



Europe  
**Tobacco Industry Interference**  
Index 2025

# Author

**Raquel Venâncio**, Senior Policy Officer, Smoke Free Partnership

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

**Yodhim Dela Rosa**, Global Center for Good Governance in Tobacco Control (GGTC)

**Olivier Hoedeman**, Corporate Europe Observatory (CEO)

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# Endorsement

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# Abstract

This report analyses how 25 countries in the WHO European Region are affected by tobacco industry interference and how far they have progressed in the implementation of Article 5.3 and its Guidelines that were unanimously adopted by the Conference of the Parties of the WHO FCTC in 2008. It is divided into 7 indicators which reflect the Article 5.3 Guidelines.

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# Introduction

The 2025 Tobacco Industry Interference Index for the European Region captures the trends, challenges, and emerging developments in TI influence over public policy across 25 countries.

Tobacco remains the leading preventable cause of death in the Euro Region. WHO/Europe estimates around **179 million adult tobacco users and over 1.2 million annual deaths attributable to tobacco in the Region**<sup>1</sup>. June 2024 WHO analysis estimated that 1.15 million deaths per year across Europe result from tobacco exposure, contributing to over 24% of all mortality when combined with deaths from alcohol, ultra-processed foods, and fossil fuels<sup>2</sup>. While overall smoking prevalence is declining in some countries, the burden is shifting, with new patterns emerging. **The gap in tobacco use between men and women has narrowed significantly, reflecting a troubling rise in use among women**<sup>3</sup>. <sup>3</sup> At the same time, tobacco companies continue to **view children and youth as “replacement smokers” critical to the survival of their business**. A 2025 WHO report reveals how they deploy flavours, online marketing, and packaging strategies to capture the next generation of users<sup>4</sup>.

The year 2025 marks the 20th anniversary of the WHO FCTC's entry into force and a decade since the adoption of the UN Sustainable Development Goals. Countries that have aligned their policies with the FCTC and its guidelines have seen the sharpest reductions in tobacco use. **However, many remain off track to achieve the global target of a 30% reduction in adult tobacco use by 2025** set by the WHO Global Action Plan for the Prevention and Control of Non-Communicable Diseases, underscoring the need for renewed and stronger political will<sup>5</sup>.

The WHO FCTC remains the primary international legal instrument for tobacco control. Adopted in 2003 and entering into force in 2005, it has been ratified by 183 Parties, covering more than 90% of the population and including 50 of the 53 WHO European Region countries<sup>6</sup>. The EU as a bloc also supports and implements FCTC obligations, including under its Tobacco Products Directive, Tobacco Tax Directive and Council Recommendations on Smoke and Aerosol Free Environments, alongside regional coordination mechanisms. However, **full implementation across**

**all policy domains remains weak**, and interference by the TI continues to hinder progress.

The TI routinely mounts opposition to control policies, spreading misleading research, co-opting retired officials, funding CSR initiatives, and leveraging front groups to create the perception of broad support for its positions. It often targets non-health departments (finance, commerce, customs) with economic arguments claiming that, for instance, higher taxes fuel illicit trade, thereby influencing fiscal policy more successfully than public health policy.

## Industry strategies include:

- Public–private partnerships and voluntary codes drafted by tobacco companies;
- CSR campaigns (e.g. environmental clean-ups) to win influence and positive media coverage;
- Diplomatic-level endorsements via embassies or trade missions promoting the industry overseas.

**This report analyses how 25 countries in the WHO European Region are affected by TI interference and how far they have progressed in the implementation of Article 5.3 and its Guidelines that were unanimously adopted by the Conference of the Parties of the WHO FCTC in 2008. It is divided into 7 indicators which reflect the Article 5.3 Guidelines.**

Article 5.3 obliges Parties to “protect public health policies [...] from commercial and other vested interests” of the TI. It is binding and applies across all government branches where tobacco control policy may be affected<sup>7</sup>. The Guidelines for implementation of Article 5.3, adopted in 2008, remain the authoritative framework: they emphasise the irreconcilable conflict between industry interests and public health, and prescribe proactive measures like limiting interactions, ensuring transparency, rejecting partnerships, avoiding conflicts of interest, and denormalising CSR activities.

However, awareness-raising and transparency measures remain uneven, and many governments have still not adopted comprehensive policies covering lobbying, disclosure or conflict of interest prevention.



Bearing this in mind, the current report provides comparative overview of how countries perform in resisting TI interference. It highlights both the strongest and weakest examples among the 25 countries assessed. **Lower scores reflect stronger implementation of protective policies, while higher scores indicate greater industry influence and weaker safeguards.**

Countries in the region vary largely in their performance, with **the Netherlands, Finland, Norway, the UK and France** ranking low with effective safeguard measures in place against TI interference. On the other hand, in countries like **Switzerland, Georgia or Romania** TI influence is very strong because of the lack of effective tobacco control measures, as it can be seen throughout the report.

Throughout the region, tobacco companies seek to influence policymaking processes, though their success varies across countries (see **“Indicator 1: Participation in policy development”**). In Norway, no evidence was found to suggest that the government accepts or endorses any offer of assistance when setting or implementing tobacco control policy. Moreover, in the Netherlands, the government takes a firm stance against such interference. No incidents were found in which the government accepted, supported, or endorsed any offer for assistance by or in collaboration with the TI in setting or implementing public health policies.

Similarly, in **the UK**, public consultations on tobacco and vaping policy systematically require respondents to disclose any financial or organisational links to the TI. In several instances, such as the 2023 *Smokefree generation<sup>8</sup> and tackling youth vaping consultation* and the 2024 Scottish consultation on single-use vapes<sup>9</sup>, the government explicitly excluded industry-linked submissions from influencing the policy outcome. While some consultation processes have shown inconsistencies in how these disclosures are treated, the overall approach reflects a strong framework of transparency and safeguards against industry interference.

In other countries, like **Switzerland**, there are no barriers preventing TI actors from influencing public health policymaking. Parliamentarians openly represent tobacco interests, lobbyists have direct access to federal buildings, and industry-linked individuals hold

influential political positions. The industry participates in official consultations and informal processes, sometimes even drafting the policy text.

To cultivate a positive public image and build relationships with policymakers, the TI often carries out CSR activities (**“Indicator 2: Corporate Social Responsibility”**). These may include sponsorships, community donations, environmental projects such as litter clean-ups, and support for local education or community development initiatives, all aimed at portraying the industry as a socially responsible actor despite the harms caused by its products. However, during the reporting period (April 2023 – March 2025), no such efforts were observed to receive government endorsement in **the Netherlands** and **Slovenia**. More concretely, in the Netherlands, there was no evidence of government agencies or officials supporting or participating in TI CSR initiatives. Similarly, in Slovenia, government institutions have generally kept their distance from industry-led CSR, with no public records of official endorsement, partnership, or participation in such activities.

Although Article 5.3 Guidelines of the WHO FCTC prohibit granting incentives or any form of preferential treatment to the TI, many countries continue to fall short of this obligation (**“Indicator 3: Benefits to the tobacco industry”**). **Switzerland**, which has not ratified the FCTC, invests public funds in major tobacco companies and has resisted calls to end this support. In **Georgia**, key tobacco control measures have been repeatedly delayed under industry pressure, and no tax increases have been introduced in recent years. **Romania** has granted the industry extended timelines to implement health warnings and tax rises, while in **Czechia** cigarettes remain among the cheapest in the EU, reflecting persistently low taxation.

