



Global Center for  
Good Governance  
in Tobacco Control



Eastern Mediterranean  
**Tobacco Industry Interference**  
Index 2025

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# Introduction

The tobacco industry (TI) has targeted the Eastern Mediterranean Region (EMR) as a lucrative market for its products and business expansion. To protect its business, it has stepped up interference to undermine tobacco control policy. While some governments have made efforts to protect their tobacco control measures, others gave in to industry interference.

The World Health Organization Framework Convention on Tobacco Control (WHO FCTC) empowers governments through Article 5.3 to protect their tobacco control policies from commercial and other vested interests of the TI.<sup>1</sup> However, Article 5.3 remains underutilized to protect public health.

Several governments accepted input and assistance from the industry, received and endorsed TI charitable contributions, collaborated with the TI and participated in its events, and allowed new tobacco products to be sold in the country. Several governments recognized the TI through awards, portraying it as an exemplary industry. Some of these instances of interference recur from those reported in the EMR TI Interference Index 2021<sup>2</sup> and 2023, indicating a lack of action to address the problem.<sup>3</sup>

However, some governments demonstrated their commitment to implementing the WHO FCTC by banning or rejecting TI assistance or contributions, including corporate social responsibility (CSR) activities and enforcement actions. They disallowed industry representatives from their inter-agency committees on tobacco control and implemented tobacco control measures in a timely manner without giving in to TI delay tactics.

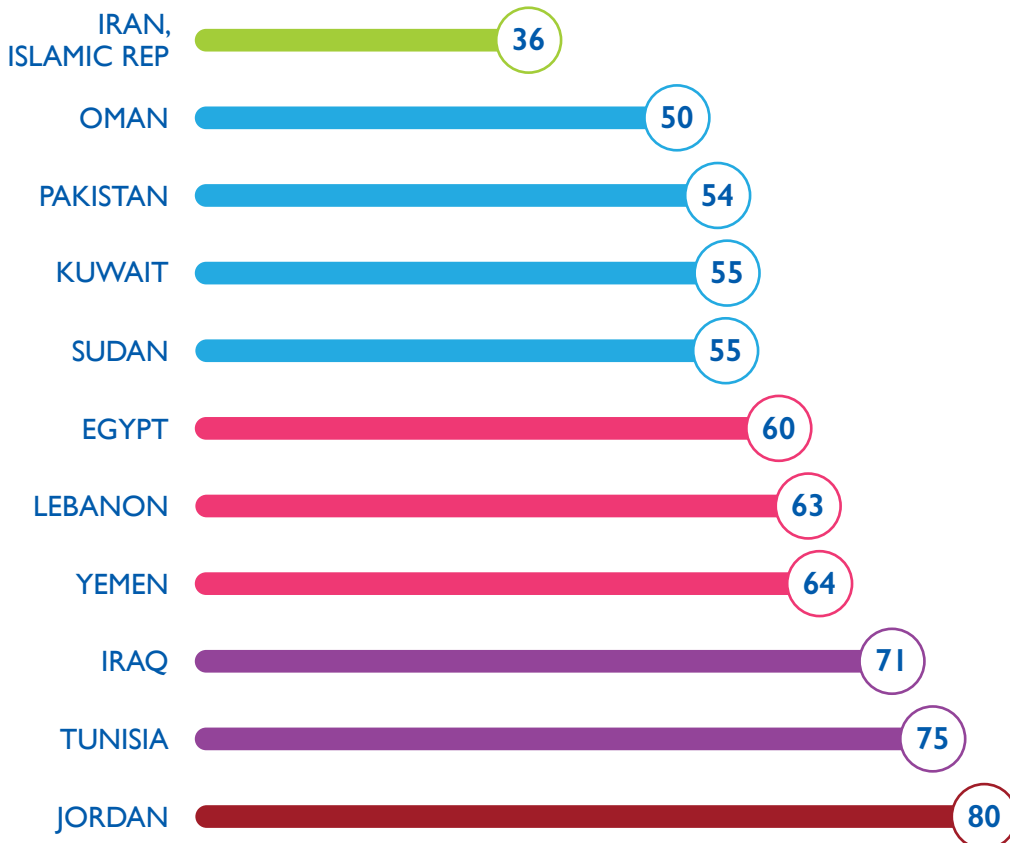
This is the third edition of the Eastern Mediterranean Tobacco Industry Interference Index which covers 11

countries, namely: Egypt, Iran, Iraq, Jordan, Kuwait, Lebanon, Oman, Pakistan, Sudan, Tunisia, and Yemen. It assesses how countries responded to TI interference by implementing Article 5.3 to protect their tobacco control policies. The report uses a questionnaire (revised) developed by the Southeast Asia Tobacco Control Alliance (SEATCA). Countries are ranked from lowest scores to highest scores, where lower scores indicate better compliance with Article 5.3 Guidelines.

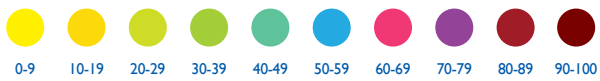
This report is based only on publicly available information, and therefore does not adequately capture all evidence of interference that may have occurred. Even then, publicly available information may not be the most up-to-date. Limited government and TI transparency makes it difficult to collect information on industry interference. The rankings applied to countries in this Index should be viewed in light of these limitations.

Figure 1 shows the country rankings with Iran achieving the lowest score and least industry interference, compared to Jordan, which shows high interference with the highest score (see Summary Table on page 23). The other countries also show industry interference to varying degrees and governments continue to succumb to industry lobbying in various ways.

