



A GLOBAL  
TOBACCO  
INDUSTRY  
WATCHDOG

# Eastern Mediterranean Region Tobacco Industry Interference Index 2021

## ACKNOWLEDGEMENTS

**Author:** Mary Assunta, Global Center for Good Governance in Tobacco Control (GGTC)

**Collaboration:** This report is prepared in collaboration with the World Health Organization Eastern Mediterranean Regional Office (EMRO) the Tobacco Free Initiative Unit, Noncommunicable Diseases and Mental Health Department.

This Index is based on reports of eight countries from the EMR.

### Country collaborators:

**Egypt:** Cairo Association Against Smoking, Tuberculosis and Lung Diseases

**Iran (Islamic Republic of):** Iranian Anti-Tobacco Association

**Iraq:** Alrafidain Center

**Jordan:** Framework Convention Alliance

**Lebanon:** Hala Alaouie, Rima Nakkash, American University of Beirut

**Oman:** Consultant - Ruth Mabry

**Pakistan:** Society for Alternative Media and Research

**Sudan:** Consultant and Ministry of Health

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**Disclaimer:** This Index is based solely on publicly available information obtained by collaborators in their respective countries. If you have information that can strengthen this report, contact us at: [info@ggtc.world](mailto:info@ggtc.world)

**Design:** Leslie Lim

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# Introduction

**While the COVID-19 virus spared no country with its infliction, the tobacco industry exploited the pandemic to increase its business. The Eastern Mediterranean Region (EMR), like other regions, was not spared and experienced tobacco industry interference which undermined and compromised public health policy.**

The WHO Eastern Mediterranean Regional Office (EMRO) has been monitoring and documenting instances of tobacco industry interference for more than two decades now.<sup>1</sup> The countries addressed in this report represent the continuation of these efforts that are much needed for policy makers to make informed decisions on the implementation of Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC).

Eight countries from the EMR (Egypt, Iran, Iraq, Jordan, Lebanon, Oman, Pakistan and Sudan) who participated in the Global Tobacco Industry Interference Index (Index), recorded various forms of interference and governments' responses to these instances of meddling. Governments received and endorsed charity from the tobacco industry during the pandemic, allowed tobacco (non-essential product) to continue production during lockdowns. Some governments were persuaded to treat new tobacco products more favourably and even recognised the tobacco industry through awarding them as an exemplary industry.

These actions are contrary to Article 5.3 of the WHO FCTC.<sup>2</sup> All eight countries participating in the survey are parties to the WHO FCTC and hence obliged to implement tobacco control measures, reduce tobacco use and protect their health policies from interference from commercial and other vested interest.<sup>3</sup>



The EMR is targeted by the global tobacco industry looking to expand its market for cigarettes as well as new tobacco products. Transnational tobacco companies are expanding in the EMR through joint ventures and acquisitions (Table 1). Japan Tobacco International (JTI), for example, acquired the Sudanese cigarette manufacturer, Hagggar,<sup>4</sup> Egyptian waterpipe company Al Nakhla,<sup>5</sup> and more recently extended its joint manufacturing agreement with Eastern Company for another three years.<sup>6</sup> Tobacco industry websites are vocal about how they see the region as a lucrative market for their products and an opportunity for expansion.<sup>7 8</sup>

The local tobacco industry in the region has also joined the expansion bandwagon. In Egypt and Iran, contrary to the WHO FCTC's objective, tobacco production has increased. The government owned Eastern Company in Egypt produced 94 billion cigarettes in 2020/2021 with an increase of 10 billion sticks in comparison to 2019/2020.<sup>9</sup> In 2020, the company sold 69 billion cigarettes in the domestic market, an increase of 8 billion sticks, and exported the rest to 12 countries.

In Iran, the number of tobacco factories increased from 36 in 2020 to 43 in 2021, with cigarette production increasing by 14 percent to 28.7 billion sticks in the first half of 2021.<sup>10</sup> Iran exported 275 million sticks in the first six months of 2021 compared to the 71 million sticks the previous year.

