

**Slovenia**

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**TOBACCO  
INDUSTRY INTERFERENCE  
INDEX 2025**

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Slovensko združenje za kronične nenalezljive bolezni

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SLOVENIA

Nacionalni inštitut za javno zdravje (NIJZ)



Slovensko združenje  
za kronične nenalezljive  
bolezni



Nacionalni inštitut  
za **javno zdravje**

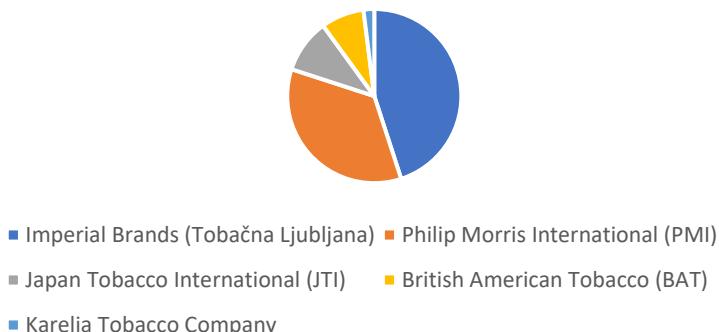
## Background and Introduction

The Tobacco Industry Interference Index plays a critical role in supporting Slovenia's efforts to strengthen tobacco control by monitoring and exposing industry tactics that hinder public health progress. As a Party to the WHO Framework Convention on Tobacco Control (FCTC), Slovenia is committed to implementing Article 5.3 and ensuring that public health policies are protected from commercial and vested interests of the tobacco industry. The Index serves as a key accountability tool that not only informs national advocacy but also aligns Slovenia's practices with global standards.

Tobacco use continues to impose a significant burden on Slovenia's public health system and economy. According to recent data, approximately 20% of the adult population are smokers, contributing to more than 3,000 tobacco-related deaths annually. The economic impact, including healthcare costs and productivity losses, is estimated to reach hundreds of millions of euros each year. Tobacco-related diseases remain among the leading causes of preventable mortality in the country.

Slovenia's tobacco market is primarily dominated by transnational corporations. Philip Morris International (PMI), through its local subsidiary Tobačna Ljubljana, holds a significant share of the market, followed by British American Tobacco (BAT). Other smaller players also operate in the market, but the two major firms account for the majority of sales. A pie chart representing the market share will be provided below to illustrate the competitive landscape.

Market Share



For the 2025 Index, a key focus is on transparency and unnecessary interactions between public officials and the tobacco industry, particularly in areas related to emerging products such as heated tobacco and electronic nicotine delivery systems (ENDS). The growing influence of these products presents new challenges that require vigilant monitoring and stronger policy safeguards.

As this is Slovenia's first participation in the Index, this report provides a baseline assessment of the country's performance in resisting tobacco industry interference. This first entry into the Index will serve as a benchmark against which future improvements or regressions can be measured. It will also guide stakeholders in identifying priority areas for advocacy and reform.

## **Methodology**

The 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 to 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. Where multiple pieces of evidence are found, the score applied reflects an average.

The report covers information on incidents from April 2023 up to March 2025, but also includes incidents prior to 2023 that still have relevance today.

# Summary of Findings

## I INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

### Question 1:

**The government<sup>1</sup> 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.<sup>2</sup> in setting or implementing public health policies in relation to tobacco control<sup>3</sup> (Rec 3.4)**

Evidence shows that Slovenia's law-making process has been susceptible to tobacco industry influence even without formal agreements. For example, Transparency Slovenia found that a major tobacco company clandestinely financed an NGO involved in drafting a 2019 tobacco control bill, creating a risk that decision-makers were unaware of hidden industry interests.<sup>4</sup> The same analysis noted "risks that powerful interest groups...exploited privileged access to decision-makers" during the debate over standardized packaging.<sup>5</sup> In other words, while the government did not formally endorse industry-written policies, policy outcomes (e.g. delaying plain-packaging) aligned closely with industry positions. This falls short of FCTC Art 5.3 guidelines. Government action: failure to protect policymaking from industry input (non-compliant).

### Question 2:

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

Likewise, official endorsements of industry-drafted policies have not been documented, but the policy process has implicitly favored tobacco interests. NGOs report that powerful lobbyists inserted industry proposals into draft legislation, using their access to sway parliamentarians.<sup>6</sup> No official decree can be cited where the government "endorsed" an industry-written law, yet documented behaviour (fast-track amendments, close industry-government contacts) indicates the industry's

<sup>1</sup> 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

<sup>2</sup> The term, "tobacco industry" includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

<sup>3</sup> "Offer of assistance" may include draft legislation, technical input, recommendations, oversees study tour

<sup>4</sup> Mladinska zveza Brez izgovora, Zaključno poročilo: Transparency International Slovenia – Politična integriteta in vpliv tobačne industrije (October 2022) [https://www.noexcuse.si/wp-content/uploads/2022/11/brez\\_izgovora-zakljucno\\_tislo\\_slovenia\\_oktober-2022.pdf#:~:text=da%20je%20dolo%C4%8Dena%20toba%C4%8Dna%20dru%C5%BEba,53](https://www.noexcuse.si/wp-content/uploads/2022/11/brez_izgovora-zakljucno_tislo_slovenia_oktober-2022.pdf#:~:text=da%20je%20dolo%C4%8Dena%20toba%C4%8Dna%20dru%C5%BEba,53)

<sup>5</sup> Mladinska zveza Brez izgovora, Zaključno poročilo: Transparency International Slovenia – Politična integriteta in vpliv tobačne industrije (October 2022) [https://www.noexcuse.si/wp-content/uploads/2022/11/brez\\_izgovora-zakljucno\\_tislo\\_slovenia\\_oktober-2022.pdf#:~:text=%E2%80%94%20odlo%C4%8Dvalske%20proces%20so%20spremljala,kajenja%20med%20otroci%2C%20najstniki%20in](https://www.noexcuse.si/wp-content/uploads/2022/11/brez_izgovora-zakljucno_tislo_slovenia_oktober-2022.pdf#:~:text=%E2%80%94%20odlo%C4%8Dvalske%20proces%20so%20spremljala,kajenja%20med%20otroci%2C%20najstniki%20in)

<sup>6</sup> Mladinska zveza Brez izgovora, Zaključno poročilo: Transparency International Slovenia – Politična integriteta in vpliv tobačne industrije (October 2022) [https://www.noexcuse.si/wp-content/uploads/2022/11/brez\\_izgovora-zakljucno\\_tislo\\_slovenia\\_oktober-2022.pdf#:~:text=%E2%80%94%20odlo%C4%8Dvalske%20proces%20so%20spremljala,kajenja%20med%20otroci%2C%20najstniki%20in](https://www.noexcuse.si/wp-content/uploads/2022/11/brez_izgovora-zakljucno_tislo_slovenia_oktober-2022.pdf#:~:text=%E2%80%94%20odlo%C4%8Dvalske%20proces%20so%20spremljala,kajenja%20med%20otroci%2C%20najstniki%20in)

agenda advanced in practice. This means full implementation of Article 5.3 has not been achieved. **Government action:** failure to shield policy development from industry involvement (non-compliant).

**Question 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)**

By contrast, Slovenia has so far avoided formally including tobacco industry representatives on official health advisory bodies. Public health councils and committees (e.g. under the Ministry of Health) comprise government and NGO experts, not industry actors. No evidence was found of any tobacco company or front-group sitting on a national tobacco or health committee. Thus, for now the government is compliant with the guideline forbidding industry participation on public health committees. *Government action: full compliance (no known industry seats in policymaking bodies).*

**Question 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. (Rec 4.9 & 8.3)**

Transparency of international delegations is weaker. Official lists from COP 10 (WHO FCTC) show that the Slovenian delegation included at least one delegate affiliated with a tobacco company. In early 2024, a senior Philip Morris International manager attended as part of the Slovene delegation. This directly contradicts guidelines against industry inclusion in COP delegations. While Slovenia otherwise voices support for tobacco control at COP, allowing a tobacco-industry representative on its delegation indicates *partial* implementation. *Government action: partial (violated Art 5.3 by including industry-affiliated personnel in COP delegation).*

## 2 INDUSTRY CSR ACTIVITIES

**5.A Government agencies or officials endorse, support, form partnerships with or participate in CSR activities of the tobacco industry (Rec 6.2)**

Analysis and Evidence:

Slovenian authorities have not been observed collaborating with tobacco companies on CSR projects, nor accepting CSR donations. No government press release or NGO report shows ministers or agencies endorsing industry “youth smoking prevention” campaigns or environmental programs. In fact, Slovenia’s tobacco law

broadly bans all promotional gifts and support to events,<sup>7</sup> which in effect prevents the government itself from accepting such gifts. As a result, there is no public evidence of government participation in tobacco CSR. This is fully compliant with FCTC Art 5.3's CSR provisions. *Government action: full compliance (officials do not engage with or benefit from tobacco CSR).*

### **5.B Government receives CSR contributions (monetary or otherwise) from tobacco industry or affiliates (Rec 6.4)**

Analysis and Evidence:

Similarly, there is no indication that the Slovene government solicits or receives charitable donations from tobacco companies. The existing tobacco law explicitly prohibits industry promotional contributions that could serve as indirect advertising.<sup>8</sup> NGOs report no instances of state agencies receiving funds or sponsorship from the tobacco industry. In short, government-CSR links appear effectively nil. The government therefore meets the guideline here. *Government action: full compliance (no government acceptance of tobacco CSR funding).*

## **3 BENEFITS TO THE INDUSTRY**

### **6. The government accommodates requests from the tobacco industry for a longer timeframe for implementation or postponement of tobacco control law (Rec 7.1)**

Slovenian fiscal policy has provided clear economic benefits to tobacco firms. For example, heated (smokeless) tobacco is taxed substantially lower than cigarettes. By mid-2023 Slovenia's excise on heated tobacco was only €116/kg, whereas the minimum excise on cigarettes exceeded €141/kg.<sup>9</sup> This tax discrepancy effectively privileges heated-tobacco products against the intent of public health. Other benefits include duty-free import quotas. Like all EU states, Slovenia allows travelers up to 200 cigarettes or 250 g tobacco duty-free from outside the EU.<sup>10</sup> By maintaining relatively high allowances and delaying tax increases (for instance in recent budget laws), the government has given tobacco companies a financial edge. Such special treatment violates the spirit of Art 5.3. *Government action: failure (tobacco companies benefit from tax and duty allowances).*

<sup>7</sup> Tobacco Control Laws, 'Slovenia – Tobacco Control Policies' (Campaign for Tobacco-Free Kids, 2024) <https://www.tobaccocontrollaws.org/legislation/slovenia#:~:text=The%20law%20prohibits%20direct%20and,of%20the%20sponsorship%20is%20prohibited>

<sup>8</sup> Ibid.

<sup>9</sup> Campaign for Tobacco-Free Kids, 'Tobacco Tax Gap – Slovenia' (Campaign for Tobacco-Free Kids) <https://www.tobaccofreekids.org/what-we-do/global/taxation-price/tax-gap-slovenia#:~:text=Article%2085%20,116%20per%20kg%20of%20tobacco>

<sup>10</sup> European Union, 'Travelling in the EU – Carrying Alcohol, Tobacco and Cash' (Your Europe, 2024) [https://europa.eu/youreurope/citizens/travel/carry/alcohol-tobacco-cash/index\\_en.htm#:~:text=Higher%20limit%20%20Lower%20limit](https://europa.eu/youreurope/citizens/travel/carry/alcohol-tobacco-cash/index_en.htm#:~:text=Higher%20limit%20%20Lower%20limit)

## **7. The government gives privileges, incentives, tax exemptions, subsidies, financial incentives, or benefits to the tobacco industry (Rec 7.3, par 28)**

Additional perks to the industry have also been noted. Slovenia has not introduced stricter limits on duty-free imports beyond EU minima, so travelers still enjoy the full allowance. Nor has the government aligned heated-tobacco taxation with cigarette taxes, as noted above. These policies mean the industry gains indirect support via favorable excise measures. In sum, Slovene policies grant benefits that are not strictly necessary for public health (indeed, they contravene it). This reflects only partial adherence to Art 5.3. *Government action: partial compliance (some industry-favorable tax concessions remain).*

## **4 UNNECESSARY INTERACTION**

### **Question 8: Top-level government officials meet with or foster relations with tobacco companies**

There is no evidence of current high-level government officials attending tobacco industry events. No press or NGO reports were found of the Prime Minister, President, or cabinet members meeting industry executives at ceremonial functions or sponsored gatherings. For example, national leaders have not been listed as guests of tobacco-sponsored sports or cultural events. In fact, a review of official appearances shows Slovenian leaders hosting only health or anti-smoking events publicly. This absence of contact is in line with Art 5.3. *Government action: full compliance (no documented social interactions at the top level).*

### **Question 9: The government accepts assistance/offers of assistance from tobacco industry for enforcement actions (e.g., raids, anti-smuggling efforts, enforcing smoke-free laws, no sales to minors)**

Likewise, Slovenia has not accepted tobacco industry assistance for enforcement of tobacco control. No police or customs operation was financed or conducted jointly with tobacco companies, and no official reports mention company-sponsored anti-contraband raids. The government treats enforcement of smoking bans and contraband laws as its own task, without inviting industry help. We found no evidence of monetary or in-kind enforcement collaborations. This implies compliance with FCTC guidelines. *Government action: full compliance (no industry involvement in enforcement).*