**FIGURE 1: TOBACCO INDUSTRY INTERFERENCE IN THE EASTERN MEDITERRANEAN REGION**



The lower the score, the better the ranking



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# Key findings

- Countries such as **Kuwait, Oman, Sudan** and **Yemen**, did not accept assistance from the TI on enforcement, conducting raids on tobacco smuggling or enforcing smoke-free policies or no sales to minors.
- **Iran, Iraq, Lebanon, Oman, and Tunisia** do not receive financial contributions from the TI.
- **Most countries** have either banned tobacco-related CSR activities (Bahrain, Iran, Lebanon and Sudan) or have severely restricted them. However, several governments accepted, endorsed, or promoted tobacco-related CSR activities, facilitating a positive relationship with the industry.
- None of the countries allow the TI into their inter-agency committees on tobacco control, but the industry in **Jordan, Sudan** and **Yemen** had a seat in the national standardization agency and used this platform to exert influence on tobacco control policy and its implementation.
- **Iran** has a policy on disclosure and management of conflicts of interest for persons involved in tobacco control policies. Most countries do not have a program in place to consistently raise awareness about TI interference.
- The governments of **Lebanon** and **Tunisia** gave in to industry pushback on tax increases and lowered taxes to facilitate the success of their state-owned enterprise and heated tobacco products respectively.
- The TI in the region continued to receive benefits to expand or improve its productivity, or protect its business. The benefits included establishing a tobacco factory in **Iraq**, allowing tobacco manufacturing inside duty-free zones in **Jordan** and **Pakistan**, and receiving investment privileges in **Yemen**. Other ways the industry benefited included delays in implementing tobacco control measures, such as applying excise duties in **Kuwait**, pictorial health warnings on tobacco packs in **Tunisia**, and track-and-trace measures in **Pakistan**.
- Senior officials from **six governments** endorsed the TI and engaged in unnecessary interactions, including visiting its manufacturing facilities or recognizing it through awards. Senior officials in **Iraq** and **Lebanon**, and **Tunisian** members of parliament visited their state-owned tobacco enterprise, while a minister in **Yemen** participated in a tobacco product launch. **Egypt's** Minister of Finance recognized the Eastern Company as the “Best Performing EGX Listed Company”, and **Pakistan's** Prime Minister awarded a tobacco company for being the “Second Highest Taxpayer.”
- Governments allowed their diplomatic missions to endorse the TI. The **Japanese** Embassy in **Egypt** and **Lebanon** was lobbied by Japan Tobacco International (JTI) to promote its business. The Japanese Ambassador to **Egypt** met with JTI at the inauguration of its new office in Cairo and discussed future investment opportunities to strengthen its presence in the country.
- Lack of transparency in interactions between government officials and the TI remains a problem across the region. Publicly available information is limited. **No country** has a registry of TI lobbyists or those who represent its interests.
- There is a revolving door of recent former public officials joining the TI or vice versa in **Jordan, Pakistan, and Tunisia**.

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# I. The TI interfered in policy development and implementation

With strong political will to protect public health, implementation of tobacco control measures can proceed as planned. The government of **Oman**, for example, implemented its standardized packaging laws as scheduled. **Oman's** standardized packaging laws, passed in 2023 with a six-month implementation period, took effect without delay.

Although several countries in the region do not allow the TI to be involved in tobacco control policy development, the industry still found ways to influence policy (Figure 2). The industry has aggressively lobbied for policies that promote and support new products. This has delayed implementation of tobacco control laws.

Both **Lebanon** and **Tunisia** have lowered tobacco taxes in support of their respective state-owned tobacco enterprises. In **Lebanon**, tax was lowered<sup>4</sup> based on the Minister of Interior and Municipalities' position, "the Lebanese state will provide whatever it can to facilitate the Regie's continued success,"<sup>5</sup> while **Tunisia** reduced the consumption tax on heated tobacco products from 135% to 50% and further lowered tax on molasses tobacco and Jirac to 10%.<sup>6</sup>

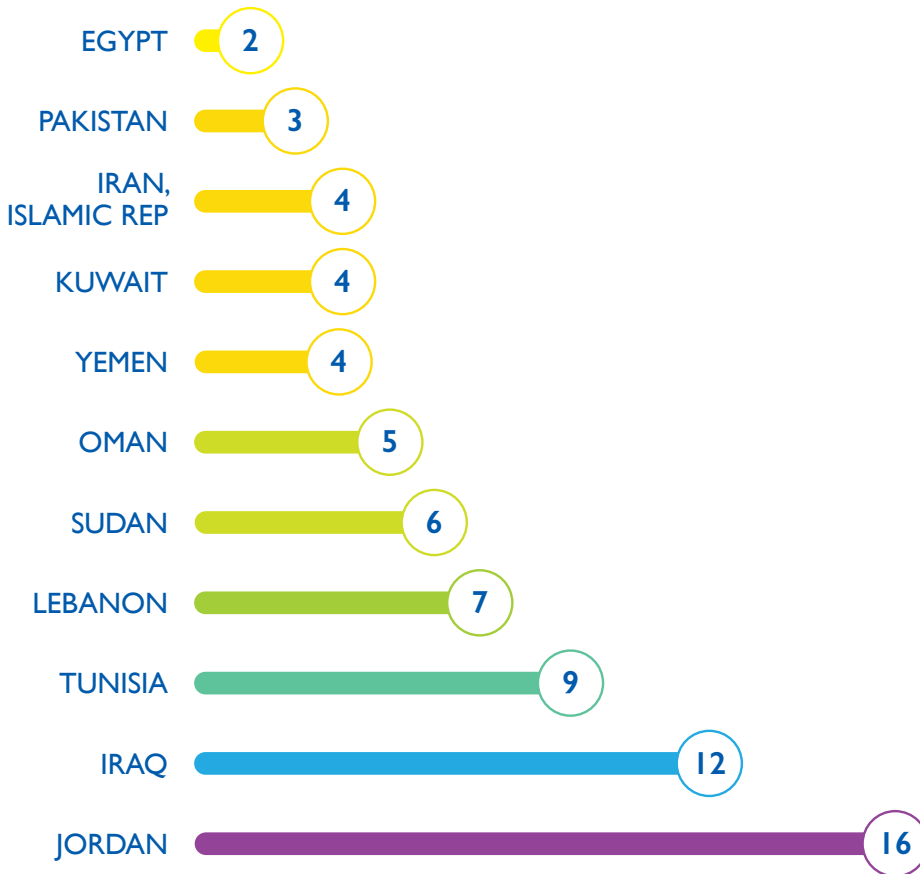
In **Lebanon**, the Ministry of Public Health's request to increase tobacco tax was opposed by the TI lobby raising the issues of patriotism and sectarianism as a rationale. The Ministry of Public Health also faced a lack of support from government officials as their

recommended tobacco product tax increase was not approved and eventually got reduced in the government's budget.<sup>7</sup> The TI stated at one of its events that it was proud of its lobbying activities.<sup>8</sup>

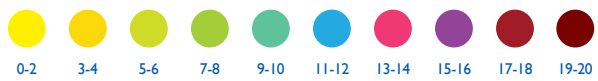
During **Lebanon's** launch of the 2024 National Campaign to stop smoking, the Minister of Public Health raised the issue of industry lobbying: "We have a very strong lobby in Lebanon with tobacco companies. I personally witnessed this when we tried to raise taxes. They brought in national and sectarian issues when we discussed the issue. So we have a tremendous amount of work to do in this regard, not only at the state level but also at the community level, to make the necessary difference."<sup>9</sup>

While the TI may not be a member of intersectoral committee on tobacco control, in some countries the industry exerted influence through its membership in other agencies, including the national standardization organization.