Governments have continued to engage in unnecessary interactions with the TI, often giving it visibility and legitimacy in public affairs (**“Indicator 4: Forms of Unnecessary Interaction”**). In **Switzerland**, numerous meetings between senior officials and tobacco companies were reported, alongside an ongoing agreement with the advertising self-regulatory and a controversial partnership between PMI and a leading federal university. In **Romania**, top officials, including the Prime Minister, attended industry events and endorsed major investments, while government agencies signed a cooperation agreement with tobacco companies under his patronage. Similarly, in **Italy** and

**Spain**, ministers and regional leaders took part in industry-sponsored events and inaugurations, while authorities also formalised collaborations with the industry on illicit trade and other initiatives.

Transparency measures are essential to protect policymaking from TI influence and to hold public officials accountable for their interactions with the industry (**“Indicator 5: Transparency”**). Yet in most countries, there are still no systems to register or require disclosure of TI entities, and no legal obligations for government agencies to proactively report meetings or communications with the industry. Where disclosure rules do exist, they are often not enforced, and information is rarely made public unless requested through freedom of information procedures. Nine countries scored the maximum (10/10), highlighting the depth of global transparency failure.

Political donations and personal ties between government officials and the TI are a major source of conflict of interest, as they can shape policy decisions in ways that favour the industry (**“Indicator 6: Conflict of Interest”**). Yet most countries still do not prohibit political contributions from tobacco companies or their affiliates, and few have measures to prevent or disclose conflicts when current or former officials move into industry roles. In **the UK, Switzerland, Georgia, and Denmark**, such donations remain legal, and numerous examples exist of senior officials and political advisors transitioning to positions in the TI, or vice versa,

illustrating the persistent gaps in safeguarding public policy from industry influence.

Most countries continue to lack the basic safeguards needed to prevent TI interference (**“Indicator 7: Preventive Measures”**). Over half of the countries in this report have no rules requiring the disclosure of interactions with the industry, no code of conduct for public officials on this issue, and no programmes to raise awareness of Article 5.3 of the WHO FCTC. **Bulgaria, Romania, and Denmark** all received the highest scores on this indicator, reflecting the complete absence of such protections.

Overall, the 2025 Tobacco Industry Interference Index reveals that while some countries have taken meaningful steps to implement Article 5.3 of the WHO FCTC, most remain far from ensuring that public health policymaking is fully protected from industry influence. Persistent gaps in transparency, conflict of interest safeguards, and preventive measures continue to undermine progress.

Before turning to the country findings, the report presents ten recommendations to protect public health policies from TI interference. The following sections then examine each of the seven indicators in detail, offering evidence to support stronger national protections.

# Acronyms

**ANPC** *Autoritatea Națională pentru Protecția Consumatorilor* (National Authority for Consumer Protection)

**AWMP** *Allianz der Wirtschaft für eine massvolle Präventionspolitik* (Business Alliance for a Moderate Prevention Policy)

**BAT** British American Tobacco

**BVTE** Tobacco Industry and New Products

**CDU/CSU–SPD** Christian Democratic Union/ Christian Social Union and Social Democratic Party

**CEO** Chief Executive Officer

**CoEHAR** Center of Excellence for the Acceleration of Harm Reduction

**CHF** Franc (Swiss national currency)

**COP10** Conference of the Parties, 10th session

**CSR** Corporate Social Responsibility

**EPR** Extended Producer Responsibility

**ESG Act** (Hungary) – *Environmental, Social, and Governance Act on Sustainable Finance and Corporate Responsibility*

**EU** European Union

**EU TRIS** EU Trade Information System

**FCTC** Framework Convention on Tobacco Control

**FOEN** Federal Office for the Environment

**FSFW** Foundation for a Smoke-Free World

**GBP** Great Britan Pound

**HPT** Heated Tobacco Products

**IGSU** Interest Group for a Clean Environment

**IQOS** *I Quit Ordinary Smoking (heated tobacco device, PMI)*

**JTI** Japan Tobacco International

**KPK** *Commission for the Prevention of Corruption* (Slovenia)

**KT&G** *Korea Tobacco & Ginseng Corporation* (South Korea)

**Körber AG** *Körber Aktiengesellschaft* (company in Germany)

**KS/CS** *Kommunikation Schweiz/ Communication Suisse*

**MoUs** Memoranda of Understanding

**MP** Member of Parliament

**NGO** Non-governmental organisation

**OVAM** *Public Waste Agency of Flanders*

**PLN** Polish złoty (Polish national currency)

**PMI** Philip Morris International

**PMI** Philip Morris Italia

**PMR** Philip Morris Romania

**SGV** *Schweizerischer Gewerbeverband* (Swiss Trade Association)

**SPD** *Sozialdemokratische Partei Deutschlands* (Social Democratic Party of Germany)

**TEPAV** The Economic Policy Research Foundation of Türkiye

**TI** Tobacco Industry

**TOBB** Union of Chambers and Commodity Exchanges of Türkiye

**UK** United Kingdom

**WHO** World Health Organization

# Recommendations

**Countries should fully** implement the Guidelines for Article 5.3 of the WHO Framework Convention on Tobacco Control (WHO FCTC) and, in particular, take the following measures to protect public health policies from TI interference:

- **Institutionalise Article 5.3 Across Government:** integrate Article 5.3 into national law and policy frameworks across all sectors and levels of government and establish official policies and legal instruments (e.g., decrees, codes of conduct) rejecting partnerships and contributions from the TI.
- **Ensure Full Transparency of All Interactions:** mandate disclosure of all meetings and communications with tobacco and nicotine industry actors, including agendas, participants, and outcomes. Extend transparency requirements to parliamentarians and subnational authorities.
- **Adopt Binding Codes of Conduct and Conflict-of-Interest Rules:** enforce codes of conduct that prohibit accepting gifts, support, or hospitality from the industry, and apply cooling-off periods before and after public service to prevent revolving-door employment.
- **Ban Political Contributions:** prohibit the TI and its affiliates from donating to political parties, election campaigns, candidates, or associated entities.
- **Prohibit TI CSR Activities:** ban TI CSR initiatives involving public institutions. Prevent such activities from being used to gain access or legitimacy in accordance with the guidelines outlined in Article 13 of the WHO FCTC.
- **Build Capacity Within Government:** implement regular training for public officials, parliamentarians, and regulatory bodies to raise awareness of Article 5.3 obligations and prevent industry influence.
- **Mandate Industry Reporting and Disclosure:** require the industry to disclose data on production, marketing, lobbying, revenues, donations, and affiliated third parties and establish national registers of tobacco-related entities and activities.
- **Support Independent Monitoring and Civil Society:** fund and protect civil society organisations monitoring TI interference and promote public participation in oversight efforts.
- **Harmonise Laws and End Privileged Access:** align legislation across jurisdictions and sectors. Terminate agreements or practices that grant the industry privileged access, including MoUs with enforcement or trade agencies.
- **Enforce Compliance and Sanction Violations:** introduce meaningful penalties for violations, including false or misleading information provided by the industry, and strengthen accountability mechanisms.