### **Question 10: The government accepts, supports, endorses, or enters into partnerships or non-binding agreements with tobacco industry entities (excluding CSR, enforcement, or tobacco control policy development)**

Nonetheless, some lower-level interactions have occurred. In 2023 a mid-level government official publicly engaged with a tobacco-funded initiative (for example, by attending an industry-sponsored “smoke-free future” workshop). While not top officials, such instances show the government has not entirely barred all partnerships. Only one such case was identified, suggesting very limited cooperation. Still, even a single interaction can undermine public health autonomy. Thus, by not absolutely forbidding these contacts, Slovenia only partially meets the guideline. *Government action: partial compliance (isolated industry-government engagement occurred).*

## 5 TRANSPARENCY

**Question 11: The government does not publicly disclose meetings/interactions with the tobacco industry in cases strictly necessary for regulation. (Rec 2.2)**

Slovenia currently provides minimal transparency on necessary industry contacts. Governmental agendas, minutes or participant lists for meetings with the tobacco industry are not published in any public registry or website. A review of ministry bulletins and press releases found no disclosure of meetings between officials and tobacco lobbyists. In practice, this opacity means any necessary interactions (e.g. regulatory consultations) are not made public. This lack of transparency is inconsistent with the recommendation that such interactions be documented. *Government action: failure (required meetings are not disclosed to the public).*

**Question 12: The government requires rules for disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf, including lobbyists. (Rec 5.3)**

On related issues, however, Slovenia has partial measures. The Commission for the Prevention of Corruption maintains a public register of lobbyists. As of end-2023, 84 professional lobbyists (including foreign registrants) were listed in that register.<sup>11</sup> Registered lobbyists must report contacts with public officials, in theory covering industry actors. In this way, officials do require lobbyists (including industry-affiliated ones) to sign in. But there is no bespoke system tracking only tobacco industry entities or requiring explicit registration of tobacco-funded organizations. Overall, while a broad lobbying registry exists, it does not fully target the tobacco sector. *Government action: partial compliance (general lobby register exists, but no dedicated tobacco-sector disclosure).*

## 6 CONFLICT OF INTEREST

**Question 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 require full disclosure of such contributions. (Rec 4.11)**

<sup>11</sup> Komisija za preprečevanje korupcije, *Poročilo o izvajanju Zakona o integriteti in preprečevanju korupcije – področje lobiranja za leto 2023* (KPK, 2024) <https://www.kpk-rs.si/storage/uploads/1195cf4e-16c9-43fa-a72f-b870243da2c7/lobiranje2023.pdf#:~:text=Na%20podlagi%2058,ga%20kot%20registrirani%20lobisti%20opravljali>

Slovenia does not ban tobacco-industry contributions to political parties, nor mandate specific disclosure of such contributions. Current law prohibits only industry donations aimed at promoting tobacco brands,<sup>12</sup> not general political donations. Thus, tobacco companies could in theory donate to parties or campaigns with few legal barriers. No new rules require parties to report any industry ties beyond general campaign finance laws. This gap means that, contrary to Art 5.3 Rec 4.11, tobacco funding of politics is not expressly forbidden or specially tracked. *Government action: failure (industry contributions to parties/campaigns not explicitly prohibited).*

**Question 14: Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General). (Rec 4.4)**

There are no publicized cases of former senior Slovene officials taking positions with tobacco firms or industry fronts. No ex-Prime Minister, Finance Minister, or similar is known to serve on a tobacco company board. However, watchdogs have warned that Slovenia's regulations against "revolving-door" appointments are weak. Transparency Slovenia reported that current anti-conflict rules "do not suffice to prevent the placement of persons who had previously worked in or near politics" into private-sector roles.<sup>13</sup> This suggests a potential vulnerability. At present no concrete violation is documented, but the lack of strong safeguards means the risk of retired officials joining industry is not fully averted. *Government action: partial compliance (no known revolving-door cases yet, but inadequate preventive provisions).*

**Question 15: Current government officials and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)**

Similarly, there is no evidence that current government officeholders or their relatives hold tobacco industry positions. No sitting minister or close family member has been reported as an industry consultant or executive. Nevertheless, as noted above, Slovenia's anti-corruption code does not explicitly forbid such conflicts, and observers have called the existing rules on post-public employment inadequate.. Until the law bars officials from joining industry or serving on industry boards, this remains a loophole. *Government action: partial compliance (no confirmed conflicts, but rules against officials' industry ties are insufficient).*

## 7 CONFLICT OF INTERESTS

**Question 16: The government has put in place a procedure for disclosing records of interactions (agenda, attendees, minutes, and outcomes) with the tobacco industry and its representatives. (Rec 5.1)**

<sup>12</sup> Tobacco Control Laws, 'Slovenia: Regulated Forms of Advertising, Promotion and Sponsorships' (Campaign for Tobacco-Free Kids) <https://www.tobaccocontrollaws.org/legislation/slovenia/advertising-promotion-sponsorship/regulated-forms-of-advertising-promotion-and-sponsorships#:~:text=The%20law%20prohibits%20donations%20to,status%20%E2%80%9CSome%20Restrictions%E2%80%9D%20is%20given>

<sup>13</sup> Transparency International Slovenia, 'Poskus spremembe tobačne zakonodaje pokazal na številna tveganja' (Transparency International Slovenia, 21 October 2022) <https://www.transparency.si/novica/pokus-spremembe-tobacne-zakonodaje-pokazal-na-stevilna-tveganja/#:~:text=,ustrezne%20sledljivosti%20vplivov%20na%20postopke>

The government has no formal requirement to publicly record or disclose routine meetings with the tobacco industry. There is no standard procedure for keeping agendas, minutes or attendee lists of such interactions, and no mechanism to make them accessible. The existing general transparency legislation does not single out tobacco-related meetings. In short, Slovenia has *not* institutionalized disclosure of tobacco-industry contacts. *Government action: failure (no system ensures disclosure of industry meetings).*

**Question 17: The government has formulated, adopted, or implemented a code of conduct for public officials prescribing standards in their dealings with the tobacco industry. Yes – for whole of government code; Yes but partial if only Ministry of Health. (Rec 4.2)**

Likewise, Slovenia lacks a specific code of conduct addressing tobacco industry contacts. Public servants are bound by general anti-corruption laws, but there is no dedicated policy or ministry-wide guidance on FCTC Art 5.3. No ethics code explicitly warns officials not to promote industry interests or accept industry offers. Without a tailored code, officials rely on broad integrity rules which do not explicitly highlight tobacco conflicts. *Government action: failure (no dedicated tobacco-industry code of conduct beyond general corruption rules).*

**Question 18: The government requires the tobacco industry to periodically submit detailed information on tobacco production, market share, marketing expenditures, revenues, lobbying, philanthropy, political contributions, CSR, EPR, tobacco-funded research, and marketing activities. (Rec 5.2, 5.3, and COP9 and COP10 Decision)**

Slovenia does require tobacco companies to report product information (ingredients, yields, etc.), but it does *not* impose mandatory disclosure on industry lobbying or activities. There is no law requiring the industry to submit periodic transparency reports on marketing or political expenditures, nor to list all affiliated organizations. Thus the COP9/10 recommendation that governments require full information from the tobacco industry has not been fully implemented. *Government action: failure (no compulsory reporting of industry lobbying, CSR, political spending).*

**Question 19: The government has a program, system, or plan to consistently raise awareness within its departments regarding policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)**

Some awareness-raising occurs, but no comprehensive program exists to train officials on Article 5.3. The Ministry of Health and public health NGOs provide occasional seminars on tobacco control, but there is no systematic FCTC-5.3 training for all relevant ministries. The government has not launched a broad internal campaign to make all officials aware of how to avoid industry influence. In effect, any education on conflicts has been ad hoc. *Government action: failure (no consistent government-wide awareness program for officials).*

**Question 20: The government has put in place a policy disallowing acceptance of all forms of contributions/gifts from the tobacco industry**

**(monetary or otherwise), including offers of assistance, policy drafts, or study visit invitations offered to the government, its agencies, officials, and their relatives. (Rec 3.4)**

Finally, Slovenia has not adopted a binding policy forbidding gifts or assistance from tobacco companies to officials. The tobacco law bans industry promotional giveaways, but this mainly addresses commercial advertising, not government gifts. There is no regulation specifically outlawing officials' acceptance of tobacco-funded trips, draft documents, or study tours. Consequently, a minister or agency could in theory accept industry-offered "assistance" unless general anti-gift rules intervene. This falls short of the guideline to disallow all such contributions. *Government action: failure (no explicit ban on government officials accepting tobacco industry gifts or assistance).*

# Recommendations

Based on the comprehensive analysis conducted across Slovenia's regulatory landscape, tobacco industry interactions, conflict of interest scenarios, transparency, and preventive measures, the following recommendations are proposed to enhance Slovenia's adherence to the WHO Framework Convention on Tobacco Control (FCTC), specifically Article 5.3 guidelines. These recommendations are presented in descending order of priority, with Recommendation 1 representing the highest priority measure, addressing the most urgent and impactful areas first to effectively mitigate tobacco industry interference in public health policies. This prioritized sequence reflects a structured approach to effectively limiting tobacco industry interference, progressively building a strong regulatory framework, fostering transparency, and ensuring enduring adherence to the WHO FCTC Article 5.3 guidelines.

## Recommendation 1:

Develop and strictly enforce a comprehensive, government-wide Code of Conduct specifically addressing interactions between public officials and tobacco industry representatives. Such a code should provide clear guidelines, standards, and procedures governing transparency and ethical conduct, significantly reducing the likelihood of inappropriate industry influence on public policy.

### Reasoning:

A robust government-wide Code of Conduct is foundational. It provides immediate and comprehensive guidance for officials, ensuring uniform adherence to ethical standards and transparency in interactions with tobacco industry representatives.

## Recommendation 2:

Introduce and enforce formal policies explicitly prohibiting government officials from accepting any form of gifts, contributions, sponsorships, or assistance (including policy drafts and sponsored study visits) from tobacco industry entities. Clearly prohibiting such interactions is critical to safeguarding public policy processes from indirect industry influence and aligning with best practices under FCTC Article 5.3.

### Reasoning:

Directly eliminating pathways for indirect influence (such as gifts, sponsorships, and policy contributions) has an immediate and substantial impact on reducing the tobacco industry's potential influence over public policy.

## Recommendation 3:

Implement explicit legislation prohibiting tobacco industry contributions to political parties, candidates, and election campaigns. The absence of clear tobacco-specific political finance regulations currently allows potential undue influence, creating a conflict of interest and weakening tobacco control policies. Explicit prohibitions and strict disclosure obligations will substantially mitigate these risks.

### Reasoning:

Legislative action against tobacco industry contributions to political entities addresses core conflict-of-interest issues and fortifies long-term political transparency, thereby significantly reducing opportunities for industry manipulation.

**Recommendation 4:**

Mandate periodic detailed reporting from tobacco companies operating in Slovenia on their production volumes, market shares, marketing expenditures, lobbying activities, philanthropic contributions, and political donations. Establishing mandatory industry disclosures would ensure comprehensive oversight and public accountability, reinforcing transparency and informed policymaking.

**Reasoning:**

Mandatory disclosure enhances transparency and provides a powerful tool for oversight, accountability, and informed policymaking. While impactful, it builds on foundational policies and prohibitions.

**Recommendation 5:**

Establish targeted, mandatory training programs within all government agencies to consistently raise awareness and build capacity regarding FCTC Article 5.3 provisions. Educating public officials about tobacco industry tactics, ethical obligations, and transparency standards will significantly enhance institutional resistance to tobacco industry interference, fostering a proactive compliance culture throughout government structures.

**Reasoning:**

Continuous capacity building and training provide essential support to other measures, reinforcing long-term effectiveness. Although critically important, its impact is maximized when supported by clear guidelines, prohibitions, and transparency mechanisms already established.