FIGURE 2: TOBACCO INDUSTRY INTERFERENCE IN POLICY DEVELOPMENT



The lower the score, the better the ranking



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In **Jordan**, the TI has maintained a presence in policymaking through the Jordan Standards and Metrology Organization (JSMO) tobacco committee, which oversees specifications relating to labeling, packaging, and the contents of tobacco and recreational nicotine products.<sup>10</sup> In 2024, the committee was restructured,<sup>11</sup> and the committee representation of TI expanded: in addition to the two proxy seats previously held through the Jordan Chambers of Commerce and Industry, two additional proxies were allocated via the Amman Chamber of Commerce and the Amman Chamber of Industry.<sup>12</sup> Consequently, representatives from British American Tobacco (BAT), JTI, and Philip Morris International (PMI) now hold over 25% of the votes [4/14], which grants the ability to sway policy decisions.<sup>13</sup> Additionally, JTI sits on the Accreditation and Quality Assurance Commission's food industry committee, which may facilitate further influence over regulation and normalization of their role.<sup>14</sup>

In **Sudan**, the Ministry of Justice published a new regulation in March 2021 that increased the size of pictorial health warnings (PHWs) on packs from 30% to 75%, and banned kiddie packs (10 sticks), allowing only 20-stick packs. However, three TI representatives sit on the five committees of the Sudanese Organization for Standardization and Metrology (SOSM), which is responsible for developing the standards. The PHW standards have been delayed, and Sudan has yet to implement the 75% PHW and ban on kiddie packs.

BAT's subsidiary, Pakistan Tobacco Company, lobbied the Prime Minister of **Pakistan** to amend the country's tobacco control law and allow it to manufacture kiddie packs for export to Sudan after its manufacturing there was affected by civil war.<sup>15</sup> Although the Prime Minister approved the request, the Ministry of Health stood firm and refused to change the law banning kiddie packs.<sup>16</sup>

In **Yemen**, the TI has been lobbying the Standardization Metrology and Quality Control Organization that wholesalers have been lobbying not to take any legislative action to restrict or prohibit novel tobacco and nicotine products.<sup>17</sup>

On 28 May 2025, the Council of Ministers in **Iraq** lifted the ban on the import of e-cigarettes and heated tobacco products (HTPs). Earlier, on 7 May 2025,<sup>18</sup> the Parliamentary Health and Environment Committee voted unanimously on a comprehensive ban on the import, sale, marketing, manufacture and use of electronic means intended for smoking, especially vapes and electronic hookahs.<sup>19</sup> There is no record of any publicly posted consultation or hearing with tobacco control stakeholders regarding the reversal of the ban, or whether the TI had a role. However, the primary beneficiary of the reversal appears to be the industry.

In **Tunisia**, while no comprehensive tobacco control measures have been introduced since 2019, in 2023, nine Ministers signed a charter aimed at strengthening multisectoral coordination in the fight against tobacco marking Tunisia's commitment at the highest level to the implementation of the WHO FCTC.<sup>20</sup> While there is no evidence of government accepting industry assistance in the development of health policy, with the Minister of Finance simultaneously chairing RNTA's Board of Directors while overseeing health budget allocations, it is difficult to confirm the absence of industry influence in the delay of implementation of tobacco control.

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## II. Tobacco-related CSR activities increased access to senior government officials

The TI conducts CSR activities to improve their reputation and shift attention away from the harm their products cause. Through these activities, the industry executives gain access to senior-level public officials and foster acceptance and goodwill. The Article 13 Guidelines of the WHO FCTC call for a ban on these activities because they are a form of promotion, and the Article 5.3 Guidelines call on governments to denormalize these activities.

Most countries have either banned these tobacco-related CSR activities (**Bahrain, Iran, Iraq, Jordan, Lebanon, and Sudan**) or have severely restricted them (Table 1).<sup>21</sup> However, the survey found that several governments accepted, endorsed, or promoted tobacco-related CSR activities, facilitating a positive relationship with the industry.

Although sports sponsorship of tobacco has ended in most countries around the world, in **Egypt**, the Minister of Youth and Sports, and the Minister of Education and Technical Education endorsed Eastern Company's sponsorship of the Tam Mondial Schools Football Championship in Giza Governorate.<sup>22</sup>

**Egypt's** Eastern Company has been involved in several health-related CSR activities at public medical facilities including funding the purchase of medical equipment for burn survivor treatment at Ahl Masr Hospital<sup>23</sup> and contributing towards cancer treatment services at Shifa Al-Orman Hospital in Luxor.<sup>24</sup>

Numerous tobacco-related CSR activities were conducted in **Lebanon** obtaining government endorsement and publicity at both national and provincial levels. The Ministry of Finance, a representative of the Speaker of Parliament and the Speaker of the Council of Ministers endorsed the Regie's CSR educational activities for the children of farmers.<sup>25</sup> In November 2024, a delegation from the town of Siddiqin, headed by its mayor, visited the Regie to thank it for its support to tobacco farmers during the difficult times that Lebanon was facing.<sup>26</sup>

In **Oman**, Khimji Ramdas, tobacco distributor that also distributes other products, conducted activities through its CSR arm, Eshraqa Foundation, with endorsement from high-level government officials. The activities involved the education, social development, and health sectors, targeting children, youth, women, or people with disabilities.<sup>27,28,29</sup>

Tobacco growing and production harms the environment, including through deforestation and

**TABLE I: STATUS OF BAN ON TOBACCO-RELATED CSR ACTIVITIES IN EMR**

	Ban	Restriction	No ban
Bahrain	✓		
Egypt			✗
Iran	✓		
Iraq	✓		
Jordan	✓		
Kuwait		✓	
Lebanon	✓		
Pakistan			✗
Sudan	✓		
Tunisia		✓	
Yemen		✓	

leaching of harmful substances into the ground and waterways. The TI therefore sponsors CSR environmental programs to shift attention away from its role in environmental harm. In **Pakistan**, the Irrigation and Forest Departments in 2024 collaborated with Pakistan Tobacco Company (PTC) to plant 44 hectares of native forest species across conservation sites. The National Rural Support Program has a 13-year partnership with PTC to carry out reforestation initiatives among rural communities.<sup>30</sup>

In 2023, **Jordan's** Ministry of Agriculture, Madaba Municipality, and JTI jointly launched a series of tree-planting initiatives.<sup>31</sup>

In **Tunisia**, Municipality of Dar Chaâbane El Fehri, a local government authority, partnered with PMI in an environmental initiative, "Wayout", to install Zigofiltres in sewer systems to reduce flooding.<sup>32</sup>

The ambassadors of **Japan**, Magoshi Masayuki, and **Bulgaria**, Boyan Belev, officiated at the launch of the JTI-funded solar-powered lighting system project in the Gibran National Museum in Bsharri, along with parliamentary representatives, head of the Union of Municipalities of Bsharri District, Mayor and the Deputy Mayor of Bcharre, and head of the Lebanese Forces Office in Bcharre.<sup>33</sup>

Although the TI is restricted from conducting CSR activities in **Yemen**, the Director-General of the Youth and Sports thanked the Hayel Saeed Anam Group (HSA Group), which includes a tobacco business, for supporting Second Division Football League competitions.<sup>34</sup> In 2025, the Minister of State and Governor of Aden Governorate inaugurated Aden Mall Park, attended by the Regional Director of HSA Group, and in the presence of the Minister of Civil Service. The Minister praised the efforts of the HSA Group in completing this important project.<sup>35</sup>

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# III. Incentives given to the TI which benefited its business

The Article 5.3 Guidelines recommend that countries not grant incentives, privileges, or benefits to the TI to establish or run its business, but many governments ignored these provisions and proceeded to grant the industry various benefits and tax exemptions.