# Methodology

## About the Report:

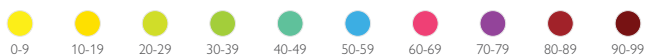
This analysis draws on submissions prepared by independent national experts across **25 countries in the WHO European Region**. The assessments are based on a standardised questionnaire developed by the **Southeast Asia Tobacco Control Alliance**, comprising **20 questions aligned with the WHO FCTC Article 5.3 Guidelines**. Only publicly available information was used.

## Currency and Time Frame:

Financial figures are reported in local currencies and **converted approximately into Euros** for comparison purposes. The reporting period spans **April 2023 to March 2025**, with earlier incidents included where they remain relevant.

Each country is evaluated using a scoring system ranging from 0 to 5, where **5 reflects severe interference by the TI**, and **1 indicates minimal or no interference**. A lower score signals stronger protection against industry influence. A score of 0 is used when no relevant evidence is found or the question is not applicable. In cases with multiple data points, an average score is assigned. **Non-Parties to the WHO FCTC receive a default score of 0 for Question 4.**

For consistency, the regional ranking uses the same colour scheme as the **Global Tobacco Industry Interference Index**.



## Scoring Interpretation and Presentation:

For each indicator, a **colour-coded system** is used:

- **Green:** countries scoring **33% or less** of the maximum possible points
- **Yellow:** scores up to **60%**
- **Red:** scores of **61% or higher**

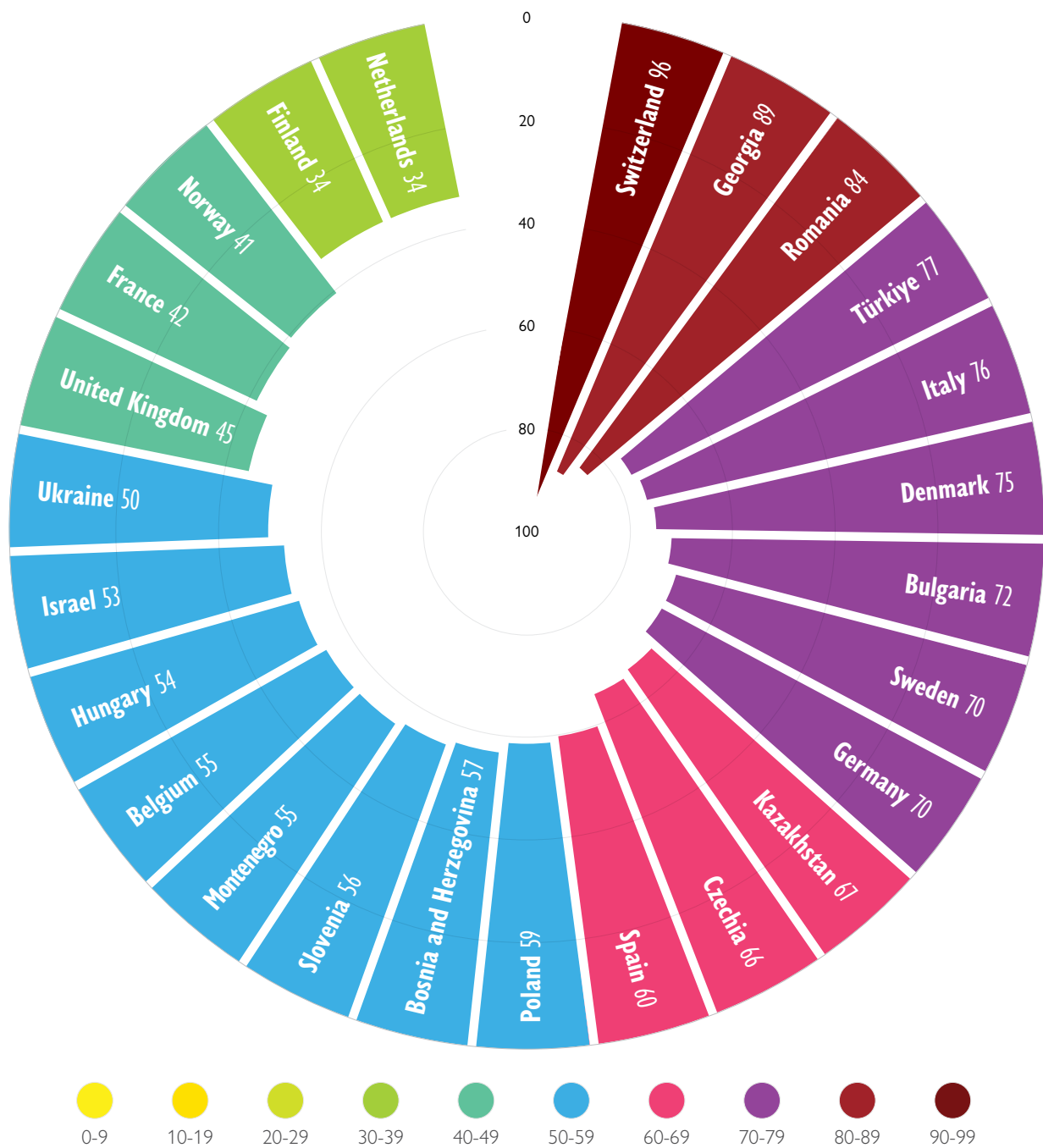
Indicator summaries highlight **notable good practices** from selected countries, along with the **three lowest-scoring countries per indicator**. If several countries share the same low score, all are listed.

## Limitations:

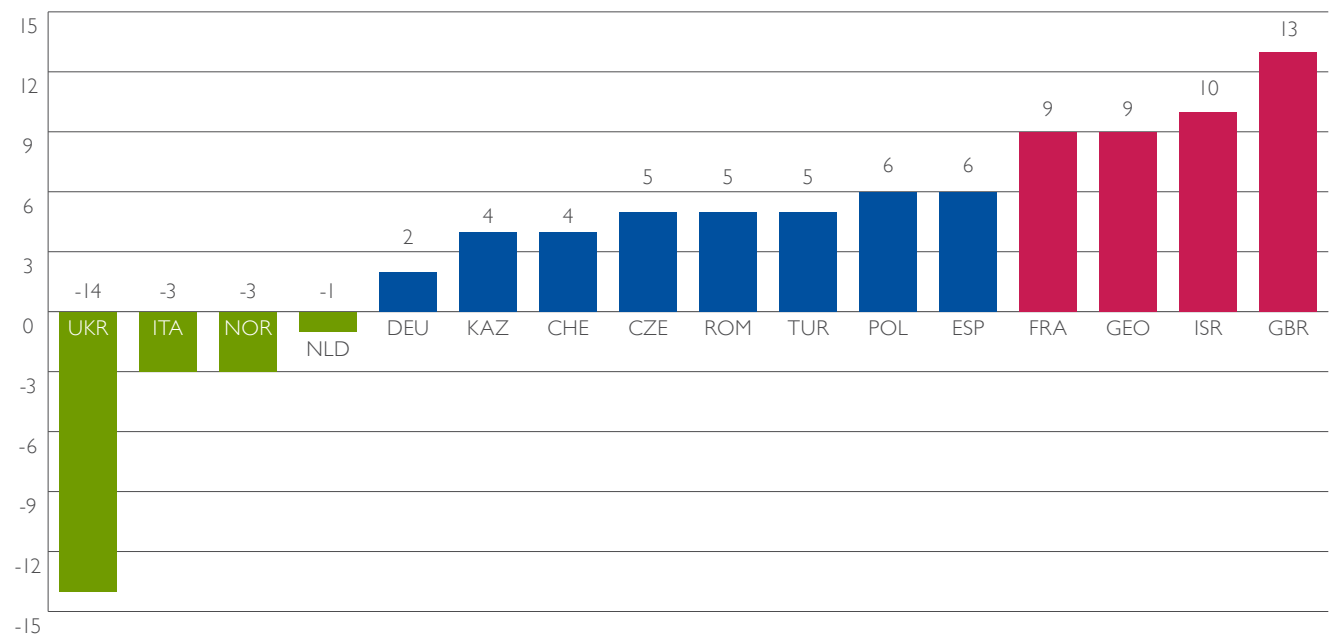
As the findings are based solely on **publicly accessible sources or freedom of information requests**, the data presented may not reflect the full extent of industry interference. Country rankings are derived from individual national assessments and should be interpreted with this limitation in mind.