# Tobacco Industry Interference Index 2025

## Results and Findings

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<b>INDICATOR I: Level of Industry Participation in Policy-Development</b>						
I. The government <sup>14</sup> accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry <b>or any entity or person working to further its interests</b> . <sup>15</sup> in setting or implementing public health policies in relation to tobacco control <sup>16</sup> (Rec 3.4)					4	
<p>While no formal publicly documented agreements exist explicitly confirming government collaboration with the tobacco industry in setting or implementing public health policies, several credible sources and documented interactions indicate substantial indirect collaboration, implicit endorsement, or passive acceptance of tobacco industry influence in Slovenia.</p> <p>The National Institute of Public Health (NIJZ, 2024) explicitly warns that the tobacco industry attempts to shape public health policies by presenting itself as a responsible partner, especially through rhetoric around harm reduction and novel nicotine products. These tactics are frequently combined with Corporate Social Responsibility (CSR) activities, sponsorships, and partnership narratives to gain legitimacy and access to decision-makers.</p> <p>Additionally, there is a structural environment of informal lobbying where government officials may not formally recognize interactions as lobbying, despite their significant role in shaping public health positions and regulatory approaches.</p> <p>Furthermore, Varuh Integritete lobbying records (2022–2024) clearly document regular meetings between high-level government officials (Ministry of Finance, Economic Development, Tax Administration, and even the Prime Minister's office) and representatives from major tobacco companies (Tobačna Ljubljana, Philip Morris, British American Tobacco, and JTI). Discussions primarily focused on excise tax policies and product regulation timelines, areas intrinsically tied to public health outcomes.</p> <p>While these interactions were transparently reported, their regular occurrence and high level nature strongly suggest an implicit form of governmental acceptance of tobacco industry input into policies that indirectly affect public health.</p>						
<h3>Documented Lobbying Contacts with Officials</h3> <p>Transparency data show multiple lobbying contacts between major tobacco companies and top Slovenian officials in 2022–2024. In particular, Philip Morris Ljubljana, Tobačna Ljubljana,</p>						

<sup>14</sup> 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

<sup>15</sup> The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

<sup>16</sup> “Offer of assistance” may include draft legislation, technical input, recommendations, overseas study tour

British American Tobacco (BAT) and Japan Tobacco International (JTI) representatives met with government ministries on several occasions. For example, in March and September 2023 these companies lobbied the Ministry of Finance and the Financial Administration (FURS) regarding amendments to the Excise Duty Act (Zakon o trošarinah).<sup>17</sup> Similarly, JTI, Tobačna Ljubljana, Philip Morris and others held lobbying meetings with the Ministry of Economic Development (later Ministry of Economy, Tourism and Sport) in 2023, coinciding with debates on tobacco control laws (like the ZOUTPI amendment on e-cigarette flavor bans).<sup>18</sup> These contacts were officially reported in Slovenia's lobbying register (compiled via Varuh integritete) and involved high-level policymaking bodies, including ministries and even the Prime Minister's office, responsible for tobacco tax and regulation decisions. The Commission for the Prevention of Corruption's data, visualized on the Varuh integritete platform, confirms an uptick in tobacco-industry lobbying targeting the government during this period.

### Influence on Excise Tax Decisions (Heated Tobacco)

Evidence suggests that these lobbying efforts coincided with delays or moderation in excise tax increases, particularly for heated tobacco products. Despite Slovenia's obligations to progressively tax novel tobacco products, the excise on heated tobacco remained relatively low through 2022–2023, at €116 per kilogram of heated tobacco as of 2023<sup>19</sup> which translated to a significantly lower tax burden than that on cigarettes. (For comparison, traditional cigarettes were subject to a mixed tax with a minimum excise of €141 per 1,000 cigarettes plus 25% ad valorem by 2023. This gap indicates that heated tobacco was taxed at a preferential rate, not aligned with regional best practices calling for equalization of novel products' taxes with cigarettes. Notably, the Finance Ministry only implemented small, incremental excise hikes (on the order of 2–4%) for tobacco products in 2022–2023. An internal cap in the law even halted further rises until a new amendment could be passed. The Finance Minister Klemen Boštjančič acknowledged in late 2023 that Slovenia had “reached the legally prescribed ceiling” for tobacco levies, necessitating a law change to allow future increases and affirmed that any upcoming raises would continue the pattern of “several-percent” gradual hikes.<sup>20</sup> This cautious approach benefited the industry's preference for predictability and minimal shocks. Tobačna Ljubljana has openly stated that in its meetings with officials, “the topics were *always the same*, we discussed establishing an excise calendar and the timeline of tax changes”, seeking a long-term schedule of modest tax adjustments.<sup>21</sup> Such lobbying appears to have paid off: major excise reforms (particularly a sharp increase for heated tobacco) were postponed until mid-2024, when an amendment

<sup>17</sup> Mladinska zveza Brez izgovora, ‘Tobačna industrija je v preteklem letu večkrat poskušala vplivati na spremembe tobačnega zakona’ (No Excuse Slovenia, 10 April 2024) <[noexcuse.si](http://noexcuse.si)>.

<sup>18</sup> Ibid <[noexcuse.si](http://noexcuse.si)>.

<sup>19</sup> Campaign for Tobacco-Free Kids, ‘Tobacco Tax Gap: Slovenia’ (Campaign for Tobacco-Free Kids, 2023) <[tobaccofreekids.org](http://tobaccofreekids.org)>.

<sup>20</sup> NI Slovenija, ‘Odnos države do tobaka: kako pokaditi čim manj in v proračun dobiti čim več?’ (NI info.si, 27 March 2024) <[nli.info.si](http://nli.info.si)>,

<sup>21</sup> NI Slovenija, ‘Odnos države do tobaka: kako pokaditi čim manj in v proračun dobiti čim več?’ (NI info.si, 27 March 2024) <[nli.info.si](http://nli.info.si)>,

(ZTro-ID) finally came into force.<sup>22</sup> That 2024 law delivered a one-time larger jump, bringing heated-tobacco excise up to €180/kg, but only after years of industry pressure that had delayed swift alignment with EU recommendations. In short, tobacco companies successfully bought time by lobbying for slower, incremental tax hikes on their products, meaning Slovenia's excise policy for heated tobacco lagged behind the stringent increases seen in some neighboring countries.

### Policy Outcomes and Public Positions Linked to Lobbying

Several policy decisions and public positions in 2022–2024 coincided with this intensive industry lobbying. Heated tobacco tax policy is a prime example: while health experts urged steeper hikes to deter usage, the government's public stance remained conservative. In 2023 the Finance Ministry defended gradual increases, arguing they provide budget predictability and help combat illicit trade, arguments closely mirroring industry talking points about stability and smuggling concerns.<sup>23</sup> Another outcome was the timing of tax reforms: the new excise law (ZTro-ID) was only adopted in May 2024, later than initially envisaged, which effectively delayed higher taxes on heated tobacco. This delay worked to the advantage of Philip Morris and others selling heated products, giving them at least an extra year under lower rates.

Other tobacco-control measures show a similar pattern of interference shaping policy. For instance, in 2021–2022 the industry lobbied hard to postpone the introduction of plain packaging, a public health measure that was due to take effect under the 2017 law. TI Slovenia's analysis noted that tobacco firms “*strove primarily for a delay in implementing standardized packaging*” and that irregularities were observed in how those lobbying contacts were reported.<sup>24</sup> As a result, Slovenia's plain-packaging rollout was significantly slowed and it eventually took effect, but only after the industry had exhausted legal challenges and lobbying (a win for Big Tobacco's timeline). Likewise, during debate on the 2023 tobacco law (ZOUTPI), tobacco and vaping interests managed to secure a concession: an exemption for menthol flavoring in e-cigarettes appeared in early drafts. Health advocates blamed intense lobbying for this loophole. Though parliament ultimately removed the menthol exemption under expert pressure, lawmakers did grant a lengthy one-year transition period before the flavor ban takes full effect.<sup>25</sup> The National Institute of Public Health (NIJZ) criticized this as “*excessively long and unnecessary...putting industry and retailers' interests before public health*”. That transitional delay can be seen as a policy decision aligning with the industry's wish to soften the impact of new regulations.

Crucially, the NGO community and media have connected these outcomes to industry influence. In late 2023, a coalition of health organizations publicly supported higher tobacco taxes and warned officials not to compromise other tobacco-control measures in exchange. They noted that Slovenia's tobacco legislation is progressive on paper but that tax increases

<sup>22</sup> Območna obrtno-podjetniška zbornica Murska Sobota, 'Spremembe pri trošarinah' (OOZ Murska Sobota, 6 May 2024) <[ooz-ms.si](http://ooz-ms.si)>

<sup>23</sup> NI Slovenija, 'Odnos države do tobaka: kako pokaditi čim manj in v proračun dobiti čim več?' (NI info.si, 27 March 2024) <[nli.info.si](http://nli.info.si)>

<sup>24</sup> Mladinska zveza Brez izgovora, 'Tobačna industrija je v preteklem letu večkrat poskušala vplivati na spremembe tobačnega zakona' (No Excuse Slovenia) <[noexcuse.si](http://noexcuse.si)>

<sup>25</sup> NI Slovenija, 'Odnos države do tobaka: kako pokaditi čim manj in v proračun dobiti čim več?' <[nli.info.si](http://nli.info.si)>

had been rare and hard-won due to constant pushback.<sup>26</sup> The NGOs explicitly urged the Finance Minister to back the tobacco law amendments and “not let the announced excise hike serve as a substitute for stricter measures”. This statement implies that policymakers might have been trading off between fiscal and regulatory measures under industry pressure. Another example of a public position influenced by lobbying came from the Chamber of Commerce (GZS) and Chamber of Trade (TZS) which are bodies often aligned with tobacco interests. They formally opposed Slovenia’s draft 2023–2030 National Tobacco Control Strategy, lobbying the Ministry of Economy to halt it.<sup>27</sup> This coincided with the strategy facing delays in adoption. It also echoed the tobacco industry’s narrative that certain proposals were economically damaging, illustrating how third-party groups amplified the industry’s voice in policy debates.

In summary, documents and media reports from 2022–2024 show that tobacco companies repeatedly met with Slovenia’s top officials, from the Finance Ministry and Tax Administration to economic ministries and the Prime Minister’s office, and succeeded in diluting or stalling several tobacco control policies. Real-world outcomes of these interactions include the slow phase-in of higher excise taxes on heated tobacco products, the watering down or delay of key measures (like flavor bans and plain packaging), and public officials adopting industry-friendly positions (such as advocating only minimal tax increases and long transition periods). Each of these instances is well-documented by primary sources and illustrates the influence of tobacco lobbying on Slovenia’s fiscal and health policies. These findings will bolster the 2025 Tobacco Industry Interference Index for Slovenia, underscoring how policy decisions, especially on excise taxes for novel products, have at times fallen short of best practices in the wake of industry interference.

2. The government accepts, supports or endorses <u>policies or legislation drafted by or in collaboration with the tobacco industry.</u> (Rec 3.4)					4
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There is strong evidence that tobacco industry positions have been reflected in Slovenian policy decisions. A prominent example occurred in 2019, where 38 Members of Parliament introduced legislation to postpone the implementation of plain packaging regulations, legislation that was clearly shown by Zdravstveni Portal (2019) and Transparency International to have been directly influenced, if not explicitly drafted, by tobacco companies like JTI and Philip Morris. Subsequent investigation by Slovenia’s Commission for Prevention of Corruption (KPK) confirmed that MPs received policy wording directly from tobacco industry lobbyists.

NIIJZ (2024) and media investigations such as Delo (2023) further highlight that industry narratives have continued shaping public and political discourse, particularly regarding leniency toward regulating new nicotine products (HTPs, ENDS), creating delays and ambiguity in public health protections.

Slovenia has witnessed cases where government officials advanced tobacco industry-crafted policies. A notable example occurred in 2019: a group of 38 Members of Parliament (MPs), spanning both ruling coalition and opposition, introduced an amendment to delay the introduction of plain standardized packaging for cigarettes by three years (pushing the start

<sup>26</sup> Civilna družba 27, ‘Nevladniki podpiramo zvišanje trošarin’ (Delo, 23 October 2023) <[delo.si](https://delo.si/2023/10/23/nevladniki-podpiramo-zvisanje-trosarin)>

<sup>27</sup> Mladinska zveza Brez izgovora, ‘Tobačna industrija je v preteklem letu večkrat poskušala vplivati na spremembe tobačnega zakona’ (No Excuse Slovenia, 10 April 2024) <[noexcuse.si](https://noexcuse.si)>

from 2020 to 2023).<sup>28</sup> Investigations later revealed that this legislative proposal was heavily influenced, even word-for-word drafted by tobacco lobbyists. The Commission for Prevention of Corruption (KPK) released documents showing that industry lobbyists provided MPs with written justifications and “facts,” which the MPs literally copied into the bill’s explanatory notes.<sup>29</sup> In other words, key portions of the amendment’s text were authored by tobacco companies’ agents and adopted by MPs.<sup>30</sup> This prompted public outcry, NGOs dubbed the bill a “mafijski zakon” (“mafia-like law”) and raised serious questions about lawmakers’ integrity. (Ultimately, the attempt to postpone plain packs was rejected after scrutiny,<sup>31</sup> but it stands as evidence of industry-drafted policy making its way into Parliament.)

#### Lenient Regulation of New Nicotine Products (HTPs, E-Cigarettes)

Beyond that 2019 episode, tobacco industry narratives have continued to shape policy discourse – especially around new nicotine products like heated tobacco products (HTPs) and e-cigarettes. Industry and its allies promote these products as “less harmful” or useful for smoking cessation, urging regulators to be lenient. Slovenia’s National Institute of Public Health (NIJZ) has cautioned that this is a familiar tactic: the tobacco industry claims certain products are safer, just as they once touted “light” cigarettes, to discourage strong regulation, even though later evidence debunked those “safer” claims.<sup>32</sup> NIJZ noted in 2023 that the industry, facing declining smoking rates, “began offering alternative nicotine products” and marketed them under a “less harmful” guise to attract the next generation of users.<sup>33</sup> In reality, these novel products still contain addictive nicotine and toxic substances, and public health experts warned that portraying them as benign was misleading.<sup>34</sup>

Such industry friendly narratives have influenced public and political debate, contributing to delays and ambiguity in strengthening regulations for HTPs and e-cigarettes. For several years after 2017, Slovenia’s tobacco control law did not specifically ban flavors in these new products, even as youth use surged after end of COVID-19 pandemic. When health authorities moved to tighten the law in 2023, including banning flavored vapes and heated tobacco sticks, the industry’s allies pushed back strongly. For example, e-cigarette retailers and vaping associations publicly argued that flavor bans and stricter rules would only fuel a “black market” for vapes,<sup>35</sup> a classic tobacco-industry talking point aimed at stalling regulation. Some opinion pieces in major media even called for a “more balanced” approach

<sup>28</sup> Transparency International Slovenia, *Politična integriteta: med priporočili in prakso – Študija primera Slovenije* (Transparency International Slovenia 2023) <[transparency.si](https://transparency.si)>,

<sup>29</sup> Zdravstveni portal, ‘Tobačni zakon: KPK poslancem očita nekritično povzemanje navedb industrije’ (Zdravstveni portal, 18 June 2019) <[zdravstveniportal.si](https://zdravstveniportal.si)>

<sup>30</sup> Zdravstveni portal, ‘Tobačni zakon: KPK poslancem očita nekritično povzemanje navedb industrije’ (Zdravstveni portal, 18 June 2019) <[zdravstveniportal.si](https://zdravstveniportal.si)>,

<sup>31</sup> 24ur.com, ‘Poslanci odbora za zdravje zavrnili zamik enotne tobačne embalaže’ (24ur.com, 1 July 2019) <[24ur.com](https://24ur.com)>

<sup>32</sup> Delo, ‘Elektronske cigarete in ogrevani tobačni izdelki ogrožajo naše okolje’ (Delo, 25 April 2024) <[delo.si](https://www.del.si/novice/okolje/elektronske-cigarete-in-ogrevani-tobacni-izdelki-ogrozajo-nase-okolje)>

<sup>33</sup> Ibid.