The government of **Iraq** provided various benefits to encourage the local TI to flourish including new public-private partnerships to reactivate and enhance tobacco production, including activating the Nasr Factory.<sup>36</sup>

In **Jordan**, the Prime Ministry approved BAT's expansion to include e-cigarettes and HTPs under its authorized operations.<sup>37</sup> Additionally, the Ministry of Industry and Trade has advocated for tobacco manufacturing operations inside duty-free zones, a change that could greatly benefit tobacco companies.<sup>38</sup>

**Kuwait** does not have an excise duty on cigarettes and only applies levies on imported cigarettes. However, Kuwait has delayed the implementation of the customs tax agreed to by the Gulf Cooperation Council, of which Kuwait is one of six countries. In January 2025, the Minister of Finance and Minister of State for Economic Affairs and Investment announced that a new selective tax on harmful products, such as tobacco is part of the current tax reform agenda.<sup>39</sup> This law will target goods that are harmful to health and is expected to generate non-oil revenues of approximately 200 million dinars

annually.<sup>40</sup> However, this has not been implemented to date. In 2022, the government had decided to delay imposing an earlier planned 100% tariff on e-cigarettes and their flavors, reportedly due to TI lobbying against tobacco control policies.<sup>41</sup>

In **Tunisia**, the government allowed the TI two years to implement PHWs. A Ministerial Order of January 21, 2022, establishing the procedures for inscribing PHWs to be displayed on the cover of packs allowed implementation within 1 year maximum from publication (until January 2023).<sup>42</sup> On 16 January 2023, the Ministry of Health issued another Ministerial Order extending the deadline until 31 December 2023, granting the TI a total of 24 months for implementation.<sup>43,44</sup> This is four times the internationally recommended 180-day standard for implementing PHWs on tobacco packs. Additionally, Tunisia's tobacco control law has not been updated to fulfill Article 9 of the WHO FCTC to ban the use of descriptors including light and mild, and still allows cigarettes with brand names such as "Merit Mild" (PMI), "Camel Light" (JTI), and "Monte Carlo Light" (JTI) to be promoted and sold.<sup>45</sup>

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**The tobacco industry remains fundamentally resistant to change and has become increasingly bold in its efforts to interfere with government policies aimed at protecting public health. The tobacco industry must be held accountable for the significant harm it has caused and continues to cause to public health. It's therefore the responsibility of public authorities to regulate this industry rigorously to safeguard population health. If we are truly committed to protecting our youth and future generations, we must work towards gradually phasing out this industry.**

- Dr Jawad Al-Lawati, Senior Consultant, Tobacco Control Programme, Ministry of Health, Oman

In **Pakistan**, due to poor monitoring of green leaf threshing units, a process necessary in tobacco manufacturing, the Federal Bureau of Revenue (FBR) faced an estimated revenue loss of Rs 40 billion (about USD 142 million).<sup>46</sup> In 2021, the FBR launched a track-and-trace system, mandating tax stamps on all tobacco products from April 2022, but full implementation was delayed<sup>47</sup> until December 2024. Tobacco companies (General Tobacco Company, SM Ali Industries, Maraya International Pte. Ltd., Pioneer Tobacco and Trading Company, China-Pakistan Tobacco Company, and Pak-China Tobacco) are located in the Export Processing Zone<sup>48</sup> to access a range of fiscal and regulatory incentives and benefits for production and export, including tax exemptions such as customs duties, income tax holidays, and sales tax waivers.

In **Yemen**, tobacco companies are excluded from privileges granted under investment laws,<sup>49</sup> however this law excludes the companies which were established prior to its enactment in 1991. Therefore, Kamaran Industry and Investments (Established in 1963), National Tobacco and Sulfur Company Limited (Established in 1973) and United Industries Company (Established in 1984) are exempted and benefit privileges granted under the investment laws.

**All countries** still allow duty-free tobacco allowance for international travellers. While most countries allow 200 sticks of cigarettes or 250g of tobacco duty-free, Kuwait allows a larger allowance of 500 sticks of cigarettes or 900g of tobacco.

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# IV. Governments freely interacted with the industry

According to Article 5.3, governments should interact with the TI only when strictly necessary and to the extent necessary to effectively regulate the industry and tobacco products. However, most governments, especially those with state-owned enterprise, interacted freely with the TI, through visits to facilities, collaboration, or endorsement by giving awards. The non-health departments were most vulnerable to such interactions.

The government of **Kuwait** does not accept assistance or offers of assistance from the TI on enforcement, including conducting raids on tobacco smuggling or enforcing smoke-free policies or no sales to minors.<sup>50</sup>

The government in **Egypt** maintains close collaboration with the TI. Philip Morris Egypt collaborated with the Tax Authority on price stabilization and QR code verification systems.<sup>51</sup> This alignment was further reflected in high-level endorsements, with the Prime Minister encouraging the Eastern Company to increase cigarette production,<sup>52</sup> and the Minister of Finance recognizing Eastern Company as the “Best Performing EGX Listed Company 2023” during the 2024 Egypt Summit for Excellence.<sup>53</sup>

In March 2024, the Japanese Ambassador met with JTI at the inauguration of its new office in Cairo and discussed future investment opportunities to strengthen JTI’s presence in Egypt.<sup>54</sup>

