip Morris International (PMI). Representatives from several government agencies attended, and the events received broad media coverage. At the same time, the group published a special supplement⁶ in the national newspaper, misrepresenting the anti-vaping positions of international bodies, including the World Health Organization (WHO), which raises serious concerns.⁷In May 2024, Policy Exchange Bangladesh, a non-governmental organization, in collaboration with a renowned national daily, hosted a roundtable discussion themed "Policy for Progress: Towards Harm Reduction." At this event, the organization voiced to the suggested prohibition of e-cigarettes and vaping within the draft amendments to the tobacco control law, advocating instead for the government to develop specific policies for electronic cigarettes. A number of participants in the event are deeply involved with Philip Morris International (PMI) and previously participated in numerous forums sponsored by the PMI-funded Foundation for Smoke-Free World (FSFW). Following this, a letter was sent to the Health Services Division, urging consideration of arguments put forth by BATB. As of March 2025, no response had been received from the government.^{8,9}On October 2024, with a view to thwarting the amendment process of the tobacco control law, British American Tobacco Bangladesh (BATB) and Japan Tobacco International (JTI) have sent letters addressed to the Honorable Advisors of the Ministry of Finance and the Ministry of Law, opposing the amendment proposals put forth by the Ministry of Health and Family Welfare (MoHFW). Copies of the letters have also been sent to the Honorable Advisors of the Ministry of Industries, the Ministry of Labour and Employment, the Cabinet Secretary, the Senior Secretary of						

² 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

³ "Offer of assistance" may include draft legislation, technical input, recommendations, overseas study tour

⁴ Experts for developing framework on tobacco harm reduction, Dhaka Tribune, 28 May 2023,

<https://tinyurl.com/4vjb54fs> [Accessed on 05 July 2025]

⁵ Roundtable participants: THR Framework key in achieving smoke-free Bangladesh, Dhaka Tribune, 28 May 2023, <https://tinyurl.com/3v9y7y> [Accessed on 05 July 2025]

⁶ THR Supplement, Dhaka Tribune, 31 May 2023, <https://tinyurl.com/5fmhj2ya> [Accessed on 05 July 2025]

⁷ Tobacco cos blamed for working against law, promoting e-cig, Bangladesh Post, 29 May 2023
<https://tinyurl.com/3rbvrj93>, [Accessed on 10 March 2025]

⁸ BATB sent a letter to oppose amendment to Tobacco Control law, Daily Janakantha, 18 September 2022
<https://tinyurl.com/mtbavw3r>, [Accessed on 10 March 2025]

⁹, NBR wrote a letter to the Health Services Division, RisingBD, 10 January 2023 <https://tinyurl.com/23dk2cn2>, [Accessed on 10 March 2025]

INDICATORS**0 1 2 3 4 5**

the Ministry of Industries, the Secretary of the Finance Division and the Chairman of the National Board of Revenue (NBR). However, the government did not any response as of March 2025.¹⁰

- On 25 October 2024, Bangladesh Electronic Nicotine Delivery System Traders Association (BENDSTA), Voice of Vapers Bangladesh (VoV), and Consumer Rights of Sales Alternatives (CoRSA) organized a human chain in Chattogram, demanding the reversal of the proposed ban on vaping products included in the draft amendment of the tobacco control law. However, the government did not any response as of March 2025.¹¹
- On 27 October 2024, Bangladesh Electronic Nicotine Delivery System Traders Association (BENDSTA) held a press conference opposing the proposed ban on e-cigarettes and vaping products. The association urged the government to introduce sensible regulations that support harm reduction instead. However, the government did not any response as of March 2025.¹²
- On 18 December, 2024, the Bangladesh Electronic Nicotine Delivery System Traders Association (BENDSTA) conveyed significant apprehension regarding the government's directive to halt the import of e-cigarettes and ENDS, which effectively constitutes a ban within Bangladesh. BENDSTA asserted that this decision would eliminate potentially less harmful alternatives for adult smokers.¹³
- In 2021, the Ministry of Health and Family Welfare (MoHFW) has initiated an amendment to the tobacco control law, which includes a comprehensive ban on the production, marketing, and import of e-cigarettes and vaping products.¹⁴ However, the amendment proposal remains under review by the Advisory Committee, which is tasked with examining the draft amendment to the Smoking and Tobacco Products Usage (Control) Ordinance, 2024.¹⁵ In the meantime, on 01 January 2025, the Ministry of Commerce issued a gazette notification—effective immediately—prohibiting only the **import** of all e-cigarettes and Electronic Nicotine Delivery Systems (ENDS) products.^{16,17}
- On 31 January 2025, the International Trademark Association (INTA) submitted formal comments to the Chief Adviser and Finance Adviser of Bangladesh, raising concerns over proposed branding and packaging restrictions in the Smoking and Tobacco Products Usage (Control) Ordinance, 2024. INTA strongly opposed potential measures such as plain packaging or restrictions on trademark use for tobacco products. Instead, INTA urged Bangladesh to consider less restrictive, evidence-based alternatives to reduce tobacco use while preserving brand rights. However, the government did not any response as of March 2025.¹⁸