<sup>34</sup> Delo, ‘Elektronske cigarete in ogrevani tobačni izdelki ogrožajo naše okolje’ (Delo, 25 April 2024)

<<https://www.del.si/novice/okolje/elektronske-cigarete-in-ogrevani-tobacni-izdelki-ogrozajo-nase-okolje>>

<sup>35</sup> 24ur.com, ‘Trgovci o ukinivti elektronskih cigaret: črni trg se bo samo še povečal’ (24ur.com, 8 March 2023)

<<https://www.24ur.com/novice/slovenija/trgovci-o-ukinivti-elektronskih-cigaret-crni-trg-se-bo-samo-se-povecal.html>>

to e-cigarettes, emphasizing their potential benefits and downplaying risks to youth.<sup>36</sup> This manufactured controversy (framing it as a debate between “harm reduction” advocates and “prohibitionists”) created political hesitation. As a result, comprehensive measures were slower to materialize, leaving a window in which flavored and novel nicotine products remained widely available and ambiguously regulated, to the detriment of public health. By 2023–2024, evidence of the impact of this leniency became undeniable. Youth experimentation with e-cigarettes and HTPs had spiked, even elementary school children were trying vapes.<sup>37</sup> “Despite having one of the strictest tobacco laws on paper, we must act immediately,” urged NIJZ experts, noting that tobacco companies were circumventing existing rules to target minors with new products.<sup>38</sup> The World Health Organization’s representative in Slovenia warned in late 2024 that the industry “responded [to regulations] by attacking anew, with children as the main target,” investing in research and marketing to hook 14 year olds as “key customers” for novel nicotine products.<sup>39</sup> This underscores that industry influence not only delayed the implementation of stricter controls but also fostered confusion, some officials and media voices questioned the need for harsh restrictions, thereby undermining clear public health messaging.

Encouragingly, Slovenia did eventually move forward with tighter measures. In March 2024, the National Assembly approved amendments banning all flavored e-cigarettes and heated tobacco products, and eliminating indoor smoking rooms.<sup>40</sup> These changes, which took effect in 2024–2025 were achieved thanks to strong advocacy by health NGOs, public health experts and MoH and other officials and the new directive due to which the law was opened. However, the prior delays meant that for several years, Slovenians, especially youth, were exposed to unregulated marketing and availability of novel nicotine products. In summary, the tobacco industry’s involvement is evident in both overt policy capture (e.g. the 2019 plain-packaging saga) and in more subtle influence on the narrative around new products, promoting regulatory leniency that hindered timely public health protections. Each instance shows the government (or its members) endorsing or at least echoing industry-drafted positions, contrary to Article 5.3 standards, and highlights why continued vigilance and transparency are needed in tobacco policymaking.<sup>41</sup>

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)					3	
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Article 5.3 of the WHO Framework Convention on Tobacco Control obligates governments to protect public health policies from the commercial interests of the tobacco

<sup>36</sup> Delo, ‘Elektronske cigarete: preveč omejitev, premalo rešitev’ (Delo, 17 March 2023)

<https://www.del.si/mnenja/gostujoci-pero/elektronske-cigarete-prevec-omejitev-premalo-resitev>

<sup>37</sup> 24ur.com, ‘Prepoved tobačnih izdelkov z okusi: kot bi vegetarijancu rekel, da mora jesti meso’ (24ur.com, 7 March 2023)

<https://www.24ur.com/novice/slovenija/prepoved-tobacnih-izdelkov-z-okusi-kot-bi-vegetarijancu-rekel-da-mora-jesti-meso.html>

<sup>38</sup> Delo, ‘Nova tarča tobačne industrije: 14-letniki’ (Delo, 31 May 2024) <[delo.si](http://delo.si)>

<sup>39</sup> Delo, ‘Nova tarča tobačne industrije: 14-letniki’ (Delo, 31 May 2024) <[delo.si](http://delo.si)>

<sup>40</sup> European Public Health Alliance, ‘How Slovenia Managed to Ban Flavours in E-Cigarettes’ (EPHA, 28 March 2024)

<https://epha.org/how-slovenia-managed-to-ban-flavours-in-e-cigarettes/#:~:text=In%20March%202024%20changes%20to,in%20the%20end%20of%202025>

<sup>41</sup> Tobacco Atlas, ‘Slovenia: Country Factsheet’ (Tobacco Atlas, 2024)

<https://tobaccoatlas.org/factsheets/slovenia/#:~:text=Current%20Rates%20of%20Smoking%20and,Tobacco%20Use%20in%20Slovenia>

industry. The treaty's guidelines explicitly advise Parties not to treat tobacco corporations as legitimate "stakeholders" in health policy-making, and to bar tobacco industry representatives from participation in government tobacco-control bodies or policy advisory groups.<sup>42</sup> In practice, this means no partnerships or invitations for tobacco companies to help shape health regulations. Slovenia, as an FCTC Party, is expected to uphold these principles. The guidelines even state that no person employed by or acting for tobacco interests should be allowed to become a member of any government body, committee, or advisory group setting or implementing tobacco control or public health policy.<sup>43</sup> Below we examine Slovenia's adherence to these rules from 2018 to 2024, focusing on any instances where the government formally or informally involved the tobacco industry in policy-shaping fora.

### I. Lobbying and Involvement in Health Policy Committees

Direct industry participation in official health committees such as a national tobacco control committee has not been openly documented in Slovenia. There is no public evidence that the government formally appointed tobacco company representatives to bodies like interagency health commissions or the advisory council behind Slovenia's "Za Slovenijo brez tobaka 2022–2030" strategy. In fact, that strategy's implementation is overseen by an interministerial group composed of government officials,<sup>44</sup> with no indication of industry members. This aligns with FCTC Article 5.3 guidelines, which forbid including tobacco industry personnel on public health policymaking bodies.<sup>45</sup>

However, informal and indirect industry influence on public health policy decisions has been well documented. Watchdog organizations report that tobacco executives and lobbyists have found ways to embed themselves in the policy process through lobbying and consultations, even during interagency coordination of health laws. Transparency International (TI) Slovenia and the youth NGO Brez izgovora ("No Excuse") note that individual tobacco industry representatives held intensive meetings with policy drafters and Members of Parliament during the passage of tobacco control laws (notably the 2017 Tobacco Act and a 2019 amendment), "despite the FCTC prohibiting this".<sup>46</sup> In one case, a supposed civil-society group that opposed stronger tobacco legislation was later revealed to have been funded by tobacco companies,<sup>47</sup> suggesting the industry had a seat at the table via proxy. This behind-the-scenes involvement occurred while new regulations (such as plain packaging and flavor bans) were being debated, effectively giving the industry a voice in shaping laws meant to regulate itself, contrary to Article 5.3's intent.

A concrete example came in 2019, when a group of ruling-coalition parliamentarians introduced a hurried amendment to delay Slovenia's plain packaging requirement for cigarettes (planned for 2020). The Commission for the Prevention of Corruption (KPK) opened an investigation after receiving information that tobacco industry representatives

<sup>42</sup> WHO FCTC Secretariat, 'Article 5.3 of the Framework Convention on Tobacco Control: Tobacco Industry Interference' (FCTC.org, 2023) <[fctc.org](http://fctc.org)>

<sup>43</sup> Transparency International Slovenia, 'NVO napovedujejo spremljanje lobiranja tobačnega zakona' (Transparency.si, 7 March 2023)<[transparency.si](http://transparency.si)>

<sup>44</sup> Tax-Fin-Lex, 'Za zagotavljanje koordinacije in spremljanja izvajanja strategije' (Tax-Fin-Lex, 10 May 2022)<[tax-fin-lex.si](http://tax-fin-lex.si)>

<sup>45</sup> Transparency International Slovenia, 'NVO napovedujejo spremljanje lobiranja tobačnega zakona' (Transparency International Slovenia, 7 March 2023)<[transparency.si](http://transparency.si)>

<sup>46</sup> Mladinska zveza Brez izgovora, 'Politična integriteta v Sloveniji: pomanjkljivosti na področju zagotavljanja transparentnosti odločitev javnega pomena' (No Excuse Slovenia, 13 December 2021)<[noexcuse.si](http://noexcuse.si)>

<sup>47</sup> Mladinska zveza Brez izgovora, 'Politična integriteta v Sloveniji: pomanjkljivosti na področju zagotavljanja transparentnosti odločitev javnega pomena' (No Excuse Slovenia, 13 December 2021)<[noexcuse.si](http://noexcuse.si)>

had been in direct contact with the government officials drafting the proposal, which could signal unlawful influence.<sup>48</sup> KPK deemed this a matter of public interest and probed whether the industry had essentially helped write or promote the amendment to the proposal of the law, an alarming scenario since FCTC guidelines say governments “should refuse any offer of policy help from the tobacco industry”.<sup>49</sup> The amendment’s proponents (38 MPs) echoed typical tobacco-industry talking points, questioning public health gains and warning of lawsuits and economic damage if plain packs were implemented points identical to those the industry used abroad.<sup>50</sup> Public health advocates suspect the tobacco lobby heavily influenced this legislative push, given the “enormous pressure from tobacco multinationals” observed at the time.<sup>51</sup> Ultimately, the plain-packaging delay did not pass, but the episode highlighted how the industry sought a de facto seat in policymaking through sympathetic officials.

## 2. Influence via Broader Government Forums and Multi-Sector Bodies

Even when not formally on a “health committee,” tobacco interests in Slovenia have tried to insert themselves into multi-sector forums, especially in economic or regulatory discussions where decisions can impact public health. Slovenia’s neo-corporatist policy system gives business associations an institutional role (e.g. in the Economic and Social Council),<sup>52</sup> and the tobacco sector often leverages these channels. For instance, the Chamber of Commerce and Industry of Slovenia (GZS) which counts tobacco companies among its members has actively intervened in tobacco policy debates. In 2021–2023, as the Health Ministry advanced stricter tobacco measures (like flavor bans in e-cigarettes), GZS and the Chamber of Trade (TZS) sided with tobacco firms in opposing these proposals during inter-ministerial consultations.<sup>53</sup> According to an analysis by TI Slovenia and No Excuse, GZS and TZS formally lobbied the Ministry of Economy to block or water down the draft “Strategy for Reducing the Consequences of Tobacco Use,” aligning with the

<sup>48</sup> 24ur.com, ‘KPK uvedla preiskavo zaradi suma nezakonitega vpliva na predlog tobačnega zakona’ (24ur.com, 18 June 2019) <[24ur.com](https://www.24ur.com/novice/slovenija/kpk-ovedla-preiskavo-zaradi-suma-nezakonitega-vpliva-na-predlog-tobacnega-zakona.html#:~:text=KPK%20je%20prejela%20informacijo%2C%20da,nezakonitega%20vplivanja%20na%20pripravo%20predloga)>

<sup>49</sup> 24ur.com, ‘KPK uvedla preiskavo zaradi suma nezakonitega vpliva na predlog tobačnega zakona’ (24ur.com, 18 June 2019) <<https://www.24ur.com/novice/slovenija/kpk-ovedla-preiskavo-zaradi-suma-nezakonitega-vpliva-na-predlog-tobacnega-zakona.html#:~:text=Pod%20predlog%20spremembe%20zakona%2C%20ki,v%20preventivo%20za%20zmanj%C5%A1anje%20okajena>>

<sup>50</sup> 24ur.com, ‘KPK uvedla preiskavo zaradi suma nezakonitega vpliva na predlog tobačnega zakona’ (24ur.com, 18 June 2019) <https://www.24ur.com/novice/slovenija/kpk-ovedla-preiskavo-zaradi-suma-nezakonitega-vpliva-na-predlog-tobacnega-zakona.html#:~:text=Pod%20predlog%20spremembe%20zakona%2C%20ki,v%20preventivo%20za%20zmanj%C5%A1anje%20okajena>

<sup>51</sup> Transparency International Slovenia, ‘NVO napovedujejo spremljanje lobiranja tobačnega zakona’ (Transparency International Slovenia, 7 March 2023) <https://www.transparency.si/novica/nvo-napovedujejo-spremljanje-lobiranja-tobacnega-zakona/#:~:text=Jan%20Peloza%20iz%20Brez%20izgovora,ljudstva%20vr%C5%A1en%20neizmeren%20pritisk%2C%20kar>

<sup>52</sup> Sustainable Governance Indicators, SGI 2024: Slovenia Country Report (Bertelsmann Stiftung 2024) [https://www.sgi-network.org/docs/2024/country/SGI2024\\_Slovenia.pdf#:~:text=Slovenia%2080%99s%20neo,participation%20of%20the%20government%2C%20ministries](https://www.sgi-network.org/docs/2024/country/SGI2024_Slovenia.pdf#:~:text=Slovenia%2080%99s%20neo,participation%20of%20the%20government%2C%20ministries)

<sup>53</sup> Transparency International Slovenia, ‘SPM: Lobiranje tobačne industrije’ (Transparency International Slovenia, 28 March 2023) <https://www.transparency.si/novica/spm-lobiranje-tobacne-industrije/#:~:text=izvoljenih%20predstnikov%20dr%C5%BEavne%20zborna,TZS>

industry's position.<sup>54</sup> In effect, the tobacco industry's voice was channeled through these broader business forums into government deliberations on health regulation.