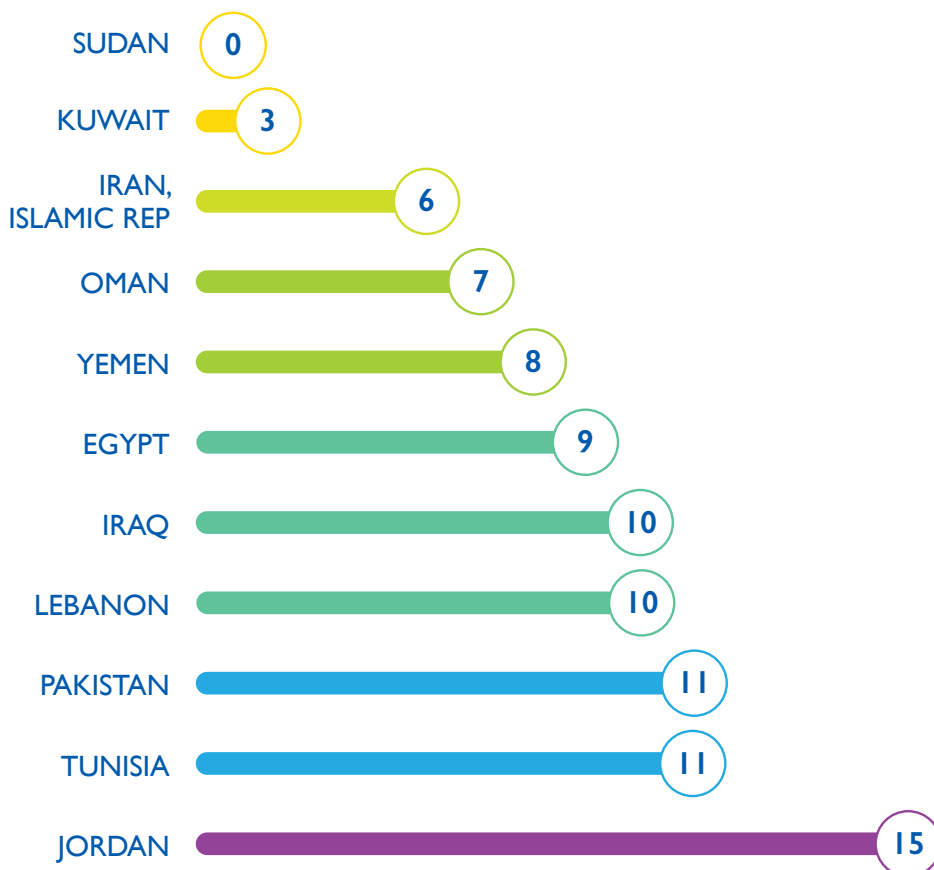
In **Pakistan**, the Federal Minister for Commerce, endorsed Pakistan Tobacco Company Limited (PTC)’s export program<sup>55</sup> under the “Made in Pakistan 3.0” initiative. Under this program PTC began exporting nicotine pouch, Velo, to Japan. During the inauguration ceremony, the minister highlighted the importance of

PTC’s contributions, stating that the company is a major taxpayer in Pakistan. In 2024, Pakistan’s Prime Minister gave an award to a tobacco company for being the “Second Highest Taxpayer”.<sup>56</sup>

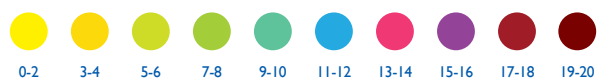
**Lebanon**’s TI received endorsement from the highest level. In March 2025, the President of Lebanon visited Regie, the state-owned tobacco enterprise, and endorsed its work.<sup>57</sup> The Minister of Finance<sup>58</sup> and the Speaker of Parliament<sup>59</sup> met with the Regie on several occasions and acknowledged its achievements. In June 2024, the Director General of the Ministry of Economy and Trade met with Regie’s top leadership and discussed cooperation between the ministry and the Regie to strengthen the national economy and ensure product safety in the local market.<sup>60</sup>

In **Tunisia**, which also has a state-owned enterprise, members of the Parliamentary Finance and Budget Committee conducted an official visit to RNTA (Régie Nationale des Tabacs et des Allumettes) headquarters in May 2025.<sup>61</sup> In **Yemen**, the Minister of Industry and Trade participated in Kamran Company’s product launch and praised the company for its contribution to the national economy, while expressing the ministry’s support.<sup>62</sup>

**FIGURE 3: GOVERNMENTS FREELY INTERACTED WITH THE TOBACCO INDUSTRY**



**The lower the score, the better the ranking**



In **Jordan**, members of the Parliamentary Committee on Labor, Social Development and Population,<sup>63</sup> visited Philip Morris' local subsidiary's factory. The committee reviewed working conditions and emphasized strengthening partnerships between the public and private sectors, especially the industrial sector, which is considered one of the most important productive sectors and contributes to creating new job

opportunities. In 2023, the Minister of Education of **Iraq** visited the printing department of the state-owned Nasr Tobacco and Cigarette Factory to recognize its role in the textbook printing process.<sup>64</sup> This high-level visit to a tobacco factory, not related to regulatory oversight, suggests that official interaction with the industry had become normalized.

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# V. Transparency and accountability still lacking

Transparency in interactions with the TI helps prevent interference. It is also important for government officials to know who represents the TI's interests in their interactions. None of the countries maintain a lobbyist register or a registry of TI groups.

**Iran, Iraq, Kuwait, Lebanon, Sudan, Tunisia,** and **Yemen** do not have laws or procedures to require the government to disclose interactions with the industry representatives, nor do they mandate lobbying disclosures by tobacco companies or their affiliates. The absence of compulsory registration makes it challenging to detect industry influence on public policy or hold the industry accountable.

In **Jordan**, the public faces challenges in accessing information related to the TI from various government agencies. Meeting minutes between government officials and the TI are not publicly disclosed.

The government of **Pakistan** does not have any disclosure policy. In May 2024, BAT executives met with the Prime Minister and the Special Investment Facilitation Council (SIFC) national coordinator about the company's declining investment in Pakistan. During the meeting, BAT had warned it may withdraw investment from Pakistan if the government further increased taxes on cigarettes in the budget, stating that existing taxation has already caused a slump in sales and increased smuggling.<sup>65</sup> The Prime Minister approved establishing a committee to review the regulations hindering exports to overseas markets.

The government's ownership and engagement with state-owned tobacco enterprise in **Iraq, Lebanon** and **Yemen** raises potential conflicts of interest in policymaking.

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# VI. Public officials remain vulnerable to conflicts of interest

Governments can avoid conflicts of interest by prohibiting contributions from the TI and establishing rules based on the guidance provided in the Article 5.3 Guidelines. The situation in several countries shows that public officials are vulnerable to conflicts of interest with the TI (Figure 4) including close interactions with state-owned enterprises or allowing industry representatives to hold public office.