# Europe Regional Ranking

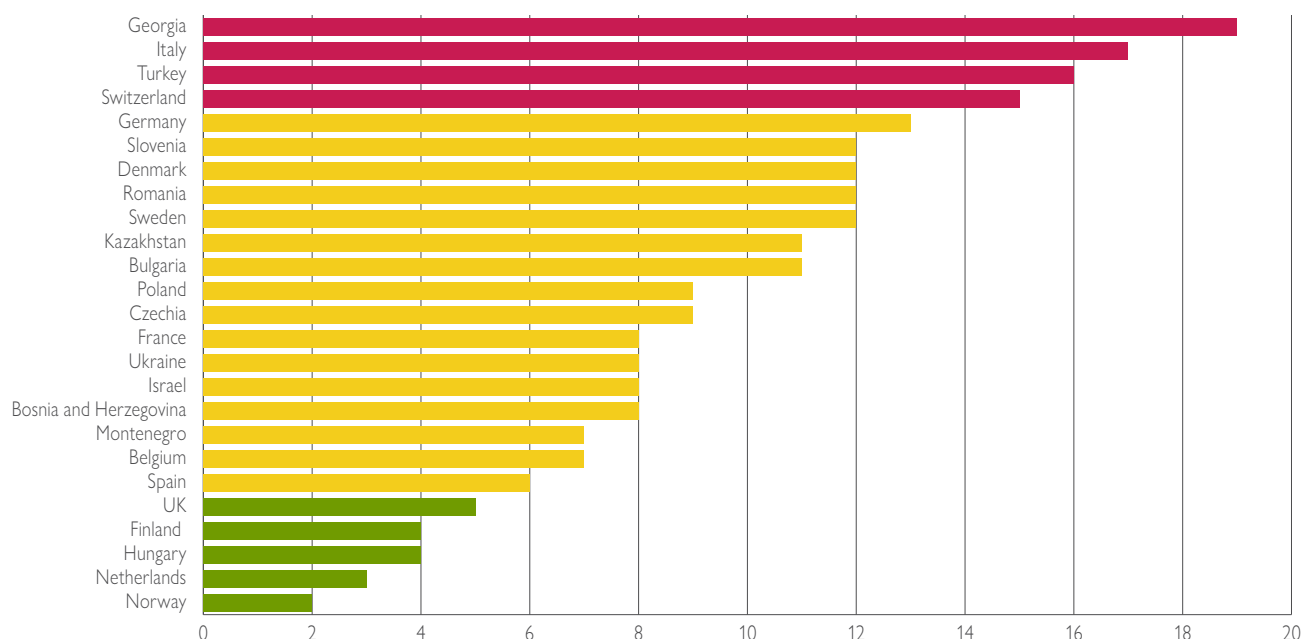
Overall country scores: 61



Score Difference of GTI 2021 and GTI 2025



# Indicator 1: Level of Industry Participation in Policy Development



Ranking for indicator 1: Participation in policy development.

**The WHO FCTC Article 5.3 Guidelines recommend that Parties reject any form of assistance from the TI when developing public health policies.** Despite this, the TI has a long-standing history of attempting to influence policy development at both national and EU levels<sup>10</sup>.

In contrast, some governments allow or indirectly enable TI participation in policymaking. In **Ukraine**, the Ministry of Finance openly acknowledged reaching a compromise with the TI on the excise tax level for cigarettes in Draft Law No. 11090, which was later adopted<sup>11</sup>. In **France**, while the tobacco sector is not formally involved in drafting the national tobacco control programme, it continues to participate in parliamentary hearings and was described by the Minister of Public Accounts as “key to the success” of the programme. In **Finland**, the Chancellor of Justice concluded that the former Minister of Education had compromised the legislative process of the Tobacco Act by promoting flavour additives linked to a local nicotine pouch manufacturer, without disclosing the company’s involvement<sup>12,13</sup>. In **Slovenia**, although no official partnerships exist, credible sources confirm that the TI is treated as a legitimate stakeholder in public health debates, particularly through harm reduction rhetoric. **Bulgaria** lacks any current policy restricting

industry influence in public health policymaking, and organisations like the Bulgarian Chamber of Commerce continue to advocate on the industry’s behalf<sup>14</sup>. In **Germany**, limited publicly available information suggests that the TI has opportunities to influence policy decisions. The 2021 fast-track law on tobacco taxation introduced only minimal annual increases until 2026 and maintained lower rates for fine-cut tobacco, developments seen as favourable to the industry<sup>15,16,17</sup>. Moreover, a representative of the Federal Association of the BVTE sits on the Single-Use Plastics Commission, which advises the legislature on tax rates for items including cigarette filters<sup>18,19,20,21</sup>.

## Best practice examples

Governments can protect their tobacco control policymaking by ensuring transparency and explicitly rejecting TI involvement. During the reporting period, no evidence was found that the governments of **Norway** and **the Netherlands** accepted or endorsed offers of assistance or collaboration from the TI in drafting or implementing tobacco control policies.

## Worst ranked countries

**Georgia (19/20):** In the past two years, the TI has strengthened its ties with Georgian decision-makers.

On 29 May 2024, the Parliament approved a 50% tax cut on raw tobacco, chewing tobacco, snus, and hookah tobacco<sup>22</sup>, reportedly influenced by local producers such as Tbilisi Tobacco, and aligning with PMI's plans to introduce snus in Georgia<sup>23,24,25</sup>.

The industry has repeatedly delayed plain packaging regulations: first due on 1 January 2018, then moved to January 2023, July 2024, and now April 2025.

The most recent postponement of plain packaging was officially proposed by the Business Ombudsman's Office of Georgia, based on suggestions from TI representatives. Following this, an MP initiated a formal delay proposal in June 2024<sup>26,27</sup>. Parliament and government agencies have consistently backed industry proposals, holding regular, non-transparent meetings, especially within the economic sector<sup>28,29</sup>.