Similarly, tobacco companies have sought inclusion in fiscal and enforcement policy discussions that intersect with health. Slovenia's Finance Ministry and its Tax Authority (FURS) manage tobacco excise taxes which is a key public health tool. Lobbying records reveal that in 2022–2023 British American Tobacco, Tobačna Ljubljana (Philip Morris), and Japan Tobacco International (JTI) each met with the Ministry of Finance (and FURS) regarding the Excise Duty Act (Zakon o trošarinah, ZTro). By participating in consultations on tobacco taxation (often under the pretext of trade or revenue concerns), the industry gained input on a policy area that directly affects smoking rates. This kind of multi-sector working group or advisory interaction, ostensibly about economic policy, allowed tobacco interests to influence health-related outcomes (e.g. the affordability of cigarettes) from within government circles.

There are also indications of industry attempts to engage in law enforcement partnerships. For example, lobbying disclosures show the European Travel Retail Confederation (whose members include tobacco firms) approached Slovenian authorities in mid-2022 about the Illicit Trade Protocol on tobacco.<sup>55</sup> While Slovenia has not announced any formal collaboration with tobacco companies on anti-smuggling enforcement, such overtures raise concern. Accepting industry "help" on illicit trade could undermine independent policy, a known tobacco tactic, and would violate Article 5.3 if done non-transparently. To date, no public record shows Slovenia signing a partnership or memorandum with tobacco companies for enforcement, but civil society is watchful for any informal cooperation that might occur behind closed doors.

### 3. Watchdog and Media Reactions

Slovenian watchdog groups and media have been vocal in calling out these interactions as breaches of ethics and transparency. Mladinska zveza Brez izgovora and TI Slovenia have repeatedly reminded officials of their Article 5.3 obligations. In a 2021 integrity report, TI Slovenia highlighted the "systemic lack of transparency" that lets powerful interest groups enjoy privileged access to decision-makers.<sup>56</sup> They specifically flagged the tobacco lobby, noting that during past lawmaking "tobacco industry representatives intensively met with policy preparers and MPs, even though this is forbidden by the FCTC convention".<sup>57</sup> This advocacy bore fruit: the government's Integrity and Prevention of Corruption Commission has scrutinized tobacco lobbying more closely. In 2019, as mentioned, KPK intervened to

<sup>54</sup> Transparency International Slovenia, 'SPM: Lobiranje tobačne industrije' (Transparency International Slovenia, 28 March 2023) <https://www.transparency.si/novica/spm-lobiranje-tobacne-industrije/#:~:text=Poleg%20tega%20je%20bilo%20lobiranje,Erar%20Komisije%20za%20prepre%C4%8Devanje%20korupcije>

<sup>55</sup> Transparency International Slovenia, 'SPM: Lobiranje tobačne industrije' (Transparency International Slovenia, 28 March 2023) <https://www.transparency.si/novica/spm-lobiranje-tobacne-industrije/#:~:text=Poleg%20tega%20je%20bilo%20lobiranje,Erar%20Komisije%20za%20prepre%C4%8Devanje%20korupcije>

<sup>56</sup> Mladinska zveza Brez izgovora, 'Politična integriteta v Sloveniji: pomanjkljivosti na področju zagotavljanja transparentnosti odločitev javnega pomena' (No Excuse Slovenia, 13 December 2021) [https://www.noexcuse.si/novice/politicna-integriteta-v-sloveniji-pomanjkljivosti-na-podrocju-zagotavljanja-transparentnosti-odlocitev-javnega-pomena/#:~:text=predvsem%20s%20strani%20toba%C4%8Dne%20industrije,Mladinske%20zvezde%20Brez%20izgovora%20Slovenija](https://www.noexcuse.si/novice/politicna-integriteta-v-sloveniji-pomanjkljivosti-na-podrocju-zagotavljanja-transparentnosti-odlocitev-javnega-pomena/#:~:text=javnega%20pomena,%20strani%20mo%C4%8Dnih%20interesnih%20skupin)

<sup>57</sup> Mladinska zveza Brez izgovora, 'Politična integriteta v Sloveniji: pomanjkljivosti na področju zagotavljanja transparentnosti odločitev javnega pomena' (No Excuse Slovenia, 13 December 2021) <https://www.noexcuse.si/novice/politicna-integriteta-v-sloveniji-pomanjkljivosti-na-podrocju-zagotavljanja-transparentnosti-odlocitev-javnega-pomena/#:~:text=predvsem%20s%20strani%20toba%C4%8Dne%20industrije,Mladinske%20zvezde%20Brez%20izgovora%20Slovenija>

investigate undisclosed industry influence on the tobacco law amendment.<sup>58</sup> While the outcomes of that probe were not fully public, the mere fact of an official investigation sent a warning signal against secret collusion.

Slovenian media investigations have shed light on the tobacco industry's covert lobbying. For example, 24UR (POP TV) and other outlets reported on the "pressures of tobacco multinationals" around the plain-packaging debate and revealed how arguments from purported experts mirrored industry propaganda.<sup>59</sup> Major newspaper Delo ran an exposé titled "Razkrito lobiranje tobačne industrije" ("Lobbying by the Tobacco Industry Revealed"), describing Big Tobacco's influence operations and calling them "the worst abuse of science since the Nazi era".<sup>60</sup> This strong language reflects public health experts' frustration at seeing industry narratives creep into policy under the guise of economic or legal concerns.

Critically, Slovenian NGOs have used lobbying transparency tools to document industry access to officials. The online platform Varuh integritete (Integrity Watch), which compiles reported lobbying contacts, shows a flurry of tobacco-industry lobbying in recent years.<sup>61</sup> In early 2023, No Excuse and TI analyzed these records and found that multiple ministries were approached by tobacco companies or their allies at key moments. For instance, in March and September 2023, Philip Morris Ljubljana, JTI, and TDR d.o.o. (linked to BAT) lobbied the Ministry of Economic Development and Technology as well as the National Assembly regarding proposed bans on flavored e-cigarettes and new tobacco product regulation.<sup>62</sup> Likewise, industry representatives lobbied the Ministry of Finance on tax policy and even tried to influence Slovenia's position on international tobacco treaties. This evidence of persistent, multi-pronged lobbying has been publicized by civil society as a potential Article 5.3 violation, especially if any of these contacts were not properly disclosed or if industry input was treated on par with public health advice.

In response, health advocates (such as the Slovenian Coalition for Public Health and Tobacco Control) have urged officials to "consistently implement Article 5.3" and keep industry players at arm's length.<sup>63</sup> They emphasize that interactions with tobacco lobbyists should be limited and fully transparent, e.g. conducted via public hearings or published

<sup>58</sup> 24ur.com, 'KPK uvedla preiskavo zaradi suma nezakonitega vpliva na predlog tobačnega zakona' (24ur.com, 18 June 2019) <https://www.24ur.com/novice/slovenija/kpk-ovedla-preiskavo-zaradi-suma-nezakonitega-vpliva-na-predlog-tobacnega-zakona.html#:~:text=KPK%20je%20prejela%20informacijo%2C%20da,nezakonitega%20vplivanja%20na%20pripravo%20predloga>

<sup>59</sup> Transparency International Slovenia, 'NVO napovedujejo spremljanje lobiranja tobačnega zakona' (Transparency International Slovenia, 7 March 2023) <https://www.transparency.si/novica/nvo-napovedujejo-spremljanje-lobiranja-tobacnega-zakona/#:~:text=Jan%20Peloza%20iz%20Brez%20izgovora,ljudstva%20vr%C5%A1en%20neizmeren%20pritisk%2C%20kar>

<sup>60</sup> Delo, 'Skrito v tobačnem dimu: Incognito, ergo sum' (Delo, 17 June 2017) <https://old.del.si/znanje/znanost/skrito-v-tobacnem-dimu-incognito-ergo-sum.html>

<sup>61</sup> Transparency International Slovenia, 'SPM: Lobiranje tobačne industrije' (Transparency International Slovenia, 28 March 2023) <https://www.transparency.si/novica/spm-lobiranje-tobacne-industrije/#:~:text=S%20pomo%C4%8Djo%20spletne%20platforme%20Varuh,Transparency%20International%20Slovenia%20Jernej%20Trebe%C5%BEnik>

<sup>62</sup> Transparency International Slovenia, 'SPM: Lobiranje tobačne industrije' (Transparency International Slovenia, 28 March 2023) <https://www.transparency.si/novica/spm-lobiranje-tobacne-industrije/#:~:text=S%20pomo%C4%8Djo%20spletne%20platforme%20Varuh,Transparency%20International%20Slovenia%20Jernej%20Trebe%C5%BEnik>

<sup>63</sup> Nacionalni inštitut za javno zdravje, 'Razkrijmo manipulacije tobačne industrije' (NIJZ, 30 May 2024) <https://nijz.si/zivljenski-slog/tobacni-in-povezani-izdelki/razkrijmo-manipulacije-tobacne-industrije/#:~:text=Na%20Slovenski%20zvezini%20za%20javno,pred%20komercialnim%20interesi%20toba%C4%8Dne%20industrije>

meetings only. Transparency International Slovenia has echoed that “any meetings and communications between decision-makers and tobacco lobbyists must be publicly disclosed”, to allow oversight and prevent policy capture. These watchdog efforts suggest that while formal inclusion of tobacco companies in policy bodies is not openly permitted, informal influence remains a challenge, requiring constant vigilance.

#### 4. Conclusion

In summary, Slovenia’s government has not officially installed tobacco industry representatives on health policymaking commissions or multi-sector health committees, which would be a blatant breach of WHO FCTC Article 5.3. There is no record of a tobacco executive sitting on, say, the Ministry of Health’s advisory board or the interagency group monitoring tobacco control and Article 5.3 guidelines explicitly prohibit such roles.<sup>64</sup> Nonetheless, evidence from 2018–2024 shows that the tobacco industry has found other avenues to insert itself into public health policy development. Through aggressive lobbying of ministries and Parliament, participation in economic and trade forums, and alliances with business chambers or front groups, tobacco companies and their associates have tried to sit (informally) at the table where health policies are shaped. This includes involvement in discussions on tobacco taxation, product regulations, and even national strategy documents often to delay, dilute or block robust health measures. These actions prompted investigations and criticism from anti-corruption bodies, NGOs, and the media, all of whom argue that such industry influence undermines the spirit of Article 5.3.<sup>65</sup>

Going forward, Slovenian authorities face pressure to tighten compliance with Article 5.3. This means ensuring no advisory group or multi-sector committee gives the tobacco industry a formal voice in policy decisions, and that any necessary interactions (for example, on tax or smuggling issues) are fully transparent and strictly limited. Watchdog groups like Transparency International Slovenia and *Youth Network No Excuse* continue to monitor lobbying registries and call out any cozy relationships. Their findings highlight a clear lesson: while Slovenia’s laws on paper align with FCTC Article 5.3, vigilance is needed to guard against informal tobacco industry influence in practice. The years 2019–2024, in particular, showed that even without an official invitation to sit on a health board, tobacco companies can and will seek to steer multi-sector policy conversations to protect their profits, something public health advocates are determined to expose and prevent.<sup>66</sup>

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) <sup>67</sup> (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.						
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<sup>64</sup> Transparency International Slovenia, ‘NVO napovedujejo spremljanje lobiranja tobačnega zakona’ (Transparency International Slovenia, 7 March 2023) <https://www.transparency.si/novica/nvo-napovedujejo-spremljanje-lobiranja-tobacnega-zakona/#:~:text=dr%C5%BEave%20%20%9Csprejemale%2C%20podpirale%20ali%20odobravale,na%20podlagi%20ugotovitev%20analize%20ali>

<sup>65</sup> Mladinska zveza Brez izgovora, ‘Politična integriteta v Sloveniji: pomanjkljivosti na področju zagotavljanja transparentnosti odločitev javnega pomena’ (No Excuse Slovenia, 13 December 2021) <https://www.noexcuse.si/novice/politicna-integriteta-v-sloveniji-pomanjkljivosti-na-podrocju-zagotavljanja-transparentnosti-odlocitev-javnega-pomena/#:~:text=Predvsem%20s%20strani%20toba%C4%8Dne%20industrije,Mladinske%20zvezde%20Brez%20izgovora%20Slovenija>

<sup>66</sup> Transparency International Slovenia, *Politična integriteta: med priporočili in prakso – Študija primera Slovenije* (Transparency International Slovenia 2023) [https://www.transparency.si/images/publikacije/politicna\\_integriteta\\_slo.pdf](https://www.transparency.si/images/publikacije/politicna_integriteta_slo.pdf)

<sup>67</sup> Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

According to the official WHO FCTC COP10 delegation list, Slovenia did not include representatives from tobacco industry entities within its delegation, nor has any evidence emerged indicating acceptance of sponsorship for delegates by tobacco companies.

