

CHILE

2020

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AlianzaENTChile appreciates the leadership of STOP CORPORATE ABUSE, and the support of COALICION LATINOAMERICA SALUDABLE

Tobacco Industry Interference

Towards the end of the 20th century, tobacco consumption in Chile remained at extraordinarily high levels, and it was not until the second decade of the 2000s that a decline in its prevalence was observed. According to the 2009-2010 National Survey on Health (ENS), the prevalence of tobacco consumption was 39.8% in the general population¹, which dropped to 33.3% in the 2016-2017 ENS². According to the WHO/PAHO 2018 report, our country continues to have the highest prevalence of tobacco consumption among the countries of the Americas, especially among young people (women) and those with limited resources³.

The Ministry of Health, with the support of scientific societies and various civil society organizations, has achieved changes in the tobacco law (No. 19,419)⁴, which dates from 1995, introducing modifications, according to the guidelines of the Framework Convention on Tobacco Control (FCTC)⁵ in 2006 and 2013. It was achieved that the warning occupies 50% of the main faces of the cigarette packet, the prohibition of advertising, sales to minors under 18 years old, sales near schools and colleges, the prohibition of smoking in closed places of public use, among other important advances.

But it is still necessary to advance and improve our current law in aspects such as regulating Internet advertising, raising the tax on tobacco, implementing the generic pack, banning advertising at points of sale, improving control of smuggling, etc. It is also necessary to expand enforcement of this law and provide the health system with programs of tobacco cessation and drug therapy for smokers who require it.

The tobacco industry has hindered, both globally and nationally, the efforts of governments to fully implement interventions contained in the Framework Convention on Tobacco Control that can save lives and costs, through a strong and constant onslaught not only with intense and attractive advertising and promotion campaigns for their products in young people, but also by covering and influencing the highest political and government spheres.

In Chile, the tobacco industry is concentrated in BAT Chile⁶ formerly Chile Tobacco, a subsidiary of British American Tobacco) which has 93% of the market, a figure that leaves no doubt about its weight in the national market. Its commercial practices and exercise of influence (lobbying, strategic communication, corporate presence, etc.) are repeated among its subsidiaries worldwide and include strategies that range from almost absolute control of the distribution chains of its products to exercising its political and economic influence at the highest level. This practice has been successful, among other things, because BAT has included in its board of directors representatives of all political tendencies, whether current or recent, ministers of the military regime, Concertación governments, and the cabinet of current President Sebastián Piñera.

The company has always declared that it does not resort to these practices, despite the fact that the current Minister of Health, Jaime Mañalich, and several parliamentarians declared that in January 2012 there was pressure and lobbying by the tobacco industry to stop the processing in Congress of the new tobacco control bill⁷.

Chile does not have specific legislation that adequately regulates these actions for

tobacco companies, despite the insistence of various academic authorities and national leaders on the subject

Finally, the tobacco industry, adapting to the new times in the face of the tobacco control laws that are being enacted in different countries, has been varying its strategies, incorporating new devices to administer nicotine such as electronic cigarettes and heated tobacco products, camouflaging them as healthier products than conventional cigarettes, Therefore, we face a new challenge not only to denounce the promotion of these devices with biased information to adolescents, and lobbying attempts in scientific and governmental communities, but also these strategies require improving the laws regulating the sale, promotion and control of all tobacco products, including these new generations of devices.

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¹ Encuesta Nacional de Salud 2009-2010
<https://www.minsal.cl/portal/url/item/bcb03d7bc28b64dfe040010165012d23.pdf>

² Encuesta Nacional de Salud 2016-2017
<https://www.minsal.cl/wp-content/uploads/2017/11/ENS-2016-17-PRIMEROS-RESULTADOS.pdf>

³ Chile, el país que más fuma en Latinoamérica
https://www.paho.org/chi/index.php?option=com_content&view=article&id=325:chile-pais-que-mas-fuma-america&Itemid=215