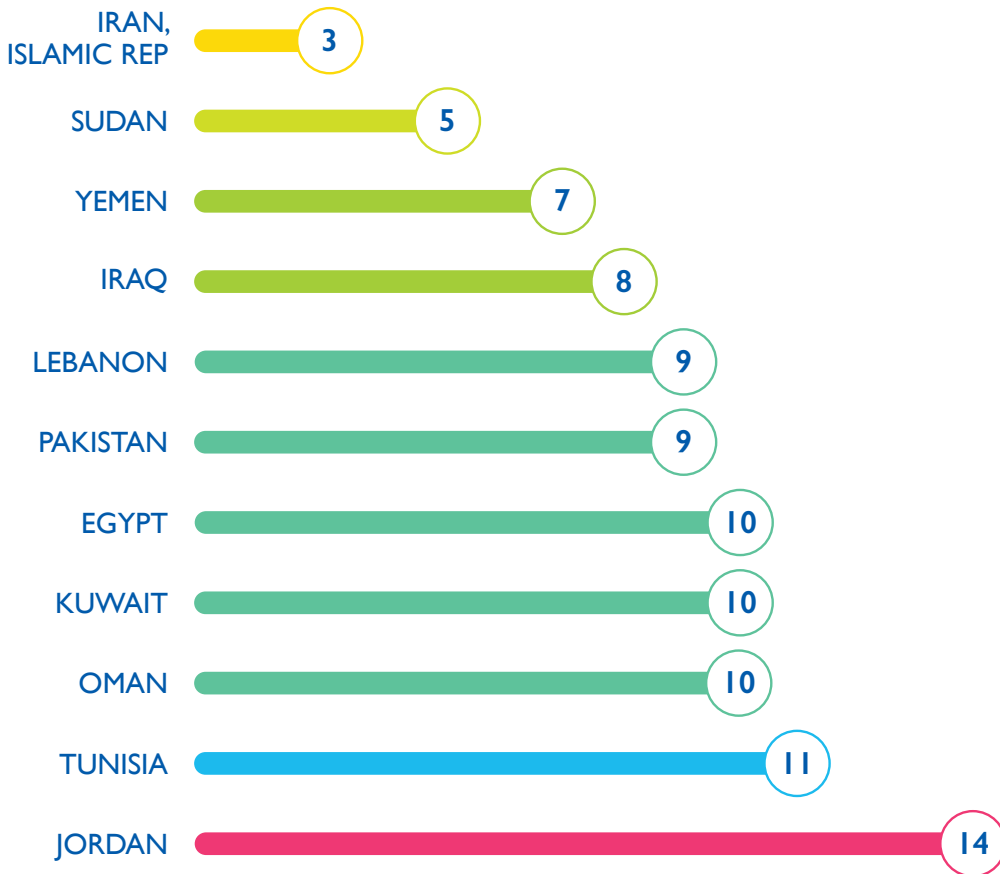
**Lebanon** has prohibited contributions from the TI as stipulated in Article 32 of the 2022 Budget Law. While no direct financial contributions have been reported, the Regie continues to carry out various campaigns and CSR activities across the country, which appear to breach the law's provisions.

**Jordan's** strategic plan for tobacco control includes provisions for disclosure of first- and second-degree ties to the TI for public officials, emphasizes implementation of Article 5.3, and formalizes collaboration with tobacco control NGOs during preparation of the 2025 TI Interference Index.<sup>66</sup> It also strengthens access to information through the Ministry of Health and includes plans for advocacy and awareness-raising workshops.

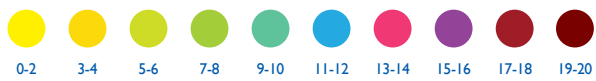
In **Oman**, the director of the Khimji Ramdas Group, the local tobacco distributor, is also an advisor for foreign trade and international cooperation at the Ministry of Commerce, Industry and Investment Promotion. As an advisor, he has been part of the Omani delegation for state visits and other high-level bilateral discussions.

In **Tunisia**, the 2023 Annual Report of the High Committee for Administrative and Financial Control documents financial arrangements of the state tobacco agency that cover expenses for Ministry of Finance staff and provides tobacco products as monthly allowances to various government officials, creating extensive financial relationships between the tobacco monopoly and government personnel across multiple departments.<sup>67</sup>

FIGURE 4: PUBLIC OFFICIALS CONTENTED WITH CONFLICT OF INTEREST



The lower the score, the better the ranking



## THE REVOLVING DOOR BETWEEN PUBLIC OFFICIALS AND INDUSTRY EXECUTIVES CONTINUED

A revolving door of retiring senior government officials joining tobacco companies, or industry executives taking up senior government positions (Table 2), can create opportunities for undue influence.

In **Pakistan**, a former Principal Secretary to the Prime Minister was appointed chairman of Pakistan Tobacco Company in April 2025.

**Jordan's** Minister of Industry and Trade has served as a consultant to PMI since 2019.<sup>68</sup> While he relinquished board positions upon entering government office, there is no documentation confirming whether or when his consultancy with the tobacco company formally concluded.<sup>69,70</sup>

**Tunisia's** Minister of Finance (MOF) currently chairs the Board of Directors of the RNTA (Régie Nationale des Tabacs et des Allumettes), and three other senior officials from the MOF also sit on the board. This institutional arrangement embeds the TI within key government decision-making bodies that are also responsible for fiscal and health policy, raising conflicts of interest.

**TABLE 2: REVOLVING DOOR BETWEEN PUBLIC OFFICIALS AND THE TI**

Country	Government		Industry
<b>Jordan</b>	Minister of Trade, reinstalled in September 2024	↔	Consultancy position at PMI
<b>Pakistan</b>	Former Principal Secretary to the Prime Minister	→	Mr. Nasir Mahmood Khan Khosa Chairman, PTC, April 24, 2025 <sup>71</sup>
	Muhammad Riaz, former Federal Board of Revenue, Prime Minister's Office, and National Assembly Secretariat <sup>72</sup>	→	Independent Director, Pakistan Tobacco Company
<b>Tunisia</b>	The Minister of Finance and three Ministry of Finance officials	↔	President of RNTA's Board of Directors; <sup>73,74</sup> three MOF officials are board members

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# VII. Governments can protect themselves from industry interference

The Article 5.3 Guidelines provide a range of measures governments can adopt to protect their tobacco control policies from TI interference. While a few governments have put protective measures in place, the guidelines remain largely underutilized in the region (Figure 5).

**Iran**<sup>75</sup> has a policy on disclosure and management of conflicts of interest for persons involved in tobacco control policies. The policy prohibits accepting any support from the TI for its public health programs. The government is currently in the process of drafting bylaws to implement Article 5.3. In **Kuwait**, Ministry of Health officials are prohibited from engaging with the TI.<sup>76</sup>

In most other countries, including **Iraq, Kuwait, Sudan, Tunisia**, and **Yemen** there is no structured system or national program to create awareness for public officials on their obligations under Article 5.3.

In **Iraq, Lebanon, Sudan**, and **Tunisia** there is a lack of transparency when the industry engages with government officials since there is no procedure in place to record such meetings.

