

BOTSWANA

2021

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Introduction

Following the decision of the World Health Organisation Member States to create the World No Tobacco Day in 1987, Botswana became among the first in 1992 to introduce its first ever [Control of Smoking Act No.33 of 1992](#) to regulate cigarette smoking, prohibit persons under the age of 16 years to sell or to buy tobacco, to require workplaces to have separate areas for smoking and non-smoking customers and to restrict tobacco advertising and promotion. Botswana signed and ratified the World Health Organisation Framework Convention on Tobacco Control (WHO FCTC) in 2003 and 2005 respectively. As a sign of commitment to the protection of the health of the people of Botswana, the Government of Botswana further amended the Control of Smoking Act of 1992 in 2004 to meet the minimum requirements of three Articles of the WHO FCTC namely, Articles 8 (protection from Tobacco Smoke), Article 13 (Tobacco Advertising, Promotion and Sponsorship and Article 16 (Restriction of Sales to and By Minors). [The Control of Smoking \(Amendment\) Act no. 28 of 2004](#) raised the minimum age restriction of persons who buy or sell tobacco products from 16 to 18 years, required complete separation of smoking and non-smoking areas, and prohibited tobacco advertising and promotion.

Botswana has, however, over the years seen an increase in tobacco industry interference. In 2013 government law enforcement entities such as the [Botswana Police Service](#) and the [Botswana Unified Revenue Service](#) partnered with companies such as British American Tobacco Botswana (BATB) and the Tobacco Institute of Southern Africa (TISA), a [front company for multinationals](#) like Philip Morris International and British American Tobacco. Activities of the tobacco Industry include [receiving donations](#) from the Tobacco industry as well as signing [Memorandums of Agreements](#) with tobacco industry front companies. In 2014, The Ministry of Agriculture collaborated with Japan Tobacco in a [licensing agreement](#) on research on a novel gene found and isolated from wild relative species of water melon and to commercialize a technology on monocots plants.

The Government of Botswana initiated further efforts [to repeal the current Control of Smoking Act](#) since 2013 to make it compliant to the WHO FCTC. However, the tobacco industry has continued to thwart Government efforts. TISA has further objected to the introduction of the [tobacco levy](#) introduced in Botswana in 2014 arguing that “Illegal operators seize the opportunity to make huge profits by avoiding the payment of the levies and other taxes imposed by Government”. However the Botswana Government went ahead with the introduction of the [Control Of Goods \(Tobacco And Tobacco Products Levy Regulations, 2014](#). BATB continued to [partner](#) with the Botswana Police Service in 2015 under the guise of curbing illicit trade in tobacco, as well as using the Business Botswana (a Business representative body) to advance its deceptive Youth Smoking Prevention (YSP) campaign. Due to pressure from the Ministry of Health and Wellness and the Anti-Tobacco Network the BURS has [cancelled](#) its MOU with TISA.

Despite Tobacco industry interference, and the [frustrations](#) noted by the Ministry of Health on the delay in passing the proposed FCTC compliant Bill into an Act, the Botswana Government Commitment to tobacco control emerged strong during the COVID-19 pandemic. In 2020 the Government introduced regulations that [banned the import and sales of tobacco products](#) during COVID-19 lockdown, creating an opportunity for smokers to quit tobacco use. However there was a [strong media lobby](#) for the lifting tobacco sales ban

from the media which led to a [divided cabinet](#) and consequently the lifting of the tobacco imports and sales ban whilst the alcohol sales ban remained. On account of the tobacco sales ban there has been an increase on the advertisements of non-conventional tobacco products such as [vapes, hubbly bubbly and accessories](#), [smoke stores](#) on social media and other online platforms.

Another positive development was noted on March 12th, 2021, the Government of Botswana published the long awaited [Tobacco Control Bill No. 9 of 2021](#) which repeals and re-enacts the Control of Smoking Act of 2004. The Bill seeks to among others, fulfill Botswana's obligations under Article 5.3 of the WHO/FCTC to protect tobacco control policies from the commercial and other vested interests of the tobacco industry. It prohibits Government partnerships and endorsements of the tobacco industry among others. It further prohibits voluntary contributions from the tobacco industry.