⁴ Ley 19419, <https://www.bcn.cl/leychile/navegar?idNorma=30786>

⁵ Convenio Marco de Control del Tabaco
<https://apps.who.int/iris/bitstream/handle/10665/42813/9243591010.pdf;jsessionid=E3160C85123295D5E6D475F20594EF47?sequence=1>

⁶ BAT Chile <http://www.batchile.com/>

⁷ https://www.cnnchile.com/lodijeronencnn/ministro-manalich-lobby-tabaco-lado-oscuro-fuerza-amenazas_20190906/

Summary of results

1. INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Chile has a high tax on tobacco, it also has a 100% smoke-free indoor legislation, the labeling is 50% at the bottom. Promotion and sponsorship are almost totally prohibited, but the penalty is low. Currently, Chile does not have a strong legislative regulation on the participation in the State of harmful companies such as tobacco companies. Because of this, it is necessary to reinforce and improve existing measures

2. CORPORATE SOCIAL RESPONSIBILITY (CSR) INDUSTRIAL ACTIVITIES

Government agencies or their officials do not endorse, support, form associations or participate in so-called Corporate Social Responsibility (CSR) activities organized by the tobacco industry. In Chile the issue of CSR is carried out through government policies and specific laws such as the Transparency Law 20.285⁸, the Lobby Law 20.730⁹, Probity Law 20.880¹⁰, and Donations Law 19.885¹¹, but there is no specific law that regulates CSR. As a definition, it follows the idea of the European Community that specifies the following: "The voluntary integration of social, labor and environmental concerns and respect for human rights in business management, strategy, policies and procedures arises from transparent dialogue between stakeholders, so that the company is responsible for the consequences and impacts arising from their actions".

3. BENEFITS FOR THE INDUSTRY

International travelers may bring into the country up to an amount not exceeding, per adult person, 400 units of cigarettes, 500 grams of pipe tobacco, 50 units of cigars and 2,500 cubic centimeters of alcoholic beverages.

4. UNNECESSARY INTERACTION

In Chile, tobacco companies behave like any other industry, they must abide by the law of transparency in acts with the State and they must assume the law of lobbying as well, but it is not forbidden, nor exempt to deal with the State.

5. TRANSPARENCY

Chile has a Law of Transparency 20.285 , which specifies that the authorities, (whatever the level at which the Constitution and the laws designate them), and the officials of the State Administration, must strictly comply with the principle of transparency of the public function, which consists of respecting and protecting the publicity of the acts, procedures and documents of administration of resolutions, as well as its foundations, and in facilitating the access of any person to that information, through the means and procedures that the law has established. So the interactions with the tobacco industry can be transparent

6. CONFLICT OF INTEREST

Since 2014 there is the Lobbying Law 20,730, which seeks to regulate advertising in the activity of the lobby and other particular management in order to strengthen transparency and probity in relations with the organs of the State. In order to comply with this law, meetings with tobacco companies and the topics that were discussed must be published. The government does not prohibit contributions by the tobacco industry or any entity that works to promote its interests to political parties, candidates or campaigns or to demand full disclosure of such contributions. In Chile there is a Law of Transparency 20.285 and a Law of Probity 20.880 (Declaration of assets and interests), but neither of them specifically indicates that there is a clear impediment to tobacco industry contributions.

7. PREVENTIVE MEASURES

The government has not formulated or adopted a code of conduct for public officials to follow when dealing with the tobacco industry.

Recommendations

Formulate or adopt a code of conduct for public officials to guide them when the government deals with the tobacco industry.

Decrease the amount of cigarettes, grams of pipe tobacco and units of cigars that international travelers can bring into the country.

Increase the penalties of the tobacco legislation.

Accelerate new tobacco legislation that remains in the Senate Agriculture Committee two years ago.

Require rules for disclosure or registration of tobacco industry entities, affiliated organizations and persons acting on their behalf, including lobbying

Prohibit contributions by the tobacco industry or any entity working to promote its interests to political parties, candidates or campaigns or to require full disclosure of such contributions.

