

Denmark

**TOBACCO
INDUSTRY INTERFERENCE
INDEX 2025**

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Background and Introduction

Background

Denmark is a tobacco-producing country

Denmark has been a tobacco-producing country since the 1700s.

Skandinavisk Tobakskompagni (*Scandinavian Tobacco Company*) was founded in 1961 by a merger of three Danish tobacco companies. In 1972, the American Tobacco Company joined the merger (1).

In 1990, all cigarette production was gathered in the new subsidiary under House of Prince A/S, while cigar production was gathered under Nobel Cigars A/S, now ST Cigar Group Holding B.V.

In 2008, the company's cigarette and snus divisions were sold to British American Tobacco. Skandinavisk Tobakskompagni changed its name to *Scandinavian Tobacco Group* and continued production of cigars, pipe tobacco, roll-your-own tobacco and chewing tobacco (1) (2).

In 2010, Scandinavian Tobacco Group merged with the cigar and pipe tobacco divisions of *Swedish Match AB (SM)* (3) and in 2011 acquired the Lane Limited Group, a manufacturer of pipe tobacco and cigars, from Reynolds American Inc. USA.

Scandinavian Tobacco Group employs almost 11,500 people globally and is headquartered in the capital, Copenhagen. Scandinavian Tobacco Group is the world's largest player in pipe tobacco and Europe's largest – and the world's third largest – in cigars.

The owners of Scandinavian Tobacco Group consist of Skandinavisk Holding A/S (owned by Chr. Augustinus Fabrikker and C.W. Obel) with 51 percent and Swedish Match with 49 percent (1).

The main tobacco companies in Denmark

Three transnational companies British American Tobacco (BAT), Philip Morris International (PMI) and Japan Tobacco International (JTI) dominate the Danish market. There is no access to market shares, but according to a presentation made by a PMI representative in 2020, BAT had the largest share of the cigarette market in Denmark (70 %) followed by PMI (18%) and JTI (10 %) (4).

The influence of the tobacco industry in Denmark - history

There have been close links between the tobacco industry and several high-level researchers in Denmark in the 1980s and 1990s (5) (6) (7) (8) (9).

A Danish doctor, *Tage Voss*, received a large annual fee from the tobacco company Philip Morris in the years 1987-1993 (10). His dissemination of scientific results has been of great importance to Danish professionals and laypeople's perception of the health damage of smoking and passive smoking. For example, he categorically denied that it has been proven that people get lung cancer from tobacco.

Tage Voss was the founder of the *Hen-Ry (Considerate Smokers) & National Smokers Alliance* in 1987. The official aim was to improve the relations between smokers and non-smokers. The association received a lot of money from the *Scandinavian Tobacco Company* and Philip Morris and worked to deny the harm of smoking and passive smoking.

In 1989, Denmark hosted the first *Nordic seminar on Smokers' Rights*. The meeting was sponsored by Philip Morris and many prominent people participated, including the then Minister of Foreign Affairs, Uffe Elleman Jensen (11).

Denmark played a prominent role in the industry's strategies throughout the 1990s. Philip Morris founded and sponsored the Komiteen for Kommerciel Ytringsfrihed (*Committee for Commercial Freedom of Expression*), which recruited over 50 prominent Danes (12). According to Philip Morris' head of communications, the committee was: "Probably the single biggest factor that caused Denmark to abstain from voting on the advertising directive in the EU in 1990." Advertising bans in the EU were therefore postponed for several years (12) (13) (14).

There have been close relations between Danish politicians and the tobacco industry over the years. For example, in 2018, Minister of Taxation Karsten Lauritzen (Liberal Party) invited the tobacco industry to a "greet-on-meeting" (15).

Smoking prevalence and health consequences

In 1950, almost 80% of Danish men and 40% of women smoked (16). Even more women started smoking in the 1960s and Danish women have held a world record in smoking. The Danes have the highest incidence of COPD in Europe (17) and there are almost 16,000 smoking related deaths in Denmark per year (18). Since the 1970s, the proportion of smokers has fallen slowly, for both women and men, but stagnated for 7 years from 2012. Since then, there has again been an annual, slow decline for both sexes. In 2024 more than 3,500 million cigarettes were sold in Denmark (19).

Almost 16,000 smoking related deaths per year in Denmark



35% of Danish young people (15–29-year-old) reported use of a tobacco and/or nicotine product in 2024

Smoking prevalence in 2024
Adults: 11% daily smokers + 6% occasional smokers

Young people (15–29-year-old): 7% daily smokers + 10% occasional smokers



Sources: number of smoking related deaths: (18); smoking prevalence adults (16); young persons' use of tobacco and nicotine products (20)

Tobacco and nicotine legislation in Denmark

Denmark signed the World Health Organization's (WHO's) Framework Convention on Tobacco Control (FCTC) in 2004 but has implemented the recommended tobacco legislation more slowly than many other countries in the world.

The *Tobacco Control Scale* monitors the implementation of tobacco control policies across Europe. In 2016 Denmark was at the bottom of the scale and ranked 29th out of 36 European countries (21). When compared with other countries in Europe from 1998 to 2019, tobacco prices increased the least in Denmark,(22) and no major legislative actions had been taken for many years (23). However, in the latest edition of the *Tobacco Control Scale* in 2021, Denmark ranked number 13 out of 37 European countries (24). It was the European country (together with the Netherlands) with the greatest improvements in tobacco control in the last three years (24).

In 2018 WHO Europe undertook a capacity assessment of Danish Tobacco Control and concluded that the tobacco industry in Denmark is “actively working to influence the policymakers and the public and only a small part of their activities are known” and that there was a lack of transparency in interactions between the government and the tobacco industry (25).

In 2019, a broad political coalition agreed on a comprehensive *Tobacco Action Plan* aimed at eliminating smoking among children and young people. This was adopted by law one year later (26). A significant strengthening of the tobacco legislation took place including the adoption of plain packaging; a point-of-sale display ban; a flavor ban on e-cigarettes, heated tobacco, chewing tobacco, and waterpipe; a strengthening of the promotion and marketing ban; a ban on the sale of novel nicotine products to minors; health warnings on nicotine pouch packages and smoke- and nicotine-free-school hours in all-schools with minors. Further, there was a major tobacco tax increase. The price of a 20-piece cigarette pack increased from approximately 40 DKK (approximately 5.3 euro/6 USD) in 2020 to approximately 60 DKK (approximately 8.1 euro/8.8 USD) per pack in 2022.

A paper investigated the major drivers for implementation of the *Tobacco Action Plan* and found that that seven factors strongly influenced the political will to comprehensively strengthen the national tobacco control in Denmark in a short time: national data; a nationwide alliance with broad partnerships; a strict focus on children and young people;

continuous media coverage; intensive lobbying by many different advocates; making it a community agenda (not a political one), and effective professional campaigns (27).

Since 2024, the following tightening of the tobacco legislation has been introduced: Ban on the import, purchase, possession, etc. of single-use e-cigarettes with illegal sweet flavors and too high nicotine content; strengthened age control and introduction of young “mystery shoppers”; higher fines and the possibility of depriving the right to sell tobacco and nicotine products; e-cigarettes and heated tobacco products included in the law on smoke-free environments; prohibition of flavors and fragrances in tobacco substitutes (=novel nicotine and tobacco products); limit on nicotine content and additives in tobacco substitutes; package size requirements for tobacco substitutes and chewing tobacco; the spread of plain packaging (including, for example, packaging for tobacco substitutes); Requirements for web-shops that sell tobacco or nicotine that they must use an effective online system to check the age of the buyer. The authorities' resources and opportunities for enforcing the legislation were also strengthened.

The tobacco and nicotine product legislation in Denmark in 2025

FCTC-based tobacco control policies	Cigarettes and roll your own tobacco	Chewing tobacco	Pipes, pipe tobacco, and cigar	Waterpipe tobacco	E-cigarettes	Nicotine pouches	New tobacco products e.g., heated tobacco
Article 8 Indoor smoking ban*	X (partly)	NO	X (partly)	X (partly)	X (partly)	NO	X (partly)
Article 8 Smoke- and nicotine-free school hours**	X	X	X	X	X	X	X
Article 9 Ban on characterizing flavors	X	NO	NO	NO	X (except menthol/ mint)	X (except menthol/ mint)	X
Article 11 Health warnings	X	X	X	X	X	X	X
Article 11 + 13 Plain packaging	X	X	NO	X	X	X	X
Article 13 Point-of-sale display ban	X	X	X	X	X	X	X
Article 16 Ban on sale to minors below 18 years	X	X	X	X	X	X	X

X = yes, legislation is adopted or implemented

*The smoking ban has several exceptions. Smoking is e.g. allowed in small bars (<40m²), single person offices and homes for elderly and a workplace can have a room/cabin designated for smokers.

** The legislation also bans use of nicotine products and covers the whole day, also when the students leave the school premises, e.g. during a long break.

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Methodology

The report is based on a questionnaire developed by the Southeast Asia Tobacco Control Alliance. There are 20 questions based on Article 5.3 guidelines. Information used in this report is obtained from the public domain only. The report only shows the *documented* cases of interaction between the tobacco industry and policymakers, but there may be a much larger, undocumented interaction.

A scoring system is applied to make the assessment. The score ranges from 0 to 5, where 5 indicates the highest level of industry interference, and 1 is low or no interference. Hence the lower the score, the better for the country. The 0 score indicates absence of evidence or not applicable. Where multiple pieces of evidence are found, the score applied reflects an average.

As it is the first time Denmark is contributing to the Tobacco Industry Interference Index this report covers information on incidents in the recent 5 years, from January 2020 up to May 2025.

We interpret the term “tobacco industry” as transnational tobacco and nicotine companies.

The term “government” covers not only the current government in power in 2025, but all politicians and civil servants, also at regional and municipal level. However, the score is higher if cases apply to Members of the Parliament/Ministers than lower-level officials.

Summary of Findings

1 INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

- Danish politicians, including Members of the Danish Parliament, interact with the tobacco industry, and the tobacco industry has been invited to present to the Health Committee in the Danish Parliament.
- The Danish government invites the tobacco industry to respond to draft legislation and has taken industry responses into account when shaping policy, resulting in final drafts that reflect the industry's interests.
- There is no documentation indicating that the government has allowed or invited the tobacco industry to sit in committees/advisory groups that sets public health policy, but the Danish Tax Committee has invited the tobacco industry to a meeting regarding future tobacco legislation and a discussion on initiatives the industry can take to reduce the number of new smokers.
- We found no documentation indicating that the government allows representatives from the tobacco industry in the delegation to the Conference of the Parties (COP), which is the governing body of the World Health Organization's Framework Convention on Tobacco Control.

2 INDUSTRY CSR ACTIVITIES

- There is lack of transparency in industry's donations to political parties and politicians in Denmark. Many political parties have so called "money clubs"/business clubs that open the doors to industry representatives' meeting with Danish Parliament members and Ministers.
- Government officials partake in tobacco industry related CSR activities.

3 BENEFITS TO THE INDUSTRY

- The Ministry of Health and the Elderly has on several occasions accommodated requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law.
- Despite political agreements to regulate and tax nicotine products, the tobacco industry benefited from delays. Nicotine pouches remained untaxed for over three years, and a planned cigarette price increase in 2020 was not enforced on time allowing continued sales at lower prices.

4 UNNECESSARY INTERACTION

- No interactions between top level government officials (Prime Minister or Minister) and the tobacco industry were identified. However, there are several cases where Members of the Parliament foster unnecessary relations with the tobacco companies.
- No findings indicate that the government accepts assistance from the tobacco industry on tobacco control enforcement.
- The Ministry of Taxation informs that they are always interested in receiving relevant information from the tobacco industry.

5 TRANSPARENCY

- The government does not publicly disclose meetings/interactions with the tobacco industry.
- Publicly available Parliamentary documents regarding questions and answers to the Danish Parliament do exist, but there is no insight regarding e.g., committee meetings with the tobacco industry.
- The Danish government does not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations and lobbyists acting on their behalf.