¹⁰ BATB and JTI have sent letters addressed to the Honorable Advisors, bdnews24.com, 30 October 2024, <https://tinyurl.com/ua8ka692> . [Accessed on 13 March 2025].

¹¹ Consumers want rational policies on tobacco harm reduction products, Daily Notun Somoy, <https://tinyurl.com/2s3jex6d> [Accessed on 13 March 2025].

¹² BENDSTA urges sensible regulations to support harm reduction products, Daily Star, 27 October 2024, <https://tinyurl.com/95knp86c>, [Accessed on 13 March 2025].

¹³ BENDSTA calls for evidence-based review on e-cigarette import ban, Daily Sun, 04 January 2025, <https://tinyurl.com/5apusuj8>, [Accessed on 13 March 2025].

¹⁴ Govt looks to ban e-cigarettes to prevent catastrophe, Dhaka Tribune, 18 July 2023, <https://www.dhakatribune.com/bangladesh/320563/govt-looks-to-ban-e-cigarettes-to-prevent>, [Accessed on 07 July 2025].

¹⁵ Govt plans to raise high-end cigarette prices to curb consumption, The Business Standard, 24 March 2025, <https://www.tbsnews.net/bangladesh/govt-plans-raise-high-end-cigarette-prices-curb-consumption-1100236> [Accessed on 07 July 2025].

¹⁶ Gazette notification, Ministry of Commerce, 01 January 2025, https://www.dpp.gov.bd/upload_file/gazettes/56596_41334.pdf, [Accessed on 07 July 2025].

¹⁷ E-cigarette imports banned, The Daily Financial Express, 08 January 2025 <https://today.thefinancialexpress.com.bd/last-page/e-cigarette-imports-banned-1736275134>

¹⁸ INTA's Letter to the Bangladesh government regarding the Smoking and Tobacco Products Usage (Control) Ordinance, 2024, International Trade Association (INTA), 31 January 2025, <https://tinyurl.com/mvtss4u> , [Accessed on 13 March 2025].