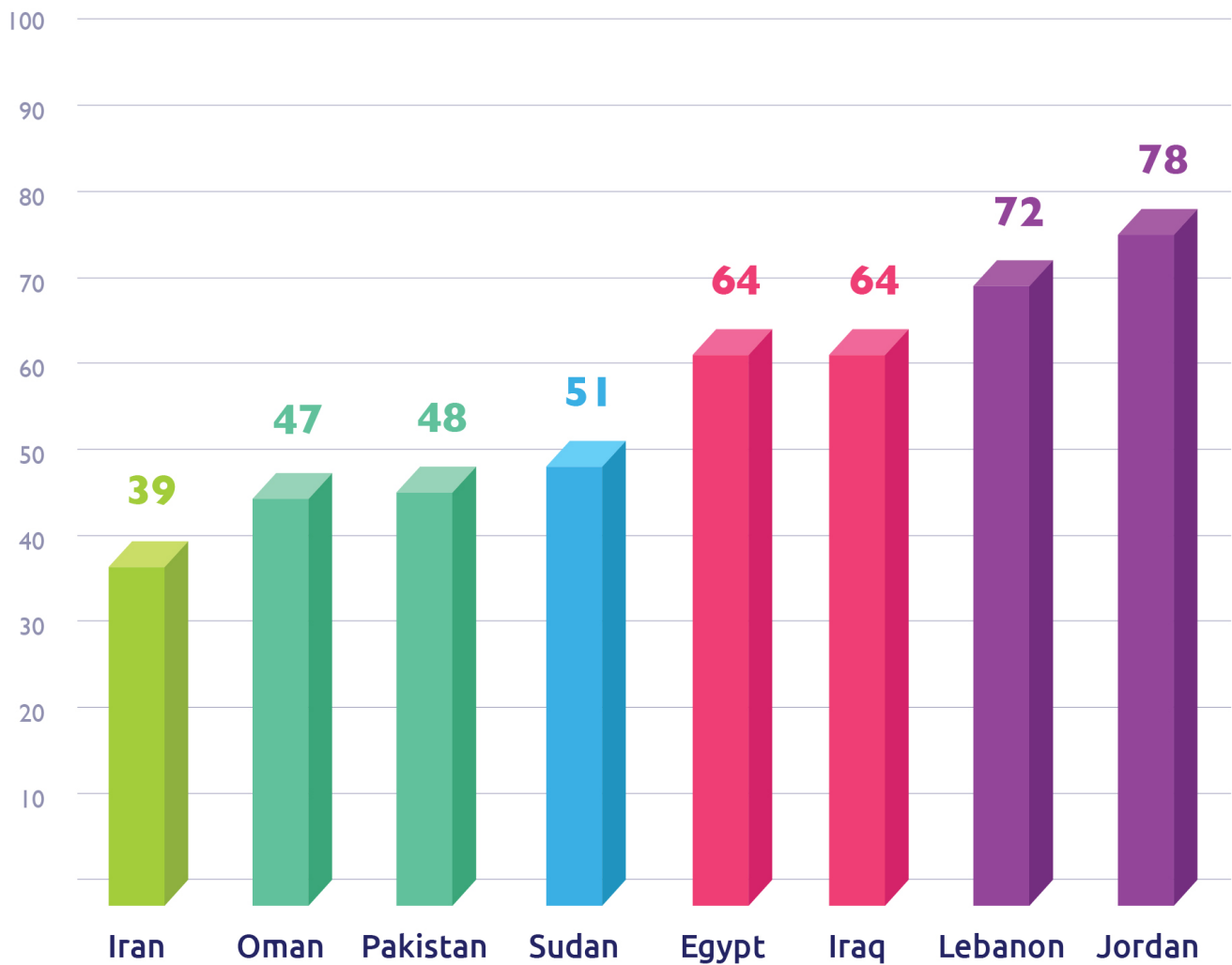
This Index reviews eight countries from the Eastern Mediterranean Region and documents the compliance of governments in implementing Article 5.3 guidelines using information from the period January 2019 to March 2021. The questionnaire used by countries in the preparation of their reports was developed by the Southeast Asia Tobacco Control Alliance (SEATCA) based on the specific recommendations from Article 5.3 guidelines.<sup>11</sup> All information used in the report are obtained from the public domain. The Index covers seven indicators based on the recommendations of Article 5.3 guidelines. Countries are ranked from lowest scores to highest scores where lower scores indicate better compliance with WHO FCTC Article 5.3 guidelines. This EMR Index draws reference from the Global Tobacco Industry Interference Index 2021.<sup>12</sup>

Figure 1 shows the ranking of the countries with Iran securing the lowest score and less industry interference, compared to Jordan and Lebanon showing high scores and high interference (Summary Table).

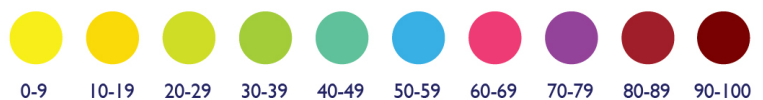
**Table 1:** Main tobacco companies operating in eight Eastern Mediterranean countries<sup>13</sup>

<b>Egypt</b>	Eastern Company SAE, Philip Morris International Misr LLC (PMI), British American Tobacco (BAT)
<b>Iran (Islamic Republic of)</b>	Iran Tobacco Company (ITC), JTI, BAT
<b>Iraq</b>	State Company for Tobacco and Cigarettes, Mared Al Iraqiya, local distributors of international brands
<b>Jordan</b>	Philip Morris Investment B.V. (PMI), JTI, BAT
<b>Lebanon</b>	Regie Libanaise de Tabacs et Tombacs (Regie), PMI, JTI
<b>Oman</b>	Local distributors: Khimji Ramdass (PMI brands), Enhance Oman, (BAT brands), Cigars and Tobacco Corner
<b>Pakistan</b>	BAT, PMI, Imperial Brands
<b>Sudan</b>	JTI (Hagggar Cigarette & Tobacco Factory), BAT (Blue Nile Cigarette Company)