**Switzerland (15/20):** Apart from Monaco, Switzerland continues to be the only country in the WHO European Region that has not ratified the WHO FCTC. Lobbyists frequently gain entry to federal and cantonal parliaments through parliamentary access badges, each MP receives two, allowing entry to restricted areas. Several members have granted badges to industry representatives: a BAT lobbyist since 2007<sup>30</sup>; a Swiss Cigarette BAT/JTI/PMI front group, and tobacco expert on the Commission for Fairness<sup>31,32,33</sup>; representatives from Centre Patronal<sup>34,35</sup>; representatives from SwissTabac and Swiss Farmers Union (The Centre)<sup>36</sup>. Other notable allies include the president of the Commission for Fairness and opponent of the 2022 tobacco advertising ban initiative (The Centre)<sup>37,38</sup>; individuals (The Centre) linked to the Business Alliance for a Moderate Prevention Policy (AWMP)<sup>39,40,41</sup>; the president of SGV and AEMP member<sup>42</sup>.

**Italy (17/20):** There is currently no law or policy in place or under discussion that regulates or limits the TI's involvement in setting or implementing public health policies related to tobacco control in Italy. Transnational tobacco companies are treated by the Italian government as successful industries making significant investments in the country. As such, they are considered partners in national development, particularly by the Ministry of Economy and Finance, the Ministry of Agriculture, Food Sovereignty and Forests, and the Ministry of Enterprises and Made in Italy (formerly the Ministry of Economic Development).

Within this framework, the TI is able to exert influence on public health and tobacco control policies. Historically, the Ministry of Health has been the only governmental department consistently opposing such partnerships. A shift seemed possible in early 2023, when the newly appointed Minister of Health declared that his main priority would be to strengthen and enforce current tobacco legislation<sup>43</sup>. Following political pressure, the Health Minister stepped back: primary prevention, including regulatory action on tobacco and nicotine products, appears to have been deprioritised. In addition, all major transnational tobacco companies operating in Italy, including BAT, JTI, and PMI, are officially registered in the Italian Parliament's registry of lobbyists<sup>44,45,46,47</sup>. To worsen the situation, for the COP10 to the WHO FCTC, held in Panama from 5 to 10 February 2024, Italy's approach raised serious concerns about indirect TI interference<sup>48</sup>. The government had designated a delegation composed of high-level officials from various ministries, especially economic ones, and from the Customs and Monopoly Agency. However, at the last moment, the government withdrew the planned delegation.

**Turkey (16/20):** TEPAV, a semi-public foundation established and run by the TOBB, receives funding from the FSFW since 2021<sup>49,50</sup>. FSFW-funded projects led to the creation of TEPAV's Health Economics Department, which produces reports promoting the economic benefits of novel tobacco and nicotine products and advocating for their legalisation in Turkey<sup>51</sup>.

Over the last decade, the TI has persistently lobbied for changes to the Special Consumption Tax structure on cigarettes. Industry representatives also hold seats on the boards of two semi-public organisations created and governed by law, providing direct access to decision-making processes<sup>52</sup>.

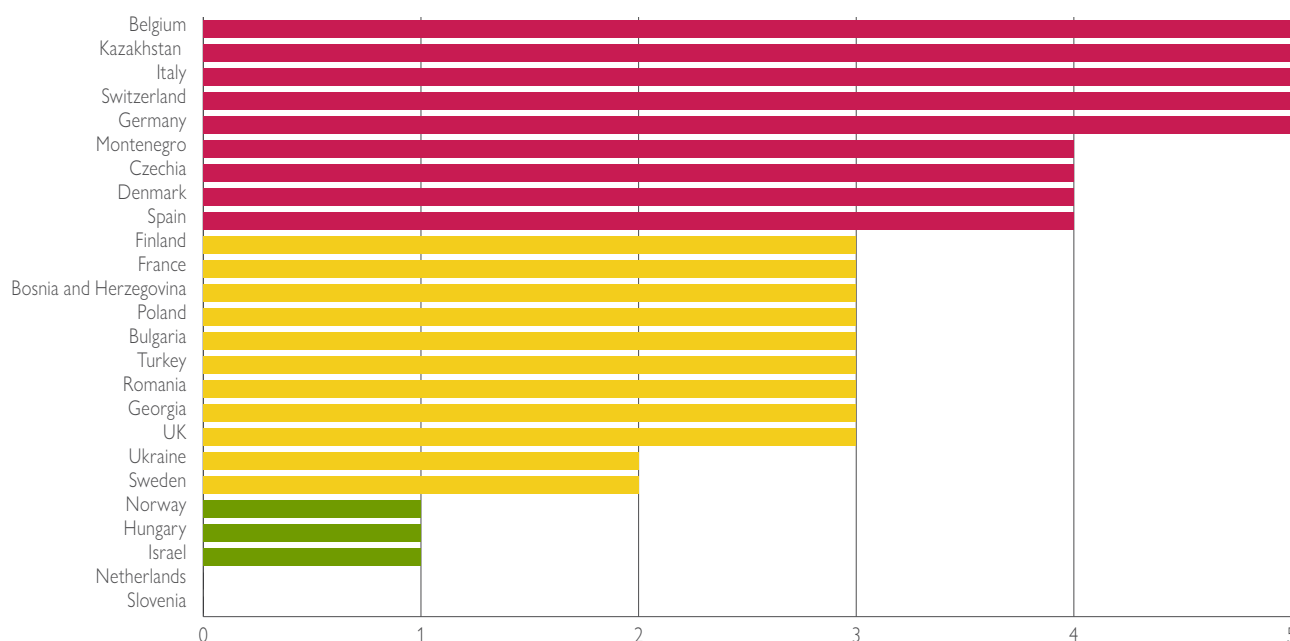
**Denmark (12/20):** MP, youth politicians, and political commentators regularly interact with the TI<sup>53</sup>. On several occasions, the government has accepted draft legislation proposed by the industry and incorporated the responses into policy processes, resulting in final laws that reflect industry interests<sup>54,55,56</sup>. While there are no known cases of the government allowing or inviting the industry to sit on public health committees or advisory groups, the Danish Tax Committee has invited industry representatives to a meeting on future legislation<sup>57</sup>.



**Romania (12/20):** In April 2025, Romania submitted a detailed opinion under the EU TRIS procedure opposing Spain's proposed nicotine cap of 0.99 mg per pouch, arguing that the measure was disproportionate, lacked sufficient public health justification, and would violate internal market rules by creating trade barriers<sup>58</sup>. Romanian authorities have historically received and endorsed legislative input or offers of assistance from the TI, including collaboration on taxation, customs enforcement, and traceability regulation. Notwithstanding, in early 2024, the government formally established the Interministerial Committee for the Control of Tobacco Consumption. There is no public record or legislative statement indicating that TI representatives or affiliated groups have been invited to participate in its sessions<sup>59</sup>.

**Sweden (12/20):** In May 2024, Swedish authorities invited the TI to provide input on proposed regulations concerning nicotine school hours<sup>60</sup>. In December of the same year, the Swedish Parliament formally shifted the overarching goal of national tobacco policy from reducing overall use to reducing medical and social harms, emphasising harm reduction and acknowledging varying risk levels across tobacco and nicotine products. Swedish Prime Minister even publicly highlighted the snus tax reduction on social media, framing it as a measure to reduce smoking, noting that the decision was not motivated by personal use preferences<sup>61</sup>. Additionally, meetings with government representatives from both the Moderate Party and the Sweden Democrats referenced TI submissions when deciding to reduce the excise duty on brown snus, while increasing taxes on cigarettes, cigars, cigarillos, and other smoking tobacco by 9 percent<sup>62</sup>.