6 CONFLICT OF INTEREST

- The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns. Information about all contribution above DKK 25.000 should be publicly available, but many political parties have established “money/business clubs” and organizations that pool funding before transferring them to the parties.
- We have no documentation that retired senior government officials form part of the tobacco industry. However, two former political advisors to senior government officials now hold executive positions in the tobacco industry. Further, a former Head of Business Affairs of a major tobacco company is now an adviser for the current Minister of Health.
- There are no current officials or relatives holding positions in the tobacco business. However, there are examples of government officials which simultaneously with their political position also held positions within the tobacco industry. Further, there are examples of current and former Politicians, a Minister of the Parliament and Special Advisors of Ministers who have previously worked for the tobacco industry or in lobbyist firms working for the tobacco industry. Further, a former Head of Business Affairs in a major tobacco company is now an adviser for the current Minister of Health.

7 PREVENTIVE MEASURES

- The government does not have a code of conduct for disclosing records of interactions with the tobacco industry and its representatives.
- The government does not require 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 tobacco advertising, promotion and sponsorship activities, 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.
- The government does not have a program to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines.
- The government has not put in place a policy to disallow the acceptance of all forms of contributions/gifts from the tobacco industry including offers of assistance, policy drafts, or study visit invitations given or offered to the government, its agencies, officials and their relatives.

Recommendations

Recommendation 1: Fully implement Article 5.3 in the WHO FCTC

- **Limit interactions** of public officials and civil servants with the tobacco or nicotine industry only to the extent strictly necessary to enable them to efficiently regulate the tobacco and nicotine industry and its products.
- **Stop giving benefits**, such as giving a longer time frame for implementation of a tobacco control measure, to the tobacco and nicotine industry.

Recommendation 2: Full transparency in all interactions with the tobacco and nicotine industry

- The government and national and local decision makers should publicly disclose all interactions with the tobacco and nicotine industry and any entity working to further these industries' interests. Information should be publicly accessible.

Recommendation 3: Prohibit donations and contributions from the tobacco and nicotine industry

- Prohibit donations from the tobacco and nicotine industry to political parties, politicians, civil servants, trade unions and their foundations, think tanks etc. from the tobacco and nicotine industry or any entity working to further these industries' interests.

Recommendation 4: Regulate “socially responsible” activities by the tobacco and nicotine industry

- The government should not endorse, support, form partnerships with or participate in activities of the tobacco industry described as socially responsible (CSR activities). This includes all branches of government e.g., taxation, environment, foreign affairs etc.
- The government should not allow public disclosure by the tobacco industry of their activities described as socially responsible unless required by law.

The government should put in place the following measures:

- Implement a program to consistently raise awareness within all its departments on policies relating to FCTC Article 5.3 Guidelines.
- Develop a specific code of conduct for the government including civil servants, local and national politicians etc. and a mandatory procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco and nicotine industry and its representatives.
- Require the tobacco and nicotine industry to periodically submit information not only on tobacco production, manufacture, market share, marketing expenditures, revenues but also any other activity, including lobbying, philanthropy, political contributions, and all other tobacco advertising, promotion and sponsorship activities, as well as on tobacco and nicotine industry entities, affiliated organizations, lobby firms and individuals acting on their behalf, and funded groups and their research and marketing activities.

The “revolving door” between the tobacco/nicotine industry and the Danish Parliament and vice versa prepares the ground for unnecessary interaction and should be avoided.

Denmark

Tobacco Industry Interference Index 2025

Results and Findings

	0	1	2	3	4	5
INDICATOR I: Level of Industry Participation in Policy-Development						
I. The government ¹ 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 ² in setting or implementing public health policies in relation to tobacco control ³ (Rec 3.4)					4	
Brief overview: Members of the Danish Parliament, youth politicians, and political commentators regularly interact with the tobacco industry.						
Case I: Head of Communications at Philip Morris writes in a newspaper article that his company is becoming a member of business clubs that open the doors to Parliament Members and Ministers						
In a business club, also called “money club” ⁴ , you can buy a membership for typically just around DKK 20,000 (2,700 US\$). Conveniently, this is just such a low amount that the public does not have the right to see the membership lists. For that rate, you get access to meetings with the elected representatives a couple of times a year.						
Arzrouni writes in the article: “We are in the process of becoming members of the Moderate Party’s (Moderaterne, part of the current government) business club, the Liberal Alliance’s (Liberal Alliance) business club, the Danish Democrats’ (Danmarks Demokraterne) business club, the Danish People’s Party’s (Dansk Folkeparti) business club and the Conservatives’ (Konservative) business club”. He also writes: “We talk to politicians from virtually all parties.” ⁵						

¹ 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

² The term, “tobacco industry” includes those representing its interests or working to further its interests, including the State-owned tobacco industry.

³ “Offer of assistance” may include draft legislation, technical input, recommendations, oversees study tour

⁴ Altinget, 2021: <https://www.altinget.dk/artikel/her-er-partierne-erhvervsklubber> [01-07-2025]

⁵ Politiken, 2025: <https://politiken.dk/danmark/politik/art10450999/Tobakslobbyist-Her-er-de-partiers-erhvervsklubber-vi-er-ved-at-blive-medlem-af> [30-06-2025]

Venstre sagde nej, da virksomheden Philip Morris ville betale til partiets erhvervsclub. Andre erhvervsclubber sagde ja, fortæller tobaksvirksomhedens lobbyist, der afviser kritik af lobbyisme.

Tobakslobbyist: Her er de partiers erhvervsclubber, vi er ved at blive medlem af



Niels Christopher Arzrouni, talsmand for tobaksvirksomheden Philip Morris, »hører den der påstand om, at der er kommet et ønske om at få et møde med politikerne og muligvis andre, til mig placere øens det rigtige sted, og det er hos politikerne.« Foto: Palle Nansen

Translation: “Tobacco lobbyist: Here are the parties' business clubs we are about to become members of. The Liberal Party (Venstre) said no when the company Philip Morris wanted to pay to the party's business club. Other business clubs said yes, says the tobacco company's lobbyist, who rejects criticism of lobbying”⁶.

Case 2: The tobacco industry invited to the Health Committee in the Danish Parliament

In 2020⁷ and 2023⁸, Member of Parliament Liselott Blixt invited Philip Morris International to discuss bill L123 concerning the implementation of parts of the delegated directive on heated tobacco products, where they presented their new products to the Health Committee in the Danish Parliament. All members of the Health Committee were invited. (We have not been able to identify what consequences this meeting had on the attending politicians' future attitudes on the novel tobacco and nicotine products.)

Politisk kalender

16. maj 2023 14:45 - 15:00

Deputation: Philip Morris International besøger Sundhedsudvalget

Folketingets Udvælg får besøg af Philip Morris International om L 123 (Om implementering af dele af delegeret direktiv vedrørende opvarmede tobaksvarer m.v.).

2-011, Christiansborg

Læs mere

Translation: Deputation: Philip Morris International visits the Health Committee (a meeting on heated tobacco products).

Case 3: Youth politicians on a ‘study trip’ with the tobacco industry

The chairmen of youth politicians (many coming members of the Parliament) were invited on a trip to Switzerland in 2022 with Philip Morris International, who paid for the entire trip⁹. PMI

⁶ Politiken, 2025: <https://politiken.dk/danmark/politik/art10450999/Tobakslobbyist-Her-er-de-partiers-erhvervsclubber-vi-er-ved-at-blive-medlem-af> [30-06-2025]

⁷ 2020 presentation from Philip Morris Int.: <https://www.ft.dk/samling/20201/lovforslag/L61/bilag/11/2273087/index.htm> [19-05-2025].

⁸ Altinget, 2023: <https://www.altinget.dk/kalender/51254> [19-05-2025]

⁹ Frihedsbrevet, 2022: <https://frihedsbrevet.dk/ryg-og-rejs-ungdomspolitikere-var-paa-studietur-i-schweiz-koebt-og-betalt-af-tobaksgigant/> [19-05-2025]

presented their new products, research, and position on smoking policy. A few months later, several youth politicians publicly criticized the government's tobacco and nicotine control policy and argued that nicotine product legislation should be much less strict ¹⁰.

Mads Brüggers opslag

Mads Brügger 6. juli 2022

"Knap to måneder efter formændene for stort set samtlige ungdomspartier var på studietur betalt af tobaksgiganten Philip Morris, er der nu flere af dem, der langer ud efter regeringens rygepolitik. I et debatindlæg kritiserer de regeringens forslag om at hæve aldersgrænsen på salg af tobaks- og nikotinprodukter til 25 år for at være "ude af proportioner" og kalder det "meningsløst" at lave ens regulerig af tobaks- og nikotinprodukter. Timingen for kritikken er et tilfælde, lyder det fra flere af ungdomspartierne formænd, der afviser, at studieturen betalt af Philip Morris yder indflydelse på den kritik, de reiser nu."

Shortened translation: "Just under two months after the leaders of nearly all youth political parties went on a study trip funded by tobacco giant Philip Morris, several of them are now criticizing the government's smoking policy".

Case 4: Chairmen of youth politicians signed op-ed/opinion chronicle written by the tobacco industry

A Danish Lobbyist agency, Grace, was hired by British American Tobacco. British American Tobacco/Grace wrote a chronicle/debate post where they argued that the existing law prohibiting the sale of tobacco and nicotine products to persons under the age of 18 should not be changed to the proposed 25 years ¹¹. They then contacted youth politicians and had them sign as a third party. The youth politicians did not declare that the newspaper chronicle, published June 28, 2022, in a major Danish newspaper, Berlingske, was written by the tobacco industry ^{12 13}.

Berlingske

SAMFUND OPINION BUSINESS KULTUR

KOMMENTARER

Ungdomspartier: Står det til regeringen, kan man drage i krig, blive politibetjent eller være pornostjerne i årevis, inden man skal have lov at købe tobak

En aldersgrænse på 25 år for køb af tobak og nikotin er ude af proportioner sammenholdt med samfundets øvrige aldersgrænser, og det faktum at unge ryger mindre og mindre.



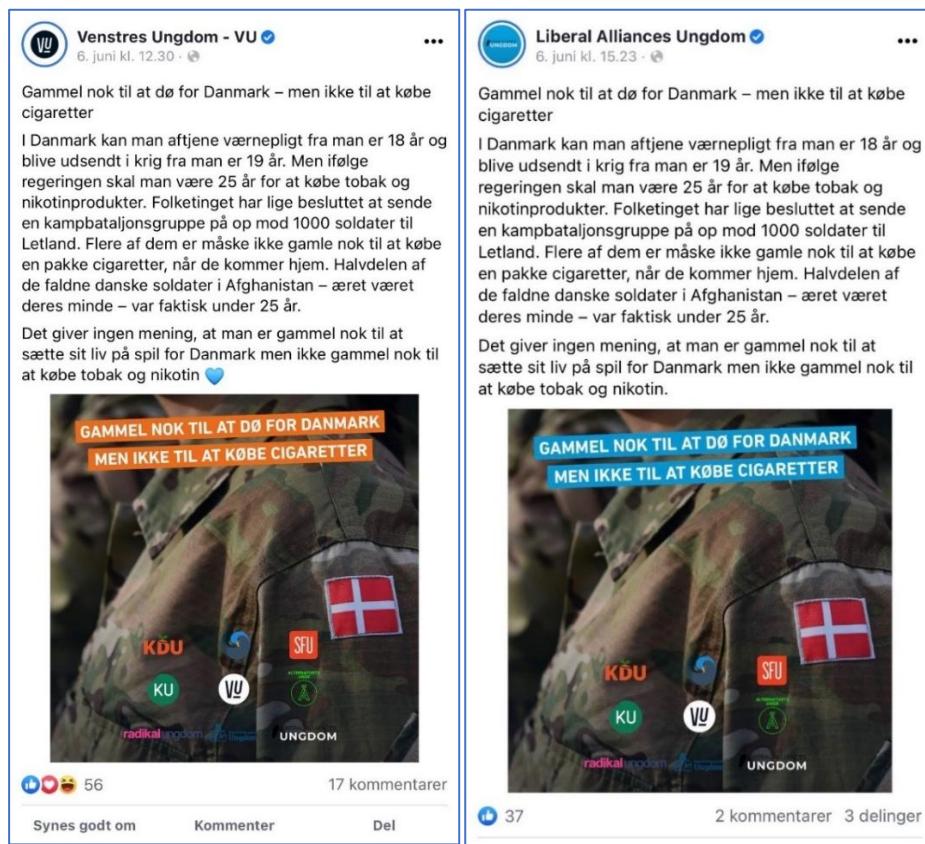
Translation: Youth parties: If the government gets its way, you could go to war, become a police officer, or work as a porn model for years before you're allowed to buy tobacco.