**Figure 1: Tobacco Industry Interference Index 2021**  
Eastern Mediterranean Region Ranking



The lower the score,  
the better the ranking



# Key Findings

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Iran, Oman, Pakistan and Sudan do not allow the tobacco industry to have a seat in their multisectoral committee that decides on tobacco control policy or accept assistance from the industry to develop tobacco control measures.

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Iran has banned tobacco related corporate social responsibility (CSR) activities. Most other countries accepted these CSR which was stepped-up during the COVID-19 pandemic. Egypt, Jordan, Lebanon and Pakistan accepted CSR from the tobacco industry, used to whitewash its image, gain public endorsement and facilitate access to senior government officials.

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Most countries allowed production and sales of tobacco products to continue during pandemic lockdowns and Jordan classified their sales as “essential.” Tobacco companies introduced new tobacco brands during the pandemic.

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Iran, Oman and Sudan did not accept assistance from the tobacco industry or entered into a partnership with it.

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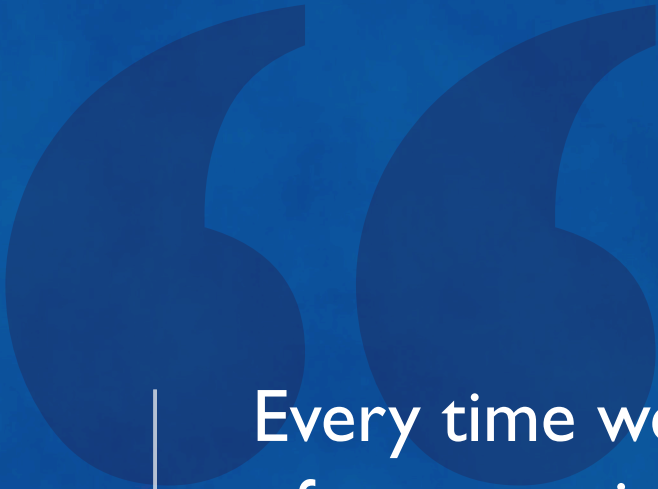
Egypt accepted the tobacco industry’s technical training course for officials of the Egyptian Customs Authority of Alexandria, and Lebanon allowed the government-owned tobacco enterprise to conduct enforcement to curb smuggling of tobacco products.

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Egypt, Iraq, Jordan, Lebanon, Pakistan and Sudan do not have a procedure for disclosing records of interactions with the tobacco industry and its representatives. They also do not have a policy of rejecting contributions from the tobacco industry.

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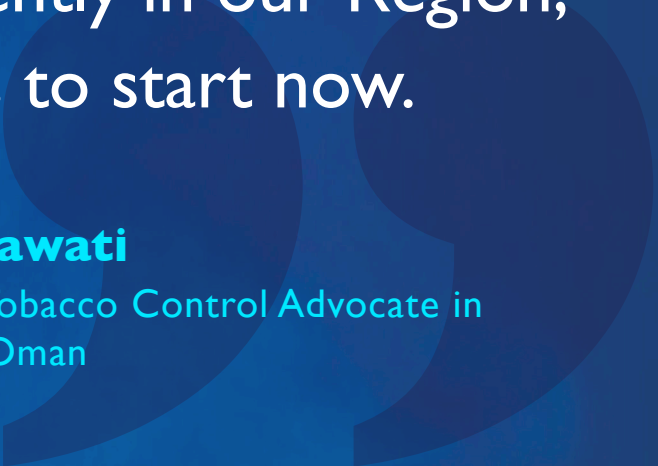
Iran has a policy to not accept any form of contributions from the tobacco industry. A draft bylaw on Article 5.3 is currently under review and will be proposed to the Ministerial Cabinet for approval.



Every time we trace the lack of progress in any aspect of tobacco control in individual countries or collectively in EMR, we find the tobacco industry, its local distributors or front groups and individuals are behind it. Thus comes the extreme importance of implementing Article 5.3 of the FCTC diligently in our Region, and this has to start now.