INDICATORS	0	1	2	3	4	5
<ul style="list-style-type: none"> On 16 February 2025, an open letter, namely We Are Innovation, run by Global Advocacy Group, has also urged the government to adopt a science-based tobacco control policy. The letter suggested that Bangladesh consider vaping, e-cigarettes, nicotine pouches and other innovative tobacco products as alternatives to traditional tobacco products. It should be noted that We Are Innovation is closely associated with Philip Morris International (PMI) funded Global Action to End Smoking (GAES).^{19,20,21} 						
2. The government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. (Rec 3.4)			2			
<ul style="list-style-type: none"> On 07 May 2023, bidi workers in different parts of the country organized human chain under various banners, demanding a reduction in taxes on bidi and related products. Also submitted memoranda addressed to the Prime Minister through the respective Deputy Commissioners. However, the government did not reduce bidi taxes as of June 2023.²² On 18 March 2024, bidi worker's federation organized human chains and submitted memorandums to the Chairman of the National Board of Revenue (NBR) demanding tax benefits. However, the government did not accommodate their demand in the Budget FY 2024-25. Subsequently, in January 2025, while the government initiated a move to increase taxes on cigarettes, it did not implement any tax or price increases for bidis.²³ On 22 April 2024, the Pabna Bidi Majdur Union (Pabna Bidi Factory Laborers' Association) submitted a memorandum to the Prime Minister through the district's Deputy Commissioner, demanding the withdrawal of taxes on bidis. However, the government did not withdraw bidi taxes in the FY 2024–25 budget announced in June 2024. Moreover, in January 2025—midway of the fiscal year—the government initiated a move to increase taxes on cigarettes, but no tax or price hikes were implemented for bidis.²⁴ On 28 December 2024, Following the latest announcement from the Ministry of Commerce which has incorporated vaping and e-cigarettes in the list of prohibited items in the Import Policy, Bangladesh Electronic Nicotine Delivery System Traders Association (BENDSTA) has expressed its utter discontent with such a decision and a memorandum to the Chief Advisor against the ban on the import of e-cigarettes.²⁵ 						
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)	1					
1 Never 5 Yes						
<ul style="list-style-type: none"> The government has not invited the tobacco industry or its representatives 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	1					

¹⁹ Harnessing Innovation for a Smoke-Free Bangladesh: An Open Letter on Policy Opportunities, We Are Innovation, February 2025, <https://tinyurl.com/385uphdb>, [Accessed on 09 March 2025]

²⁰ Global advocacy group calls for evidence-based tobacco regulation in Bangladesh, The Daily Financial Express, 17 February 2025, <https://tinyurl.com/2s3pfh6p>, [Accessed on 25 February 2025]

²¹ Global Forum on Nicotine 2022, TobaccoTactics, 20 March 2025, <https://tinyurl.com/29sk4srz>, [Accessed on 25 February 2025]

²² Bidi workers hold human chain, demand fair price, lower tariff; The Daily Observer, 08 May 2023, <https://tinyurl.com/yuyjsyak>, [Accessed on 13 March 2025]

²³ Bidi workers forms Human chain in National Press Club, Daily Messenger, 18 March 2024, <https://tinyurl.com/5frm7tr6>, [Accessed on 17 March 2025]

²⁴ Bidi workers demand withdrawal of taxes; The Daily Observer, 23 April 2024, <https://tinyurl.com/2h68yx4d>, [Accessed on 13 March 2025]

²⁵ Memorandum to the Chief Advisor against the ban on the import of e-cigarettes, Barta24.com, 28 December 2024, <https://tinyurl.com/y7nrkxap>, [Accessed on 02 February 2025]

INDICATORS	0	1	2	3	4	5
subsidiary bodies or accepts their sponsorship for delegates. (i.e. COP 4 & 5, INB 4 5, WG) ²⁶ (Rec 4.9 & 8.3)						
<ul style="list-style-type: none"> There was no tobacco industry representative in the government delegation to the COP in previous years, or to COP10 session in 2023.²⁷ 						
Tobacco related 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. (Rec 6.2)</p> <p>B. The government (its agencies and officials) receives CSR contributions²⁸ (monetary or otherwise, including CSR contributions) from the tobacco industry or from those working to further its interests (eg political, social, financial, educational, community or other contributions (Rec 6.4) including environmental or EPR activities (COP10 Dec).</p> <p><i>NOTE: exclude enforcement activities as this is covered in another question</i></p>						5
TI CSR Activities at National Level:						
<ul style="list-style-type: none"> On 06 June 2024, British American Tobacco Bangladesh (BATB) launched a sapling distribution campaign as part of its annual 'Bonayan' afforestation program on the occasion of World Environment Day 2024. The program aims to mask the extensive deforestation caused by BATB for tobacco processing and to greenwash the company's public image.²⁹ Bangladesh Labour Welfare Foundation (BLWF) received BDT 18.54 Crore donation from BATB. Executives of BATB handed the cheque over to the State Minister for Labour and Employment.³⁰ On 05 December 2023, two organizations handed over the 'Bangladesh Sustainability Excellence Awards 2023' using BATB's global slogan 'A Better Tomorrow'. Such branding indirectly promoted e-cigarettes and vaping products at a time when the government was preparing to ban these harmful products, raising concerns over CSR misuse for product marketing.³¹ 						
TI CSR at Regional Level:						
<ul style="list-style-type: none"> On 22 August 2023, under the banner of 'Probaho', a British American Tobacco Bangladesh (BATB) funded CSR initiative, several safe drinking water booths were inaugurated in Koyra, Khulna. A Member of Parliament (MP) attended the ceremony as the chief guest.³² In March 2025, stepping into its 16th year, PROBAHO, British American Tobacco Bangladesh (BATB) has taken full advantage of the World Water Day as the company used the occasion to 						

