



STOPPING TOBACCO
ORGANIZATIONS & PRODUCTS

Policy Brief

Global

Protecting Your Country's Tobacco Track and Trace System From the Tobacco Industry

The Protocol to Eliminate Illicit Trade in Tobacco Products (ITP) requires a global tobacco tracking and tracing system.

This system was developed in light of overwhelming evidence of tobacco industry involvement in smuggling their own cigarettes² and was deliberately intended to stop this involvement.

Executive Summary

The Protocol to Eliminate Illicit Trade in Tobacco Products (ITP) requires a global tobacco tracking and tracing system.¹ Packs of cigarettes and rolling tobacco need to be marked with a secure, unique ID so they can be tracked from their point of manufacture to the point where all taxes have been paid. If they then end up on the illicit market, they can be traced back to identify where the problem arose and where they were originally manufactured.

This system was developed in light of overwhelming evidence of tobacco industry involvement in smuggling their own cigarettes² and was deliberately intended to stop this involvement. For this reason, the protocol specifically says that responsibility for track and trace cannot be delegated to the tobacco industry.¹

The latest evidence suggests that the tobacco industry, including the world's major tobacco companies, remains involved in smuggling.³ They therefore have a clear vested interest in trying to control track and trace systems. Doing so would enable them to continue this involvement with impunity, thereby evading tax payments and potential litigation.

In line with this, research on leaked industry documents and other materials reveals that the major tobacco companies are seeking to achieve this control through an elaborate and underhand effort, implemented over years. They have come to control most of the data on tobacco smuggling and used this to exaggerate the problem of counterfeiting and the involvement of small local competitors while obscuring their own involvement,⁴ thereby convincing governments they are the victims not the perpetrators of smuggling. To further their influence, they have made payments to the regulatory authorities and agencies meant to hold them to account.^{3,5-7} They have increasingly used third parties, often ex-policemen,⁸ to present their data and increase the credibility of their case. They have now developed their own digital tax verification system which they are promoting as a track and trace system, and using third parties to claim it is independent of industry.^{3,5,6} If governments allow such a system to be implemented they will lose their ability to control tobacco smuggling.

This briefing summarizes this research. It aims to alert regulatory agencies and government departments to this scandal which must be exposed and stopped in order to ensure that a functional, independent track and trace system can be implemented. Only this, and not a system the tobacco industry controls, will help reduce tobacco smuggling and increase government revenues.

Part 1

of the briefing outlines the evidence of the industry's involvement in tobacco smuggling, both past and present, and its motivations for controlling tobacco tracking and tracing.

Part 2

describes the tactics it has been using to achieve this goal and explains how the industry has sought to hoodwink governments, regulatory agencies, the media and the public.

Part 3

explains what we can expect next, what works and what governments should do.

*Tobacco companies...
...have an extensive history of
complicity in tobacco smuggling*

*...can benefit from
tobacco smuggling*

*...are still involved in tobacco
smuggling (tobacco company
cigarettes comprise around two-
thirds of the illicit market)*

Part 1

Tobacco company involvement in illicit and why they want to control track and trace systems

In the late 1990s, overwhelming evidence from the major tobacco companies' own documents showed they had been orchestrating the smuggling of their own cigarettes in vast quantities across the world. A third⁹ of global cigarette exports were ending up on the illicit market. The industry's own documents showed that smuggling was a core part of their business strategy.¹⁰ The major tobacco companies were supplying some markets¹¹ almost entirely with smuggled cigarettes and were later implicated in organized crime.¹² From 1998 to 2008, in addition to the research and press exposés of their misconduct, the industry faced a series of inquiries, legal agreements¹³ and court cases.^{12,14} Some found them guilty of involvement¹⁵ and others aimed to hold them to account. All four major tobacco companies—British American Tobacco (BAT), Philip Morris International (PMI), Japan Tobacco International (JTI) and Imperial—and various of their subsidiaries have been shown to be complicit.¹⁶⁻¹⁸

A key part of the international response to the tobacco industry's misconduct was the development of Article 15 of the Framework Convention on Tobacco Control (FCTC) and eventually the Protocol to Eliminate Illicit Trade in Tobacco Products (ITP).¹ Although the ITP aims to eliminate all forms of illicit tobacco through a whole package of measures, it focuses particularly on securing the supply chain of legally manufactured tobacco products using an effective track and trace system.