¹⁰ Link to the Facebook Post: https://www.facebook.com/story.php?story_fbid=10160289233866543&id=687296542&_rdr [19-05-2025]

¹¹ Berlingske, 2022: <https://www.berlingske.dk/kommentarer/ungdomspartier-staar-det-til-regeringen-kan-man-drage-i-krig> [19-05-2025]

¹² Jyllands-Posten, 2025: <https://jyllands-posten.dk/indland/ECE14261560/tobaksgigant-har-ogsaa-lavet-skjult-lobbyarbejde-igenmed-unge-politikere/> [19-05-2025]

¹³ Politiken, 2022: <https://politiken.dk/danmark/art8923793/%C2%BBDet-us%C3%A6dvanlige-her-er-at-det-samarbejde-foreg%C3%A5r-i-det-skjulte%C2%AB> [19-05-2025]



Shortened translation: Old enough to die for Denmark, but not to buy cigarettes.

Case 5: Former politician and political commentator for a large Danish News Paper took on a trip to Switzerland paid by Philip Morris International

Joachim B. Olsen, former politician in a Danish Liberal Party and Member of the Danish Parliament (2011-2019) and current political commentator for B.T., a large Danish News Paper, went on a trip to Switzerland in 2023, paid by Philip Morris International. During the trip, the delegation met with several researchers from the tobacco giant who presented the company's research on their new tobacco products ¹⁴



Shortened Translation: Joachim B. Olsen courted by tobacco giant. B.T.'s (newspaper) political commentator went on a lavish trip to Switzerland last week, paid for by tobacco giant Philip Morris.

¹⁴ Ekstra Bladet, 2023: <https://ekstrabladet.dk/nyheder/samfund/joachim-b.-olsen-smurt-af-tobaksgigant/9951863> [04-06-2025]

Case 6: The tobacco industry acknowledges interactions with Danish government officials

In Philip Morris International's annual Danish report from 2023 a code of conduct in meetings with government officials is described. This heavily suggests that TI representatives have regular interactions with government officials ¹⁵.

Anti-corruption

The success of our business, especially as we continue to work toward a smoke-free future, depends largely on our ability to interact with others, including government officials, in a manner consistent with our ethical values, policies, and all applicable laws, avoiding interactions that might be perceived as having an illegitimate, improper, or corrupt intent.

When interacting with stakeholders, including government officials, there is a risk that such interactions may be perceived as - or in the worst case – constitute, corruption. Hence, Philip Morris ApS has strict anti-corruption policies and processes, which unequivocally set the principles on how to interact with others responsibly and with due respect for reporting and registration requirements.



21

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

Brief overview: The Danish Government has, on several occasions, accepted draft legislation proposed by the tobacco industry and has taken industry responses into account when shaping policy, resulting in final drafts that reflect the industry's interests.

Case I: The tobacco industry is invited to respond to draft legislation

The Danish Parliament sends draft legislation to the tobacco and nicotine industries ¹⁶ ¹⁷ ¹⁸. This is a part of the democratic process. In the examples, Philip Morris International/the tobacco industry thanked for the opportunity to submit consultation responses. In recent years, the practice of sending draft legislation to the tobacco industry has diminished, but the tobacco industry still has access to draft legislations and always has many comments.

TOBAKSINDUSTRIVEN

TOBACCO MANUFACTURERS ASSOCIATION OF DENMARK

Vestergade 1 E, 3 tv.
DK-1230 København V.
Telephone: +45 39 82 88 99
+45 20 35 12 99

E-mail: jh@tobaksindustrien.dk

Ministeriet for Sundhed og Forebyggelse
Holbergsgade 6
1057 København K

Købmænnva d. 17 marts 2015

Pr. mail:
primund@sum.dk
cc. tr@sum.dk

Hørings vedrørende udkast til forslag til lov om fremstilling, præsentation og salg af elektroniske cigaretter m.v.
Tobaksindustrien har modtaget ovennævnte høringsudkast i høring. Det giver anledning til følgende bemærkninger:



PHILIP MORRIS ApS

København den 20. marts 2015

Ministeriet for Sundhed og Forebyggelse
Holbergsgade 6
1057 København K

Sendt per e-mail til primund@sum.dk med kop til tr@sum.dk

Høringsvar vedrørende forslag til lov om fremstilling, præsentation og salg af elektroniske cigaretter m.v

Kære Thomas Richter

Først og fremmest vil jeg gerne takke for muligheden for at kommentere Udkast til forslag til lov om fremstilling, præsentation og salg af elektroniske cigaretter m.v.

Der er ikke nogen tvivl om, at den markedsudvikling, vi har set de seneste år, viser, at forbrugerne ønsker et alternativ til de konventionelle tobaksprodukter.

¹⁵ Philip Morris Int. Report from 2022:

<https://api.lassox.com/data/cvr/report?id=22979752/amNsb3VkcsovLzAzLzc0LzBjLzVILzM2L2E4NDgtNDdhZS1hMzU3LW0MDk0MzM3MmNmMA.pdf> [19-05-2025]

¹⁶ Consultation list: <https://prodstoragehoeringspo.blob.core.windows.net/ee603607-748a-4fab-852b-d37f9bf35382/H%C3%B8ringssliste.pdf> [19-05-2025]

¹⁷ Consultation responses: [https://prodstoragehoeringspo.blob.core.windows.net/a1cf693-68a9-4c85-ab17-5f4e7ced85a5/H%C3%B8ringssvar%20til%20206%20bekendtg%C3%B8relser%20\(L-%C3%85\).pdf](https://prodstoragehoeringspo.blob.core.windows.net/a1cf693-68a9-4c85-ab17-5f4e7ced85a5/H%C3%B8ringssvar%20til%20206%20bekendtg%C3%B8relser%20(L-%C3%85).pdf) [19-05-2025]

¹⁸ Consultation memorandum: <https://www.ft.dk/samling/20241/lovforslag/L53/bilag/1/2915601/index.htm> [19-05-2025]

Case 2: The Ministry of Health and the Elderly accommodates tobacco industry recommendation

In this example the Danish Tobacco Manufacturers (a tobacco industry association) and Nicoventures (a company set up by BAT) complained about the size of the label with the name of the product. The Ministry of Health and the Elderly accommodated the tobacco industry and changed the wording in the 'Executive Order on the Standardization of Electronic Cigarettes and Refill Containers with and Without Nicotine' ¹⁹.

The following is excerpted from the attached consultation note:

3.2.5. Krav til "varemærke-" og "produktnavn" samt antal bogstaver
Efuma, Nicoventures og Tobaksproducenterne er kritiske overfor, at enkeltpakninger og ydre emballage kun må mærkes to steder med mærkenavn og variantnavn. Philip Morris anbefaler, at det tillades, at et læseligt mærkat med produktmærkenavn og variantnavn påsættes pakkens top.

Tobaksproducenterne og Nicoventures er kritiske overfor, at mærkenavnet begrænses til 14 bogstaver og tal i alt. Ydermere er Tobaksproducenterne og Nicoventures kritiske over for begrænsningen på antal produktnavne. Begrundelsen er dels, at der på nuværende tidspunkt er produkter på markedet med mere end én betegnelse, og at det er nødvendigt med flere navne for at kunne angive, hvilket produkt, der er tale om, og hvilket produkt, det hører til (fx er det relevant ved salg af genopfyldningsbeholdere at angive, hvilken type e-cigaret, der passer til).

Side 6

Shortened direct translation: The Tobacco Manufacturers and Nicoventures are critical of the restriction limiting brand names to a total of 14 letters and numbers. Furthermore, The Tobacco Manufacturers and Nicoventures are critical of the limitation on the number of product names.

Ministeriet har besluttet at imødekomme en række høringsparter og fjernet kravet om, at der maks. må være 14 tegn i varemærkenavnet. Idet der fortsat vil være et krav på maks. skriftstørrelse på varemærkenavnet, og et krav om, at varemærkenavnet maks. må stå på/fylde en linje på pakken, er der fortsat sat rammer for producenternes muligheder ift. branding via varemærket.

Shortened direct translation: The ministry has decided to accommodate several consultation parties and has removed the requirement that the brand name may contain a maximum of 14 characters.

Case 3: The tobacco industry succeeded in persuading the authorities to relax the requirements for the standardization of cigarettes, allowing them to continue selling 100-format (long) cigarettes

In the draft version of the executive order, the following length requirements for cigarettes had been proposed, which would have meant the end of long cigarettes ²⁰:

Original draft:

"Section 2. The length of the cigarette with filter must be a minimum of 80 millimeters and a maximum of 85 millimeters.

¹⁹ Commented consultation response: <https://prodstoragehoeringspo.blob.core.windows.net/46c7d778-9b5f-42be-a5a6-ada43fa4c595/H%C3%B8ringsnotat%20vedr.%20bekendtg%C3%B8relse%20om%20standardisering%20af%20e-cigarrer.pdf> [19-05-2025]

²⁰ Draft executive order: <https://prodstoragehoeringspo.blob.core.windows.net/a1cf693-68a9-4c85-ab17-5f4e7ced85a5/Bekendtg%C3%B8relse%20standardisering%20produkter%20og%20bestanddele.pdf> [19-05-2025]

Section 3. The length of the cigarette without filter must be a minimum of 65 millimeters and a maximum of 80 millimeters.”

The Tobacco Manufacturers sent a letter to the Health Committee in which they argued against banning long cigarettes ²¹. The arguments were: 1) The ban will have no effect on youth smoking. 2) It will increase cross-border trade, 3) It will lead to negative health consequences, as cross-border trade is related to the consumption of unhealthy products, 4) Cigarettes of the same length and without text and symbols make it easier for criminals to produce counterfeit cigarettes. In the final version of the executive order, long cigarettes will continue to be allowed:

Final draft: ²²

“Section 2. A cigarette with a filter must have a length of at least 80 millimeters and no more than 100 millimeters.

Section 3. A cigarette without a filter must have a length of at least 65 millimeters and no more than 80 millimeters.”

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)

2

Brief overview: There are no cases suggesting that the government has allowed or invited the tobacco industry to sit in government interagency/ multi-sectoral committee/ advisory group body that sets public health policy. However, the Danish Tax Committee has invited the tobacco industry to a meeting regarding future legislation and a discussion on initiatives the industry can take to reduce the number of new smokers.

Case I: The Tax Committee invites the tobacco industry to a meeting on future legislation

On November 12, 2020, the Danish Tax Committee invited Philip Morris International, Japan Tobacco International, and British American Tobacco to an open meeting and representatives from all companies attended the meeting ²³. The purpose of the meeting was described as “encouraging a dialogue with the tobacco industry regarding the design of future legislation and related measures that can meet the political goals of reducing the number of people—especially children and young people—who start smoking. Furthermore, the discussion addressed the responsibility of the industry and the initiatives it can take independently to reduce the number of new smokers.”