²⁶ Please annex a list since 2009 so that the respondent can quantify the frequency,

<http://www.who.int/fctc/cop/en/>

²⁷ WHO FCTC. List of participants, <https://tinyurl.com/3kmvij2kk>, [Accessed on 22 January 2025]

²⁸ Political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

²⁹ Bonayan to distribute 5 million saplings for World Environment Day, United News of Bangladesh (UNB), 5 June 2024, <https://tinyurl.com/57erkxtv>, Accessed on 07 February 2025]

³⁰ Annual Report 2024, BAT Bangladesh, <https://tinyurl.com/3hxri76k>, [page 213: see BATB donated to Bangladesh Labour Welfare Foundation (BLWF)], [Accessed on 07 February 2025].

³¹ Bangladesh Sustainability Excellence Awards 2023 recognizes 6 corporations, 3 individuals, Dhaka Tribune, 5 December 2023, <https://tinyurl.com/2d47we7u>, [Accessed on 07 February 2025]

³² 'Probaho', a British American Tobacco Bangladesh (BATB) funded CSR initiative, Probaho Facebook Page, posted on 22 August 2023, <https://tinyurl.com/yar9xysv>, [Accessed on 13 March 2025]

INDICATORS	0	1	2	3	4	5
promote its CSR program 'Probaho'. Two new water filtration plants were inaugurated in Satkhira's Alipur and Gabura under the PROBAHO initiative. ³³						
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)						4
<ul style="list-style-type: none"> The lawful implementation of pictorial health warnings (PHW) on upper half of tobacco packs has been delayed since the High Court postponed the government order dated July 4, 2017, following the further review petition by Bangladesh Cigarette Manufacturers' Association. Implementation of PHW remains in the lower half of tobacco packs to this date. 						
7. The government gives privileges, incentives, tax exemptions, subsidies, financial incentives, or benefits to the tobacco industry (Rec 7.3, par 28)						5
<ul style="list-style-type: none"> Bangladesh customs continued to allow international travelers to bring 200 sticks of cigarettes or 50 cigars or 225 gm of tobacco without any duty or tax into the country.³⁴ On 02 January 2025, Bangladesh Export Processing Zone Authority (BEPZA) has inked a deal with Prime Leaf Processing Company Ltd (a joint venture between entities from Singapore, the UAE, and India) which is going to establish factories in the country's EPZs. Bepza Executive Chairman along with senior officials and representatives of the company, were present during the signing ceremony.³⁵ According to a media report on 05 September 2023, the National Board of Revenue (NBR) has formed a six-member committee to inquire into the Tk2,054 crore tax waiver granted to British American Tobacco Bangladesh Company (BATBC) by the large taxpayer's unit (LTU-VAT). Process of law was not followed when LTU-VAT on 19 August 2021 granted the tax waiver.³⁶ The tax waiver continued despite the investigations. 						
Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister ³⁷) 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
<ul style="list-style-type: none"> On 22 May 2023, the Association for Community Empowerment (ACE), the UK-based Centre for Substance Use Research (CSUR), and Enam Medical College continued their promotion of a so-called research protocol on harm reduction of smoking among diabetic patients in Bangladesh. This was an FSFW-funded initiative. These promotional campaigns, backed by tobacco industry funding, were conducted at a time when the Ministry of Health and Family Welfare (MoHFW) had undertaken an initiative to ban e-cigarettes and vaping through an amendment of the tobacco control law.³⁸ On 15 July 2023, the Bangladesh Blind Mission (BBM) organized a journalists' workshop on so-called harm reduction in smoking. The event was funded by the Foundation for a Smoke-free World 						