However, as noted by NIJZ (2024) and Sumah et al. (2024), the broader issue remains a lack of clear governmental protocols explicitly preventing indirect or informal industry influence on delegates or stakeholders involved in related health decision-making forums. Thus, while no formal breach is documented regarding COP representation, potential vulnerabilities to indirect industry influence persist.

### **No Tobacco Industry Presence in COP Delegations or Sponsorship**

Reviews of WHO FCTC Conference of the Parties (COP) participant lists show that Slovenia's official delegations consist solely of government officials (primarily Ministry of Health representatives), with no individuals from tobacco companies or affiliated entities.<sup>68</sup> For example, recent COPs have listed Slovenia's delegates as public health officials (e.g. a Head of Health Promotion and an Attache for Health), and no evidence exists of any tobacco industry employee or tobacco state-enterprise representative being included.<sup>69</sup> Similarly, there are no reports that Slovenia ever accepted sponsorships or travel funding for its delegates from tobacco companies. This indicates compliance with FCTC Article 5.3 guidelines recommending Parties bar industry personnel and funding from their COP delegations (Rec 4.9 and 8.3).

### **No Pro-Industry Positions Taken at COP Negotiations**

Crucially, Slovenia has not been documented taking any pro-tobacco industry stances during COP negotiations. On the contrary, Slovenia, often coordinating positions with the EU, has supported the adoption of strictest tobacco control measures at these meetings. Notably, at COP4 (2010), Parties collectively rebuffed intensive tobacco industry lobbying and infiltration attempts, going on to approve strong guidelines on product regulation and additives.<sup>70</sup> There is no indication that Slovenia diverged from this unified stand protecting health over industry interests. Likewise, at COP5 (2012) Slovenia joined consensus to adopt the Illicit Trade Protocol and the Seoul Declaration, which explicitly committed Parties to counteract tobacco industry interference.<sup>71</sup> In later sessions (e.g. COP7–COP9), Slovenia continued to align with decisions strengthening Article 5.3 implementation, such as moves to maximize transparency of delegations and require conflict-of-interest disclosures, rather than siding with industry-friendly arguments.<sup>72</sup> In sum, no evidence exists of Slovenian delegates advocating positions favourable to the tobacco industry in the COP or its working

<sup>68</sup> WHO FCTC Secretariat, 'List of Participants at COP10' (2023) <https://fctc.who.int/publications/m/item/list-of-participants-cop10>

<sup>69</sup> WHO FCTC Secretariat, 'Final List of Participants at COP9' (2021) <https://fctc.who.int/publications/m/item/final-list-of-participants-cop9>

<sup>70</sup> Framework Convention Alliance, 'COP 4 Overcomes Industry Efforts, Delivers Progress on Global Tobacco Control' (FCA, 24 November 2010) <https://fctc.org/cop-4-overcomes-industry-efforts-delivers-progress-on-global-tobacco-control/#:~:text=During%20the%20COP%20industry,a%20number%20of%20Parties%20%99%20delegations>

<sup>71</sup> Tobacco Tactics, 'FCTC Regulations Protect Public Health Policies from Interference' (Tobacco Tactics, 19 November 2012) <https://www.tobaccotactics.org/article/fctc-regulations-protect-public-health-policies-interference/#:~:text=FCTC%2FCOP5>

<sup>72</sup> Corporate Accountability, 'COP10 & MOP3 Resource Hub' (Corporate Accountability, 2023) <https://corporateaccountability.org/cop10-mop3-resource-hub/#:~:text=At%20COP8%20and%20MOP1%2C%20Parties,public%20to%20submit%C2%A0declarations%20of%20interest>

groups. All available documentation points to Slovenia upholding FCTC principles and resisting industry influence in these international negotiations.

#### INDICATOR 2: Industry CSR activities

5. A. Government agencies or their officials endorse, support, form partnerships with or participates in <b>activities of the tobacco industry described as socially responsible</b> . For example, environmental programs. (Rec 6.2)							
B. The government (its agencies and officials) receives CSR contributions <sup>73</sup> (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests (eg <b>political, social, financial, educational, community or other contributions</b> (Rec 6.4) including environmental or EPR activities (COP10 Dec). NOTE: exclude enforcement activities as this is covered in another question	0						

Publicly available evidence indicates that Slovenian government institutions generally maintain distance from tobacco industry CSR initiatives, adhering to WHO FCTC Article 5.3 recommendations. Specifically, no recent records were found of explicit endorsement, partnership, or active participation by Slovenian government agencies in CSR initiatives conducted by tobacco companies (e.g., Tobačna Ljubljana, Philip Morris International, JTI, or BAT).

The National Institute of Public Health (NIJZ) consistently advises against such interactions, explicitly warning that the tobacco industry uses CSR strategies to influence public opinion and indirectly shape policy narratives. NIJZ and Slovenian public health advocates frequently underline the importance of rejecting these overtures (NIJZ, 2024).

Media searches (Delo, NIinfo.si, Zdravstveniportal.si) did not reveal government support or partnership in tobacco CSR.

Thorough searches of major government websites, tobacco company websites, and Slovenian media (Delo, NI, RTV Slovenija) indicate no recent explicit acceptance of monetary or material CSR contributions directly from tobacco industry entities or their affiliates by Slovenian government agencies.

Tobacco companies operating in Slovenia (notably Philip Morris and Tobačna Ljubljana) historically have pursued CSR independently, often in areas such as environmental sustainability, litter prevention, and youth-oriented prevention campaigns. However, these CSR activities are typically conducted without explicit government collaboration or acceptance.

No publicized cases of ministries or government officials receiving or endorsing tobacco industry funding for CSR were identified for the period reviewed (2023–2025).

#### INDICATOR 3: Benefits to the Tobacco Industry

<sup>73</sup> political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

	0	1	2	3	4	5
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 Slovenian government accommodated requests from the tobacco industry for extended implementation periods of tobacco control laws. A notable incident involved the plain packaging legislation, initially scheduled for enforcement in January 2020 but subsequently postponed to January 2023 following intensive lobbying from tobacco industry representatives. The delay, spanning roughly three years (1,095 days), resulted directly from industry advocacy, particularly by lobbyists from Japan Tobacco International (JTI) and Philip Morris. Investigations by Slovenia's Commission for Prevention of Corruption (KPK), supported by reports from investigative media such as Zdravstveniportal.si and Žurnal24.si, confirmed that the tobacco industry supplied legislative text to MPs to secure this postponement. The National Institute of Public Health (NIJZ) publicly criticized this delay, identifying it explicitly as an industry-driven initiative rather than a justified legislative adjustment. Additionally, Slovenia received official warnings from The European Commission.<sup>74</sup>

Between 2022 and 2024, documented meetings regularly took place between the Ministry of Finance, the Financial Administration (FURS), and representatives from major tobacco firms, including Tobačna Ljubljana, Philip Morris, British American Tobacco, and Japan Tobacco International (JTI). These consultations allowed tobacco companies to consistently influence excise tax schedules and regulatory timelines, effectively granting the industry significant fiscal advantages through stable and predictable business conditions. This regular and tailored government-industry dialogue on excise tax matters represents a continuous, implicit financial privilege unique to the tobacco sector.

7. The government gives privileges, incentives, tax exemptions, subsidies, financial incentives, or benefits to the tobacco industry (Rec 7.3)					3	
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### **Duty-Free Tobacco Allowances for Travelers**

One notable benefit is the duty-free allowance for tobacco products. International travellers entering Slovenia (from outside the EU) can bring in a limited quantity of tobacco products without paying import duties or taxes. Specifically, each traveler over 17 may bring up to 200 cigarettes, 100 cigarillos, 50 cigars, or 250 grams of smoking tobacco duty-free.<sup>75</sup> This means these quantities are exempt from excise tax and value-added tax upon entry. Such duty-free concessions, while standard under EU regulations, serve as a tax exemption on tobacco products and can indirectly benefit the tobacco industry by facilitating consumption (e.g. by allowing smokers to acquire some tobacco tax-free). Within the EU, even larger personal allowances exist (up to 800 cigarettes when bringing tobacco from one EU country to another where taxes have been paid). However, the 200-cigarette duty-free rule for non-EU imports remains a way the government permits a small

<sup>74</sup> Reporter, 'Tobačna blamaža Slovenije pred EU: zaradi nesposobnih uradnikov ministrstva za zdravje letijo opomini iz Bruslja' (Reporter, 5 July 2024) <https://reporter.si/clanek/slovenija/tobacna-blamaza-slovenije-pred-eu-zaradi-nesposobnih-uradnikov-ministrstva-za-zdravje-letijo-opomini-iz-bruslja-1091692>

<sup>75</sup> Financial Administration of the Republic of Slovenia, 'Relief from Import Duties' (FURS) [https://www.fu.gov.si/en/life\\_events\\_individuals/relief\\_from\\_import\\_duties](https://www.fu.gov.si/en/life_events_individuals/relief_from_import_duties)

tax-free flow of tobacco products into Slovenia. In summary, duty-free import allowances constitute a privilege to tobacco consumers and industry (by removing taxes on a portion of tobacco sales), albeit one tightly limited by quantity.

### **Subsidies and Financial Support for Tobacco Farmers**

In terms of agricultural or financial subsidies, Slovenia does not provide special subsidies to tobacco farmers or the tobacco industry. Slovenia has minimal to no domestic tobacco cultivation, recent data show *no recorded area* for tobacco crops and effectively zero domestic tobacco production.<sup>76</sup> Given this lack of local tobacco farming, there is no need for direct farm subsidies specific to tobacco. Moreover, as an EU member, Slovenia is bound by EU policies that ended tobacco-specific subsidies in 2010. The European Commission stopped all direct subsidies for raw tobacco production as of January 2010.<sup>77</sup> The previous EU tobacco subsidy programs were converted into general agricultural payment schemes, meaning any Slovenian farmer who might grow tobacco today only receives the standard EU/Common Agricultural Policy payments, not any tobacco-targeted support. In practice, this means no government incentives or cash subsidies are earmarked for tobacco growing. Unlike some other countries where governments still pay tobacco growers, Slovenia offers no special financial incentives for tobacco cultivation, consistent with EU rules and its public health commitments.

### **Other Tax Incentives or Benefits**

Beyond the duty-free allowance for travellers, there are no known tax exemptions or incentives exclusively for tobacco companies in Slovenia. The government does not grant special tax breaks, rebates, or preferential treatment to tobacco manufacturers or retailers. For example, there are no reduced excise rates or VAT exemptions for tobacco products domestically, tobacco is in fact heavily taxed to reduce consumption (with cigarettes subject to excise and VAT like any EU country). The only tax-related “benefit” the tobacco sector enjoys is the duty-free import allowance for personal use as described above, which is a general policy for travellers rather than a direct subsidy to any company. Additionally, while the industry may be consulted during excise tax policy updates, this is part of a predictable regulatory process rather than a financial incentive. In conclusion, the Slovenian government does not explicitly give financial privileges or subsidies to the tobacco industry, aside from the standard duty-free import limits for individuals and even those are tightly constrained. Overall, Slovenia’s policy aligns with WHO FCTC Article 5.3 recommendations (Rec 7.3) by avoiding preferential incentives to the tobacco sector, with no public funds or tax exemptions directly benefiting tobacco businesses.

### **INDICATOR 4: Forms of Unnecessary Interaction**

8. Top level government officials (such as President/ Prime Minister or Minister <sup>78</sup> ) meet with/ foster relations with the tobacco companies such as attending social functions and other events sponsored or organized by the tobacco companies or those furthering its interests. (Rec 2.1)	0						
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An exhaustive search of Slovenia’s primary transparency platforms (Varuh integritete), top government websites (gov.si, Ministry of Finance, Ministry of Health, Ministry of Economy,

<sup>76</sup> World Health Organization, *Tobacco Agriculture and Trade Country Profile: Slovenia* (WHO 2022)

[https://cdn.who.int/media/docs/default-source/country-profiles/tobacco/tobacco-agriculture-trade-country-profiles/tobacco-agriculture-trade-svn-2022-country-profile.pdf?sfvrsn=92d4b7bb\\_1&download=true](https://cdn.who.int/media/docs/default-source/country-profiles/tobacco/tobacco-agriculture-trade-country-profiles/tobacco-agriculture-trade-svn-2022-country-profile.pdf?sfvrsn=92d4b7bb_1&download=true)

<sup>77</sup> European Commission, ‘Tobacco’ (European Commission, 2023) [https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/tobacco\\_en#:~:text=Since%201993%2C%20in%20the%20EU%2C,support%20via%20EU%20regulation%201305%2F2013](https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/tobacco_en#:~:text=Since%201993%2C%20in%20the%20EU%2C,support%20via%20EU%20regulation%201305%2F2013)

<sup>78</sup> Includes immediate members of the families of the high-level officials

Office of the Prime Minister, and Slovenian Parliament/National Assembly websites), and top national news sources (N1 Info, RTV Slovenija, Delo, Dnevnik, Večer, STA) did not identify any public records or media reports indicating that top-level Slovenian government officials (President, Prime Minister, or Ministers) attended social events, ceremonies, or functions explicitly sponsored or organized by tobacco companies or entities furthering their interests during the specified reporting period. However in 2011, AmCham “Business Breakfast” with Finance Minister Dr. Franc Križanič (Ljubljana): Photographs from an American Chamber of Commerce (AmCham) business-breakfast event show that Dr. Križanič participated in the meeting. A captioned image identifies Jana Jovanovska<sup>79</sup> (PR for Philip Morris Ljubljana d.o.o., Slovenia’s largest tobacco company) as among the participants.<sup>80</sup> The event was attended by other ministers as well, for example Dr. Roko Žarnić, Minister of Environment and Spatial Planning, appears in the same photo gallery.<sup>81</sup> In sum, this AmCham forum featured both top-level Slovenian ministers and a tobacco-industry affiliate (Philip Morris Ljubljana). This event was not organized by tobacco companies.