²¹ Inquiry from the Tobacco Manufacturers, 2024:

<https://www.ft.dk/samling/20241/lovforslag/L53/bilag/7/2925921/index.htm> [19-05-2025]

²² Retsinformation, 2025: <https://www.retsinformation.dk/eli/ita/2025/252> [19-05-2025]

²³ Meeting description: <https://www.ft.dk/udvalg/udvalgene/sau/arbejde/#26562ACA3B494DE4B36596E69DC795BE> [19-05-2025]

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 FOLKETINGET Indtast dit søgeord her <input type="text"/>  Forside Aktuelt Folkestyret Folketingssalen Dokumenter Medlemmer Udvalg	<p>Forside > Aktuelt > Nyheder > Åbent møde med tobaksbranchen</p> <h2>Åbent møde med tobaksbranchen</h2> <p>06.11.2020</p> <p>Folketingets Skatteudvalg afholder et åbent møde med tobaksbranchen. Mødet finder sted torsdag den 12. november 2020 kl. 10.15-11.15 i Landstingssalen på Christiansborg.</p> <p>Formålet med mødet er at forde en dialog med tobaksbranchen om indretning af fremtidig lovgivning m.v., der kan imødekomme de politiske intentioner om at få færre, herunder særligt børn og unge, begynder at ryge. Mødet udspringer bl.a. af sager beskrevet i pressen om ulovligt salg af cigaretter med gammel afgift og dumping af priser på cigaretter. Sagerne har affødt debat om, hvorvidt der bør indføres skærpende tiltag såsom sluttid for salg af cigaretter med 'gammel' afgift eller indførelse af minimumspriser på tobaksvarer. Endvidere er der lagt op til en drefstelse af, hvilke tiltag tobaksbranchen selv kan tage, for at få færre begynder at ryge.</p> <p>Til mødet har Skatteudvalget inviteret:</p> <ul style="list-style-type: none"> • Japan Tobacco International • British American Tobacco • Philip Morris <p>Pga. risikoen for coronasmitte er det ikke muligt at overvære mødet som tilhører på Christiansborg. Mødet vil blive tv-optaget og sendt live på Folketingets hjemmeside. Interesserede kan følge mødet direkte og forskudt via tv-transmissionen her.</p>											
Temamøder, ekspertmøder og andre møder Skatteudvalget afholdt den 12. november 2020 et åbent møde med repræsentanter for Philip Morris, Japan Tobacco International og British American Tobacco. Mødet blev afholdt på baggrund af sager beskrevet i pressen om ulovligt salg af cigaretter med gammel afgift og dumping af priser på cigaretter. Formålet med mødet var at forde en dialog med tobaksbranchen om indretning af fremtidig lovgivning m.v., der kan imødekomme de politiske intentioner om at få færre, herunder særligt børn og unge, til at begynde med at ryge. Endvidere blev det drøftet, hvilket ansvar branchen har, og hvilke initiativer branchen selv kan tage, så færre personer begynder at ryge.												
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) ²⁴ (Rec 4.9 & 8.3) For non-COP year, follow the previous score of COP year.												
No, the government does not allow representatives from the tobacco industry in the delegation to the COP or other subsidiary bodies or accepts their sponsorship for delegates. The Danish delegation had four representatives mainly from the Ministry of Interior and Health participate in COP10. ²⁵												
INDICATOR 2: Industry CSR activities												
5. A. Government agencies or their officials endorse, support, form partnerships with or participates in activities of the tobacco industry described as socially responsible . For example, environmental programs. (Rec 6.2) B. The government (its agencies and officials) receives CSR contributions ²⁶ (monetary or otherwise, including CSR contributions) from the tobacco industry or those working to further its interests (eg political, social, financial, educational, community or other contributions (Rec 6.4) including environmental or EPR activities (COP10 Dec). NOTE: exclude enforcement activities as this is covered in another question												

²⁴ Please annex a list since 2009 so that the respondent can quantify the frequency, <http://www.who.int/fctc/cop/en/>

²⁵ WHO FCTC. List of Participants. 1 March 2024. <https://iris.who.int/bitstream/handle/10665/377693/fctc-cop10-div-1-list-of-participants-en.pdf?sequence=1> [01-07-2025]

²⁶ political, social financial, educations, community, technical expertise or training to counter smuggling or any other forms of contributions

Brief overview: It has been documented that politicians and Government officials partake in tobacco industry related CSR activities.

A) Government officials participate in tobacco industry related CSR activities:

Case I: Philip Morris organizes an election debate in 2022 with the participation of politicians.

The debate was titled “Do alternative nicotine products help reduce health inequalities among socially disadvantaged populations?” and focused on whether Philip Morris’s newer products can help socially vulnerable people and reduce social inequality²⁷. Three government officials participated: a municipal council member from the Conservative People’s Party (Konservativ Folkeparti), a Parliamentary Candidate from the Socialist People’s Party (SF), and a parliament candidate from the Social Liberal Party (Radikale Venstre).

Skaber alternative nikotinprodukter mere lighed i sundhed for socialt udsatte?



Beskrivning

Socialt udsatte slås med mange problematikker, herunder også et stort omfang af rygning. Den danske rygepolitik, som eksempelvis rygestop, er nødvendigvis ikke et meningsfuldt svar til socialt udsatte. Ulighed i sundhed underbygges af mange års forskning, hvor rygning tydeligt identificeres som en af de store syndre. Desuden indeholder rygning en trist social bagside, da de mest rygtrængende oftest er de mest socialt udsatte med den allermindste pengepung. Denne debat vil gerne åbne op for, hvordan socialt udsatte kan flyttes væk fra rygning. Socialt udsatte lever i gennemsnit langt kortere liv sammenlignet med den resterende del af befolkningen. Så hvordan bør der politisk handles og prioriteres for at inddæmme rygning i samfundet, især for de socialt udsatte?

Siden sidste valgkamp er prisen for en pakke cigaretter steget til 60 kroner. Rammer denne pris socialt skævt og skaber større ulighed? Afgifterne er ligelægts steget på e-cigaretter, nikotinposer og andre alternative nikotinprodukter. I Norge og England anbefaler sundhedsmyndighederne at anvende hhv. snus og e-cigaretter frem for cigaretter, så burde der være en større prisforskel mellem cigaretter og alternative nikotinprodukter? Og vil det være bedre, at socialt udsatte fik deres nikotinafhængighed opfyldt af produkter, som ikke indeholder tobak?

Moderator: Frederik Roland, tidligere TV-vært på TV2 Østjylland

Paneldeltager:

Charlotte Green, Det Konservative Folkeparti
 Anna Brændemos, SF
 Hanne Roed, Radikale Venstre

Shortened translation: In Norway and England, health authorities recommend using snus and e-cigarettes, respectively, instead of cigarettes. Shouldn't there therefore be a greater price difference between cigarettes and alternative nicotine products? And would it be better if socially disadvantaged people satisfied their nicotine dependence with products that do not contain tobacco? (written by Philip Morris, the organizer of the debate)

²⁷Link to the event: <https://billetto.dk/sv/e/skaber-alternative-nikotinprodukter-mere-lighed-i-sundhed-for-socialt-udsatte-billetto-735181> [04-06-2025]

Case 2: Philip Morris organizes a debate on smoke-free generations.

In 2022, Philip Morris International arranged a debate on smoke-free generations where a member of the Danish Parliament for the Moderates Party (Moderaterne) and a representative from the executive committee of the Red-Green Alliance (Enhedslisten) participated ²⁸. The debate was moderated by Joachim B. Olsen, a former member of the Danish Parliament for Liberal Alliance.

Alexander L. Nepper (@NepperDK) ...

Vi mener det, når vi siger at vi aktivt arbejder for færre unge ryger. Derfor holder vi i dag en debat om hvordan vi når målet, med at ingen unge starter på cigaretter. Kom og bland dig i debatten kl 17 Kronprinsensgade 6 i KBH. #dkpol #dksund #ft22

Politisk debat: En røgfri generation
Deltag 25. oktober kl. 17 - 18
Kronprinsensgade 6, 1114 København

9.48 AM · 25. okt. 2022 · Twitter Web App

3 Likes

Folges af nogle Tweet-forfattere, du følger
CHARLIE STJERNEKLAR @CSZT · 1 t
Svarer @NepperDK
Fedt. Hjem er i panelet?

1 1

Alexander L. Nepper @NepperDK · 1 t
Svarer @CSZT
@nikolajbogh @NikolinePrehn Jon Stephensen (M) og David Rønne (Ø) under hård styring af @JoachimBOlsen - det bliver godt

1 1

Shortened translation: We mean it when we say that we actively work to reduce youth smoking. That's why today we're holding a debate on how we can reach the goal of preventing young people from starting to smoke cigarettes.

B) The government collaborates with the tobacco industry regarding environmental protection

Case 1: Collaboration between tobacco manufacturers and municipalities.

In 2021, four municipalities indirectly collaborated with tobacco manufacturers to develop new ashtrays / cigarette butt collectors to reduce the amount of cigarette litter in public spaces ^{29 30}. The collaborations were facilitated by the environmental organization Keep Denmark Clean (Hold Danmark Rent) where the Danish Tobacco Manufacturers (trade association for tobacco manufacturers, including British American Tobacco Denmark, Japan Tobacco International Denmark and Imperial Tobacco Denmark) are thanked as a collaborating partner ³¹.

Indsatser i fire testkommuner

Randers Kommune var i 2021 testkommune for en række forsøg, der skulle reducere mængden af cigaretskod i det offentlige rum. Det er organisationen Hold Danmark Rent, der stod for at undersøge og teste indsætserne i fire testkommuner i Danmark i et samarbejde med tobaksproducenterne:

²⁸ Altinget, 2022: <https://www.altinget.dk/erhverv/artikel/philip-morris-finder-ny-politisk-chef-hos-smvdanmark> [19-05-2025]

²⁹ Link to project description: <https://www.holddanmarkrent.dk/skodmission-i-randers/> [19-05-2025]

³⁰ NB Kommune, 2021: <https://www.nb-kommune.dk/2021/03/26/kommuner-saetter-maalrettet-ind-over-for-cigaretskod> [19-05-2025]

³¹ Link to webpage: <https://www.holddanmarkrent.dk/> [04-06-2025]

Translation: *Initiatives in Four Pilot Municipalities. Randers Municipality was in 2021 a pilot municipality for a series of trials aimed at reducing the amount of cigarette butts in public spaces. The organization Keep Denmark Clean was responsible for investigating and testing these initiatives in four pilot municipalities in Denmark, in collaboration with the Tobacco Manufacturers.*

INDICATOR 3: Benefits to the Tobacco Industry

6. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1)

4

Brief Overview: The Ministry of Health and the Elderly has on several occasions accommodated requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law.

Case 1: Longer period for implementation of plain packaging

In connection with the implementation of plain packaging, the Minister of Health granted the tobacco industry's request for a longer implementation period. The industry was given extra time to produce standardized tobacco packs ³².

During the implementation of standardized e-cigarette packaging, the tobacco industry ultimately had 21 months from the legislative amendment—and 17 months from the issuance of the executive order—until the sale of non-standardized e-cigarette packs had to cease completely ³³.

Ministeren har i forbindelse med behandlingen af lovforslaget stillet et ændringsforslag om at give producenterne yderligere tid til at omstille deres produktionsapparat. Med ændringsforslaget udskydes fristen for, hvornår det er lovligt at fremstille tobaksvarer og urtebaserede rygeprodukter uden standardiseret pakning til det danske marked, fra den 1. april 2021 til den 1. juli 2021. Det fastholdes dog, at de gamle pakker skal være afviklet i butikkerne senest den 1. april 2022. At produktet er fremstillet vil sige, at det er færdigfabrikeret og klar til distribution. Med forslaget imødekommes ønske fra industrien

Shortened translation: In connection with the processing of the bill, the minister has proposed an amendment to grant the manufacturers additional time to adapt their production systems. The proposal accommodates a request from the industry.

Case 2: Postponing the flavor ban

The Ministry of Health accepted the tobacco industry's proposal to postpone the ban on the sale of chewing tobacco with characterizing flavors other than menthol and tobacco ³⁴.

³² Comment on consultation proposal:

<https://prodstoragehoeringspo.blob.core.windows.net/46c7d778-9b5f-42be-a5a6-ada43fa4c595/H%C3%B8ringsnotat%20ifm.%20bekendtg%C3%B8relse%20om%20standardisering%20af%20tobakspakker.pdf> [02-07-2025]

³³ Retsinformation, 2021: <https://www.retsinformation.dk/eli/ita/2021/570> [19-05-2025]

³⁴ Commented hearing memorandum: <https://www.ft.dk/samling/20201/lovforslag/L61/bilag/1/2259695.pdf> [19-05-2025]

Tobaksindustrien anbefaler, at forbuddet mod kendetegnede for tyggetobak, først træder i kraft pr. 01.07.2022.

Ministeriets kommentar:

Lovforslaget udmønter den politiske aftale om en national handleplan mod børn og unges rygning, som indeholder et forbud mod tobaksvarer, e-cigaretter m.v. med andre kendetegnende aromaer end mentol og tobak.

Ministeriet har efter den offentlige høring foreslægt overgangsperioden udvidet fra 6 til 12 måneder, således at produkter produceret før d. 31. januar 2021 kan sælges indtil d. 31. januar 2022.

Shortened translation: The tobacco industry recommends that the ban on characteristic flavors in chewing tobacco should not take effect until 1 July 2022. Following the public consultation, the ministry has proposed extending the transition period from 6 to 12 months, allowing products manufactured before 31 January 2021 to be sold until 31 January 2022.