This report assesses tobacco industry interference (TII) incidents in Botswana between January 2013 and March 2021. It is the first time that Botswana is participating in this exercise and as a result, key incidents on tobacco industry interference before 2020 are made for context.

This report uses the questionnaire developed by the Southeast Asia Tobacco Control Alliance (SEATCA)¹. In brief, the scoring guideline range for questions was 1-5 where the lower score indicated better country compliance with the World Health Organization's Framework Convention on tobacco Control (WHO FCTC) Article 5.3 guidelines.

We conducted consultations with public health and tobacco control experts. We supplemented this with review of academic literature, publicly available evidence which included Newspaper websites, Government websites as well as resources from the Tobacco Tactics website. A team of three reviewers separately searched evidence and agreed on the scoring together. The team leader engaged the Global Centre for Good Governance in Tobacco Control (GGTC) team to ensure uniform understanding and that the scoring was accurately executed.

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¹ Assunta M, Dorotheo EUSEATCA Tobacco Industry Interference Index: a tool for measuring implementation of WHO Framework Convention on Tobacco Control Article 5.3 *Tobacco Control* 2016;**25**:313-318.

Summary Findings

1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Although in the past the Botswana Government has accepted offers of assistance from the tobacco industry (September 2013) such as the Ministry of Agriculture had an agreement with Japan Tobacco Inc,² in recent years there is no record in the public domain of the government allowing the tobacco industry to participate in policy development. However a window of TI interference was suspected during the COVID 19 lockdown in 2020, when the Government [hastily lifted regulations on the tobacco sales ban](#) in [12 weeks](#) as opposed to the regulations on the [alcohol sales ban](#) which was banned on May 30th with strict controls and [re introduced](#) again in August 2020. The only tobacco product that remains banned is hooker/hubbly bubbly.

The Botswana delegation to the recent WHO FCTC Conference of the Parties (COP) does not include tobacco industry representatives.

2. INDUSTRY CSR ACTIVITIES

Tobacco industry activities described as “socially responsible” are currently not banned in Botswana. While in the past the Botswana Government officials have endorsed and formed partnerships with and participated in industry CSR activities, there is no record of such activities over the past few years.

3. BENEFITS TO THE INDUSTRY

There is no evidence of the Botswana Government favoring or granting exemptions to the tobacco industry. Currently there is no regulation that mandates the government not to provide preferential treatment to the TI. However, one of the tobacco companies in Botswana was initially established through a government-supported industrial diversification project. The company is now wholly privately funded.

4. UNNECESSARY INTERACTION

There is no evidence that top-level Botswana Government officials attended industry social functions. There is no further evidence that the Government or its officials accepted support from the industry for their tobacco control activities.

5. TRANSPARENCY

There are currently no guidelines for the implementation of Article 5.3 that require organizations to disclose their engagement with the tobacco industry. The government therefore, does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulations. The government does

² OReeditse Molebatsi. 2013. Japan Tobacco Not here to produce Tobacco. The Patriot on Sunday. Accessed on 12 April, 2021 at <https://www.atn.life/uploads/media/5a82ba5c213c2/the-patriot.pdf?v1>

not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists.

6. CONFLICT OF INTEREST

Currently there is no legislation that prohibits tobacco industry from making political donations. Further there is no evidence that retired and current government officials held/hold positions in the tobacco industry.

7. PREVENTIVE MEASURES

There are no regulations or guideline regulating public officials' interactions with the tobacco industry. Whilst there is no evidence of a systematic strategy for raising awareness of government departments on policies relating to Article 5.3, the government has used the commemoration of the World No Tobacco Day to raise such awareness as well as the Global Adult Tobacco Survey dissemination. There is no policy preventing Government officials from accepting TI contributions as well as prohibiting persons moving from civil service posts to jobs in the tobacco industry or vice versa. However, there is a new Tobacco Products Bill that has been published for public comments. The said Bill limits interactions between the government and the tobacco industry, prohibiting government partnerships, endorsements of tobacco industry, voluntary contributions from the tobacco industry and incentives to tobacco business.