**Dr Jawad Al-Lawati**

Senior Consultant, Tobacco Control Advocate in  
Ministry of Health, Oman



## 01

# Tobacco industry interference in policy development

**In Iran, Oman, Pakistan and Sudan, the tobacco industry is not allowed to sit in the multisectoral group that sets public health policy or accept assistance to develop tobacco control policy. The National Tobacco Control law of Iran and its bylaw ban any support of tobacco manufacturers to the programs. Hence, the tobacco industry cannot participate in policy development.**

In Sudan, however, the tobacco industry has found a way to participate in developing the standards for tobacco products. Three representatives from tobacco companies have a seat in five committees of the Sudanese Organization for Standardization and Metrology. In Iraq, the Central Organization for Standardization and Quality Control allows

representatives of local cigarette and tobacco import companies to attend meetings related to setting standards for tobacco products.

In Iraq, tax on the import of cigarettes is low keeping cigarette prices low, which are considered among the cheapest in the region. The delay in legislating the new tobacco law has raised questions on the extent of the influence of these companies on decision-makers.

In Jordan, several ministries and departments view the tobacco industry positively as one that contributes towards generating income for the country. In 2020, the Ministry of Interior requested a review of the ability to transfer of shisha license from one location to another.<sup>14</sup> This had implications on the work of Greater Amman Municipality and other municipalities in their efforts to limit shisha license owners from being able to transfer sales to another site.

In another development, when the Jordanian Environmental Classification and Licensing System of 2020 was issued, the tobacco industry was listed in category 3 (only limited danger) in the classification for their environmental impact.<sup>15</sup> This more favorable categorization follows an award JTI received from the Ministry of Environment for its efforts to reduce CO<sub>2</sub> emissions and environmental impact.<sup>16</sup> Cigarette butts are the most widely littered product<sup>17</sup> and abundant form of plastic waste in the world, with about 4.5 trillion individual butts polluting our global environment every year.<sup>18</sup>

Tobacco control efforts in Lebanon seem to have been stalled and the multi-sectoral committee that sets health policy has had no meeting. There has been little progress since the passage of the tobacco control law in 2011.



## 02

## Tobacco related CSR activities to whitewash industry image

**The tobacco industry conducts CSR to repair its image as a harmful industry. Article 5.3 recommends that these activities be denormalized because the industry uses them to clean its image, buy public goodwill and win political mileage. Article 13 also calls for them to be banned as they are a form of sponsorship.**

Iran has banned tobacco-related CSR activities and the government has implemented the ban by not accepting nor endorsing any charity from the tobacco industry.<sup>19</sup>

During the COVID-19 pandemic, in Egypt, Jordan, Lebanon and Pakistan the tobacco industry used CSR activities to gain public endorsement and access senior government officials. In Jordan the tobacco industry contributed to the Hemmat Watan Fund, which is under the auspices of the Prime Minister, in support of the COVID-19 pandemic relief<sup>20</sup> to have a leverage with the government.

In Lebanon, Regie's Director General visited the Minister of Health and discussed the possibility of purchasing COVID-19 vaccine for its employees and their families as part of Regie's CSR program.<sup>21</sup>

In Iraq, the Ministry of Trade distributed locally produced Somar brand cigarettes together with the items of the free food ration program distributed as an assistance to poor families.<sup>22</sup>

In Oman, over the past two years, CSR activities related to the public sector involved sponsorship for a National Environmental Forum and a donation to a tertiary care hospital in the capital.<sup>23</sup>

## 03

# Tobacco industry received incentives that prospered them

**Oman does not provide any incentives to the tobacco industry to operate its business. The latest tobacco-related legislation, for example, is the new Excise Tax on “sin” products which grants no exemptions on goods purchased prior to the implementation date.<sup>24</sup>**

The Central Bank of Sudan had initially issued a circular that listed tobacco and cigarette

manufacturing inputs as “necessary” products, however, the Ministry of Industry and Trade later announced that this decision was reversed.<sup>25</sup>

In Pakistan, while there was no federal excise duty imposed on tobacco, advance tax on tobacco growers was withdrawn, which helped increase exports of tobacco.<sup>26,27</sup>

Despite the COVID-19 pandemic, in Egypt the government owned Eastern Tobacco did not slow down nor cease its production of cigarettes. As a result, Eastern Tobacco Company increased its revenues in the three-month period between July and September 2020 to 3.954 billion pounds, compared to 3.71 billion pounds in the comparative period of the last fiscal year.<sup>28</sup>

BAT Egypt launched its heated tobacco product, (Glo), in the first quarter of 2021 through a statement that it is “approved by the Ministry of Health”.<sup>29</sup> The Glo brand is now widely available and offers free delivery for online orders. According to BAT, there are 150 Brand Ambassadors and 15 Supervisors, spread all around Cairo in 11 Malls and 100 convenience stores.<sup>30</sup>

In Iraq, cigarette prices are cheap and among the lowest in the region. The price of a 12-stick pack of cigarettes is sold for only 2500 Iraqi dinars (less than US\$2).

The Jordanian government welcomed new investment from the Yemini government and BAT located in the duty-free area to produce tobacco products.<sup>31</sup> This investment was endorsed by officials of both governments as well as the British Ambassador to Yemen.