³³ Probaho marks 16 years of providing clean water to crisis-hit areas, The Daily Business Standard, 22 March 2025, <https://tinyurl.com/ydyzk7ca>, [Accessed on 17 March 2025]

³⁴ Bangladesh Customs. Tourist Duty Free Allowance, <https://tinyurl.com/4wyd6fxy>, [Accessed on 24 March 2025]

³⁵ Tobacco Companies Investing in Economic Zones, The Daily Business Standard, 02 January 2025, <https://tinyurl.com/y57jm42>, [Accessed on 07 February 2025]

³⁶ NBR forms committee to inquire into Tk2,054cr tax waiver to BAT, The Business Standard, 05 September 2023, <https://tinyurl.com/4fbyn5sf>, [Accessed on 24 March 2025]

³⁷ include immediate members of the families of the high-level officials

³⁸ Tobacco industry accused of promoting E-cigarettes in the name of study, bdnews24.com, 25 May 2023, <https://tinyurl.com/ms45z43p>, [Accessed on 20 January 2025]

INDICATORS	0	1	2	3	4	5
(FSFW), a Philip Morris International (PMI) sponsored front group. BBM has held similar workshops multiple times, consistently pushing the same narrative. ³⁹⁴⁰						
<ul style="list-style-type: none"> On 24 May 2023, 'Bonayon', the so-called afforestation initiative of British American Tobacco Bangladesh (BATB), was awarded the 'SDG Brand Champion Awards 2023'. Alarmingly, UNDP, the ICT Division, the Cabinet Division, and the a2i project of the Government of Bangladesh (GoB) were involved in bestowing this recognition upon a tobacco company.⁴¹ The jury board included the Former Principal Coordinator (SDGs from the Prime Minister's Office. On 21 September 2023, BATB organized a so-called job fair at a public university, setting up a flashy booth with the message "BAT Bangladesh is here now. Drop your CV." The initiative was clearly designed to normalize the presence of the tobacco industry among students and young jobseekers.⁴² On 01 November 2023, the Institute of Chartered Accountants of Bangladesh (ICAB), under the Ministry of Commerce, awarded British American Tobacco Bangladesh (BATB) the "Best Presented Annual Report" for the 8th time. The commerce minister handed over the award, providing undue legitimacy to a company responsible for severe health consequences.⁴³ On 20 December 2023, the National Board of Revenue (NBR) once again awarded the owner of a 'jarda' company and a multinational tobacco company BAT Bangladesh as top taxpayers.^{44, 45} On 04 December 2024, the Institute of Cost and Management Accountants of Bangladesh (ICMAB) awarded "ICMAB Best Corporate Award 2023" to British American Tobacco Bangladesh (BATB). The Finance and Commerce Advisors handed over the award.⁴⁶ On 28 November 2024, BATB's Battle of Minds Grand Finale 2024 was attended by Vice Chancellor, University of Dhaka as the Chief Guest of its Battle of Mind 2020 Grand Finale event.⁴⁷ 						
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)	0					
<ul style="list-style-type: none"> No such instance was found in public domain. 						

³⁹ BBM organized a journalists' workshop on so-called harm reduction in smoking; Daily Amar Barta, 15 July 2023, <https://tinyurl.com/mrhfjh6p> [Accessed on 20 January 2025]

⁴⁰ BBM organized a journalists' workshop on so-called harm reduction in smoking, abcnewsonline24.com, 26 September 2024, <https://tinyurl.com/6azutbkr>, [Accessed on 20 January 2025]

⁴¹ SDG Brand Champion Awards celebrates remarkable sustainable development efforts of private sector, The Daily Business Standard, 27 May 2023, <https://tinyurl.com/4nhx8s4u> [Accessed on 20 January 2025]

⁴² Finance Fest 2023, Jahangirnagar University, BATB organized a so-called job fair at a public university. <https://tinyurl.com/ya6mtezf>, [Accessed on 20 January 2025]