Recommendations

Botswana has faced tremendous tobacco industry interference since 2013. This contributed to delays in the adoption of a comprehensive FCTC compliant legislation. Despite delays in the adoption of a fully compliant FCTC tobacco control law in Botswana since the ratification of the WHO FCTC, Botswana has however, published a Tobacco Control Bill, that [addresses Article 5.3](#) of the FCTC in March 2021. The law comes at a critical time when Botswana's [tobacco use rate is the highest](#) of any country in the region that has carried out a [Global Adult Tobacco Survey \(GATS\) in 2017](#). Over 80% of adults purchased single cigarettes, which are more affordable than packs for consumers with low income. Additionally, whilst Botswana Government took measures such as banning the sale of tobacco products during COVID-19, it faced [tremendous interference and pressure](#) from the tobacco industry to lift the ban. The ban therefore, lasted for only 12 weeks compared to the neighboring South Africa, where the sales ban [lasted 5 months](#). Botswana should as a matter of urgency adopt the following in the 2021 August parliamentary seating:

- Adopt all the provisions of Article 5.3 of the WHO FCTC as proposed in the Tobacco Control Bill No.9 of 2021 in order to protect tobacco control policies from commercial and other vested interests of the tobacco industry. These provisions include a) prohibitions on Government partnerships, endorsements, financial contributions, etc.; b) prohibitions on voluntary contributions from the tobacco industry,

- In line with the published Tobacco Control Bill, Botswana government should as a matter of urgency, develop conflict of interest guidelines with regard to tobacco industry relationships to eliminate any existing and to prevent any future real or perceived conflict between implementing public health measures and tobacco industry interests.
- To facilitate support for the provisions of the Tobacco Control Bill No. 9 of 2021, Botswana should implement a public education campaign to inform the general public including the youth, the business community and Government agencies of the strategies and tactics used by the tobacco industry.
- In line with the Proposed law, Botswana should adopt provisions that will prohibit tobacco industry “Corporate Social Responsibility” activities.
- The Botswana Government should maintain strict adherence to the current control of Smoking Act of 2004, which prohibits tobacco advertising and promotion

2021 Tobacco Industry Interference Index Results and Findings

	0	1	2	3	4	5
INDICATOR 1: Level of Industry Participation in Policy-Development						
1. The government accepts, supports or endorses any offer for assistance by or in collaboration with the tobacco industry in setting or implementing public health policies in relation to tobacco control (Rec 3.1)		1				
<p>There is no evidence of the government accepting or endorsing any offer for assistance from the tobacco industry in setting public health policy.</p> <p>On March 12th 2021 the government of Botswana published on the Botswana Government Gazette the Tobacco Control Bill 2021 to be presented to the National Assembly³. The object of the Bill is to repeal and re-enact the Control of Smoking Act (Cap. 65:04) and align it to the WHO Framework Convention on Tobacco Control. The proposed law has provisions that prohibit government partnerships, endorsements of tobacco industry, etc.</p>						
2. The government accepts, supports or endorses <u>policies or legislation drafted</u> by or in collaboration with the tobacco industry. (Rec 3.4)		1				
<p>There is no evidence that the Government accepts, supports or endorses policies or legislation drafted by or in collaboration with the tobacco industry. The government has publicly condemned the tobacco industry manipulation particularly among the youth in its latest world No Tobacco Day Speech.</p>						
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			
<p>There is no evidence the government allows the tobacco industry to sit in government interagency/ multi-sectoral committees. However, Business Botswana engages and partners with different government sectors including the health sector consultative council for improved ease of doing Business in Botswana. Business Botswana is a private sector organization which functions as a Chamber of Commerce and a business representative body. Among the organizations that it represents is the Tobacco Industry. In 2015 Business Botswana partnered with British American Tobacco to organize a youth smoking prevention campaign.</p> <p>A Situation Analysis of tobacco control in Botswana revealed that in 2018, three organizations had a tobacco industry representative in their committees or boards (the names of the organizations could not be revealed).</p>						

³ Botswana Government. 2021. Tobacco Control Bill, 2021, Bill no. 9 of 2021. Government Printer, Gaborone.