## DUTY FREE ALLOWANCE FOR TOBACCO

All eight countries allow international travellers to bring in certain quantity of duty-free tobacco into the country (Table 2) which is a benefit to the industry. Lebanon allows a significantly higher quantity of tobacco compared to other countries. The concept of duty-free tobacco encourages more purchases and runs contrary to the objective of WHO FCTC to reduce tobacco use.

**Table 2:** Duty-free allowance for international travellers<sup>32</sup>

<b>Egypt</b>	200 cigarettes or 25 cigars or 200g of tobacco
<b>Iran (Islamic Republic of)</b>	200 cigarettes or 50 cigars or 200g of tobacco
<b>Iraq</b>	200 cigarettes or 25 cigarillos or 10 cigars or 250g of tobacco
<b>Jordan</b>	200 cigarettes or 200g of tobacco
<b>Lebanon</b>	800 cigarettes or 50 cigars or 100 cigarillos or 1 kg of tobacco
<b>Oman</b>	400 cigarettes
<b>Pakistan</b>	200 cigarettes or 50 cigars or 500g of tobacco
<b>Sudan</b>	200 cigarettes or 50 cigars or 450g of tobacco



## 04

# Unnecessary interaction between the government & industry

**According to Article 5.3 guidelines, unnecessary interactions with the tobacco industry occur when government officials attend social functions sponsored by the industry or when the government forms a partnership with them.**

No evidence was found in Iran, Oman and Sudan of the government accepting assistance from the tobacco industry or entering into a partnership.

In Pakistan, BAT's subsidiary, Pakistan Tobacco Company, received endorsement from the Prime Minister's Office during its inauguration ceremony which was projected as complementing the Prime Minister's ambition of "Making Pakistan business friendly." BAT's new tobacco product, Velo, was launched during the event.<sup>33</sup>

Egypt's Minister of Finance presented a certificate of appreciation to Philip Morris for paying taxes on time saying, "This certificate of appreciation reflects this Ministry's role in acknowledging and applauding companies that fulfil their national duty of tax compliance."<sup>34</sup> Philip Morris Egypt conducted a technical training course for employees and officials of the Egyptian Customs Authority of Alexandria, Port Said, and Cairo to combat smuggling and trade of illegal goods.<sup>35</sup>

The Regie in Lebanon conducts its own raids on smuggled tobacco products and issues fines.<sup>36</sup> Confiscation is usually done by regulators but the Regie also "referred to the concerned authorities" showing a close relationship between Regie and the regulators to conduct part of their job of regulation and enforcement.

In 2019, JTI received an award from Jordan's Ministry of Environment for its activities to reduce CO2 emissions and environmental impact.<sup>37</sup> Granting of an award to JTI, an unnecessary interaction, can open the door to having an influence on the regulation of the industry.



## 05

## Transparency & accountability deteriorated

**None of the countries in the survey have a procedure in place to disclose meetings/ interactions with the tobacco industry to the public in cases where such interactions are strictly necessary for regulation. They also do not have a register of the tobacco industry's affiliate organizations and lobbyists acting on behalf of the tobacco industry.**

In Sudan, while the Ministry of Health previously disclosed their meetings/ interactions with the tobacco industry, however, there has been no disclosure since 2016. There is a registered union for tombak (smokeless tobacco) traders and they conduct meetings with the government as an organization that defends tobacco trade and agriculture, and there have been joint meetings

between the union and the government. However, there is no publicly available information on the procedure for these meetings or meetings with tobacco companies operating in Sudan.

Several of the countries have state-owned tobacco companies and hence should have better access to information but information about these companies is scant.

In Iran, the National Tobacco Planning and Supervision Center, working under the Ministry of Industry, Mine and Trade, is responsible for supervising the manufacturing, importing, exporting, and distributing all forms of tobacco and is the official communication channel between the industry and the government. However, information on the outcome of meetings is not available to the public. Similarly in Egypt, where Eastern Tobacco Company is a state-owned corporate, interactions and the collaborations are not made public.

In Lebanon, the Director General of the government owned Regie had a meeting with the House Speaker, but details of that meeting were not revealed to the public. Lebanon passed decree 6940 implementing Law 28 on the Right to have access to information.<sup>38</sup> This allows tobacco control advocates to request the Regie to disclose its financial data, meetings minutes, MOU with tobacco industry. It remains to be seen to what extent this decree will be implemented. Similarly, the Greater Amman Municipality has an 'Access to Information Law' that advocates can utilize to request for information.<sup>39</sup>

## 06

## Public officials faced conflict of interest situations

**Article 5.3 guidelines calls on Parties to treat state-owned tobacco industry in the same way as any other tobacco industry. Egypt, Iran, Iraq and Lebanon have state-owned tobacco enterprises (Table 3) and the governments will be conflicted when implementing the WHO FCTC and simultaneously ensure the fiduciary responsibility of facilitating protection and growth of the industry. The conflict can be experienced in several ways.**

In Iran although no government official holds any office in the tobacco industry, some of the directors in the board of Iranian Tobacco Company are appointed by the Ministry of Industry, Mine, and Trade. But no senior government official form part of the Board of the Company. In Sudan, there is no record of former senior government officials joining the tobacco industry upon their retirement nor current government officials holding positions in the tobacco business.