⁴³ BAT Bangladesh wins ICAB National Awards; Daily Bangladesh Post, 01 November 2023, <https://tinyurl.com/ykfz7djs>, [Accessed on 20 January 2025]

⁴⁴ Smokeless Tobacco Company Awarded, Daily Asian Age, 21 December 2023, <https://dailiasianage.com/news/317259/tax-cards-awarded-to-141-individuals-and-organizations> [Accessed on 20 January 2025]

⁴⁵ BAT Bangladesh honoured as one of top taxpayers for 10th consecutive year, Daily Star, 24 December 2023, <https://tinyurl.com/mw48k5v6>, [Accessed on 20 January 2025]

⁴⁶ ICMAB honoured BATB Best Corporate Award 2023, Dhaka Tribune, 04 December 2024, <https://www.dhakatribune.com/business/367115/bat-bangladesh-awarded-for-corporate-governance> [Accessed on 20 January 2025]

⁴⁷ Battle of minds BUP team secures victory, The Daily Business Standard, 01 December 2024, <https://tinyurl.com/5yn4bhyb>, [Accessed on 20 January 2025]

INDICATORS	0	1	2	3	4	5
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 not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>					4	
<ul style="list-style-type: none"> Department of Agricultural Extension (DAE)'s collaboration with BATB continued to support farmers for better crop protection practices. Also, collaboration aligns with their commitment to advancing agricultural sustainability.⁴⁸ The Ministry of Industries (Molnd) partnered with BATB in a project to develop a "sustainable model for sugarcane cultivation". In a report, Bangladesh Sugar & Food Industries Corporation (BSFIC) chairman said, sugar production will increase in the next two years with the assistance of British American Tobacco (BAT) in providing high-yielding sugarcane seeds. In addition, evidence of BATB's involvement was found in BSFIC annual report for the fiscal year 2023-24.^{49,50} 						
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)					4	
<ul style="list-style-type: none"> On 05 March 2024, British American Tobacco Bangladesh (BATB), Japan Tobacco, Locally Owned Cigarette Manufacturers Association, and Bangladesh Bidi Factory Owners' Association raised their demands for the FY 2024-25 national budget during a pre-budget meeting with the National Board of Revenue (NBR). These entities also presented misleading information and arguments to support their demands, which were later publicized in the media.⁵¹ On 04 April 2024, the Locally-Owned Cigarette Manufacturers' Association urged the government to keep low-tier cigarette tax rates and prices unchanged, and to reserve 100% of the low-tier cigarette market for local companies. These demands were voiced in a meeting attended by the Finance Minister, State Minister for Finance, and NBR Chairman, where misleading statistics were also presented.⁵² On 19 March 2025, British American Tobacco Bangladesh (BATB), Japan Tobacco International (JTI), Locally Owned Cigarette Manufacturers' Association and Bangladesh Bidi Factory Owners' Association met the National Board of Revenue (NBR) in a pre-budget discussion for upcoming FY 2025-26 where these companies and trade bodies raised their own demands.⁵³ 						
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
<ul style="list-style-type: none"> Rules for the disclosure or registration of tobacco industry entities, affiliated organizations/ individuals/ lobbyists do not exist. 						

⁴⁸ Annual Report 2024, BAT Bangladesh, (page 69, 190, 191), <https://tinyurl.com/3hxri76k>, [Accessed on 15 January 2025]

⁴⁹ BATB has partnered with the Ministry of Industries (Molnd) in a project to develop a sustainable model for sugarcane cultivation, Daily Star, 07 May 2023, <https://tinyurl.com/4ncmwy8x>, [Accessed on 15 January 2025]

⁵⁰ BFSIC Annual Report 2023-2024, BATB has partnered with the Ministry of Industries (Molnd) in a project to develop a sustainable model for sugarcane cultivation, <https://tinyurl.com/4z4hhr4p>, [Accessed on 15 January 2025]

⁵¹ NBR holds pre-budget meeting with Bidi Industry Owners Association, Newszonebd, 05 March 2024, <https://tinyurl.com/4n74vw33>, [Accessed on 16 February November 2025]