	0	1	2	3	4	5
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) ⁴ (Rec 4.9 & 8.3)		1				
<p>There is no evidence that the Botswana government has ever nominated or allowed representatives from the tobacco industry in delegations to the COP, or has accepted their sponsorship for delegates.</p> <p>Dr. A.L. Molokomme Permanent Representative, Permanent Mission, Geneva, Ms T. Sengwaketse Acting Director, Department of Public Health, Ministry of Health and Wellness, Mr P. Gaumakwe Deputy Permanent Representative, Permanent Mission, Geneva, Ms M. Letswee Principal Health Officer, Department of Public Health, Ministry of Health and Wellness, and Ms S. Mautle Minister Counsellor, Permanent Mission, Geneva represented Botswana to the COP8.⁵</p>						
INDICATOR 2: Industry CSR activities						
5. A. The government agencies or its officials endorses, supports, forms partnerships with or participates in so-called CSR activities organized by the tobacco industry. (Rec 6.2)		1				
B. The government (its agencies and officials) receives contributions (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec 6.4)						
No such activities were identified in 2020 by the government, its agencies or officials.						
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)				3		
<p>The government of Botswana has proposed the repeal of the Control of Smoking Act in 2011. However, such legislation was only published 10 years later in 2021. The repeal was first announced by the then Minister of Health Reverend Dr. John Seakgosing in 2013, former President of Botswana announced the repeal of the Control of Smoking Act in his State of the Nation address however it did not reach the parliament despite several calls to different Ministers of Health to fast track the law including calls for President Masisi to resist the pressure to lift the tobacco sales ban during COVID-19.</p> <p>Cigarette products remain to be highly affordable and easily accessible among the public placing Botswana as the top country with high incidence of tobacco smoking than other highly populated African countries such as Kenya, Nigeria, and Uganda⁶.</p>						

⁵ https://www.who.int/fctc/cop/sessions/cop8/LOP_Final.pdf

⁶ <https://tobaccoreporter.com/2018/06/01/botswana-is-smoking/>

	0	1	2	3	4	5
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)			3			
<p>It is important to note that during COVID19 the Government of Botswana banned the sales of tobacco and alcohol during the first lockdown⁷. However, the tobacco sales ban was lifted before the alcohol ban on account of the pressure from the media and despite demand from civil society. The media used the tobacco industry arguments that millions of funds were lost to illicit tobacco products as a result of the ban on tobacco sales. It cannot be confirmed whether the media was sponsored by the tobacco industry to pressure the Government.</p> <p>Prices of tobacco products remain incredibly cheap that low-income earners and the youth can purchase tobacco easily and cheaply. In its recent report, the Global Adult Tobacco Survey (GATS) reported that Botswana has the highest number of tobacco users in the African region, accounting to 82.2% of adult smokers.^{8 9}</p> <p>The government allows international travellers to import duty free 200 cigarettes and 20 cigars and 250g of tobacco into Botswana¹⁰.</p>						
INDICATOR 4: Forms of Unnecessary Interaction						
8. Top level government officials (such as President/ Prime Minister or Minister) 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)			2			
<p>i) In 2015, BATB was found to engage ministers and parliamentarians to lobby them for inclusion in consultations on the tobacco law.</p> <p>ii) Apart from these engagements, there is no evidence of further engagements of key government ministries and cabinet ministers in recent times.</p>						
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement such as conducting raids on tobacco smuggling or enforcing smoke free policies or no sales to minors. (including monetary contribution for these activities) (Rec 4.3)			3			
<p>(i) Apart from the assistance from JTI and BAT in 2013, 2014 and 2015 reported under indicators' 1 and 7 above, a Situation Analysis of tobacco control in Botswana revealed that in 2018;</p>						