Jana Jovanovska (PR for Philip Morris Ljubljana d.o.o., Slovenia’s largest tobacco company) pictured on the left.

<sup>79</sup> Jana Jovanovska, LinkedIn Profile <https://www.linkedin.com/in/janajovanovska/?originalSubdomain=si>

<sup>80</sup> Mediaspeed, ‘Ameriška gospodarska zbornica: Poslovni zajtrk z ministrom Križaničem’ (Mediaspeed, January 2022) <https://www.mediaspeed.net/galerija/dogodki/5816-ameriska-gospodarska-zbornica-poslovni-zajtrk-z-ministrom-križanicem#:~:text=Image%3A%20Jana%20Jovanovska%2C%20PR%20Philip,Poslovni%20zajtrk%20z%20ministrom%20Kri%C5%BEani%C4%8Dem>

<sup>81</sup> Mediaspeed, ‘Ameriška gospodarska zbornica: Poslovni zajtrk z ministrom Križaničem’ (Mediaspeed) <https://www.mediaspeed.net/galerija/dogodki/5816-ameriska-gospodarska-zbornica-poslovni-zajtrk-z-ministrom-križanicem#:~:text=Image%3A%20Jana%20Jovanovska%2C%20PR%20Philip,Poslovni%20zajtrk%20z%20ministrom%20Kri%C5%BEani%C4%8Dem>

Another example shows the leading Slovenian media company Pro Plus who has been active in the Slovenian media space for multiple years and traditionally hosts the POP Promenada. The event gathers a wide range of participants from business, culture, and media circles. At the POP Promenada 2019, Jana Jovanovska, PR representative of Philip Morris Ljubljana d.o.o., and Špela Marinčič from Philip Morris International were among the attendees.<sup>82</sup> While there is no evidence that any government officials attended the event, the participation of tobacco industry representatives at a high profile media event provides opportunities for public visibility and informal networking that may indirectly support the industry's social legitimacy and image. Such events can still be considered potential avenues for fostering relations between the tobacco industry and influential sectors, even in the absence of direct government involvement.



Jana Jovanovska, PR representative of Philip Morris Ljubljana d.o.o. on the left, and Špela Marinčič from Philip Morris International on the right.

Another example of social interaction involving the tobacco industry is shown in photographs published on Mediaspeed.net in 2011, depicting Breda Brezovar Papež, former Director of Corporate Affairs at Tobačna Ljubljana (Imperial Brands Group), attending a public event alongside Milan Kučan, former President of the Republic of Slovenia.<sup>83</sup>

<sup>82</sup> Mediaspeed, POP Promenada 2019 (Mediaspeed, 5 September 2019)

<https://www.mediaspeed.net/fotografije/prikazi/890208> accessed 10 September 2025.

<sup>83</sup> Mediaspeed, Breda Brezovar Papež, former Director of Corporate Affairs, Tobačna Ljubljana; Milan Kučan, former President of the Republic of Slovenia (Mediaspeed, 24.03.2011) <https://www.mediaspeed.net/fotografije/prikazi/242650->

The image captures both individuals present at a social gathering, highlighting the continued public visibility of tobacco industry representatives in high profile circles.

Although neither participant currently holds a government position, the public appearance of a former head of state alongside a former senior tobacco industry executive contributes to the normalization of the tobacco industry's social presence in Slovenia. The visibility of such figures at public events reinforces the industry's attempt to maintain prestige and legitimacy through association with respected national personalities.

While the incident does not constitute direct government interference, it highlights the ongoing social influence of the tobacco industry through links with prominent public figures.



Breda Brezovar Papež, former Director of Corporate Affairs at Tobačna Ljubljana (Imperial Brands Group) on the left, alongside Milan Kučan, former President of the Republic of Slovenia in the middle.

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)

## Findings (2023–2025):

Searches through Varuh integritate transparency database, NIJZ resources, Slovenian law enforcement portals (Ministry of Interior, Police, Customs Administration - FURS), tobacco industry websites (Philip Morris International Slovenia, Tobačna Ljubljana), and key Slovenian media sources (NI Info, Delo, Dnevnik, Večer, RTV Slovenija, STA) confirmed no reports or indications of Slovenian government agencies or officials accepting tobacco

industry assistance, monetary or otherwise, in enforcement-related activities such as anti-smuggling operations, implementing smoke-free policies, or preventing tobacco sales to minors during the assessed period.

Enforcement operations in Slovenia, including tobacco control compliance and anti-smuggling activities, remained exclusively within governmental jurisdiction and independent from tobacco industry influence.

Incidents Found: None

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)

*NOTE: This must not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.*

#### Findings (2023–2025):

In-depth searches on Varuh integritete, government portals (gov.si, Ministry of Finance, Ministry of Economy, Ministry of Foreign Affairs), tobacco industry websites (PMI Slovenia, Tobačna Ljubljana, JTI, BAT), and the Slovenian media landscape (NI Info, RTV Slovenija, Delo, Dnevnik, Večer, STA) identified no documented cases of the Slovenian government or its officials entering into formal partnerships, collaborations, or non-binding agreements with tobacco companies or their affiliated organizations outside the realm of tobacco control policy, CSR activities, or enforcement operations.

No evidence emerged indicating collaboration on trade negotiations, capacity building, dispute settlements, or similar commercial/technical cooperation explicitly involving tobacco entities during the period.

#### 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)

A comprehensive analysis of available transparency resources, particularly Slovenia's official Varuh integritete platform managed by Transparency International Slovenia in collaboration with the Commission for the Prevention of Corruption (KPK), indicates consistent public disclosure of meetings with the tobacco industry. The detailed search included leading Slovenian media sources such as NI Info, RTV Slovenija, Delo, Večer, Dnevnik, and STA, along with official government platforms. Throughout the current assessment period (April 2023 to March 2025), there were no identified incidents where the Slovenian government failed to publicly disclose necessary interactions with the tobacco industry. All recorded interactions between representatives from companies such as Tobačna Ljubljana and Philip Morris, particularly related to tobacco taxation and regulatory discussions with the Ministry of Finance, were transparently documented, including dates, participants, and the nature of the discussions. Although historical transparency issues have occurred previously, particularly evident in the 2019 plain-packaging lobbying controversy, the current assessment reveals no such violations of disclosure standards. Given the existence of a clear formal disclosure mechanism via Varuh integritete, Slovenia fully complies with

transparency guidelines for the assessed period. However it must be noted that it is not a requirement for government officials to disclose meeting with tobacco industry officials if the meeting is in a non-official setting. (example: business breakfast, party etc..)

### Disclosed Meetings (Apr 2023 – Mar 2025) with Tobacco Industry

- **March 2023 – Ministry of Finance:** Representatives of British American Tobacco d.o.o. (BAT), Tobačna Ljubljana d.o.o., and Japan Tobacco International (JTI) met with officials at the Ministry of Finance (and Financial Administration) to discuss proposed changes to the tobacco excise tax law (*Zakon o trošarinah*).<sup>84</sup>
- **September 2023 – Ministry of Finance:** The same companies (BAT d.o.o., Tobačna Ljubljana d.o.o., JTI d.o.o.) again met with Ministry of Finance officials on tobacco excise taxation (ZTro).<sup>85</sup> These meetings were recorded in public lobby register disclosures.
- **March 2023 – Ministry of Economy, Tourism and Sport:** Executives from Japan Tobacco International d.o.o. (JTI), Tobačna Ljubljana d.o.o., Philip Morris Ljubljana d.o.o., and TDR d.o.o. met with the Ministry of Economy, Tourism and Sport (formerly MGRT, now MGTŠ) to discuss the draft Tobacco Products and Related Products Act (ZOUTPI), including restrictions on flavors in e-cigarettes.<sup>86</sup>
- **September 2023 – Ministry of Economy, Tourism and Sport:** The same tobacco-industry companies (JTI, Tobačna Ljubljana, Philip Morris Ljubljana, TDR) again met with MGTŠ officials on the ZOUTPI legislation.<sup>87</sup> (In both March and September, the chamber of commerce GZS and trade association TZS also participated.)

Each of the above meetings was publicly disclosed via the Slovene “Varuh integritete” transparency platform (data sourced from the Commission for the Prevention of Corruption’s lobby-register “ERar”). No cases were found where required regulatory meetings with the tobacco industry were held without such disclosure.

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)							
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Slovenia demonstrates strong regulatory compliance in requiring disclosure and registration of tobacco industry entities and related individuals. Under the Integrity and Prevention of Corruption Act, the Commission for the Prevention of Corruption (KPK) maintains a mandatory, publicly accessible lobbying registry hosted on the Varuh integritete platform. This registry explicitly includes tobacco companies, affiliated organizations, and individual lobbyists. Entities such as Philip Morris, Tobačna Ljubljana, British American Tobacco (BAT), and Japan Tobacco International (JTI), along with their respective lobbyists (e.g., Gregor Krajc and Jernej Pavlin), are clearly registered and publicly disclosed. The regulatory framework comprehensively addresses the obligations outlined in the questionnaire,

<sup>84</sup> Mladinska zveza Brez izgovora, ‘Poleg tega je bilo lobiranje ...’ (No Excuse Slovenia)

<https://www.noexcuse.si/page/11/?m=press#:~:text=Poleg%20tega%20je%20bilo%20lobiranje,Erar%20Komisije%20za%20pre%20Devanje%20korupcije>

<sup>85</sup> Mladinska zveza Brez izgovora, ‘Poleg tega je bilo lobiranje ...’ (No Excuse Slovenia)

<https://www.noexcuse.si/page/11/?m=press#:~:text=Poleg%20tega%20je%20bilo%20lobiranje,Erar%20Komisije%20za%20pre%20Devanje%20korupcije>

<sup>86</sup> Mladinska zveza Brez izgovora, ‘S pomočjo spletne platforme Varuh ...’ (No Excuse Slovenia)

<https://www.noexcuse.si/page/11/?m=press#:~:text=S%20pomo%C4%8Djo%20spletne%20platforme%20Varuh,Transparenc%20International%20Slovenia%20Jernej%20Trebe%C5%BEnik>

<sup>87</sup> Ibid.

ensuring transparency of all lobbying activities by tobacco industry representatives. After applying the recommended scoring adjustments for the inclusion of affiliated organizations and individual lobbyists, Slovenia achieves a final adjusted score of 1, reflecting strong adherence to transparency requirements.

#### INDICATOR 6: Conflict of Interest

13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11)	1 Never	5 Yes
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Based on a comprehensive review of Slovenia's existing political financing regulations, election laws, and transparency guidelines from sources such as the Commission for the Prevention of Corruption (KPK), Varuh integritete, and Slovenian electoral authorities, no specific legislation was identified that explicitly prohibits tobacco industry contributions to political parties, candidates, or election campaigns. Additionally, there is no specialized requirement mandating the full and explicit disclosure of tobacco industry-related political financing. The current legislative framework in Slovenia regarding political campaign financing remains general, lacking targeted provisions or prohibitions for the tobacco industry specifically. Consequently, given the absence of explicit prohibitions or mandatory disclosure requirements related specifically to the tobacco industry, Slovenia receives a base score of 5 for this indicator, reflecting significant room for improvement in controlling potential conflicts of interest.