## Indicator 2: Industry Corporate Social Responsibility (CSR) activities



Ranking for indicator 2: Corporate social responsibility.

According to the Guidelines for the Implementation of **Article 5.3 of the WHO FCTC**, governments should denormalise and, where possible, regulate so-called “socially responsible” activities conducted by the TI, including CSR<sup>63</sup>.

These activities aim to enhance the industry’s public image and gain access to policymakers. Common CSR efforts include sponsoring environmental clean-up campaigns, donating to public health or education initiatives, and funding cultural or innovation events.

While some countries maintain (strong) legal frameworks that limit CSR activities by the TI like Norway, others are experiencing new forms of indirect engagement or evolving regulatory landscapes. For example, **Hungary** adopted a new ESG Act in December 2023 requiring sustainability reporting from large companies, yet no evidence of joint government-industry ESG events has been identified<sup>64,65</sup>. In **France**, despite a comprehensive ban on all forms of tobacco advertising, including CSR, the eco-organisation Alcome maintains partnerships with local authorities under the guise of waste management, effectively preserving industry visibility<sup>66</sup>.

**Romania** and **Poland** both demonstrate the industry’s continued pursuit of influence through non-governmental channels: in Romania, JTI’s long-running scholarship programme for journalists raises concerns about shaping media narratives and policy discourse<sup>67</sup> while in Poland, CSR efforts have shifted away from public institutions and now focus on schools, internships, and partnerships with NGOs and private entities<sup>68,69</sup>. Like France, **Spain** has introduced measures obliging the TI to cover cigarette waste clean-up costs, but Royal Decree 1093/2024<sup>70</sup> controversially assigns management of the process to the industry itself, opening the door to CSR-style “greenwashing” campaigns. Recent initiatives by Ávora and the Mesa del Tabaco, often carried out with municipal support, show how these activities sustain industry visibility<sup>71,72,73,74,75,76,77,78,79,80,81,82</sup>. These illustrate continued efforts to influence public perception through indirect channels.

### Best practice examples

In the Netherlands, no evidence was found of government agencies or officials endorsing, supporting, or participating in CSR activities of the TI between April 2023 and March 2025. Similarly, in **Slovenia**, government institutions have generally maintained

distance from TI CSR initiatives, in line with the recommendations of Article 5.3 of the WHO FCTC.

## Worst ranked countries

**Switzerland (5/5):** Switzerland has yet to ratify the WHO FCTC, which considers CSR by the TI a form of advertising. The Swiss government does not prohibit partnerships or sponsorships involving the TI, leaving federal institutions open to interference<sup>83</sup>. A clear example is the ongoing collaboration between the FOEN and the IGSU, which organises Clean-Up-Day campaigns<sup>84,85,86</sup>. Despite cigarette butts being among the most littered items, FOEN omits mention of them, while IGSU lists JTI, a tobacco company as a key supporter. In 2024, IGSU campaigns encouraged public responsibility for littering, subtly shifting focus away from the industry's role<sup>87</sup>.

Beyond environmental initiatives, JTI sponsors a range of high-profile cultural institutions with public funding ties, including the Grand Théâtre de Genève, the Museum of Modern and Contemporary Art, and the Zurich Film Festival. This entrenchment of tobacco CSR in state-supported spaces highlights a systemic lack of safeguards against industry influence<sup>88,89,90,91,92,93,94,95,96,97</sup>.

**Italy (5/5):** In Italy, national government agencies and officials publicly endorsed and participated in CSR initiatives promoted by major transnational tobacco companies. These activities were framed around environmental sustainability and circular economy themes. For instance, the Ministry of the Environment continued to support and sponsor CSR programmes of BAT and JTI. These initiatives aim to raise awareness about cigarette butt litter and promote proper disposal, effectively allowing the TI to position itself as a partner in environmental protection<sup>98</sup>.

In September 2023, Logista Italia, the main distributor of smoking and inhalation products, and the Italian Tobacco Federation (*Federazione Italiana Tabaccai*) signed a programme agreement with the Ministry of the Environment and Energy Security to organise the nationwide collection and disposal of used electronic cigarettes and heated tobacco devices<sup>99</sup>. In January 2024, Philip Morris Italia launched “*Riciclo per economia circolare*” a project to recycle used IQOS and Lil devices. The event was held in Rome with the presence of the Minister of the Environment, endorsing official

support of a TI CSR initiative in the area of e-waste management<sup>100</sup>.

**Kazakhstan (5/5):** No explicit ban exists on TI CSR activities<sup>101,102</sup>. A loophole in Article 110, paragraph 13 of the Health Act, introduced in 2012 with backing from a senior tobacco lobbyist and politician permits both declared and undeclared CSR by tobacco companies. This legal gap facilitates covert influence under the guise of philanthropy<sup>103</sup>.

In 2025, the Ministry of Ecology, Geology and Natural Resources signed an agreement with KT&G, a Korean transnational tobacco company, and the Asian Forest Cooperation Organisation for the “Green Globe Project,” a long-term reforestation initiative linked to wildfire recovery. The project allows KT&G to position itself as a public-interest actor, reinforcing dependency on private sector aid for government-led ecological recovery<sup>104</sup>. Meanwhile, transparency has declined. Since the WHO FCTC Secretariat delegation's visit in 2022, tobacco companies have ceased disclosing their meetings with high-level officials. Industry representatives reportedly remain embedded in influential platforms like “Atameken,” posing continued risks of policy interference.

**Belgium (5/5):** Belgium's implementation of the EU Single-Use Plastics Directive includes a pending plan for EPR obliging tobacco companies to cover clean-up costs related to cigarette waste starting in 2023<sup>105</sup>. However, due to the delayed adoption of the interregional cooperation agreement between Belgium's three regions, producers are not yet paying EPR fees to regional governments<sup>106,107</sup>. Without mandatory contributions, the TI has launched voluntary initiatives framed as CSR.

Since 2008, Cimabel, the Belgian tobacco manufacturers' federation, has partnered with the OVAM on anti-litter campaigns<sup>108</sup>. In 2022, Cimabel and PMI signed a 2.25€ million agreement with OVAM to fund activities under the Flemish Cleanliness Plan, including *Mooimakers* campaigns<sup>109</sup>. The sector has also launched a pocket ashtray campaign under the Flemish Litter Charter, promoted in partnership with tobacco vendors in several cities and coastal towns. Additionally, TI players are financially involved in FostPlus, a packaging waste consortium that participates in public cleanliness decision-making<sup>110,111,112,113,114</sup>.

**Germany (5/5):** Numerous cases illustrate close ties between policymakers, public institutions, and the TI. At the federal level, the long-standing cooperation between the Federal President and the Körber Foundation is particularly noteworthy. Since 1973, each Federal President, including the current officeholder, has partnered with the Foundation for the *Federal President's History Competition*<sup>115,116</sup>. The Körber Foundation is the sole owner of Körber AG, the world's leading manufacturer of cigarette-making machinery, which until recently stated that two-thirds of all filter cigarettes and tobacco products worldwide were produced with its equipment<sup>117</sup>. Körber AG is also expanding into machinery for new tobacco and nicotine products<sup>118</sup>.