⁵² Demand for low reserve only for domestic company cigarettes, Banglavision online, 04 April 2024, <https://tinyurl.com/bdfx89sw>, [Accessed on 16 February 2025]

⁵³ Cigarette price won't increase in budget: NBR, Daily Asian Age, 19 March 2025, <https://tinyurl.com/3evtrjw8>, [Accessed on 16 February 2025]

INDICATORS	0	1	2	3	4	5
Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11) 1 Never 5 Yes						5
<ul style="list-style-type: none"> In continuation of previous years, the government continued to hold investment in BATB, which is now 9.17%.⁵⁴ There was not any policy in place to prohibit contributions from the tobacco industry. However, generally, election candidates are required to disclose contributions received to bear election expense at the time of submitting nomination paper, according to section 44A of the Representation of the People Order, 1972.⁵⁵ 						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)						4
<ul style="list-style-type: none"> According to the BAT Annual Report 2023, Mr. K. H. Masud Siddiqui, former Secretary of the Ministry of Industries under the Government of Bangladesh, served as an Independent Director of BAT Bangladesh (BATB). However, the current BAT Bangladesh website does not list any former government officials as part of its board of directors.⁵⁶ 						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)						4
<ul style="list-style-type: none"> According to the BATB website, as of 04 May 2025, the Additional Secretary of the Ministry of Finance held positions as Non-Executive Directors.⁵⁷ Ms. Zakia Sultana, Senior Secretary, Ministry of Industries, appointed to BATB Board in 2021 when she was Senior Secretary.⁵⁸ 						
Preventive Measures						
SCORING for this section: 1. Yes, 2. Yes but partial only, 3. Policy/ Program being developed 4. Committed to develop such a policy/ program 5. None						
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
<ul style="list-style-type: none"> There is no procedure in place for disclosing the records of the interaction with tobacco industry specifically. However, there is a provision under the Right to Information Act, 2009 to get information by submitting an application. This places an unnecessary burden on citizens to use this process to obtain the information which otherwise should be made available to the public under Article 5.3 guidelines. 						
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. <i>Yes – for whole of government code; Yes but partial if only MOH</i> (Rec 4.2)				2		
<ul style="list-style-type: none"> The Ministry of Health and Family Welfare (MoHFW) has formulated the "Guidelines for the Implementation of FCTC Article 5.3," which came into effect on 06 March 2025. These guidelines apply to all employees of the MoHFW and its subordinate directorates, departments, and agencies. They are aligned with Article 5.3 of the World Health Organization's Framework Convention on Tobacco Control (WHO FCTC). The Health Services Division of the MoHFW has 						

⁵⁴ BAT Bangladesh website, shareholding position, <https://tinyurl.com/4ed2c5kt>, [Accessed on 27 March 2025]

⁵⁵ The Representation of the People Order, 1972 (President's Order) (PRESIDENT'S ORDER NO. 155 OF 1972), <https://tinyurl.com/77nk3v7m>, [Accessed on 27 March 2025]

⁵⁶ BAT Bangladesh Annual Report 2023, <https://tinyurl.com/8snvrmji>, [Accessed on 12 March 2025]

⁵⁷ BAT Bangladesh: Profile of the Director, <https://tinyurl.com/58txx7bu>, [Accessed on 12 March 2025]

⁵⁸ BAT Bangladesh: Profile of the Director, <https://tinyurl.com/58txx7bu>, [Accessed on 07 July 2025]