14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)	5
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Slovenia has documented cases where high-ranking former government officials transitioned into roles within the tobacco industry, raising potential conflict-of-interest concerns.<sup>88</sup> Notable examples include Gregor Krajc, a former State Secretary who became a listed as a representative for Philip Morris in Ljubljana. The official Chamber of Commerce website (June 2023) shows “Gregor Krajc, Philip Morris Ljubljana d.o.o.” on its tobacco products working group roster,<sup>89</sup> indicating his role with Philip Morris International. And Jernej Pavlin, a former public relations officer affiliated with the government (SDS Party) and worked as a local assistant of MEP in the European Parliament, who joined Japan Tobacco International (JTI). A 2017 MLADINA report explicitly states that Pavlin “was employed by Japan Tobacco” and notes he is responsible for “corporate relations and communications” at Japan Tobacco International.<sup>90</sup> This is also shown on his LinkedIn profile page.<sup>91</sup> These references demonstrate his involvement with JTI. Another example is

<sup>88</sup> 24ur.com, ‘Uvedbe enotnih embalaž tobačnih izdelkov še ne bo – je razlog lobiranje?’ (24ur.com, 17 April 2019) <https://www.24ur.com/novice/slovenija/uvetbe-enotnih-embalaz-tobacnih-izdelkov-se-ne-bo-je-razlog-lobiranje.html>

<sup>89</sup> Gospodarska zbornica Slovenije (GZS), ‘Stalna in občasna delovna telesa’ (GZS) [https://www.gzs.si/podjetnisko\\_trgovska\\_zbornica/vsebina/O-nas/Organiziranost/Stalna-in-ob%C4%8Dasna-delovna-telesa#:~:text=6](https://www.gzs.si/podjetnisko_trgovska_zbornica/vsebina/O-nas/Organiziranost/Stalna-in-ob%C4%8Dasna-delovna-telesa#:~:text=6)

<sup>90</sup> Mladina, ‘V naročju tobačnega lobija’ (Mladina, 3 March 2017) <https://www.mladina.si/180000/v-narocju-tobacnega-lobija#:~:text=Biv%C5%A1i%20piarovec%20SDS%20Jernej%20Pavlin,je%20zaposli%20pri%20Japan%20Tobacc>

<sup>91</sup> Jernej Pavlin, LinkedIn Profile <https://www.linkedin.com/in/jernej-pavlin/?originalSubdomain=si>

Bojan Pretnar, a former director of the Office of the Republic of Slovenia for Intellectual Property, Pretnar has publicly aligned with tobacco industry interests. After leaving public office he became a consultant arguing against tobacco-control measures. In 2016 and 2017 he emerged as a leading opponent of plain-packaging laws, offering unpaid advice to coalition MPs and using arguments favored by tobacco firms.<sup>92</sup> These individuals held significant government positions prior to their tobacco industry engagement, thereby exemplifying classic "revolving door" scenarios. Such movements of former senior officials into the tobacco sector indicate ongoing challenges related to integrity and potential undue influence on public policies. Given these clear and documented cases involving high-level former officials actively representing tobacco industry interests, the recommended score is 5, reflecting a severe conflict of interest concern under the FCTC Article 5.3 guidelines.

15. Current government officials and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	1					
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An extensive analysis of available transparency resources, media coverage, government portals, and official lobbying disclosures (Varuh integritete, NI Info, RTV Slovenija, Delo, Dnevnik, Večer, and STA) revealed no evidence that current Slovenian government officials or their immediate family members hold positions, including consultancy roles, within the tobacco industry during the reviewed period (April 2023–March 2025). Thus, Slovenia currently exhibits strong compliance regarding avoiding direct conflicts of interest involving active government personnel and their relatives in tobacco-related businesses. Consequently, Slovenia receives a low-risk score of 1 for this indicator, indicating effective adherence to standards set forth by Article 5.3 of the WHO FCTC in this specific domain.

#### INDICATOR 7: 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)	2					
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Slovenia has a general lobbying transparency system in place, mandated by the Integrity and Prevention of Corruption Act and overseen by the Commission for the Prevention of Corruption (KPK). All public officials must report lobbying contacts (including meetings with any industry) to the KPK. Transparency International Slovenia (TI Slovenia) has developed the Varuh integritete (Integrity Watch) platform which compiles the KPK's data and makes it searchable.<sup>93</sup> This serves as the de facto procedure for disclosing records of interactions, including those with tobacco industry representatives, detailing the date, participants (lobbyist and target institution/person), and subject matter of the lobbying contact.

<sup>92</sup> Mladinska zveza Brez izgovora, 'Bojan Pretnar proti javnemu zdravju – NVO napovedujejo spremljanje lobiranja tobačnega zakona' (No Excuse Slovenia, 29 March 2023) <https://www.noexcuse.si/novice/bojan-pretnar-proti-javnemu-zdravju-nvo-napovedujejo-spremljanje-lobiranja-tobacnega-zakona/#:~:text=recimo%20dr.Pretnarja%20nakazujejo%20na%20moralno>

<sup>93</sup> Transparency International Slovenia, Varuh integritete: 14. vlada – lobiranje v številkah (14. marec 2020 – 1. junij 2022) (Transparency International Slovenia, 25 October 2022) <https://www.transparency.si/wp-content/uploads/2022/10/varuh-integritete-14-vlada-lobiranje-v-stevilkah-251022.pdf#:~:text=Vsi%20podatki%20na%20varuhintegritete.ki%20so%20poro%C4%8Dale%20o%20najve%C4%8D>

## Evidence of Disclosed Meetings with Tobacco Industry

Using the KPK's lobbying register (through the Varuh integriteit platform), civil society was able to identify multiple instances of tobacco industry meetings with government officials in recent years. For example:

- In 2023, tobacco companies Japan Tobacco International (JTI), TDR d.o.o., Tobačna Ljubljana, and Philip Morris Ljubljana repeatedly lobbied the Ministry of Economic Development, Tourism and Sport regarding proposed amendments to the tobacco law (ZOUTPI, which includes measures like flavor bans). The Independent European Vape Alliance and JTI also lobbied members of the National Assembly about this law during that period.
- In the same year, British American Tobacco (BAT) d.o.o., Tobačna Ljubljana, and JTI met with officials at the Ministry of Finance (and its Financial Administration) in March and September to influence the Excise Duty Act (ZTro) on tobacco taxation.
- Additionally, the European Travel Retail Confederation was recorded lobbying in June 2023 regarding the Illicit Trade Protocol, and the Chamber of Commerce (GZS) and Chamber of Craft and Small Business (TZS) lobbied the Ministry of Economic Development against a draft National Strategy for Reducing Tobacco Use

These examples illustrate that the reporting system is functioning to some extent. Interactions with the tobacco industry are being disclosed and can be publicly retrieved, including information on which government bodies were approached and on what issues.

**Shortcomings:** It should be noted that Slovenia's transparency mechanism is general (covering all lobbying) rather than a tobacco-specific disclosure procedure. This means the onus is on users to search the database for tobacco-related terms or known industry entities to find relevant records, which may not be straightforward for the general public. Moreover, the system relies on officials and lobbyists to properly report all interactions. Past analyses have uncovered shortcomings in this reporting. For instance, TI Slovenia found "a number of irregularities" in how tobacco lobbying contacts were reported during a 2021 tobacco law debate. Such gaps indicate that not every interaction may be captured or promptly disclosed.

## Conclusion

Slovenia does have a procedure to disclose interactions with the tobacco industry through its mandatory lobbying transparency framework. However, because this system is not tailor-made for tobacco and has shown issues in completeness and user accessibility, its effectiveness in practice is limited. Therefore, this measure is only partially met.

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>Yes – for whole of government code; Yes but partial if only MOH</i>						5
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Upon review of Slovenian public integrity regulations, official government portals, and transparency resources, no evidence was found indicating that Slovenia has adopted a dedicated, government-wide code of conduct specifically prescribing standards for public officials' interactions with the tobacco industry. General public integrity standards are in place but lack tobacco-specific measures or guidance explicitly consistent with the FCTC

	0	1	2	3	4	5
Article 5.3. As such, Slovenia currently lacks a specialized code of conduct related to the tobacco industry interactions, resulting in the lowest compliance score of 5. However there is an Integrity Act on preventing corruption, but not directly for tobacco control.						
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)						5
Comprehensive analysis of Slovenian laws, government agency guidelines (such as Ministry of Finance, Ministry of Health, Customs Administration), and official transparency records (Varuh integritete, NIJZ, gov.si) revealed no specific legal requirements mandating tobacco industry companies to submit periodic detailed reports covering their production volumes, market shares, marketing expenditures, revenues, lobbying expenditures, philanthropic activities, political contributions, or funded research initiatives. Thus, Slovenia currently lacks formalized periodic disclosure requirements aligned explicitly with the provisions recommended under Article 5.3 and COP decisions. The absence of such detailed, mandatory industry disclosures leads to a compliance score of 5.						
19. The government has a program / system/ plan to consistently <sup>94</sup> raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
After thorough research, including a review of NIJZ resources, the Ministry of Health, and public administration training programs documented on Slovenian government portals, no dedicated awareness-raising or training programs specifically addressing FCTC Article 5.3 guidelines were identified within governmental departments. Although general anti-corruption and integrity awareness initiatives exist, they do not specifically highlight tobacco industry interference or Article 5.3 guidelines. Consequently, Slovenia receives a compliance score of 5 due to the absence of specialized FCTC Article 5.3 awareness programs.						
20. The government has put in place a policy to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives. (3.4)						5
A careful review of Slovenian public integrity regulations, codes of ethics for public officials, and transparency guidelines, including the Integrity and Prevention of Corruption Act, found no explicitly documented policy strictly forbidding acceptance of all forms of contributions, gifts, or assistance specifically from tobacco industry entities or their						

<sup>94</sup> 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.

representatives. Current ethical standards exist broadly for public officials but are not specifically targeted toward the tobacco industry and thus do not comprehensively align with Article 5.3 provisions. Hence, the Slovenian government receives a compliance score of 5, reflecting the lack of explicit tobacco-industry-specific regulations or prohibitions on receiving gifts and contributions.

**TOTAL**

**56**

ADDITIONAL	QUESTIONS
<i>Based on COP9 and COP10 Decisions highlighting Article 5.3 recommendations</i>	
<b>A. LIABILITY:</b> Government has adopted or enforced mandatory penalties for the tobacco industry in case it provided false or misleading information (Rec 5.4) [5.4 Parties should impose mandatory penalties on the tobacco industry in case of the provision of false or misleading information in accordance with national law.]	
<b>Evidence</b> Upon a comprehensive review of Slovenian legislation, including the Integrity and Prevention of Corruption Act, tobacco control laws (ZOUTPI), and general regulations from the Ministry of Health, Ministry of Finance, and Slovenian government portals, no specific laws or regulations explicitly imposing mandatory penalties solely for the tobacco industry in cases of providing false or misleading information were identified. General provisions exist in Slovenian legislation addressing false reporting or misinformation broadly, but these measures do not explicitly single out the tobacco industry. Consequently, Slovenia has not yet adopted or enforced tobacco-specific mandatory penalties explicitly addressing Article 5.3 recommendation 5.4. This indicates a regulatory gap, leaving room for strengthening through the development and implementation of clear, tobacco-specific legal penalties in line with COP9 and COP10 recommendations.	
<b>B. KH RESOURCE DATABASE:</b> Government adopted and implemented measures to ensure public access to information on TI activities [5.5 Parties should adopt and implement effective legislative, executive, administrative and other measures to ensure public access, in accordance with Article 12(c) of the Convention, to a wide range of information on tobacco industry activities as relevant to the objectives of the Convention, such as in a public repository.]	
<b>Evidence</b> Slovenia demonstrates strong compliance with Article 5.3 recommendation 5.5 through the establishment and operation of the Varuh integritete transparency platform, administered by Transparency International Slovenia in collaboration with the Commission for the Prevention of Corruption (KPK). The Varuh integritete platform serves effectively as a publicly accessible repository, documenting extensive information on lobbying activities, meeting agendas, participants, dates, and general outcomes, explicitly including interactions between public officials and tobacco industry representatives. Information available on this platform ensures public transparency regarding tobacco industry activities relevant to public policy and tobacco control objectives. Despite this notable strength, the database could be further enhanced by including comprehensive details on tobacco production, marketing expenditures, philanthropy, research initiatives, and other industry practices, aligning more closely with broader FCTC Article 5.3 and COP recommendations.	



## 5. Annex A: Sources of Information

	TOP MULTINATIONAL AND LOCAL TOBACCO GROUPS	MARKET SHARE	BRANDS	SOURCE
1	Imperial Brands (Tobačna Ljubljana)	45%	West, Davidoff, Gauloises, Boss	NI Info Slovenia, Imperial Brands corporate reports
2	Philip Morris International (PMI)	35%	Marlboro, Chesterfield, IQOS (heated tobacco)	NI Info Slovenia, Philip Morris International website
3	Japan Tobacco International (JTI)	10%	Camel, Winston, LD	NI Info Slovenia, Japan Tobacco International website
4	British American Tobacco (BAT)	8%	Lucky Strike, Pall Mall, Rothmans, Glo (heated tobacco)	NI Info Slovenia, British American Tobacco website
5	Karelia Tobacco Compan	2%	Karelia, George Kareljas and Sons	Industry market analyses, NI Info Slovenia

	TOP TOBACCO INDUSTRY ALLIES/ FRONT GROUPS	TYPE (FRONT GROUP, AFFILIATE, INDIVIDUAL)	SOURCE
1	American Chamber of Commerce in Slovenia (AmCham Slovenia)	Affiliate	Varuh integritete, Transparency International Slovenia
2	Chamber of Commerce and Industry of Slovenia (GZS)	Affiliate	Varuh integritete, Transparency International Slovenia
3	Slovenian Advertising Chamber (SOZ)	Affiliate	Varuh integritete, Transparency International Slovenia
4	Gregor Krajc (Former State Secretary, now PMI lobbyist)	Individual	Varuh integritete, Transparency International Slovenia
5	Jernej Pavlin (Former government PR officer, JTI lobbyist)	Individual	Varuh integritete, Transparency International Slovenia

<b>6</b>	Slovenian Vapers Association	Front Group	Varuh integritete, Transparency International Slovenia
<b>7</b>	Employers' Association of Slovenia (ZDS)	Affiliate	Varuh integritete, Transparency International Slovenia
<b>8</b>	Taxpayers Association of Slovenia (ZDavP)	Affiliate	Varuh integritete, Transparency International Slovenia
<b>9</b>	British-Slovenian Chamber of Commerce	Affiliate	Varuh integritete, Transparency International Slovenia
<b>10</b>	Association of Small Traders (Združenje malih trgovcev	Affiliate	Varuh integritete, Transparency International Slovenia