Egypt, Iraq and Lebanon do not prohibit contributions from the tobacco industry or any entity working to further its interests, and there is no requirement for disclosure of the funds.

The Iraqi government fully supports the Baghdad tobacco factories which are under the jurisdiction of the Ministry of Industry and Minerals. Though these factories are run by the private sector, the ministry is supportive by creating investment and partnership opportunities with international companies. The government's National Investment Commission promotes opportunities available for tobacco under the industry and manufacturing sector.<sup>40</sup>

The former Chairman of Egypt's Capital Market Authority and Member of the Board of Directors of the Central Bank is the Vice Chairman of Philip Morris Egypt. He has held several prominent positions in the General Investment Authority and the first official of US-Egyptian fund to promote investment in Egypt.<sup>41</sup>

**Table 3:** State owned enterprise

<b>Egypt</b>	The Ministry of Investment owns 50.5% of Eastern Company SAE <sup>42</sup>
<b>Iran (Islamic Republic of)</b>	Iran Tobacco Company <sup>43,44</sup>
<b>Iraq</b>	State Company for Tobacco and Cigarettes <sup>45</sup>
<b>Lebanon</b>	Regie Libanaise De Tabacs et Tombacs (Regie) <sup>46</sup>

## 07

# Governments can protect themselves from industry interference

**Article 5.3 guidelines outlines various measures governments can adopt to protect their health policies from tobacco industry interference. These include adopting a code of conduct for public officials prescribing standards for interactions with the tobacco industry, requiring the tobacco industry to periodically submit information on tobacco production, marketing expenditures, revenues, lobbying and philanthropy activities, consistently raising awareness on policies relating to**

## **Article 5.3 guidelines within its departments, and disallowing contributions from the tobacco industry.**

In Iran, the government has a policy to not accept any form of contributions from the tobacco industry. Iran also has a draft bylaw on Article 5.3 currently under review which will be proposed to the Ministerial Cabinet for approval.<sup>47</sup>

While Oman has a similar policy of prohibiting acceptance of contributions from the tobacco industry, it is however limited to members of the multisectoral national tobacco control committee and does not apply to the whole government, leaving the door open for the tobacco industry to approach public officials in other departments.

Egypt, Iraq, Lebanon and Sudan do not have a procedure for disclosing records of interaction (such as agendas, attendees, minutes and outcome) with the tobacco industry and its representatives. They also do not have a policy of rejecting contributions from the tobacco industry including invitation for study visits offered to the government and its agencies.

The governments have not adopted/ implemented a code of conduct for public officials prescribing the standards when interacting with the tobacco industry. The governments have not put in place a program to consistently raise awareness on Article 5.3 for other departments.

Pakistan has developed a National Action Plan on tobacco industry interference however this has not been implemented yet.<sup>48</sup>

Oman has a 'conflict of interest' form for members of the National Committee for Tobacco Control and alerting the Ministry's departments not to purchase medicines from tobacco industry linked entities, and alerts to all government units not to accept donations and grants from tobacco companies.