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

4

Brief Overview: Despite political agreements to regulate and tax nicotine products, the tobacco industry benefited from delays. Nicotine pouches remained untaxed for over three years, and a planned cigarette price increase in 2020 was not enforced on time allowing continued sales at lower prices.

Case I: Nicotine Pouches exempt from taxes

Nicotine pouches entered the Danish market in 2019 but were exempt from regulation and excise duty. This meant, for example, that nicotine pouches could be distributed as free samples, such as with the purchase of a plane ticket ³⁵.



As part of an agreement between the government and several parties in December 2019 – the Action Plan against Smoking Among Children and Youth – it was stated: “The parties to the agreement agree that nicotine products, including the so-called ‘nicotine pouches,’ are subject to the same regulations as tobacco products regarding advertising rules, age limits, etc.”

But the products were exempt from taxes: “The parties to the agreement agree to monitor the consumption of nicotine products and based on this, consider further regulation.”

³⁵ Zetland, 2020: <https://www.zetland.dk/historie/s81EDQxm-aejvz2nA-34dfs> [19-05-2025]

In October 2020, the government presented a new action plan aimed at ensuring that the tax increases passed by the Parliament have the intended effect. The plan included a measure for the government to investigate whether taxes could be imposed on new nicotine products such as nicotine pouches ³⁶.

In 2021, the government proposed a tax on nicotine pouches so that a typical can would cost 11 DKK more in the future. Until then, nicotine pouches had not been taxed. The bill was first read on 25 November 2021, but the rules only came into effect in January 2023. Altogether, the tobacco industry had over three years without taxes to introduce their new nicotine products to the Danish market ³⁷.

Case 2: Increased price on cigarettes in 2020 not implemented on time

In connection with the 2020 Finance Act, passed in December 2019, it was decided that cigarette prices would increase from approximately 40 DKK to approximately 55 DKK per pack on average. Formally, this was to take effect on 1 April, but in the autumn of 2020, cigarettes could still be bought at the “old price.” ³⁸

As early as June 2020, the coalition parties were concerned about the tobacco industry’s behavior, but the minister only responded to political pressure at the end of November 2020, almost 8 months after the price increase was supposed to have taken effect ^{39 40}.



Translation of the newspaper frontpage: Decidedly punishable: Tobacco giant has launched cheap cigarettes on the market despite price increases.

INDICATOR 4: Forms of Unnecessary Interaction

8. Top level government officials (such as President/ Prime Minister or Minister⁴¹) 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)

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³⁶ TV2, 2020: <https://nyheder.tv2.dk/samfund/2020-10-27-saadan-vil-regeringen-haeve-cigaretpriserne> [19-05-2025]

³⁷ Skattestyrelsen, 2022: <https://sktst.dk/nyheder-og-pressemeddelelser/fra-1-januar-2023-er-det-slut-med-nikotinprodukter-uden-afgift-nu-begynder-skattestyrelsens-kontroller> [04-06-2025]

³⁸ DR, 2020: <https://www.dr.dk/nyheder/indland/caia-kan-koebe-cigaretter-til-gammel-pris-paa-grund-af-afgiftsfinte-jeg-synes-jo-det> [19-05-2025]

³⁹ DR, 2020: <https://www.dr.dk/nyheder/indland/decideret-strafbart-tobaksgigant-har-sendt-billige-cigaretter-paa-markedet-trods> [19-05-2025]

⁴⁰ Skatteministeriet, 2020: <https://skm.dk/aktuelt/presse-nyheder/pressemeddelelser/regeringen-vil-skaerpe-krav-og-kontrol-over-for-tobaksbranchen> [19-05-2025]

⁴¹ Includes immediate members of the families of the high-level officials

Brief Overview: We found no interactions between top level government officials (Prime Minister or Minister) and the tobacco industry. However, there are several cases where Members of the Parliament from mostly the liberal parties foster unnecessary close relations with the tobacco companies.

Case I: Health Spokesman for Danish political party interacts with the Nicotine Industry

Louise Brown, Health Spokesman for the political party Liberal Alliance, is active in debates on nicotine products and is a strong pro harm reduction advocate. Interaction between her and the tobacco/nicotine industry representatives has been observed during a public meeting in the Health Committee of the Parliament on regulation of nicotine products. The Danish newspaper, Ekstra Bladet, described this interaction and accused her of acting as a "mouthpiece" for the nicotine industry ⁴².

Loise Brown read her pro-nicotine product arguments directly from her mobile phone. Loise Brown presented similar arguments to Inger Schrolls' (director of the Nicotine Industry) posts on X during the expert meeting in the Danish Parliament's Health Committee on young people's use of nicotine products. She quoted word for word a sentence on the relatively lower harmfulness of nicotine products said one year previously by one of the experts, in a local newspaper; a sentence that has been used by the nicotine industry since.



Further, Louise Brown has asked 11 official critical questions about nicotine legislation to the Danish Parliament and argued for a weaker legislation ⁴³, and supported a X post by Jeffrey Singer (an employee of the Cato Institute, a liberal think tank) who argues that the association between flavored puff bars and cigarette smoking among teenagers is misleading ⁴⁴.

⁴² Ekstra Bladet, 2023: <https://ekstrabladet.dk/nyheder/politik/danskpolitik/la-politiker-vækker-opsigt-i-forsvar-for-nikotin-lobby/9851126> [19-05-2025]

⁴³ Link to all questions to the Danish Parliament from Louise Brown: https://www.ft.dk/medlemmer/mfl/louise-brown/dokumenter/alle_spoergsmaal?mi=%7b78226B9F-52AC-4153-840E-0DD7F6F9B77E%7d&searchText=nikotin [19-05-2025]

⁴⁴ Link to the X post: <https://x.com/Louisebrowndk/status/1859355991894036490> [19-05-2025]

Louise Brown  @Louisebrowndk

Nogle gange, så giver det mening at lytte til fornuft.

Det er altså ikke kun mig og Liberal Alliance, der kan se udfordringerne i måden vi regulerer nikotin- og e-cigarett-markedet.

Vi rammer de forkerte!!!

#dkpol #sundpol #danmarkhørbrugforenfriskstart #liberalalliance

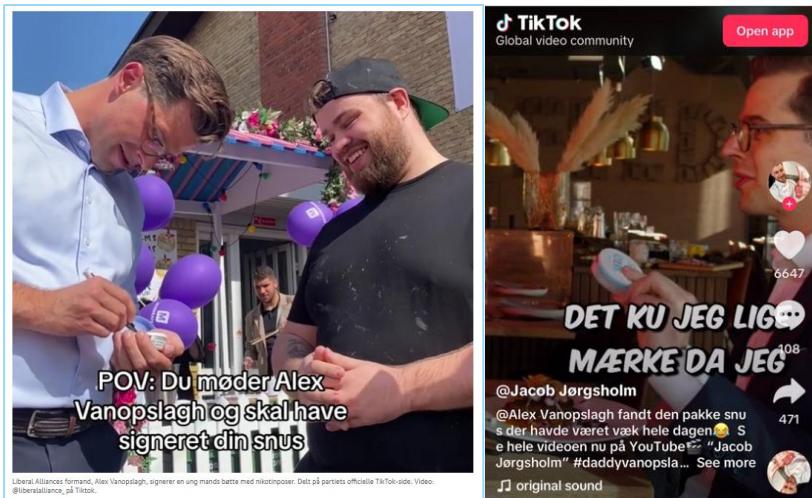
Jeffrey A. Singer  @dr4liberty · Oct 18, 2024

With teen vaping and smoking both declining, policymakers no longer have an excuse to restrict adults from consuming flavored e-cigarettes and other nicotine delivery systems that make it easier for them to quit tobacco. [@CatoHealth cato.org/blog/misleadin...](#) via [@CatoInstitute](#)

10:59 PM · Nov 20, 2024 · 480 Views

Case 2: Leader of a Danish political party advocates for nicotine pouches/snus

On TikTok, there are several videos of celebrities using nicotine pouches, including Alex Vanopslagh, chairperson of the political party Liberal Alliance^{45 46}. One video from April 2024 shows Vanopslagh signing nicotine pouch cans while visiting youth education institutions, and another from March 2023 features product placement for his nicotine pouches.



Furthermore, a motion for a resolution to the Danish Parliament was tabled by Alex V and two other politicians (2020). The proposers wanted the government to contact the EU to ask for an exemption from the ban on the marketing of snus that follows from the EU's Tobacco Products Directive⁴⁷.

Case 3: Friendly exchange between tobacco industry representative and Member of Parliament

Anna Kalituhu, Corporate Affairs & Communications Manager at Japan Tobacco International, congratulated Michael Aastrup Jensen, Member of Parliament for the Liberal Party (Venstre), on his 20th anniversary in the Danish Parliament. He responded warmly, indicating a close personal connection and a collaboration. He writes: “Anna Kalituhu Thank you so much for the really nice words which I am very happy about :-), and I was absolutely also happy with our collaboration :-).”

⁴⁵ Politicians using nicotine pouches on Social Media: <https://nikotinposenews.mediajungle.dk/> [19-05-2025]

⁴⁶ Jyllands-Posten, 2024: <https://jyllands-posten.dk/politik/ECE17003107/paa-tiktok-jubler-fans-over-laformands-snusforbrug-nu-kommer-eksperter-med-opsigtsvaekkende-anklage/> [19-05-2025]

⁴⁷ Link to the motion: <https://www.ft.dk/samling/20191/beslutningsforslag/B65/BEH1-57/forhandling.htm> [19-05-2025]

However, there is no documentation of a current collaboration.



Kristian Lausten Madsen • 2nd
Partner hos GRACE Public Affairs

3mo ...

Stort tillykke med jubilæet, Michael! 🎉🎈

Show translation

Like · 1 | Reply · 1 reply



Michael Aastrup Jensen • Author
Incoming Danish Ambassador to the Council of Europe, effective Au...

3mo ...

Kristian Lausten Madsen tusind tak, Lausten :-)

Show translation

Like | Reply



Anna Kalituhu • 2nd
Corporate Affairs & Communications Manager hos JTI (Japan Tobacco Inter...

3mo ...

Tillykke med jubilæet, Michael! Som en af dem, der har været med på rejsen, kan jeg kun sige tak den anden vej også. Tak fordi du for knap 16 år siden gav mig (såvel som mange andre i årenes løb) muligheden for at arbejde med politik for første gang - et drømmejob for en dengang nyuddannet bachelor i Europæiske studier og kommunikation. Tiden flyver, men du bliver ved med at være en ildsjæl, der kæmper for både lokale og globale dagsordener med samme passion, fordi du ikke kan lade være 🤗

Show translation

Like · 1 | Reply · 1 reply



Michael Aastrup Jensen • Author
Incoming Danish Ambassador to the Council of Europe, effective Au...

3mo ...