Implement a program/system/plan to continually increase awareness within government departments of policies related to the FCTC Article 5.3 Guidelines.

Establish a clear policy not to allow the acceptance of all forms of contributions/gifts from the tobacco industry (monetary or otherwise), including offers of assistance, draft policies, or invitations to study visits offered to the government, its agencies, officials, and their relatives

⁸ Ley de Transparencia 20.285 <https://www.bcn.cl/leychile/navegar?idNorma=276363>

⁹ Ley de Lobby 20730, 2014. <https://www.leylobby.gob.cl/> , <https://www.bcn.cl/leyfacil/recurso/ley-del-lobby>

¹⁰ Ley 20880 de Probidad, 2016 <http://dpi.minsepres.gob.cl/files/Manual-ley-de%20probidad.pdf>

¹¹ Ley de Donaciones 19885 <https://www.bcn.cl/leychile/navegar?idNorma=213294>

Results

| | 0 | 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|---|---|
| INDICATOR 1: Level of industry participation in policy development | | | | | | |
| 1. The government accepts, supports, or endorses any offer of assistance from or in collaboration with the tobacco industry to establish or implement public health policies related to tobacco control (Rec 3.1) | | | 2 | | | |
| <p>The state does not accept, support or endorse offers of assistance by or in collaboration with the tobacco industry to establish or implement public health policies related to tobacco control^{4,6}, however, there is no prohibition but that the fact is regulated through transparency of the facts through Law 20.730 (Lobby Act) dating from 2014, with the aim of regulating lobbying and other efforts representing private interests, in order to strengthen transparency and honesty.</p> <p>2.-There is also the Law of Transparency 20.880 of the public function, which has as one of its purposes to regulate the lobbying evidencing the facts ,(Respect and protect the publicity of the acts, procedures and documents of administration of resolutions, as well as its foundations, and facilitate access to any person to that information, through the means and procedures that the law has established)</p> <p>While the government does not accept, support or endorse offers of assistance from the tobacco industry or its collaboration in establishing or implementing public health policies related to tobacco control, and regulates this situation through transparency: The Minister of Economy in 2019, receives industry representatives who wish to speak with him about future plans for PM⁷</p> | | | | | | |
| 2. The government accepts, supports or endorses policies or laws drafted by or in collaboration with the tobacco industry. (Rec. 3.4) | | | 2 | | | |

¹The term "government" refers to any public official, whether or not he acts within the purview of authority, as long as he is disguised with that authority or is offered to another as having such authority.

²The "offer of assistance" may include bills, technical inputs, recommendations and supervised study visits

³The term "tobacco industry" includes those who represent their interests or work to advance their interests, including the state-owned tobacco industry.

⁴ Ministro Santelices Día Mundial sin Fumar 2019 <http://portal.nexnews.cl/showN?valor=byby3>

⁵ Jorge Iribarra, Gerente General BAT Chile : Nosotros por una decisión unilateral del gobierno de Chile no tenemos acceso a hablar con la autoridad de salud <https://www.futuro.cl/2019/09/jorge-iribarra-gerente-general-de-la-bat-chile-nosotros-por-una-decision-unilateral-del-gobierno-de-chile-no-tenemos-acceso-a-hablar-con-la-autoridad-de-salud/>

⁶Manalich vuelve a decir que el lobby por el tabaco esta en el lado oscuro de la fuerza y que no lo amenacen https://web.archive.org/web/20190920153445/https://www.cnnchile.com/lodijeronencnn/ministro-manalich-lobby-tabaco-lado-oscuro-fuerza-amenazas_20190906/

⁷Audiencias 2019 <https://www.leylobby.gob.cl/instituciones/AH001/audiencias/2019/173920/318408>

The government does not accept, support or endorse policies or laws drafted by or in collaboration with the tobacco industry. From a legal standpoint, these activities are regulated through the aforementioned laws (Lobbying and Transparency Law).