By presenting itself as a "technology group," both Körber AG and its subsidiary Körber Technologies (formerly Hauni) obscure their links to the tobacco sector, although Körber Technologies remains a member of the lobby organisation BVTE<sup>119,120,121</sup>. The History Competition targets children and young people up to the age of 21 and involves high-ranking public officials. Its board of trustees includes senior civil servants at federal and state levels, and public servants sit on the juries<sup>122,123</sup>. Federal winners are honoured at the official residence of the Federal President by

the President and a representative of the Körber Foundation, while state-level prizes are awarded by state leaders, ministers, or senior officials<sup>124</sup>.

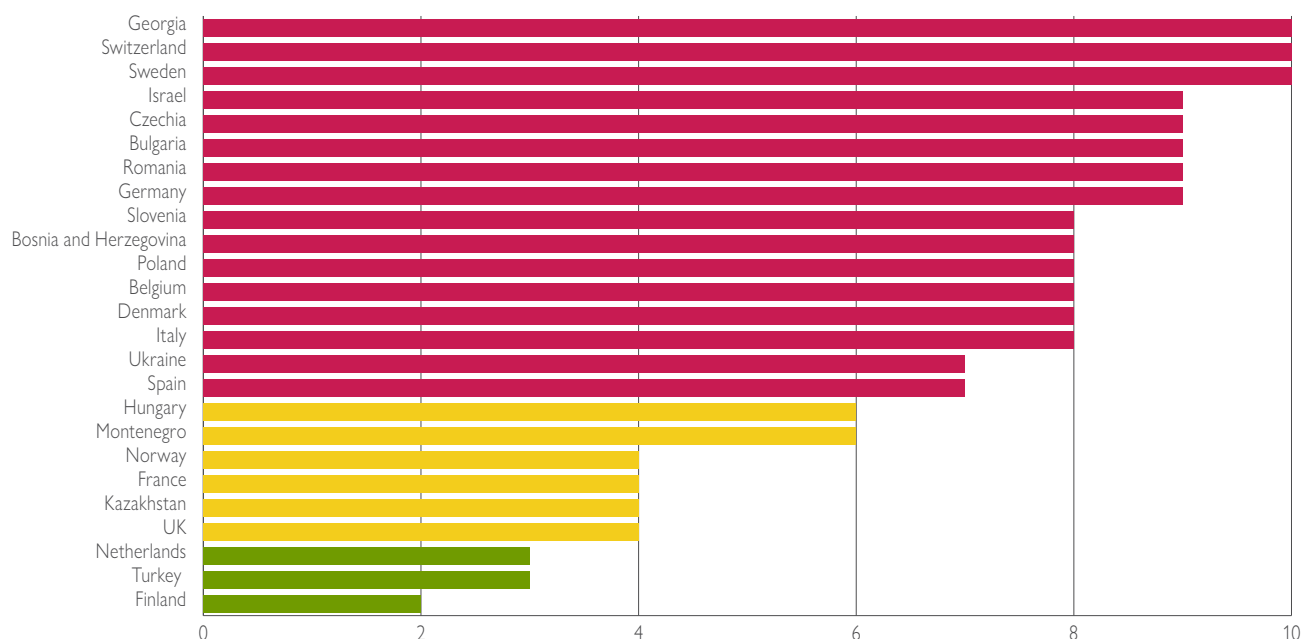
Several municipalities, including Flensburg, Krozingen, Meissen, Egelsbach, and Oberheldrungen<sup>125</sup>, have partnered with the TI on cigarette butt clean-up projects. Framed as environmental initiatives, such activities polish the industry's image, with further examples reported in states like Hamburg, Lower Saxony, North Rhine-Westphalia, and Rhineland-Palatinate.

**Montenegro (4/5):** TI CSR in Montenegro is increasingly embedded in public institutions. American Chamber of Commerce, chaired by the Executive Director of PMI, partnered with the Ministry of Health through the "Rule of Dialogue" platform, offering policy advice and financial support for healthcare initiatives<sup>126</sup>.

These engagements continued in 2024, including events coinciding with the World No Tobacco Day, attended by key public health bodies<sup>127,128</sup>.

PMI also sponsored the 2024 Game Changer Festival, using the platform to promote its IQOS products and government representatives were present<sup>129</sup>.

## Indicator 3: Benefits to the Tobacco Industry



Ranking for indicator 3: Benefits to the tobacco industry.

Article 5.3 of the WHO FCTC explicitly states that **the TI should not be granted incentives such as tax exemptions, delays in the implementation of tobacco control measures, or investment-related benefits**. However, in practice, tobacco companies continue to receive various forms of support in many countries. These benefits facilitate the operation and expansion of the tobacco business, undermining public health objectives<sup>130</sup>.

Across the region, governments continue to grant the industry fiscal advantages, subsidies, and regulatory delays. In 2024, **Switzerland** provided subsidies of around CHF 40,000 (roughly EUR 41,200) per hectare to 114 tobacco farmers cultivating 366 hectares, a crop otherwise unviable without public funding<sup>131</sup>. **Romania** also provides substantial (over EUR 1,600) per-hectare subsidies to raw tobacco growers, making tobacco one of the most heavily supported crops in the country<sup>132,133</sup>. Regulatory delays remain a common form of benefit. **Bosnia and Herzegovina** postponed full enforcement of smoke-free legislation by two years, extending transitional periods into mid-2025. In **Poland**, the *vacatio legis* for new tobacco control measures was extended from three to nine months, and planned taxes on single-use vapes were excluded from an excise bill<sup>134</sup>.

BAT Polska also received over PLN 8.9 million (around EUR 2 million) in public subsidies in 2023–2024<sup>135</sup>. In **Spain**, while no nationwide fiscal privileges are granted, the Canary Islands benefit from a special tax regime that keeps tobacco prices significantly lower than in the rest of the country. Retailers set prices freely, excise rates are lower than national and EU levels, and duty-free allowances facilitate cheaper inflows, making the region a hub of industry advantage<sup>136,137</sup>.

### Best practice examples

No country is a best practice example overall as even the lowest-scoring countries in this indicator are not without shortcomings. **Finland**, for example, shows no direct evidence of granting such benefits long one-year transition period, and large passenger import quotas exist for Swedish smokeless tobacco (snus) and will also apply to nicotine pouches in the future<sup>138</sup>.

In **the Netherlands**, the prohibition of flavours in e-cigarettes other than tobacco was postponed twice<sup>139</sup>. First from July 2022 to January 2023, and then to January 2024<sup>140</sup>. Duty-free allowances for tobacco products remain high, and the minimum purchase age of 18 does not apply to travellers importing tobacco duty-free from the age of 17<sup>141</sup>.

In **Norway**, there is no publicly available evidence that the government has granted the TI extensions or



postponements in implementing tobacco control laws. Notwithstanding, the ban on menthol and click-based cigarettes, initially due at the end of 2024, was shifted to a turnover period between 2024 and 2025<sup>142</sup>. Additionally, the tax share of the retail price of a 20-pack of cigarettes has fallen from 62% to 56%, although the 2024 budget proposes a 3–4% tax increase depending on the product type<sup>143</sup>. Lastly, duty-free allowances remain high, with international travellers permitted to bring in 200 cigarettes, 250g of tobacco, or 200 cigarette papers, higher than the quota for residents.