Why would tobacco companies be complicit in tobacco smuggling? It may seem counterintuitive, but tobacco smuggling benefits tobacco companies in several ways.^{3 19-21} The most obvious reason is that tobacco is a highly taxed product and so, if smuggled, tobacco companies avoid paying the taxes due on it—whether excise taxes or import duties. In addition, because smuggled tobacco is much cheaper to buy than legal tobacco (as it is not taxed), tobacco companies sell more. In particular, they sell more to the most price-sensitive smokers, which includes children. The industry's documents show that it knows cheap tobacco is essential to ensuring that children can afford to smoke.²²

This means more profit, because the tobacco companies make their money when they sell to the distributor and their profit per pack is the same whether their cigarettes then end up in the smuggled market or not. Illicit tobacco also undermines the effectiveness of tobacco control measures that would otherwise reduce the industry's sales. Most obviously, it undermines the effectiveness of tobacco taxation, the most effective means of reducing tobacco use.²³

But smuggling also undermines other tobacco control measures. For example, smuggled product often does not feature the right health warnings and images.^{24,25}

These motivations have not changed and there is growing evidence that, despite its very public claims to have changed (see part 2), the tobacco industry, including the major companies, remains involved in and benefits from the illicit tobacco trade. Independent analyses of diverse data at global, regional and national levels consistently shows that the majority—approximately two-thirds—of the illicit cigarette market is made up of tobacco industry cigarettes³ (see further below²⁶).

The most favorable explanation to the tobacco industry is that it is failing to control its supply chain, with products then leaking into the illicit market.

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...and therefore have a vested interest in controlling tobacco tracking and tracing.

This can take many forms, including oversupply, underproduction and “round tripping.” For example, evidence shows that major tobacco companies have been overproducing cigarettes in some markets (e.g. Ukraine²⁷) in the knowledge that they will spill into illicit channels. They have also continued to oversupply lower-tax jurisdictions with the product then being smuggled back into the target country, thereby avoiding domestic excise taxes (“round tripping”). BAT was recently fined for this.²⁸ In addition, smaller tobacco companies in some African countries and in Paraguay are now similarly involved in such practices in part because they have learned from the major tobacco companies.^{3,29,30}

The tobacco companies aim to avoid culpability by outsourcing distribution to third parties. However, leaked BAT documents also show that, in contravention of legal agreements reached with the European Union, it continued to use a distributor known to have been previously involved in smuggling and that, as in the past, some of those cigarettes ended up in the illicit market, and BAT staff sought to cover this up.³ The tobacco industry could of course far more closely control its distributors and supply chain, as other fast-moving consumer goods companies do, but as tobacco is a highly taxed product it appears the industry does not wish to do so.

Other evidence—from government reports,³¹ whistleblowers,³² investigative journalists²⁷ and leaked industry documents³—is more damning and suggests that the major tobacco companies are more actively involved in facilitating the smuggling of their product. For example, ex-JTI employees have described “rampant smuggling”³² by the company throughout the Middle East, Russia, Moldova and the Balkans. Leaked documents show that BAT suspected JTI was facilitating smuggling in Africa.³

The problem outlined above—ongoing tobacco industry involvement in tobacco smuggling—would be addressed by an effective track and trace system run independently of the tobacco industry. Indeed, that is the very purpose of such a track and trace system: to bring tobacco company supply chains under control.

Given the large volume of tobacco industry product currently in the illicit market, if such a system were implemented, tobacco companies would face increased tax payments, fines and even the threat of further litigation related to tobacco smuggling. Further, once all tobacco company cigarettes now sold in the illegal market are fully taxed, global tobacco consumption would inevitably fall, further decreasing the industry's profits.

The industry therefore has clear motivations to control and undermine tracking and tracing. In line with this, leaked industry documents show they fear both the cost and a lack of control over track and trace systems, particularly enhanced tax stamp systems, run by others.³³ Ceding control to the tobacco industry would fundamentally undermine the illicit trade protocol and global efforts to reduce tobacco smuggling.