Chile has a high tax to the tobacco, fiscalization of the manufactured tobacco, either in threads, tablets, pastes or cords, granules, or pulverized: it is structured on the base of a specific tax of 59.7% on the retail price, including taxes, of each package, box or wrapper in which it is sold. Cigarette packages, boxes or wrappers shall pay a specific tax equivalent to 0.0010304240 units of monthly tax for each cigarette they contain; and, in addition, a 30% tax, which shall be applied to the retail price, including taxes, for each package, box or wrapper, considering as a whole any fraction of the tax below one weight.^{8,9}

2.-Also Chile has Law 20.600¹⁰ which regulates 100% smoke free places, on packaging and labeling (Focus on graphic health warnings), Chile has a graphic image size of 50%, the position is the bottom, has a validity of 90 days, the variation is given by 4 images, change once a year.^{11,12}

3.-Finally, tobacco advertising, promotion and sponsorship is almost totally prohibited, but the penalty is low⁴

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| 3. The government allows/invites the tobacco industry to be part of the interagency/multisectoral committee/advisory group of the agency that sets public health policy. (Rec 4.8) | 1 | | | | |
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Currently, Chile does not allow or invite the tobacco industry to form part of advisory groups to the body that establishes public health policy, this process is regulated by laws of transparency, lobbying and probity. The country has made a great effort to regulate this situation, and the strategy is to be transparent, not to ban.

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| 4. The government nominates or allows representatives of the tobacco industry (including state-owned) on the delegation to the COP or other subsidiary bodies or accepts their sponsorship of delegates. (i.e. COP 4 and 5, INB 4 5, WG) (Rec 4.9 and 8.3) | 1 | | | | |
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The government has no representatives from the tobacco industry in the delegation to COP 4 and 5^{13,14}

INDICATOR 2: Industry CSR activities

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| 5. A. Government agencies or their officials endorse, support, form associations or participate in so-called CSR activities organized by the tobacco industry. (Rec. 6.2) B. The Government (its agencies and officials) receives contributions (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). (Rec. 6.4) | | | 3 | | |
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⁸ Decreto Ley 828 <https://www.leychile.cl/Navegar?idNorma=6372>
⁹Ley 20455 | Artículo 6 Impuesto Especifico <https://www.leychile.cl/Navegar?idNorma=1015783&idParte=8955051&idVersion=2010-08-31>
¹⁰Ley 20660 <https://www.leychile.cl/Navegar?idNorma=1047848>
¹¹ Advertencias de los productos del tabaco 2019 Minsal <https://www.minsal.cl/advertencias-sanitarias-para-productos-de-tabaco-2019/>
¹² Diario Oficial establece regulaciones de salud para en empaquetado de cigarrillos <https://www.diariooficial.interior.gob.cl/publicaciones/2018/12/21/42235/01/1515661.pdf>
¹³ https://apps.who.int/gb/fctc/PDF/cop4/COP4_DIV_Rev1.pdf
¹⁴https://apps.who.int/gb/fctc/PDF/cop5/FCTC_COP5_DIV1_Rev1.pdf

a.-Government agencies or their officials do not endorse, support, form associations or participate publicly in the so-called CSR activities organized by the tobacco industry, the subject is regulated through the laws of lobbying, transparency
 B.-The government (its agencies and officials) does not publicly receive contributions (monetary or otherwise) from the tobacco industry (including so-called CSR contributions). These activities are regulated by the laws mentioned above

INDICATOR 3: Benefits to the Tobacco Industry

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| 1. The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law. (e.g. 180 days is common for PHW, Tax increase can be implemented within 1 month) (Rec 7.1) | | | | | | 5 |
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The government accommodates requests from the tobacco industry for a longer time frame for implementation or postponement of tobacco control law.