Anna Kalituhu tusind tusind tak for de virkelig flotte ord, som jeg er meget glad for :-) og jeg var absolut også meget glad for vores samarbejde :-)

Show translation

Like | Reply

Case 4: Former politician and political commentator for a large Danish News Paper took on a trip to Switzerland paid by Philip Morris International

Joachim B. Olsen, former politician in a Danish Liberal Party and Member of the Danish Parliament (2011-2019) and current political commentator for B.T., a large Danish News Paper, went on a trip to Switzerland in 2023, paid by Philip Morris International. During the trip, the delegation met with several researchers from the tobacco giant who presented the company's research on their new tobacco products ⁴⁸

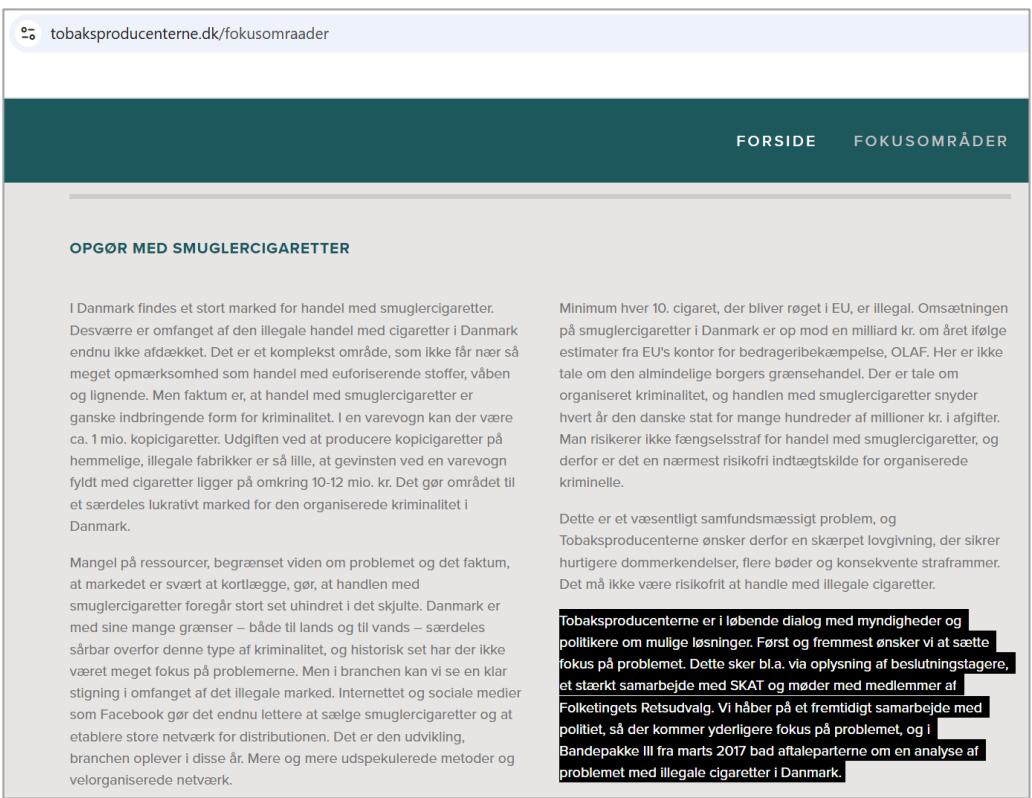
Samfund · 15. sep. 2023 · Gem artikel

Joachim B. Olsen smurt af tobaksgigant

B.T.s politiske kommentator Joachim B. Olsen tog i sidste uge på en fed tur til Schweiz betalt af tobaksgiganten Philip Morris. Overhovedet ikke noget problem, lyder det fra både Joachim B. Olsen og hans chef. En ekspert er uenig og kalder turen 'ulden'

Shortened Translation: Joachim B. Olsen courted by tobacco giant. B.T.'s (newspaper) political commentator went on a lavish trip to Switzerland last week, paid for by tobacco giant Philip Morris.

⁴⁸ Ekstra Bladet, 2023: <https://ekstrabladet.dk/nyheder/samfund/joachim-b.-olsen-smurt-af-tobaksgigant/9951863> [04-06-2025]

	0	1	2	3	4	5
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)	0					
No cases found.						
10. The government accepts, supports, endorses, or enters into partnerships or non-binding agreements with the tobacco industry or any entity working to further its interests. (Rec 3.1) <i>NOTE: This must not involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i>					3	
Brief Overview: The tobacco manufacturers are in an ongoing dialogue with authorities and politicians about solutions to the issue of smuggled cigarettes and The Ministry of Taxation has informed us that they are always interested in receiving relevant information from the tobacco industry.						
Case I: The tobacco manufacturers are in an ongoing dialogue with authorities and politicians about solutions to the issue of smuggled cigarettes⁴⁹.						
On their official website, the tobacco manufacturers state: "First and foremost, we want to highlight the problem. This is done, among other things, by informing decision-makers, maintaining strong cooperation with the Danish Tax Agency (SKAT), and holding meetings with members of the Parliamentary Legal Affairs Committee. We hope for future collaboration with the police to further address the issue. Moreover, in Gang Package III from March 2017, the agreement parties requested an analysis of the problem of illegal cigarettes in Denmark."						
 <p>OPGØR MED SMUGLERCIGARETTER</p> <p>I Danmark findes et stort marked for handel med smuglercigaretter. Desværre er omfanget af den illegale handel med cigaretter i Danmark endnu ikke afdækket. Det er et komplekst område, som ikke får nær så meget opmærksomhed som handel med euforiserende stoffer, våben og lignende. Men faktum er, at handel med smuglercigaretter er ganske indbringende form for kriminalitet. I en varevogn kan der være ca. 1 mio. kopicigaretter. Udgiften ved at producere kopicigaretter på hemmelige, illegale fabrikker er så lille, at gevinsten ved en varevogn fyldt med cigaretter ligger på omkring 10-12 mio. kr. Det gør området til et særdeles lukrativt marked for den organiserede kriminalitet i Danmark.</p> <p>Mangel på ressourcer, begrænset viden om problemet og det faktum, at markedet er svært at kortlægge, gør, at handlen med smuglercigaretter foregår stort set uhindret i det skjulte. Danmark er med sine mange grænser – både til lands og til vands – særdeles sårbar overfor denne type af kriminalitet, og historisk set har der ikke været meget fokus på problemerne. Men i branchen kan vi se en klar stigning i omfanget af det illegale marked. Internettet og sociale medier som Facebook gør det endnu lettere at sælge smuglercigaretter og at etablere store netværk for distributionen. Det er den udvikling, branchen oplever i disse år. Mere og mere udspukulerede metoder og velorganiserede netværk.</p> <p>Minimum hver 10. cigaret, der bliver røget i EU, er illegal. Omsætningen på smuglercigaretter i Danmark er op mod en milliard kr. om året ifølge estimater fra EU's kontor for bedrageribekæmpelse, OLAF. Her er ikke tale om den almindelige borgers grænsehandel. Der er tale om organiseret kriminalitet, og handlen med smuglercigaretter snyder hvert år den danske stat for mange hundreder af millioner kr. i afgifter. Man risikerer ikke fængselsstraf for handel med smuglercigaretter, og derfor er det en nærmest risikofri indtægtskilde for organiserede kriminelle.</p> <p>Dette er et væsentligt samfundsmæssigt problem, og Tobaksproducenterne ønsker derfor en skærpet lovgivning, der sikrer hurtigere dommerkendelser, flere bøder og konsekvente straframmer. Det må ikke være risikofrit at handle med illegale cigaretter.</p> <p>Tobaksproducenterne er i løbende dialog med myndigheder og politikere om mulige løsninger. Først og fremmest ønsker vi at sætte fokus på problemet. Dette sker bl.a. via oplysnings af beslutningstagere, et stærkt samarbejde med SKAT og møder med medlemmer af Folketingets Retsudvalg. Vi håber på et fremtidigt samarbejde med politiet, så der kommer yderligere fokus på problemet, og i Bandepakke III fra marts 2017 bad aftaleparterne om en analyse af problemet med illegale cigaretter i Danmark.</p>						

⁴⁹ Link to the Tobacco Manufacturers webpage: <https://www.tobaksproducenterne.dk/fokusomraader> [19-05-2025]

Case 2: The Ministry of Taxation is “always interested in receiving relevant information” from the tobacco industry

As a response to our enquiry, the Ministry of Taxation writes that they are always interested in receiving relevant information from the tobacco industry anymore, e.g., on the development of the illegal trade and cross-border trade of cigarettes.


Skatteministeriet

13. juni 2025
J.nr. 2025 - 3657

Skatteministeriet
Nicolai Eigtveds Gade 28
DK 1402 – København K

Telefon +45 33 92 33 92
Mail skm@skm.dk

www.skm.dk

Kære Charlotta Pisinger

Tak for din henvendelse af 6. maj 2025 vedr. et samarbejde etableret i 2015 mellem tobaksindustrien og Skatteministeriet vedr. illegal handel med cigaretter.

Indledningsvist skal jeg gøre opmærksom på, at Skatteministeriet ikke har eller har haft et sådant samarbejde, men det er korrekt, at der i 2015 blev oprettet et sådant samarbejde, men at dette ikke eksisterer længere. Baggrunden herfor er, at myndighederne som følge af WHO rammekonventionen om tobakskontrol, skal begrænse unødig kontakt med tobaksindustrien. Derfor afholdes sådanne løbende møder ikke længere.

Som myndigheder er vi dog altid interesseret i at modtage relevante oplysninger bl.a. til brug for kontrol. I dag henvises tobaksindustrien og deres interesseorganisationer til, at hvis de har oplysninger, som er relevante for Skatteforvaltningens kontrolarbejde, hører de gerne fra dem i form af anmeldelser.

Herudover kan jeg oplyse, at Skatteministeriet løbende modtager materiale fra tobaksindustrien og deres interesseorganisationer, fx om udviklingen i den illegale handel og grænsehandlen med cigaretter baseret på en såkaldt ”Empty Pack Survey”.

Translation: "Thank you for your inquiry of 6 May 2025 regarding a collaboration established in 2015 between the tobacco industry and the Ministry of Taxation regarding illegal trade in cigarettes. At the outset, I would like to point out that the Ministry of Taxation has not or has not had a cooperation, but it is true that such cooperation was established in 2015, but that this no longer exists. The reason for this is that the authorities because of the WHO Framework Convention on Tobacco Control, is intended to limit unnecessary contact with the tobacco industry.

Therefore, such regular meetings are no longer held. However, as authorities, we are always interested in receiving relevant information, e.g. need control. Today, the tobacco industry and their interest groups are referred to if they have information that is relevant to the Tax Administration's control work, they like to get from them in the form of reviews. In addition, I can inform you that the Ministry of Taxation regularly receives material from the tobacco industry and their interest groups, e.g. on the development of the illegal trade and cross-border trade cigarettes based on a so-called "Empty Pack Survey".

INDICATOR 5: Transparency

II. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)							4
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Brief Overview: The government does not publicly disclose meetings/interactions with the tobacco industry. However, The National Board of Health (Sundhedsstyrelsen) publishes all contacts and interactions with the tobacco industry online and refers to article 5.3. The National Board of Health writes that one out of four requests of access to documents were from the tobacco industry (2023 data) ⁵⁰.

Publicly available Parliamentary documents regarding questions and answers to the Danish Parliament do exist but there is no insight regarding e.g., committee meetings.

Case I: No insight into meetings between tobacco industry and members of the Parliament

The following was the response to our request on documentation on meetings between members of the Parliament and the tobacco industry: “As the Danish Parliament is not part of the public administration, the rules in the Public Administration Act do not apply to the activities of the Danish Parliament. Parliamentary documents shall be made available to the public. This is done by publication on the Folketing's website. However, this does not apply to committee minutes and minutes and summaries of committee meetings.”

Folketingets Præsidium har efter Folketingets Forretningsordens § 44, stk. 1, fastsat regler om adgang til Folketingets parlamentariske dokumenter m.v. Reglerne er tilgængelige på Folketingets hjemmeside via dette link:

[Regler for adgang til Folketingets parlamentariske dokumenter m.v. / Folketinget](#)

Det fremgår af reglerne, nærmere bestemt § 3, at Folketingets administration foranlediger, at parlamentariske dokumenter gøres tilgængelige for offentligheden. Dette sker ved offentliggørelse på Folketingets hjemmeside. Det gælder dog bl.a. ikke udvalgsprotokoller og referater og resuméer af møder i udvalgene.

Mine kolleger i Folketingets Oplysning kan hjælpe med at lave en finmasket segningspå ft.dk på offentlige dokumenter.

Har du spørgsmål, er du velkommen til at kontakte mig.

Med venlig hilsen

David Kruse Lange
Specialkonsulent



FOLKETINGET

12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)							5
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Brief Overview: The Danish government does not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists. Therefore, politicians can easily act in the interests of the industry.