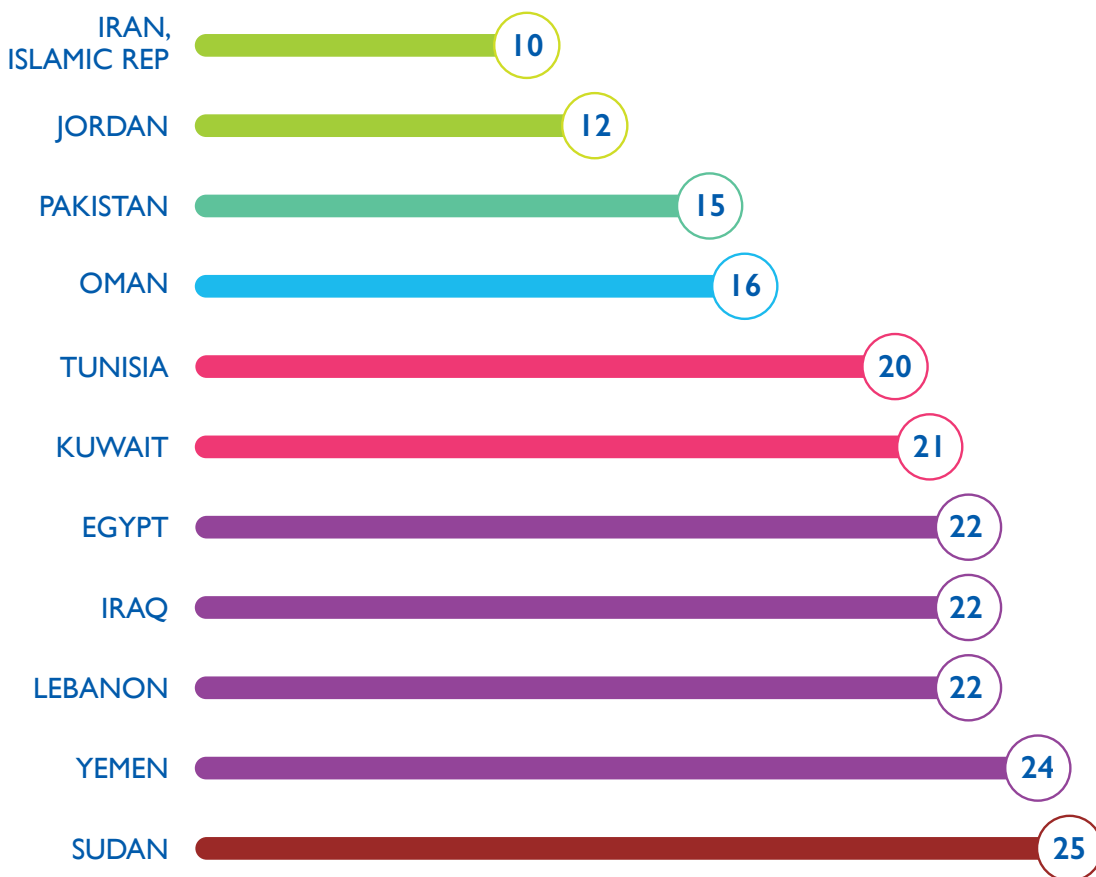
“We have a very strong lobby in Lebanon with tobacco companies. I personally witnessed this when we tried to raise taxes. They brought in national and sectarian issues when we discussed the issue. So we have a tremendous amount of work to do in this regard, not only at the state level but also at the community level, to make the necessary difference.” Dr. Firas Al-Abiad, Minister of Public Health, 27 May, 2024<sup>77</sup>

**Jordan's** tobacco control strategic plan (2022-2030) includes provisions for disclosure of first- and second-degree ties to the TI for public officials and formalizes collaboration with tobacco control NGOs.<sup>78</sup> It also strengthens access to information through the Ministry of Health and includes plans for advocacy and awareness-raising workshops.

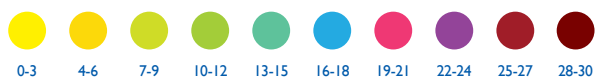
While governments collect basic information from tobacco companies, it is often limited to tobacco production, trade, and revenue for tax purposes. In **Iraq, Kuwait, Lebanon, Sudan, Yemen**, the industry is not required to report on marketing activities, CSR expenditures, lobbying, and political contributions. The countries also do not collect information on groups representing the TI.

**Iran** and **Lebanon** have policies prohibiting acceptance of contributions or gifts from the TI (monetary or otherwise) including offers of assistance, or invitations for study visits. In **Oman**, members of the multisectoral national tobacco control committee are not allowed to receive donations or accept subsidies from tobacco companies or their agents. However, it does not apply to the whole government.<sup>79</sup> The National Committee for Tobacco Control conducts awareness-raising and a circular was distributed to all government ministries advising them not to accept donations from agents of the TI.<sup>80</sup>

**FIGURE 5: GOVERNMENTS' ACTION TO PROTECT THEMSELVES WITH PREVENTIVE MEASURES**



The lower the score, the better the ranking



**Pakistan's** National Tobacco Control Strategy 2022-2030 action plan includes adopting measures to protect public health policy from the influence of the TI, and maintaining transparency while interacting with the TI, discouraging partnership and industry involvement in policymaking, and the development of a registry of all representatives of the TI.<sup>81</sup> While the Pakistan government requires all corporations, including the TI, to provide information on their tobacco-related activities

including production, marketing expenses, revenues, lobbying, philanthropy, and political contributions, this information has not been utilized to regulate the TI.<sup>82</sup>

**Iraq, Sudan, Tunisia, and Yemen** do not prohibit contributions or assistance from the TI, invitations to its events, policies or proposals offered to government officials, study visits offered to government agencies or officials or their families.

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# Conclusion

As governments in the EMR strengthen tobacco control measures, the TI has targeted the region for market expansion and intensified its interference to frustrate government efforts to protect public health. Most governments have not fully utilized the tools available to them in Article 5.3, which can help address industry interference.

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While a few governments have a policy of non-engagement with the TI and reject its contributions, most do not have such a policy and are open to receiving contributions and assistance from the industry.

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Most countries have either banned tobacco-related CSR activities or have severely restricted them. However, the survey found that governments still accepted, endorsed, or promoted tobacco-related CSR activities facilitating a positive relationship with the industry.

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Most governments have not adopted a code of conduct to guide them on their interactions with the industry. Transparency on industry engagement with government, especially outside the health sector, remains a problem across the region as most governments do not make public record of meetings with the TI.

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Governments must take a whole-of-government action to address TI interference.