Health Ministry, Dr Mañalich noted that “there is a Lobby Law in Chile that was accentuated during the discussion of President Piñera's first tobacco law, because it slept for 10 years in Congress. Why the Lobby Law was finally legislated? Because the tobacco companies have an absolutely miserable, shameful lobby, with the parliamentarians, with the ministers, to ensure that President Piñera's tobacco law does not advance.⁶

In September 2018, a new bill was sent to Parliament to introduce a generic pack, increase the tax on electronic cigarettes and heated tobacco products. After that date, the tobacco industry has not agreed with the bill and has been looking for opportunities to meet with the Ministry of Health. In 2019 Dr. Santelices, the Minister of Health, did not accept a meeting with the tobacco industry⁴. The CEO of BAT Chile, Mr. Irribarra, indicated on his website that they do not have access to speak with the health authorities⁵. However, the tobacco control bill has been delayed by the Senate Agriculture Committee.

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| 7.The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3) | | | | | | 5 |
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International travellers can bring into the country up to an amount not exceeding, per adult person, 400 units of cigarettes, 500 grams of pipe tobacco; 50 units of cigars and 2,500 cubic centimeters of alcoholic beverages.¹⁵

INDICATOR 4: Forms of Unnecessary Interaction

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| 8.Top level government officials (such as President/ Prime Minister or Minister ¹) 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) | | 1 | | | | |
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Dr Mañalich, current Minister of Health, calls on tobacco companies to communicate with him through legal channels. September 2019⁶

¹⁵ Aduanas de Chile <https://www.aduana.cl/preguntas-frecuentes-viajero-y-turista/aduana/2011-06-21/152845.html>

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| 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) | | | 2 | | | |
| The government does not publicly accept the assistance of the tobacco industry in the application and implementation of tobacco control policies, although these issues are regulated through the Lobby , Transparency and Probity Laws | | | | | | |
| 10.The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry. (Rec 3.1) <i>NOTE: This must <u>not</u> involve CSR, enforcement activity, or tobacco control policy development since these are already covered in the previous questions.</i> | | | | 4 | | |
| Although the government does not accept, support, support or establish alliances or agreements with the tobacco industry publicly and regulate these situations through transparency, the Economy minister receives a delegation of companies with a view to the APEC Chile 2019 sum ^{16,17} Philip Morris International was one of them.Finally, APEC 2019 was not held in Chile. | | | | | | |
| 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) | | | 2 | | | |
| <p>The government promotes public disclosure of meetings / interactions with the tobacco industry in cases where such interactions are strictly necessary for regulation through lobbying and transparency laws, which need to be strengthened and enforced.</p> <p>1.- Law 20.730, regulates lobbying and other efforts that represent private interests, in order to strengthen transparency and honesty, indicates that government meetings with tobacco companies are made public. However, the industry does not show all its activities in front of the authorities and leaders of the public world.</p> <p>2.-Chile also has transparency legislation, Law 20.285 that regulates the principle of transparency of the public function, the right of access to information of the organs of the State Administration, the procedures for the exercise of the right and for its protection, and the complications of the publicity of the information. This law needs to be supervised more rigorously</p> | | | | | | |
| 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) | | | | 3 | | |
| There is no specific requirement for the tobacco industry, only a Lobby Law that is general for all corporate companies. Therefore, compliance is incomplete. | | | | | | |
| 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) | | | | X | | |
| Indeed, the government does not prohibit contributions from the tobacco industry or any entity that works to advance its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions. In Chili there is a Transparency , a Probity and a | | | | | | |

Lobby Law but none of them indicate that they specifically impede the contributions of the tobacco industry.

1.-Various mechanisms make it very difficult for the origin of the money that finances the electoral campaign to be truly transparent and traceable in Chile. Contributions go to an account maintained by the Electoral Service (Servel).