*To achieve this, the major tobacco companies have ...
... used misleading data and press coverage to present themselves as the victims of tobacco smuggling while they repeatedly fail to control their own supply chain*

Part 2

How the major tobacco companies have sought to create confusion and control track and trace systems

Many within governments and regulatory agencies working to reduce tobacco smuggling will be shocked by what they have read above—that the major tobacco companies remain involved in smuggling and are seeking to undermine the illicit trade protocol. That is because tobacco companies have made a concerted effort to create confusion. From the point at which their involvement in smuggling was exposed in the late 1990s, they have worked to convert a public relations disaster into a potential success story. Despite being the pariah supplier of illicit product, they claimed they had changed—that they are no longer perpetrators but now victims of new forms of smuggling, particularly counterfeiting. They now argue that governments should no longer hold them to account for smuggling and instead should work in partnership with them, which many now mistakenly do.³⁴

Leaked industry documents help spell out this plan and research shows how the major tobacco companies have used their vast resources³⁵ to control every aspect of this debate and thereby create this confusion.^{2,19,21}

The major tobacco companies continually stress the problems of counterfeits³⁶ and “illicit whites”³⁷ because these are forms of illicit for which they are not held responsible and from which their business suffers. Counterfeits are products which bear major trademarks without industry consent. Illicit whites, more accurately known as “cheap whites”³⁸ because they are not always sold illegally, are cigarettes which are legally produced, generally by small manufacturers, and sold cheaply—often but not always illegally.

Cheap whites are a particular threat to the major tobacco manufacturers because, whether sold legally or illegally, they are generally cheaper and therefore likely to undercut their sales.³⁸

It is true that the nature of illicit trade has changed since the tobacco companies were caught in the late 1990s. In the past, the illicit tobacco market was entirely made up of major tobacco industry product. Now it also includes these other products. However, it is also clear that the tobacco industry exaggerates these problems to paint itself as the victim of smuggling. The reality is that counterfeits and cheap whites comprise a small proportion of the illicit cigarette market compared to tobacco industry product. As outlined above, tobacco industry illicit comprises 60% to 70% of the illicit market. By contrast, counterfeit products are estimated to make up only 5% to 8%, and cheap whites somewhere between one-fifth and one-third, depending on the dataset.³

The situation with cheap whites is even more complex, with evidence that the major tobacco companies may be involved and therefore responsible for an even larger proportion of the illicit cigarette market than even the data above suggest. For example, in the European Union, reports commissioned by the tobacco industry repeatedly labeled the brand “Classic” (repeatedly one of the most seized brands in the illicit market) as an illicit white brand. In fact, Classic was an Imperial Tobacco brand being manufactured in Ukraine.^{3,39} In line with this, research also suggests that the major tobacco companies own some cheap white trademarks. For example, the trademark Premier is owned in Peru by a BAT

...presented themselves as the solution to the problem, despite the growing evidence that the opposite is true

subsidiary, in Russia by a JTI subsidiary and in Uruguay by a PMI subsidiary³⁸. Even where the major tobacco companies are not involved, evidence indicates that manufacturers of cheap white cigarettes effectively learned their trade from the major tobacco companies.²⁹

The major tobacco companies have supported their misleading claims about the prominence of counterfeit and illicit whites by funding and promoting falsified data and reports on illicit tobacco trade. From small-scale surveys⁴⁰ to reports from the world's major accountancy firms,⁴¹⁻⁴³ the tobacco industry now controls most of the data on tobacco smuggling and it uses those data to generate misleading, scaremongering, media coverage.⁴⁴ A recent systematic review shows that the data the industry funds routinely exaggerate the level of illicit.⁴

It is also clear that the tobacco companies, recognizing their lack of credibility in this area, pay others—often ex-policemen—to spread their message in the media.^{8,40} Leaked industry documents refer to these individuals and organizations both as “media messengers”⁸ and the “the credible voice for contraband tobacco,”⁴⁵ and indicate that BAT uses these third parties to ensure it has “a voice in international policy forums.”⁴⁶

These efforts mean the major tobacco companies already dominate the debate on illicit. PMI's launch of PMI Impact in 2016—a \$100 million funding initiative for projects related to illicit trade⁴⁷—is making this problem worse still, not least because the first 32 recipients of funding (totaling approximately US\$28 million) include organizations such as KPMG, Oxford Economics and Transcrime, whose previous reports for the tobacco industry have been widely criticized.^{4,48-51}

Tobacco companies combine the data and narratives created above with other public relations efforts to create further public confusion and ingratiate themselves with governments as partners in reducing illicit trade. These efforts include, at the **national level**:

- Training border patrol and customs officials⁵²
- Funding sniffer dogs⁵³
- Sharing tracking devices (placed illegally on the vehicles of BAT's competitors) with the authorities to enable illicit tobacco raids on those competitors⁵⁴
- Promoting ineffective memoranda of understanding with law enforcement and customs agencies.³⁴