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# Recommendations

Governments can better protect their tobacco control policies by adopting the following:

1. Inform and create awareness among all branches of government about the need to protect tobacco control policies from commercial and other vested interests of the TI, as required under Article 5.3.
2. Adopt a clear procedure for government officials when interacting with the TI that ensures transparency. This can be a code of conduct for all public officials to guide interactions with the industry, which should be limited to only when strictly necessary. Expand the current code for members of the tobacco control committee to cover the whole of government and close any loopholes.
3. Denormalize and ban tobacco-related CSR contributions as recommended in the Article 5.3 Guidelines and the Article 13 Guidelines.
4. Exclude the TI as a stakeholder at all levels of health policy development. Terminate any existing collaboration with the TI on training programs or law enforcement activities.
5. Address conflicts of interest and apply policy coherence across all sectors. Issue a policy to avoid any preferential treatment for state-owned TI.
6. Adopt a procedure for disclosing records of all interactions with the TI and its representatives.

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**Yes, the tobacco industry may have deep pockets and an arsenal of tricks. But you have something infinitely stronger: the truth, the evidence and the moral conviction that your cause is just. Use this evidence, combine it with your expertise, your integrity and your resilience to fortify good governance and transparency in tobacco control.**

- H.R.H. Princess Dina Mired, Jordan

## Summary table: Eastern Mediterranean Tobacco Industry Interference Index 2025

Countries/ Indicators	EG	IR	IQ	JO	KW	LB	OM	PK	SD	TN	YE
<b>Participation in Policy Development</b>	<b>2</b>	<b>4</b>	<b>12</b>	<b>16</b>	<b>4</b>	<b>7</b>	<b>5</b>	<b>3</b>	<b>6</b>	<b>9</b>	<b>4</b>
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	3	5	1	2	1	1	0	2	1
The government accepts, supports or endorses legislation drafted by/ collaboration with the tobacco industry (Rec 3.4)	0	1	3	5	1	1	2	0	0	1	1
The government allows the tobacco industry to sit in multi-sectoral committee/ advisory group that sets public health policy (Rec 4.8)	1	1	5	5	1	3	1	1	5	5	1
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	1	1	1
<b>Tobacco Related CSR Activities</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>1</b>	<b>5</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>5</b>	<b>4</b>
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4)	4	1	1	5	1	5	4	2	0	5	4
The government agencies/officials endorses, forms partnerships with/ participates in tobacco industry CSR activities (Rec 6.2)											
<b>Benefits Given to the Tobacco Industry</b>	<b>3</b>	<b>6</b>	<b>8</b>	<b>10</b>	<b>6</b>	<b>4</b>	<b>2</b>	<b>4</b>	<b>9</b>	<b>10</b>	<b>7</b>
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control law (Rec 7.1)	0	2	4	5	3	1	1	2	5	5	3
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	3	4	4	5	3	3	1	2	4	5	4
<b>Forms of Unnecessary Interaction</b>	<b>9</b>	<b>6</b>	<b>10</b>	<b>15</b>	<b>3</b>	<b>10</b>	<b>7</b>	<b>11</b>	<b>0</b>	<b>11</b>	<b>8</b>
Top-level government officials meet with/ foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies. (Rec 2.1)	4	4	5	5	1	5	5	5	0	2	5
The government accepts assistance/ offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	0	1	0	5	1	5	1	3	0	4	3
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	5	1	5	5	1	0	1	3	0	5	0

Countries/ Indicators	EG	IR	IQ	JO	KW	LB	OM	PK	SD	TN	YE
<b>Transparency</b>	<b>10</b>	<b>6</b>	<b>10</b>	<b>8</b>	<b>10</b>	<b>6</b>	<b>6</b>	<b>10</b>	<b>10</b>	<b>9</b>	<b>10</b>
The government does not publicly disclose meetings/ interactions with the tobacco industry where such interactions are strictly necessary for regulation. (Rec 2.2)	5	3	5	5	5	5	1	5	5	4	5
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists. (Rec 5.3)	5	3	5	3	5	1	5	5	5	5	5
<b>Conflict of Interest</b>	<b>10</b>	<b>3</b>	<b>8</b>	<b>14</b>	<b>10</b>	<b>9</b>	<b>10</b>	<b>9</b>	<b>5</b>	<b>11</b>	<b>7</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	5	1	5	5	5	5
Retired senior officials work for the tobacco industry (Rec 4.4)	5	1	2	4	5	0	5	4	0	1	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	0	4	4	0	0	5	2
<b>Preventive Measures</b>	<b>22</b>	<b>10</b>	<b>22</b>	<b>12</b>	<b>21</b>	<b>22</b>	<b>16</b>	<b>15</b>	<b>25</b>	<b>20</b>	<b>24</b>
The government has a procedure for disclosing records of the interaction with tobacco industry and its representatives. (Rec 5.1)	5	1	5	3	5	5	5	5	5	4	5
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply when dealings with the tobacco industry (Rec 4.2)	5	3	5	2	2	5	2	2	5	4	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)	2	4	3	2	5	5	5	2	5	2	4
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	1	4	3	4	5	2	1	5	5	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	2	5	5	5	5
<b>TOTAL</b>	<b>60</b>	<b>36</b>	<b>71</b>	<b>80</b>	<b>55</b>	<b>63</b>	<b>50</b>	<b>54</b>	<b>55</b>	<b>75</b>	<b>64</b>

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## APPENDIX I: STATE-OWNED ENTERPRISES

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**Egypt** The Ministry of Investment owns 49.4%<sup>83</sup> of Eastern Company S.A.E. In 2021, it controlled 70% of the market.<sup>84</sup>

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**Iran** After the privatization of the Iranian Tobacco Company (ITC), half of its shares were acquired by the pension fund of the Ministry of Cooperatives, Labour and Social Welfare.<sup>85</sup> The board of directors of ITC is appointed by the ministry. ITC has 10% of the cigarette market.<sup>86</sup>

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**Iraq** Baghdad Tobacco and Cigarette Factory is the only state-owned factory in Iraq that produces local tobacco and cigarettes.<sup>87</sup> Although government-owned, this factory is operated by the private sector and shares a portion of its revenue with the government.

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**Lebanon** The Libanaise Des Tabacs Et Tombacs (Regie) is a state-owned enterprise. It is the sole entity in Lebanon legally allowed to manufacture, distribute, and sell tobacco and tombac (tobacco for waterpipe) and comes under the jurisdiction of the Ministry of Finance.<sup>88</sup> The Regie controls 63% of the market.<sup>89</sup>

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**Tunisia** Tunisia's tobacco sector is dominated by the state-owned Régie Nationale des Tabacs et des Allumettes (RNTA, the National Tobacco and Matches Authority), which is supervised by the Ministry of Finance and chaired by the Minister of Finance. The RNTA holds a monopoly over tobacco manufacture, import, and wholesale distribution, while managing 15,966 tobacco retailers nationwide. The Manufacture des Tabacs de Kairouan (MTK) serves as the second major state-owned manufacturer. Locally manufactured cigarettes account for approximately 70% of the market, while imported products represent 30%, all under RNTA's monopoly control.<sup>90</sup>

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