⁷ http://www.tobaccojournal.com/Botswana_bans_sale_of_tobacco.55758.0.html

⁸ <https://www.thegazette.news/news/botswana-leads-region-in-tobacco-use/>

⁹ https://www.tobaccofreekids.org/press-releases/2020_12_18_botswana

¹⁰ <https://www.worldtravelguide.net/guides/africa/botswana/money-duty-free/>

	0	1	2	3	4	5
<p>a. Three senior government officials reported that their organizations previously had relationships with the tobacco industry working on tobacco control projects (the names of the organizations could not be revealed)</p> <p>b. Of these three, one reported that their organization is still partnering with the tobacco industry on fighting illicit tobacco trade in the country. The names of the organization could not be revealed</p> <p>(ii) The Botswana Unified Revenue Service (BURS), a government entity with a mandate to perform tax assessment and collection functions on behalf of the government signed a Memorandum of Understanding (MOU) with the Tobacco Institute of Southern Africa (TISA) in 2012 in order to share intelligence to intercept illegal activities such as cigarettes being smuggled at ungazetted points in Botswana. TISA represents the larger tobacco manufacturers and is active across the Southern Africa Customs Union (Botswana, Lesotho, Namibia, South Africa and eSwatini) and is funded by BAT, Phillip Morris International (PMI) and Japan Tobacco Incorporated (JTI) the largest was brought on board because it had the capacity to destroy the illegal cigarettes. TISA was also training customs officers in addition to destroying and seizing tobacco products on behalf of BURS. However, the MOU was cancelled in 2013.</p>						
<p>10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</p>		I				
<p>In 2014, The government of Botswana entered into a tripartite licensing agreement involving the Nara Institute of Technology and Japan Tobacco International (JTI) to boost agriculture by using technology to harness drought tolerance and increased productivity in monocotyledonous crops such as maize. The agreement was endorsed by Cabinet Ministers without any public consultation. The government was petitioned by civil society believing that the said partnership with the tobacco industry is incongruent with the Control of Smoking Act CAP 65:04 and the WHO Framework Convention on Tobacco Control (FCTC) resulting in conflict of interest. However, the agreement went ahead as it was reported that some Ministers were going to benefit immensely from the project.</p> <p>The government of Botswana has previously supported the establishment of cigarette manufacturing companies such as Benson Craig (Pty) (year of support or establishment was not disclosed). Benson Graig continues to market itself using the tagline it that it was “initially established through a government-supported industrial diversification project” even though it is now privately funded. The government has not objected to the use of its name for the company to advertise itself and its activities.</p> <p>Since 2019, there is no evidence that the government has accepted, endorsed or entered into agreements or partnerships with the tobacco industry. However, it is recognized that the government has in the past done so as a result of pressure from the Anti Tobacco Network, Botswana.</p>						

	0	1	2	3	4	5
INDICATOR 5: Transparency						
11. The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. (Rec 2.2)				3		
The government does not publicly disclose meetings/ interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation. However the proposed Tobacco control law no.9 of 2021 requires full transparency and calls for limitations on interactions between the Government and the tobacco industry. These include among others: a) limited interactions with the tobacco industry necessary only for the effective regulation of the tobacco industry; b) full transparency of a public body that interacts with the tobacco industry. Such transparency includes conducting any interactions in public, such as through public hearings, (unless if doing so will jeopardize effective regulation or would not be possible, such as in the case of inspections, investigations or litigation).						
12. The government requires rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists (Rec 5.3)						5
The government does not require rules for the disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists.						
INDICATOR 6: Conflict of Interest						
13. The government does not prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. (Rec 4.11)				3		
The 2018 situation analysis revealed that the tobacco companies, BATB to be specific, continues to offer funding to government agencies and NGO'S.						
14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4)		1				
There is no evidence for this in Botswana						
15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)		1				
There is no evidence established of current government officials and relatives holding positions in the tobacco business.						
INDICATOR 7: Preventive Measures						