Leaked industry documents and other evidence shows that, in Africa for instance, BAT has been paying staff in small competitor tobacco companies to obtain data on those companies showing they are also involved in illicit. BAT in turn shares those data with the tax authorities to point the finger at others while failing to disclose its own involvement. This and linked payments to staff in those tax authorities also help ingratiate the company and paint it as the victim as well as the solution.³ In South Africa, such efforts have led to “regulatory capture” by BAT of the Illicit Tobacco Task Team, the intergovernmental agency fighting tobacco smuggling.⁵⁴

At the **international level**, the major tobacco companies have been providing funding for high profile conferences on illicit and the international police and anti-corruption organizations that are meant to hold them to account. In 2012, for example, PMI donated 15 million euros to Interpol, the world's largest police organization.⁵⁵ PMI is also using PMI Impact (its \$100 million funding

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...confused the public about the drivers of tobacco smuggling

...have attempted to gain control of tobacco tracking and tracing across the world thereby undermining the Illicit Trade Protocol

initiative)⁴⁷ to enable its executives to link to and establish credibility with, among others, the World Customs Organization, the Organisation for Economic Co-Operation and Development (OECD), Europol and numerous United Nations agencies including the United Nations Office on Drugs and Crime. For example, representatives from each of these organizations and several others presented at a PMI Impact event on illicit trade in 2017.⁵⁶ Collectively this has created public messaging and a powerful network of organizations supportive of the industry's misleading position on illicit.

Despite benefiting from tobacco smuggling, and continuing to be the main source of smuggled cigarettes, major tobacco companies argue that tobacco control policies are the root cause⁵⁹ of illicit trade. Historically tobacco companies, while orchestrating the smuggling of their product, argued that tobacco taxes⁶⁰ led to smuggling. Now, in order to discourage countries from implementing effective policies to reduce tobacco use, they argue that almost every⁶¹ tobacco control policy will drive increases in illicit trade. In reality, smuggling is a multifaceted problem. Issues such as corruption, the presence of criminal networks, industry complicity and weak government enforcement capacity are all important factors.⁶² It is also clear that rates of tobacco smuggling, and smoking, have fallen in countries that have continued to implement high tobacco taxes in combination with effective tobacco control policies while also holding the industry to account.²¹

Research has pieced together diverse sets of leaked industry documents to show that the major tobacco companies, despite years of animosity, have been working collaboratively to gain control of the global track and trace system envisaged in the ITP, thereby undermining its very purpose and the requirement for independence.^{3,6,33,63}

These documents suggest that their strategy involves four key elements: creating and promoting their own track and trace system, first known as Codentify; actively opposing alternative tax stamp-based systems to convince governments they are inferior to Codentify; disguising their links to Codentify by using a growing number of third parties to promote it and by renaming it Inexto Suite; and, in their own words, "*proactively shap[ing] T&T regulation*" to enable the above.^{3,6,33,64}

Codentify was initially developed by PMI as a non-secure authentication system to determine if a product is authentic or counterfeit, and later adapted for use as a digital tax verification system. Experts, including tobacco industry insiders, have criticized it as an inefficient⁶⁵ and ineffective⁶⁴ track and trace mechanism. Despite this, several sources⁶⁶ claim that the Codentify technology has been used in 50 to 100 countries worldwide. Given the levels of tobacco industry illicit detailed above, this alone should signal that Codentify is ineffective.

In 2008, negotiations for the ITP began. In 2010, PMI licensed Codentify for free to its main competitors who, in exchange, agreed to work collectively to promote

The Transnational Alliance to Combat Illicit Trade (TRACIT)

One of the organizations that presented at the PMI Impact event⁵⁶ is the Transnational Alliance to Combat Illicit Trade. TRACIT was launched in 2017, aiming to build cooperation between business and government regarding regulatory responses to illicit trade.⁵⁷ PMI is a member, and it has received research sponsorship from BAT, JTI and PMI, including funding from PMI Impact.⁵⁷

TRACIT has represented industry interests at the government level in countries within a number of regions including Asia, Latin America, Europe, the Middle East and Africa⁵⁷ and, in 2019, co-hosted a meeting on illicit trade in partnership with the United Nations Conference on Trade and development.⁵⁸ TRACIT is thus an example of both the tobacco industry's sponsoring of third parties which produce research on illicit trade, as well as of the industry's use of third parties to become ingratiated with governments as partners in reducing illicit trade.