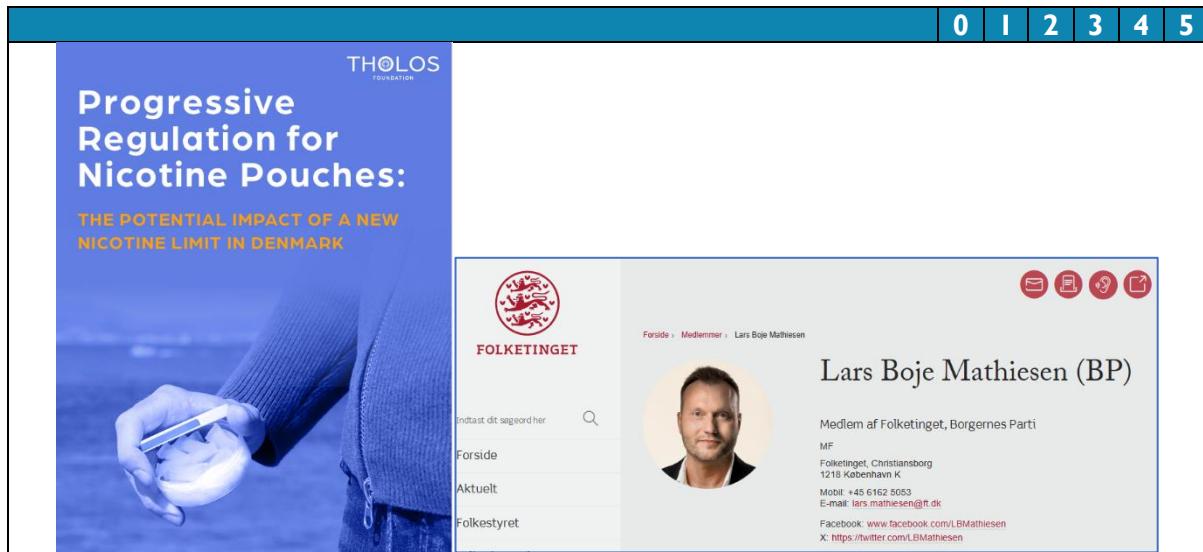
Case I: Member of Parliament Lars Boje Mathiesen acting on behalf of the tobacco industry.

In April 2025, Member of Parliament Lars Boje Mathiesen posed a critical question to the Minister for the Interior and Health, Sophie Løhde, regarding the government's proposal to introduce a limit on the nicotine content in nicotine pouches. He argued against a nicotine limit by referring to a press release from the Tholos Foundation, which published the report “*Progressive Regulation for Nicotine Pouches: The Potential Impact of a New Nicotine Limit in Denmark*.” The report and the Tholos Foundation are not widely known in Denmark. The Tholos Foundation has connections to the tobacco industry ^{51, 52}.

⁵⁰ The National Board of Health on WHO article 5.3: https://www.sst.dk/da/Fagperson/Forebyggelse-og-tvaergaaende-indsatser/Tobak-og-nikotin/Lovgivning/FCTC-artikel-5_3 [19-05-2025]

⁵¹ Tobacco Tactics, 2023: <https://www.tobaccotactics.org/article/global-tobacco-and-nicotine-forum-2023/>

⁵² Tobacco Tactics, 2024: <https://www.tobaccotactics.org/article/cop10-mop3-interference/>



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

5

Brief Overview: There is no such legislation. However, information about all contribution above DKK 25.000 should be publicly available. Many political parties have taken measures to circumvent the legislation through the establishment of “money clubs” (business clubs) and organizations that pool funding before transferring them to the parties.

Case 1: Companies and business clubs transfer each year of secretly millions of Danish kroner to the parties of the Danish Parliament.

How much money and their donors influence the policy pursued is not known, since the Danish legislation on party support only requires that the donor is published for amounts above the annually adjusted threshold amount (DKK 23,600 in 2024), and the size of the amount does not have to be declared, cf. section 2a of the Political Parties Accounts Act. The little bit public transparency that exists, can be relatively easily circumvented by sending the money via specially established associations or so-called “money clubs” (business clubs) ⁵³. The Council of Europe's Anti-Corruption Unit, The Group of States against Corruption (GRECO), has for more than 10 years raised a harsh criticism of Denmark's lack of openness about party support. In 2022, the European Commission has also called for Denmark to ensure more transparency when it comes to private party support ⁵⁴.

An investigative newspaper article found that The Liberal Party (Venstre) receives money from the Augustinus Fabrikker – an old Danish tobacco company that today is co-owner of Scandinavian Tobacco Group. The Liberal Party also accepts money from the organization The Tobacco Industry, which is owned by the CEO of Scandinavian Tobacco Group ⁵⁵.

⁵³ Altinget, 2021: <https://www.altinget.dk/artikel/her-er-partiernes-erhvervsklubber> [01-07-2024]

⁵⁴ Report on the rule of law 2022 – Country chapter on Denmark, European Commission:

https://commission.europa.eu/document/download/38604de7-d53f-4229-8276-ec3dc14fcf15_en?filename=14_1_193981_coun_chap_denmark_en.pdf [04-06-2025]

⁵⁵ Information, 2022: <https://www.information.dk/indland/2022/10/partierne-bruger-millioner-naar-valg-ved-hemmelige-donorer> [19-05-2025]

A 100% A

VALG 2022

Partierne bruger millioner, når der er valg. Her er, hvad vi ved om de hemmelige donorer

En stor del af partiernes økonomi er hemmeligholdt for offentligheden, og det har Danmark ofte fået kritik for. Men graver man sig ned i gamle regnskaber, kan man alligevel få et fingerpeg om, hvem der sponsorerer de dyre valgkampe

Martine Amalie Krøgh



Translation: Political parties spend millions during election campaigns. Here's what we know about their secret donors.

Representatives from The Red-Green Alliance (Enhedslisten) submitted proposals for a resolution by the Danish Parliament to ensure transparency in private political donations in both 2022 and 2023, but no resolution has yet been adopted^{56, 57}.

 **FOLKETINGET**

Folketingstidende
Tillæg A

Beslutningsforslag nr. **B 152** Folketinget 2023-24

Fremsat den 1. marts 2024 af Rosa Lund (EL), Pelle Dragsted (EL), Jette Gottlieb (EL), Runa Friis Hansen (EL), Anne Hegelund (EL), Trine Pertou Mach (EL), Søren Egge Rasmussen (EL), Søren Søndergaard (EL) og Victoria Velasquez (EL).

Forslag til folketingsbeslutning
om åbenhed om privat partistøtte

Folketinget pålægger regeringen inden udgangen af 2024 at foretage de nødvendige foranstaltninger, der sikrer fuld åbenhed om privat partistøtte. Følgende initiativer bør indgå:

- 1) Der indføres krav om, at størrelsen på private bidrag over beløbsgrænsen skal offentliggøres.
- 2) Der indføres oplysningspligt for pengeklubber og indsamlingsforeninger.
- 3) Der gøres op med selskabsfinten.
- 4) Fristen for regnskabsafslæggelse for politiske partier fremrykkes fra 12 til 4 måneder, og der indføres krav om regnskabsoffentliggørelse umiddelbart for folketingsvalg, kommunalvalg og europaparlamentsvalg.
- 5) Der oprettes et offentligt register over partistøtte.
- 6) Straffen for brud på partistøttereglerne skærpes.
- 7) Der indføres krav om en præcis beskrivelse af modtageren af donationer.
- 8) Der oprettes et kontrolorgan, der løbende skal føre kontrol og tilsyn med partistøtte.

⁵⁶ Link to the proposal, 2022: https://www.ft.dk/samling/20222/beslutningsforslag/b28/20222_b28_som_fremsat.htm [04-06-2025]

⁵⁷ Link to the proposal, 2023:

https://www.folketingstidende.dk/samling/20231/beslutningsforslag/B152/20231_B152_som_fremsat.pdf [19-05-2025]

Shortened translation: A proposal to the Parliament, to ensure full transparency regarding private party financing. The proposal was not adopted.

Case 2: “Money clubs” (business clubs) open the doors to meeting with Danish Parliament members.

These are business clubs or associations where you buy a membership for typically just around DKK 20,000 (2,700 US\$). Conveniently, this is just such a low amount that the public does not have the right to see the membership lists. For that rate, you get access to meetings with the elected representatives a couple of times a year ⁵⁸. Once you are a member of a club, you can donate large sums of money through it, which never reaches the public eye ^{59 60}. It is up to the parties themselves whether they want to give up the large amounts in their accounts if they have not been given directly to the party. We don't know much about the clubs, but we do know that almost all parties have one ^{61 62}.



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

3

Brief Overview: We have no documentation that retired senior government officials (former Prime Minister, Minister, Attorney General) form part of the tobacco industry. However, two former political advisors to senior government officials now hold executive positions in the tobacco industry.

Case 1: Inger Schroll-Fleischer, director of the Nicotine Industry

Inger Schroll-Fleischer, director of the Nicotine Industry has a long history in politics ⁶³:

- Political assistant in the Liberal Party to tax and telecommunications spokesman Torsten Schack Pedersen (Aug 2010 – Jun 2015)
- Office manager for Torsten Schack Pedersen, Michael Aastrup, Louise Schack Elholm and Erling Bonnesen (political spokespersons for the Ministry of Taxation and the Ministry of Industry, Business and Financial Affairs, Venstre (right wing party)) (July 2015 – July 2016)

⁵⁸ Altinget, 2021: <https://www.altinget.dk/artikel/her-er-partiernes-erhvervsklubber> [01-07-2025]

⁵⁹ Information, 2022: <https://www.information.dk/indland/2022/10/partierne-bruger-millioner-naar-valg-ved-hemmelige-donorer> [19-05-2025]

⁶⁰ Finanswatch, 2022: <https://finanswatch.dk/Finansnyt/article14437304.ece> [30-06-2025]

⁶¹ Information, 2022: <https://www.information.dk/debat/2022/11/boer-aendre-partistøttereglerne-tre-bud-paa-hvordan> [04-06-2025]

⁶² Politiken, 2025: <https://politiken.dk/danmark/politik/art10450999/Tobakslobbyist-Her-er-de-partiers-erhvervsklubber-vi-er-ved-at-blive-medlem-af> [30-06-2025]

⁶³ Inger Schroll-Fleischer's LinkedIn: <https://www.linkedin.com/in/inger-schroll-fleischer-a8b78638/?originalSubdomain=dk> [19-05-2025]

- Press advisor for Liberal Alliance (June 2016 – July 2019)
- Political consultant for the Danish Chamber of Commerce (Aug 2019 – Febr 2020)

She is very active in the media, promoting nicotine products, and she is friends on Facebook with the chairperson of Liberal Alliance, Alex Vanopslagh.

Case 2: Christopher Philippe Arzrouni, Head of Communications at Philip Morris⁶⁴

Previously active in the Liberal Party's Youth. He started his career in the Ministry of Finance as a clerk in 1992 until 1994. From 1995-96 he was employed for the Liberal Party in the party's political-economic secretariat. From 1996 until 2004, he held various positions in the Confederation of Danish Industry. In 2005, he became special adviser to the Minister of Social Affairs and from 2007 the Minister of Food, Eva Kjær Hansen, a position he served in until 2010. Arzrouni was hired for the Liberal Party's parliamentary group in March 2010. In June 2015 he was hired as a special adviser to Foreign Minister Kristian Jensen. He continued as a special adviser to Kristian Jensen when he became Minister of Finance in November 2016 when the VLAK government took office. Since September 2019, he has been Head of Communications at the tobacco company Philip Morris Aps. Furthermore, he has been editor of Dagbladet Børsen and Weekendavisen, two of the major Danish newspapers. He is very active in the media, promoting nicotine products.

15. Current government officials and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)					3	
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Brief Overview: There are no current officials or relatives holding positions in the tobacco business. However, three government officials simultaneously held positions within the tobacco industry, and numerous current and former Politicians and Ministers of the Parliament and Special Advisors of Ministers have previously worked in the lobbyist firms working for the tobacco industry. Further, a former Head of Business Affairs in a major tobacco company is now an adviser for the current Minister of Health.

Case 1: From key-staff in the tobacco industry to minister in current government.

Caroline Stage Olsen is Minister for Digitalisation for the Moderates Party (one of the government parties). She worked as head of public affairs at British American Tobacco from 2016 to 2019. After the formation of the Moderates Party, she became the party's political chief. For her appointment as minister, she was special adviser to the Minister for Foreign Affairs and former Prime Minister Lars Løkke Rasmussen. She has been a member of the Copenhagen City Council for the Liberal Party. She sat there until 2020 and was the party's political spokesperson as well as health spokesperson while working for BAT^{65, 66}.

Case 2: Mayor with a Dual Role

The former mayor of Aalborg Municipality (2014-2023), Thomas Kastrup-Larsen, simultaneously held a position as a board member of the Obel Family Foundation alongside his mayoral duties. The Obel Family Foundation was built on profits from tobacco production and tobacco sales^{67 68 69}, and is to this day co-owner (10%) of Scandinavian Tobacco Group⁷⁰.