Once the deposit is credited, the Servel will issue an electronic certificate for the taxpayer, in which only the amount is entered, not the identity. Then, through an electronic key system, the donor can make a "distribution" of the funds to one or more candidates if deemed appropriate. In short, there is no trace or record of the contribution, which does not imply that a private person can contact a candidate or has previously accepted the delivery of funds. Unlike Chile, in the United States you can track down to the last detail of public donations.^{16,18}

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| 14. Retired senior government officials form part of the tobacco industry (former Prime Minister, Minister, Attorney General) (Rec 4.4) | | | | | | | 5 |
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In Chile, BAT Chile (ex-Chiletabacos) has in its directory people linked to the political and business spectrum of the country. Some members of the board of directors of BAT Chile have been related to the government for positions they have held in the past. For example, the president of BAT Chile was Minister of the Interior and Finance, and he was also president of the Central Bank of Chile. Similarly, the vice president of BAT Chile was a prosecutor of the Central Bank and advisor to the ministers of Finance and Economy. In addition, the director of BAT Chile was Minister of Development and Tourism, Minister of State and was also president of the Banco del Estado. And the Director of BAT Chile was Minister of Mining.¹⁸

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| 15. <u>Current government officials</u> and relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10) | | | | | | | 5 |
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The Law 20.285: Public Transparency and Access to Information (2009) has a relevant impact on the country's reputation, which is why it gets a score of 5.

The law created the Council for Transparency, an entity that must ensure compliance with the law. To request information, it can be done through the website of the institution or by requesting the respective body in one of its offices. The Council acts receiving complaints when the public departments do not satisfy what is required by a citizen. The Board of Directors consists of four directors appointed by the President of the Republic. This Directing Council is responsible for the superior direction and administration of the Council for Transparency. Its current members are: Alejandro Ferreiro, Juan Pablo Olmedo, Raúl Urrutia and Roberto Guerrero Valenzuela. The latter is a partner of the law firm Guerrero, Olivos, Novoa, Errázuriz, along with Roberto Guerrero del Río, vice president of the board of directors of Chiletabacos.³³

INDICATOR 7: Preventive Measures

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| 16. The government has put in place a procedure for disclosing the records of the interaction (such as agenda, attendees, minutes and outcome) with the tobacco industry and its representatives. (Rec 5.1) | | 2 | | | | | |
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¹⁶ <https://www.economia.gob.cl/2018/05/08/ministro-valente-recibe-a-delegacion-de-empresas-con-miras-a-la-cumbre-apec-chile-2019.htm>

¹⁷ Price Waterhouse Coopers, [Philip Morris International is a platinum sponsor of APEC meetings](#), 15 July 2019, accessed October 2019

Since 2014 there is Law No. 20,730, with the aim of regulating the lobby and other efforts that represent private interests, in order to strengthen transparency and honesty, in which meetings with tobacco companies are published. However, it does not show its activities in front of the authorities and leaders of the public world, so this legislation must be reinforced and fiscalized better

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| 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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The government has not formulated nor adopted a code of conduct for public officials to guide them when dealing with the tobacco industry.

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| 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 |
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The government has formulated and implemented a code of conduct for public officials, prescribing the standards with which they must comply in their dealings with the industry, through the Probitry, Transparency and Lobbying Law. However, the industry does not show its activities in front of the authorities and leaders of the public world. Therefore, these laws require reinforcement and supervision.

1.-A central issue in this regard is the impossibility, by virtue of current Law, of transparent corporate financial contributions to electoral campaigns..Therefore, compliance is incomplete

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| 19. The government has a program / system/ plan to consistently ³⁵ raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2) | | | | | | | 5 |
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There is nothing about it.

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| 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) | | | 2 | | | | |
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¹⁸ Detras del Humo Informe Tabacaleras Fundacion EPES .Diciembre 2009.
https://www.chilelibredetabaco.cl/descargas/centrodoc/Detras_del_humo_informe_tabacaleras_EPES_2009.pdf.
¹⁹ <https://www.guerrero.cl/>

The government has established legislation to regulate the acceptance of all forms of contributions / gifts from the tobacco industry (monetary or otherwise), including offers of assistance, draft policies or invitations to study visits given or offered to the government, their agencies, officials and their families. This through highlighting or making these situations transparent through the laws of transparency, lobbying, transparency and probity. These laws should be improved in intensity of control and supervision

TOTAL

64