INDICATORS	0	1	2	3	4	5
been designated as the responsible authority for implementing the guidelines. The guidelines have been formally approved by the Honourable Advisor to the MoHFW. ⁵⁹						
<ul style="list-style-type: none"> The Ministry of Railway has formulated a " Guidelines for the implementation of FCTC Article 5.3 " on 12 June 2023 for employees and its subordinate directorates and departments. These guidelines are in accordance with Article 5.3 of the World Health Organization's Framework Convention on Tobacco Control (WHO FCTC).⁶⁰ 						
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 TAPS activities such as CSR or EPR (COP10), as well as on tobacco industry entities, affiliated organizations and individuals acting on their behalf, and tobacco industry funded groups and their research and marketing activities, (Rec 5.2, 5.3, and COP9 and 10 Decision)			2			
<ul style="list-style-type: none"> The government required the tobacco industry to submit monthly revenue statements (company wise) only. These statements were provided since it was a requirement as per the form KHA and GA of National Board of Revenue.⁶¹ In addition, tobacco companies had to submit monthly statements of health surcharge deposit, according to the form attached with the "Health Development Surcharge (Collection and Payment) Rules 2017".⁶² However, the tobacco companies are not required to submit information on their market share, marketing expenditures, revenues, philanthropy and political contributions. In July 2024, Bangladesh has categorized cigarette filters and thin plastic covers of cigarette packs as 'Single-Use Plastic' (SUP). A time-fitting move, the Ministry of Environment, Forest and Climate Change has issued a circular that enlists 17 categories of single-use plastic that pose a grave threat to the environment. However, in November 2024, during a roundtable organized by Policy Exchange Bangladesh, several multinational companies (MNCs) voiced concerns about the government's sudden implementation of the SUP ban, citing a lack of prior consultation with stakeholders. Note that Policy Exchange Bangladesh had previously hosted another roundtable titled "Policy for Progress: Towards Harm Reduction", which included participants closely linked to Philip Morris International (PMI). Many of these individuals have also been involved in multiple forums backed by the PMI-funded Foundation for a Smoke-Free World (FSFW).^{63, 64, 65} 						
19. The government has a program / system/ plan to consistently ⁶⁶ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5

⁵⁹ Ministry of Health and Family Welfare (MoHFW) guidelines for the implementation of FCTC Article 5.3, MoHFW, 06 March 2025, <https://tinyurl.com/yc2k458a>, [Accessed on 18 February 2025]

⁶⁰ Ministry of Railway's guidelines for the implementation of FCTC Article 5.3, Ministry of Railway, 12 June 2023 <https://tinyurl.com/9kh7nji8> [Accessed on 05 July 2025]

⁶¹ General Order. National Board of Revenue (NBR), <https://tinyurl.com/28xrcue>, [Accessed on 19 January 2025]

⁶² Health Development Surcharge (Collection and Payment) Rules 2017, National Board of Revenue (NBR), <https://tinyurl.com/2py3cup4>, [Accessed on 19 January 2025]

⁶³ 17 single-use plastic items categorised hazardous, The Financial Express, 11 July 2024 <https://tinyurl.com/yc2xp2wj>, [Accessed on 18 February 2025]

⁶⁴ Gazette notification listing items of single-use plastics, <https://tinyurl.com/575edfma>, [Accessed on 18 February 2025]

⁶⁵ Single-use plastic ban worries MNCs, The Financial Express, 29 November 2024 <https://tinyurl.com/4xsh8udz> , [Accessed on 18 February 2025]

⁶⁶ 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.

INDICATORS	0	1	2	3	4	5
<ul style="list-style-type: none"> The National Tobacco Control Cell (NTCC) of Ministry of Health and Family Welfare (MoHFW) did not develop any program/ system/ plan to raise awareness on FCTC Article 5.3 guidelines during the report period. 						
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. (Rec 3.4)			2			
<ul style="list-style-type: none"> The government did not have a comprehensive policy prohibiting all officials from accepting contributions or gifts from the tobacco industry. However, the Ministry of Railway (MoR) in June 2023 and the Ministry of Health and Family Welfare (MoHFW) in March 2025 introduced "Guidelines for the Implementation of FCTC Article 5.3," which ban such acceptance by their staffs and departments. Additionally, existing general orders and anti-corruption laws are in place and should be applicable across all government bodies.^{67,68} 						
TOTAL						69

⁶⁷ Guidelines for the implementation of FCTC Article 5.3, <https://tinyurl.com/yc2k458a>, [Accessed on 18 February 2025]

⁶⁸ Ministry of Railway's guidelines for the implementation of FCTC Article 5.3, Ministry of Railway, 12 June 2023, <https://tinyurl.com/9kh7nij8> [Accessed on 05 July 2025]