	0	1	2	3	4	5
16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1)						5
There is no evidence of establishment of such a procedure for disclosing the records of the interaction with the tobacco industry and its representatives.						
17. The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards with which they should comply in their dealings with the tobacco industry. (Rec 4.2)				3		
On March 12 th 2021 the government of Botswana published on the Botswana Government Gazette the Tobacco Control Bill 2021 to be presented to the National Assembly ¹¹ . The object of the Bill is to repeal and re-enact the Control of Smoking Act (Cap. 65:04) and align it to the WHO Framework Convention on Tobacco Control. The proposed law has provisions that prohibit government partnerships, endorsements of tobacco industry, and limit interactions between the government and the tobacco industry to only when strictly necessary.						
18. The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, political contributions and all other activities. (5.2)						5
There is no evidence of such a requirement.						
19. The government has a program / system/ plan to consistently ¹² raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)				3		
Although there is no evidence of a systematic strategy for raising awareness of government departments on policies relating to FCTC Article 5.3, the Government has used the commemoration of the World No Tobacco day to raise such awareness as well as the Global Adult Tobacco Survey dissemination.						
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)				3		

	0	1	2	3	4	5
<p>The Tobacco Control Bill was gazetted for public comments earlier this year. This Bill seeks to limit interactions between the government and the tobacco industry; prohibits government partnerships, endorsements of tobacco industry; prohibition of voluntary contributions from the tobacco industry and prohibits incentives to tobacco business.</p> <p>However, in 2016 Tobacco Institute of Southern Africa donated signage boards to the Ministry of Health and Wellness for distribution in retail stores. The idea was to convince the Ministry of Health that the tobacco industry is against youth tobacco sales and therefore can work in partnership with the Government to discourage youth smoking. Also, in 2012 British American Tobacco (BAT) donated vehicles</p>						
TOTAL						50

ANNEX A: SOURCES OF INFORMATION

TOBACCO INDUSTRY ACTIVITY

LOCAL TOBACCO COMPANIES

Top 5 Tobacco Companies/distributors	Market Share and Brands	Source
British American Tobacco Botswana (BATB)	Dunhill, Kent, Lucky Strike, Pall Mall, Rothmans. Vogue, Viceroy, Kool, vape pen and Peter Stuyvesant	https://www.bat.com/group/sites/UK_9D9KCY.nsf/vwPagesWebLive/DO9FCLEK
Benson Craig (Pty) Ltd	Life, Tshaka and Shasha Tobacco	https://www.gobotswana.com/fg-botswana-pty-ltd https://web.stanford.edu/group/tobaccopriv/cgi-bin/map/
F&G Botswana (PTY) Ltd.	Electronic Cigarettes, Raw Tobacco, Vaporizers	https://www.tobacco1.com/tobacco-suppliers/hbflavor
Japan Tobacco International		https://www.fctc.org/wp-content/uploads/2018/05/Botswana-SR.pdf
Shisha World Hubbly	Hookah/Shisha accessories	https://www.facebook.com/Shisha-World-Hubbly-414549485746362/?hc_ref=ARQ7zeiqQ7gwPGSzwCDIzmleAUpKNPJFfRvQqL4ejctLLOpi8SIXSlvFMjct_OUSs4&fref=fbfref=fb&_tn_=_kC-R

TOBACCO INDUSTRY FRONT GROUPS

Top 5 Tobacco Industry Representative	Type (Front Group/ Affiliate/ Individual)	URL
Business Botswana	Business representative Body	https://miisbotswana.com/acadp_listings/british-american-tobacco-botswana/ http://www.bb.org.bw/index.php/business-content/cid/2/about-us/
Tobacco Institute of Southern Africa	A front company for multinationals like Philip Morris International and British American Tobacco	https://static.pmg.org.za/150424tisa.pdf https://africatimes.com/2020/02/03/how-south-africa-struggles-against-big-tobacco/

NEWS SOURCES

Top 5 Newspaper/Dailies	Type (Print/Online)	URL
The Botswana Daily News	Print and online	http://www.dailynews.gov.bw
Mmegi Newspaper	Print and online	https://www.mmegi.bw/
Sunday Standard	Print and online	https://www.sundaystandard.info/
The Botswana Gazette	Print and Online	https://www.thegazette.news/
The Voice	Print and Online	https://www.localbotswana.com/company/12587/THE_VOICE_NEWSPAPER