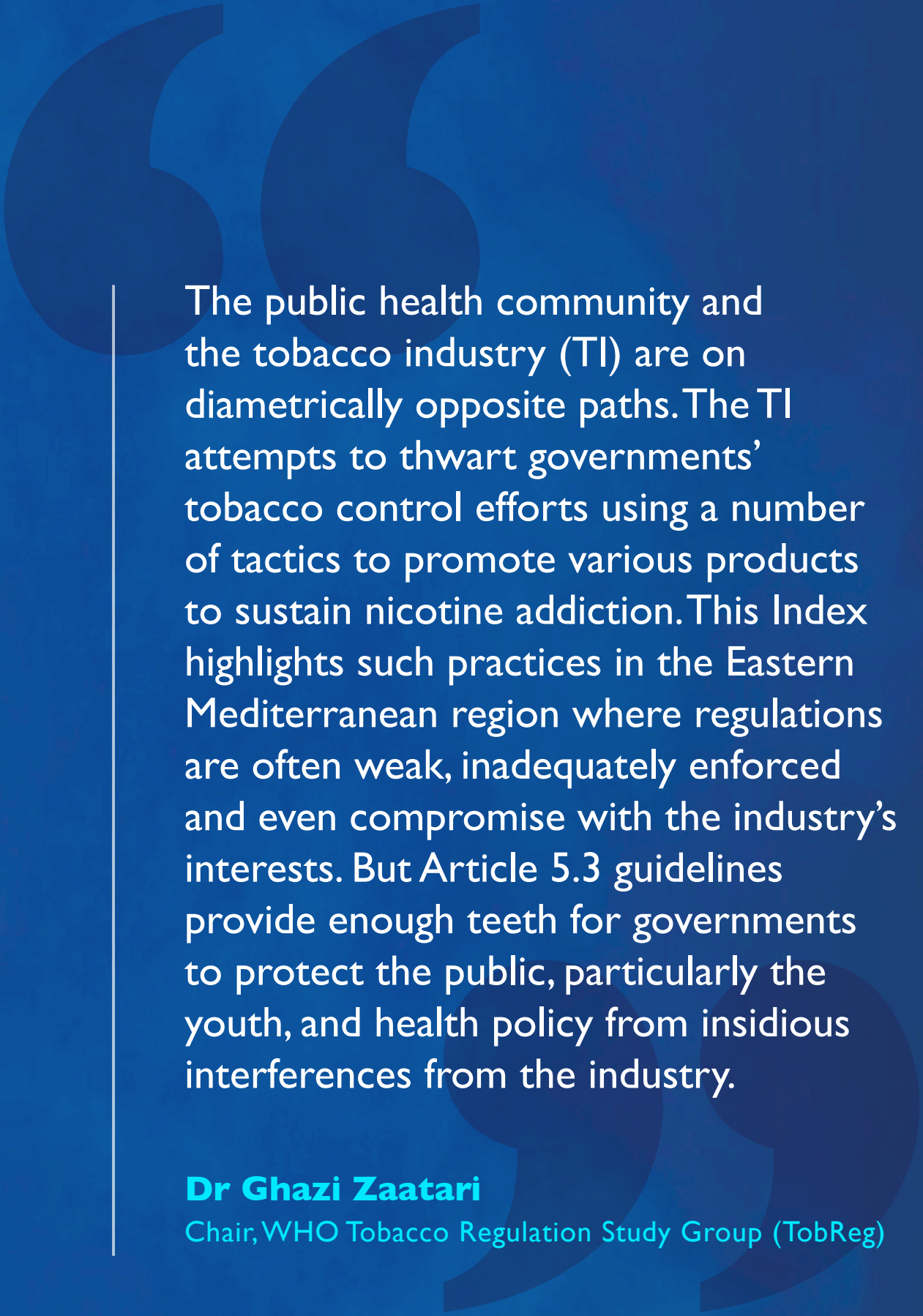


# Conclusion and Recommendations

This Index has shown that countries are facing serious challenges and are lagging far behind in implementing Article 5.3 guidelines. After 12 years since Article 5.3 guidelines were adopted, countries show little understanding of its strengths and in utilising the guidelines as a tool to protect their tobacco control policies.

The Index tracks progress or deterioration of countries in their efforts in implementing Article 5.3 guidelines. Lebanon, Pakistan and Sudan show a slight improvement in their scores compared to the previous year, while Egypt, Jordan and Iran have deteriorated in their scores.

This Index is based on publicly available information and the details provided are a reflection of what has been found. This confirms the lack of implementation of the Article 5.3 guidelines that requires governments to make public their interactions with the tobacco industry, require information from the industry and set up registries of those representing the interest of the tobacco industry.



The public health community and the tobacco industry (TI) are on diametrically opposite paths. The TI attempts to thwart governments' tobacco control efforts using a number of tactics to promote various products to sustain nicotine addiction. This Index highlights such practices in the Eastern Mediterranean region where regulations are often weak, inadequately enforced and even compromise with the industry's interests. But Article 5.3 guidelines provide enough teeth for governments to protect the public, particularly the youth, and health policy from insidious interferences from the industry.

**Dr Ghazi Zaatari**

Chair, WHO Tobacco Regulation Study Group (TobReg)

# Recommendations

Governments can adopt the following measures to better protect themselves and their tobacco control policies:

**1** **Conduct awareness programs** specifically on Article 5.3 for government departments more regularly.

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**2** **Adopt a clear policy** for the government in dealing with the tobacco industry that ensures transparency and prevents conflicts of interests. This can be a form of a code of conduct for all public officials to guide their interactions with the tobacco industry which should be limited to only when strictly necessary. Expand current code of conduct for members of the Tobacco Control Committee to cover whole of government to plug any loopholes.

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**3** **Inform and educate** all branches of government about the need to protect public health policies for tobacco control from commercial and other vested interested of the tobacco industry.

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**4** **Denormalize and ban tobacco related CSR contributions** as recommended in the WHO FCTC Article 5.3 and Article 13 guidelines. The tobacco industry uses CSR activities to normalize its business and gain public approval and favors from policymakers.