⁶⁴ Christopher Philippe Arzrouni's LinkedIn: <https://www.linkedin.com/in/christopher-arzrouni-993aa11/> [details/experience/19-05-2025]

⁶⁵ Caroline Stage Olsens' CV: <https://www.ft.dk/medlemmer/mfl/c/caroline-stage-olsen> [04-06-2025]

⁶⁶ Altinget's description of Caroline Stage Olsen: <https://www.altinget.dk/person/caroline-stage-olsen> [04-06-2025]

⁶⁷ Mig og Aalborg, 2023: <https://migo aalborg.dk/thomas-kastrup-stopper-som-borgmester/> [19-05-2025]

⁶⁸ The Obel Family Foundation Jubilee Residence Hall, Annual Report for 2021:

<https://regnskaber.cvrapidk/34877611/amNsb3VkcovLzAzLzEylLzgxLzUwlzU2L2I4YigtNDk3MC04NzZlTl3MmUzZGjkNTk2MQ.pdf> [19-05-2025]

⁶⁹ Link to The Obel Family Foundation's webpage: <https://obel.com/vores-historie/> [19-05-2025]

⁷⁰ Link to Scandinavian Tobacco Group co-owners: <https://cwobel.dk/investeringer/scandinavian-tobacco-group/> [30-06-2025]

Case 3: Mayor and public affairs director at a lobbyist company working for the tobacco industry

Jacob Bjerregaard is a special adviser to the Minister of Taxation, Jeppe Bruus (Social Democratic Party). He was public affairs director at Grace lobbying firm (which had the tobacco industry as a client) from 2021 to 2023. In addition, he was a member of the Danish Parliament for the Social Democrats from 2013-2015 and mayor of Fredericia from 2014-2020 ⁷¹.

Case 4: Former Head of Business Affairs at the tobacco company Philip Morris and current special adviser for the current Minister of Health

Anne Katrine Melvig has previously been Head of Business Affairs at the tobacco company Philip Morris (2011 to 2014). Leaked internal PMI documents reveal that she lobbied Danish Members of European Parliament (MEPs) to take a pro-tobacco position whilst the 2001 EU Tobacco Product Directive Revision was being revised ⁷². She is now a special adviser for the current Minister of the Interior and Health, Sofie Løhde ⁷³.

The screenshot shows a news article from Altinget. The headline is 'Fra tobaksindustri og medicinlobby til Sundhedsministeriet: Løhde har fået ny særlig rådgiver'. The text below the headline states: 'Indenrigs- og sundhedsminister Sophie Løhde har fundet en ny særlig rådgiver i Anne Katrine Melvig. Hun kommer fra en chefstilling i lægemiddelindustriens brancheforening og har også tidligere været ansat i tobaksvirksomheden Philip Morris.' A small photo of Sophie Løhde is visible on the left.

Translation: From the tobacco industry and the pharmaceutical lobbyism to the Ministry of Health. Løhde has hired a new special advisor.

Case 5: From lobbyist firms working for the tobacco industry to the Danish parliament

Numerous current and former Ministers of the Parliament and Special Advisors of Ministers have previously worked in the lobbyist firms, Grace or Rud Pedersen, as senior consultants or public affairs directors ⁷⁴.

Both public affairs companies have tight ties with the tobacco industry and act on their behalf. Rud Pedersen is no longer collaborating with the tobacco industry in Denmark, but they do collaborate with them at EU level ⁷⁵.

⁷¹ Altinget, 2024: <https://www.altinget.dk/artikel/se-listen-her-er-nogle-af-de-folk-der-er-skiftet-mellem-slotsholmen-og-lobbyfirmaerne> [04-06-2025]

⁷² Tobacco Tactics, 2020: <https://www.tobaccotactics.org/article/anne-katrine-mevlig/> [04-06-2025]

⁷³ Altinget, 2024: <https://www.altinget.dk/embedsvaerk/artikel/fra-tobaksindustri-og-medicinlobby-til-sundhedsministeriet-loehde-har-faet-ny-saerlig-raadgiver> [04-06-2025]

⁷⁴ Altinget, 2024: <https://www.altinget.dk/artikel/se-listen-her-er-nogle-af-de-folk-der-er-skiftet-mellem-slotsholmen-og-lobbyfirmaerne> [04-06-2025]

⁷⁵ Jyllands-Posten, 2022: <https://jyllands-posten.dk/indland/ECE14343880/kampen-for-tobaksgigant-foregaar-fra-kontoret-i-bruxelles/> [04-06-2025]

Altinget Nyheder Debat Podcast Navnnygt Kalender Job [Køb abonnement](#) [Log ind](#)

17. juni 2024 kl. 21:50

Se listen: Her er nogle af de folk, der er skiftet mellem Slotsholmen og lobbyfirmaerne

Altinget har samlet et overblik over politikere, særlige rådgivere og partiansatte, der også er eller har været ansat i et public affairs bureau. Dyk ned i listen her.



Translation: Here are some of the people who have moved between Slotsholmen (the Parliament) and lobbying firms. Altinget has compiled an overview of politicians, special advisors, and party employees who are or have been employed at a public affairs agency.

Andre nuværende og tidligere politikere med fortid i et public affairs bureau

- **Anders Vistisen** var public affairs director i Grace fra 2019-2022. Han er nu medlem af Europa-Parlamentet for DF og spidskandidat for partiet ved europarlamentsvalget. Inden han blev ansat i Grace, var han medlem af Europa-Parlamentet fra 2014-2019 og formand for DFU fra 2012-2015.
- **Bergur Løkke Rasmussen** var konsulent i Grace fra 2020-2022. Han var medlem af Venstre indtil marts 2023, men er nu medlem af Europa-Parlamentet for Moderaterne og kandidat for partiet ved europarlamentsvalget.
- **Alex Vanopslagh** var konsulent i Grace fra 2016-2019. Han er nu partileder i Liberal Alliance og medlem af Folketinget, hvor han blev valgt ind i 2019. Inden han blev ansat i Grace, var han formand for LA Ungdom fra 2014-2016 – og så var han derudover medlem af Københavns Borgerrepræsentation fra 2018-2019.
- **Mette Thiesen** var konsulent i Grace i 2017. Hun er nu folketingsmedlem for DF. Og derudover var hun medlem af byrådet i Hillerød Kommune fra 2014-2021.
- **Fie Hækkerup** var ansat som konsulent i Rud Pedersen fra 2020-2022. Hun er nu folketingsmedlem for Socialdemokratiet. Og derudover var hun formand for Frit Forum fra 2018-2020.
- **Linea Søgaard-Lidell** var ansat som konsulent i Kristiansen+Partners fra 2015-2016. Hun er nu folketingsmedlem for Venstre – og har derudover siddet i Europa-Parlamentet for partiet.
- **Anne Borch Paulin** var praktikant i Geelmuyden Kiese i 2013. Hun er nu folketingsmedlem for Socialdemokratiet.
- **Marianne Lyngbø** var partner og rådgiver i Ulveman & Børsting fra 2017-2022. Inden da var hun særlig rådgiver Ulla Tørnæs, der var uddannelses- og forskningsminister i 2016 og minister for udviklingssamarbejde fra 2016-2017. Marianne Lyngbø er nu chefkonsulent i Landbrug & Fødevarer og kandidat til både Folketinget og Europa-Parlamentet for Venstre.
- **Jane Heitmann** var public affairs director i Rud Pedersen fra 2022-2023. Hun var folketingsmedlem for Venstre fra 2011-2022. Og hun er nu blandt andet formand for Krifa og Sclerosehospitalerne.
- **Ole Hækkerup** var direktør i Grace i 2018. Inden da var han folketingsmedlem for Socialdemokratiet fra 1998-2001, fra 2007-2015 og fra 2015-2016. Han er nu administrerende direktør i Dansk Ejendomsmæglerforening.
- **Carsten Hansen** var senior rådgiver i Rud Pedersen fra 2016-2017. Inden da var han folketingsmedlem for Socialdemokratiet fra 1998-2015 og minister for by, bolig og

The red lines show the lobbying firms Grace and Rud Petersen working on behalf of the tobacco industry.

Translation: Other current and former politicians with a past in a public affairs agency.

This is only a part of a long list, also showing Special advisers in the current (SVM) government with a past in a public affairs bureau, and SVM ministers with a past in a public affairs bureau working as tobacco lobbyists ⁷⁶.

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)								5
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Brief Overview: The government has not 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. There is no lobbyist register in Denmark.

Case 1: A politician calls for a lobby register

⁷⁶ Altinget, 2024: <https://www.altinget.dk/artikel/se-listen-her-er-nogle-af-de-folk-der-er-skiftet-mellem-slotsholmen-og-lobbyfirmaerne> [04-06-2025]

Kim Valentin from the Liberal Party (Venstre) writes in Altinget (a newspaper focusing on politics): “Politicians are surrounded by a growing layer of special advisers, communications people and lobbyists who act as a wall between the population and the decision-makers. From my experience in politics, we see today how lobbyists not only influence, but to a large extent dictate political decisions through their close networks and relationships with advisers and ministers” ⁷⁷ ⁷⁸.

The screenshot shows the Altinget website with a blue header bar. The main content area features a dark blue banner at the top with the text 'Netop nu: Få Altinget Privat i 3 måneder for KUN 150 kr.' Below this, the date '4. april 2025 kl. 07:35' is displayed. The article is titled 'Debat' and 'Venstre-politiker: Den skjulte lobbyisme skævvridet magten'. A small image of Kim Valentin is shown. The text of the article begins with 'Det et problem, når lobbyister får uforholdsmæssig stor indflydelse, mens deres politiske arbejde sker i det skjulte. Etabler et lobbyregister, så offentligheden kan se, hvem der rent faktisk påvirker de politiske beslutninger, skriver Kim Valentin.'

Case 2: The Association of Accredited Public Policy Advocates to the European Union (AALE) states that there is no progress on adoption of lobby regulations despite recommendations to do so.

On the website Association of Accredited Public Policy Advocates to the European Union (AALEP) it says about Denmark: “No progress on adoption of lobby regulations despite recommendations to do so. Denmark should introduce rules on revolving doors for ministers and on lobbying and ensure adequate control of asset declarations submitted by persons entrusted with top executive functions. Note: Even though public discussions to introduce a lobbying register are common, Denmark appears to have no plans at the moment to create a mandatory lobbying register. An Ethical Code of Conduct was established by the Danish Public Relations Association. In 2012 MPs were given possibility to register contacts with external entities under a specific category in the voluntary register of financial interests, however, since several MPs found it excessively burdensome to record such contacts and difficult to determine which were significant, the system was abandoned shortly afterwards. MPs now have a link on the parliamentary website to personal or party websites where they describe contacts with lobbyists on a voluntary basis.” ⁷⁹

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);							5
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Yes – *for whole of government code; Yes but partial if only MOH*

The government does not have a code of conduct for disclosing records of interactions with the tobacco industry and its representatives.

⁷⁷ Altinget, 2025: <https://www.altinget.dk/artikel/kim-valentin-magten-er-blevet-isoleret-med-lobbyister> [19-05-2025]

⁷⁸ Altinget, 2025: https://www.altinget.dk/artikel/v-politiker-med-markant-forslag-lobbyister-skal-oplyse-hvor-mange-penge-de-bruger-paa-at-paavirke-en-lov?SNSubscribed=true&ref=newsletter&refid=15042025-paskebrev-1&utm_campaign=Altinget.dk&utm_content=15042025%20p%C3%A5skebrev&utm_medium=email&utm_source=nyhedsbrev [19-05-2025]

⁷⁹ AALEP: <https://www.aalep.eu/no-lobby-rules-member-states> [04-06-2025]

	0	1	2	3	4	5
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
No (we have searched thoroughly on the internet, on web sites of the Parliament and contacted the Danish Parliament multiple times to get an answer, but there was no response).						
19. The government has a program / system/ plan to consistently ⁸⁰ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)						5
No (we have searched thoroughly on the internet, on web sites of the Parliament and contacted the Danish Parliament multiple times to get an answer, but there was no response).						
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
No (we have searched thoroughly on the internet, on web sites of the Parliament and contacted the Danish Parliament multiple times to get an answer, but there was no response).						
TOTAL						75

ADDITIONAL QUESTIONS <i>Based on COP9 and COP10 Decisions highlighting Article 5.3 recommendations</i>	
A. LIABILITY: 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.]	
Yes	

⁸⁰ 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.

B. KH RESOURCE DATABASE: 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.]

No