Codentify to governments.⁶ In 2011, they formed the Digital Coding and Tracking Association⁶⁷ to undertake this role. This was the first of many third parties the industry has used to gain control of tracking and tracing.³

In 2016, after the Digital Coding and Tracking Association was exposed as a tobacco industry front group,⁶ PMI sold Codentify (for, reportedly, only 1 Swiss franc³) to a then newly established technology company named Inexto, and claimed⁶⁸ that "Inexto is fully independent from the tobacco industry." Yet several of Inexto's top officials are former PMI employees and co-creators of Codentify,³ and the latest leaked documents^{69,70} show that Inexto remained financially and operationally linked to the tobacco industry for at least 17 months after Codentify was sold to it, with no evidence that independence has since been established or was ever the intention.³³ Instead, the major tobacco companies met regularly with Inexto and used it as part of their concerted efforts to influence the EU track and trace system.³³ There is evidence that Inexto has also been promoting tobacco industry interests to governments elsewhere. For example, the latest leaked documents describe Inexto's plans to present an "industry proposal" at a 2017 regional meeting of the Economic Community of West African States' (ECOWAS).⁷⁰

Tobacco companies are also using other third parties in their attempts to win and influence tracking and tracing tenders. In 2012, for example, British American Tobacco (BAT) used a Danish company, Fracturecode (which a former BAT employee claimed was "in the pay of" BAT), in a failed attempt⁷¹ to promote Codentify in Kenya. In 2017, Atos (which was involved in developing Codentify³) placed a bid²¹ for a tracking and tracing tender in Chile, offering to implement Inexto's solution.^{21,72} Most recently, in May 2019, Atos and Inexto were both present at a briefing session for prospective bidders regarding a tracking and tracing system in South Africa.⁷³

In light of the growing evidence of the tobacco industry's ongoing involvement in illicit and reluctance to control its supply chain, the evidence that it is also seeking to control track and trace systems is very worrying. This would leave the major tobacco companies able to continue such practices without external scrutiny, thereby avoiding tax payments and in doing so, fundamentally undermining the ITP.

Part 3

What next, what works and what can governments do?

What next?

Governments must continue to be on alert. The major tobacco companies can be expected to:

- Change the name of their track and trace product—already changed from Codentify to Inexto Suite. Further amendments are possible.
- Adapt their product to fit with tender requirements even if these have been designed to exclude an industry-linked system.
- Continue using its existing third parties and create new ones to promote its digital track and trace system.

Identifying the industry's latest front groups, spokespeople, linked companies or coalitions will therefore become increasingly difficult.

What can governments do?

On Track and Trace:

1. Governments must ensure that their implementation of the ITP, including a track and trace system, is fully in line with Article 5.3 of the FTC and the requirement within the ITP that obligations assigned to a party "shall not be performed by or delegated to the tobacco industry."¹ This requires governments to reject any track and trace system based on Codentify or intellectual property currently or previously owned by one of the major tobacco companies.³ To this end parties should:

- a. reject any partnerships with, and funding, training or other input from the tobacco industry and those working with it in relation to track and trace systems and illicit trade policy more generally.
- b. require full transparency when tendering, contracting and implementing track and trace systems. Parties should specifically:
 - i. require full disclosure of conflicts of interest from all involved organizations including those responding to tenders and involved in all elements of supply, installation and delivery. This includes data storage providers, unique identifier providers, suppliers of anti-tampering devices and those auditing the system.
 - ii. insist that this disclosure covers details of (i) links to tobacco companies, Digital Coding and Tracking Association, and Inexto, (ii) any role they may

have played in the development of Codentify and its derivatives; and (iii) membership of any trade organizations.