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**5** **Exclude the tobacco industry as a stakeholder** at any level or stage of health policy development. Terminate existing collaboration with the tobacco industry to conduct training programs or law enforcement activities.

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**6** **Address conflict of interest situations**, apply policy coherence and fully commit to implementing the WHO FCTC to protect public health. Issue a policy on avoiding any preferential treatment to state owned tobacco industry.

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**7** **Adopt a procedure** for disclosing records of all interactions with the tobacco industry and its representatives.

**Summary Table:** Eastern Mediterranean Region Tobacco Industry Interference Index 2021

INDICATORS	EG	IR	IQ	JO	LB	OM	PK	SD
The government accepts, supports or endorses offer for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies. (Rec 3.1)	0	1	1	5	1	0	1	0
The government accepts, supports or endorses legislation drafted by/ collaboration with the tobacco industry. (Rec 3.4)	3	1	1	5	4	3	1	0
The government allows the tobacco industry to sit in multi-sectoral committee/ advisory group that sets public health policy. (Rec 4.8)	0	1	5	5	3	1	1	2
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates. (Rec 4.9, 8.3)	1	1	1	1	1	1	1	1
<b>PARTICIPATION IN POLICY DEVELOPMENT</b>	<b>4</b>	<b>4</b>	<b>8</b>	<b>16</b>	<b>9</b>	<b>5</b>	<b>4</b>	<b>3</b>
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) The government agencies/ officials endorses, forms partnerships with/ participates in tobacco industry CSR activities. (Rec 6.2)	4	0	1	5	4	2	3	3
<b>TOBACCO-RELATED CSR ACTIVITIES</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>3</b>	<b>3</b>
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control law. (Rec 7.1)	3	4	3	5	4	1	3	0
The government gives privileges, incentives, exemptions or benefits to the tobacco industry. (Rec 7.3)	4	4	5	5	5	2	2	5
<b>BENEFITS TO THE TOBACCO INDUSTRY</b>	<b>7</b>	<b>8</b>	<b>8</b>	<b>10</b>	<b>9</b>	<b>3</b>	<b>5</b>	<b>5</b>
Top-level government officials meet with/ foster relations with the tobacco companies such as attending social functions and events sponsored/ organized by tobacco companies. (Rec 2.1)	4	1	4	5	3	5	5	0
The government accepts assistance/ offers of assistance from the tobacco industry on enforcement. (Rec 3.1, 4.3)	0	1	0	5	4	0	2	0
The government accepts, endorses, or enters into partnership or agreements with the tobacco industry. (Rec 3.1)	4	2	5	5	0	2	0	0
<b>FORMS OF UNNECESSARY INTERACTION</b>	<b>8</b>	<b>4</b>	<b>9</b>	<b>15</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>0</b>



INDICATORS	EG	IR	IQ	JO	LB	OM	PK	SD
The government does not publicly disclose meetings/ interactions with the tobacco industry where such interactions are strictly necessary for regulation. (Rec 2.2)	4	5	5	5	5	0	3	5
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists.	5	5	5	3	4	5	4	5
<b>TRANSPARENCY</b>	<b>9</b>	<b>10</b>	<b>10</b>	<b>8</b>	<b>9</b>	<b>5</b>	<b>7</b>	<b>10</b>
The government does not have a policy (whether or not written) to 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)	5	1	5	5	5	0	5	5
Retired senior officials work for the tobacco industry. (Rec 4.4)	4	1	1	2	2	5	4	0
Current government officials and their relatives hold positions in the tobacco business including consultancy positions. (Rec 4.5, 4.8, 4.10)	0	1	1	5	4	4	1	0
<b>CONFLICT OF INTEREST</b>	<b>9</b>	<b>3</b>	<b>7</b>	<b>12</b>	<b>11</b>	<b>9</b>	<b>10</b>	<b>5</b>
The government has a procedure to disclose records of the interaction with tobacco industry and its representatives. (Rec 5.1)	5	1	5	3	5	5	3	5
The government has adopted or implemented a code of conduct for public officials, prescribing the standards they should comply when dealing with tobacco industry. (Rec 4.2)	5	3	4	2	5	2	3	5
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, and political contributions. (Rec 5.2)	3	2	4	2	3	5	1	5
The government has a program / system/ plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 guidelines. (Rec 1.1, 1.2)	5	3	3	3	5	2	1	5
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives. (Rec 3.4)	5	1	5	2	5	2	4	5
<b>PREVENTIVE MEASURES</b>	<b>23</b>	<b>10</b>	<b>21</b>	<b>12</b>	<b>23</b>	<b>16</b>	<b>12</b>	<b>25</b>
<b>TOTAL</b>	<b>64</b>	<b>39</b>	<b>64</b>	<b>78</b>	<b>72</b>	<b>47</b>	<b>48</b>	<b>51</b>

# Endnotes

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