- c. ensure that no organizations with links to the tobacco industry or involved in the development of Codentify or Inexto Suite are involved in supplying, installing, delivering or auditing any element of the track and trace system, ensuring instead that these elements are provided by organizations independent from the tobacco industry.
 - d. in line with the above, ensure the tobacco industry cannot select organizations that will provide elements of a track and trace system including providers of data storage systems and anti-tampering devices, unique ID generators, and auditors.
 - e. investigate any organization promoting a digital track and trace (also known as a digital tax verification system) for links to the tobacco industry. The simplest first step is to check for the name of the organization on the University of Bath's www.TobaccoTactics.org website. If concerns remain, the government should investigate further and, if necessary, contact the University of Bath team via email or secure communication on the exposetobacco.org website.
 - f. ensure contracts for track and trace systems can be canceled upon evidence of tobacco industry involvement in any the aspects outlined above.
2. Governments must ensure that they or their designated competent authority maintain direct control of their track and trace system via their contractual relationships and governance model. This includes direct contractual control over any service providers, including rights with such contracts in relation to service levels and remedies to be applied if the system is compromised or the service provider has been found to have not performed adequately, to be negligent, or to have been colluding with the tobacco industry. Detailed guidance for parties on how to develop an independent and effective track and trace system consistent with ITP is available through the **Framework Convention Alliance ITP Guidebook available here.**
3. Governments should also aim to include the following important technical elements in their track and trace systems:
- a. Utilization, where possible, of generally accepted international standards pertinent to secure track and trace.*
 - b. Independently sourced solution components such as unique identifiers which distinguish products from each other (e.g. barcodes), security features which determine if a product is genuine (e.g. holograms, microprints, molecular tags), anti-tampering devices that establish

security of the system within the manufacturing environment (e.g. cameras, seals, counters) and authentication devices (e.g. specialized readers, mobile phone applications etc.) that allow competent authorities to verify the authenticity of the unique identifiers and security features.

- c. Security features designed to deter counterfeiting/imitation, similar to those used for tax stamps, passports and banknotes, which are subject to rigorous manufacturing and supply chain controls.
4. Governments should not take the European Union system as an example of good practice given the evidence of industry influence on its development,³³ the fact that longstanding tobacco industry solution providers have been approved to implement the system, and the concern that it hands core responsibilities to the industry which may** breach the independence requirements of the ITP.^{33,74}
5. Parties, in particular small countries, should consider cooperating as regional groups during the tendering process, possibly via regional economic integration organizations. This would enable them to pool resources and to improve their negotiating position and might help reduce the chances of the tobacco industry capturing the system.

On the ITP more generally:

6. Parties should remember they have until 2023 to have their track and trace systems operational. Countries worried about tobacco industry interference should therefore come to the second meeting of the parties (MOP2) and ask for help, rather than sign up with a system the industry might control.
7. Parties must remember that while track and trace is a crucial element in the fight against illicit trade, it is not a silver bullet. The ITP also highlights the importance of effective law enforcement and border controls and these will also be essential to the effective operation of a track and trace system. Investing in these areas prior to track and trace implementation would therefore be sensible. As noted in recommendation 1 above, ensuring independence from the tobacco industry in all areas is essential.
8. Parties to the ITP should work with the Framework Convention Secretariat to establish working relationships with relevant intergovernmental organizations (including World Customs Organization, United Nations Office on Drugs and Crime, and Interpol) that have role to play in this area. It is vital however, given the tobacco industry's attempts to co-opt such organizations, that Article 5.3 is respected in operationalizing those relationships.

Key Takeaways

- Growing evidence indicates the tobacco industry remains involved in tobacco smuggling and therefore has a vested interest in influencing any track and trace system aimed at monitoring and controlling its supply in order to avoid scrutiny and minimize its excise payments.
- The tobacco industry's attempts to influence tracking and tracing systems have become increasingly underhanded, with a focus on using third parties with undisclosed links to the industry to influence tracking and tracing procurement processes and policy measures.
- No government should implement a track and trace system linked in any shape or form to the tobacco industry or those operating on its behalf. This includes systems based on intellectual property currently or previously owned by a tobacco company. For this reason, suppliers responding to track and trace tenders should be closely investigated for links to the tobacco industry and rejected if these are found.
- Governments must ensure they maintain full control over any track and trace system including direct contractual control over any service providers (i.e., contracts should be between service providers and governments or government authorities, rather than between service providers and the tobacco industry).

*For example: ISO 12931:2012 (which details a process to identify appropriate security features for various circumstances), ISO 22382:2018 (which provides guidance in relation to the implementation of tax stamps and track and trace programs for excisable goods) and ISO/IEC 15459-1&4:2014 (which pertain to the generation of unique identifiers and aggregation between various packaging units such as packs, cartons etc.)

**Details of the debate between the Framework Convention Alliance and the European Commission on this issue are available here: <https://www.ftc.org/update-re-fcas-policy-brief-why-the-eu-tracking-and-tracing-system-works-only-for-the-eu>

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