In **the UK**, no incidents were identified where the government accommodated requests from the TI for longer implementation periods of tobacco control measures. In its Party Report for the 2023 WHO FCTC<sup>144</sup> reporting cycle, the government reaffirmed that no incentives, privileges, benefits, or preferential tax exemptions are granted to the TI to establish or operate in the UK. Guidance on adherence to Article 5.3 has been developed for all government departments and is due to be published, while devolved administrations such as Scotland, Jersey, Gibraltar, and Guernsey provided further evidence of strong measures to prevent industry influence<sup>145</sup>.

## **Worst ranked countries**

**Switzerland (10/10):** The Swiss government, through the Swiss Tobacco Finance Fund and state pension funds and Publica, invests public money in tobacco giants BAT, JTI, and PMI<sup>146,147</sup>. Despite public calls for ethical investment practices and parliamentary motions to halt such support, the Federal Council has refused to intervene, citing legality and investor independence<sup>148</sup>.

These practices ignore the industry's well-documented human rights violations and environmental harms, and they contribute to the normalisation of tobacco in Swiss society. By contrast, Norway's state pension fund has excluded tobacco investments since 2010 for ethical reasons.

**Georgia (10/10):** Georgia has repeatedly delayed the adoption of key tobacco control measures due to industry interference. The government has yet to adopt the decree required by Article 5.3 and Article 6.4 of the Law on Tobacco Control, pending since September 2018<sup>149</sup>.

The plain packaging law, originally set for January 2018, was postponed to January 2023 and is still not in force, following pressure from PMI and the American Chamber of Commerce<sup>150,151,152</sup>. Georgia has not acceded to the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products, and duty-free retailers remain exempt from health warning and plain packaging requirements<sup>153,154</sup>.

No tobacco tax increases have been proposed since November 2019<sup>155</sup>.

**Sweden (10/10):** Between 2016 and 2022, white snus (nicotine pouches) remained largely unregulated, despite repeated warnings from public health authorities. When legislation was finally introduced, it was weakened under the influence of the TI<sup>156,157</sup>.

HTPs benefit from lower taxation than cigarettes and other tobacco products. These regulatory gaps allow the industry to market products to youth and promote them online to individuals over 25, with limited practical enforcement<sup>158,159</sup>. In addition, the Minister of Trade publicly defended the snus industry in the EU, citing its importance for Sweden, although the sector employs only 2,000–2,500 people and the largest nicotine pouch producers are now owned by PMI<sup>160</sup>.

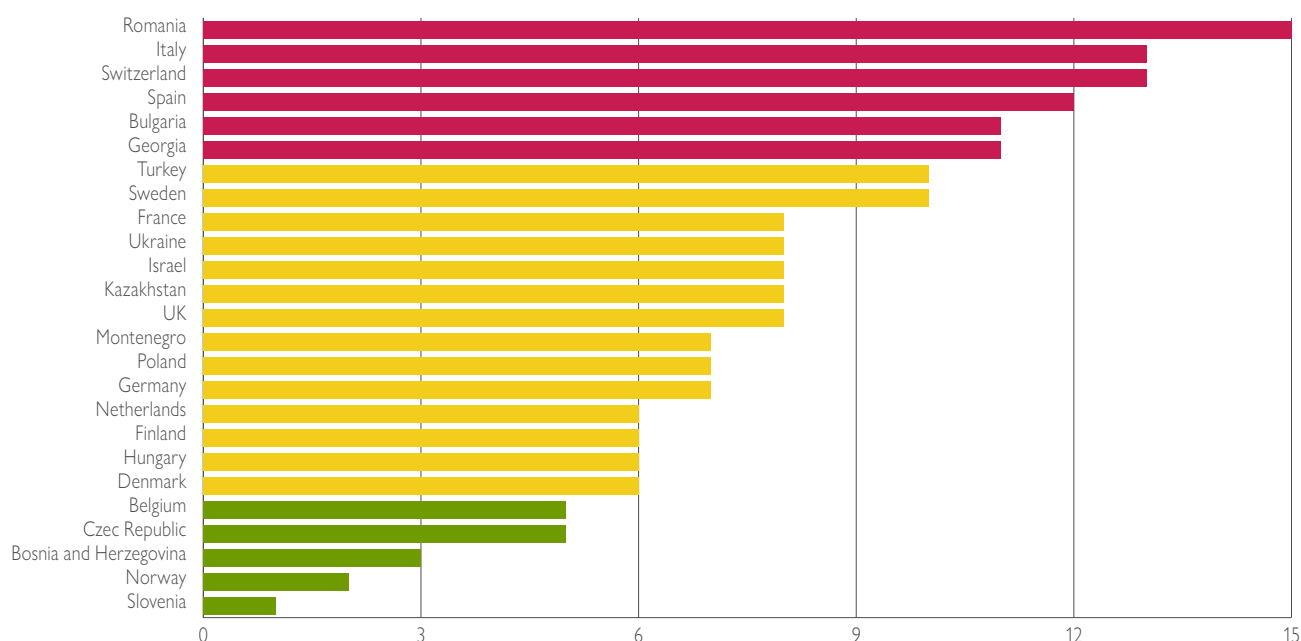
**Israel (9/10):** Amendment No. 7 of the Prohibition of Advertising of Tobacco and Smoking Products Law, approved in January 2019, remains only partially implemented, with no dedicated supervision or enforcement mechanisms<sup>161</sup>. In addition, taxation orders on electronic cigarettes, approved in 2023, are undermined by a loophole allowing import of components for local assembly without tax, fuelling black market activity and weakening regulation. Despite a Finance Committee request for a Tax Authority work plan by May 2024, no plan has been submitted<sup>162</sup>.

**Czechia (9/10):** The Ministry of Health promoted the inclusion of Article 5.3 during consultations on the draft lobbying act, approved by the government in February 2018 but not expected to take effect until 2025<sup>163</sup>. The final version omits provisions requiring disclosure of lobbyists' clients, a move criticised by anti-corruption groups as undermining transparency. Moreover, cigarettes in Czechia remain among the cheapest in the EU, with a pack of Marlboro expected to cost around 153 CZK (around EUR 6) in 2025<sup>164</sup>.

**Romania (9/10):** The government has repeatedly granted the TI extended timeframes to comply with tobacco control measures, including delays in enforcing graphic health warnings and tax increases<sup>165</sup>. Romania continues to provide substantial subsidies to raw tobacco growers under the Transitional National Aid scheme, exceeding EUR 1,600 per hectare in 2024, making tobacco one of the most heavily subsidised crops<sup>166</sup>.

**Germany (9/10):** A comprehensive ban on advertising, promotion and sponsorship remains incomplete, with long transition periods and the new CDU/CSU–SPD government ruling out further restrictions<sup>167,168</sup>. Tax policies from 2021 guarantee minimal annual increases until 2026, allowing under shifting and over shifting, and the coalition has pledged continuity<sup>169</sup>. At the local level, the city of Dortmund hosts the world’s largest tobacco trade fair, InterTabac, alongside Evo Nxt, giving the industry regular platforms for promotion. In addition, tax exemptions for employee tobacco allowances amounting to around EUR 3 million remain in place, despite government recognition that they contradict national health and sustainability goals<sup>170</sup>.

## Indicator 4: Forms of Unnecessary Interaction



Ranking for indicator 4: Forms of Unnecessary Interaction.

As emphasised in the Guidelines for Implementation of Article 5.3 of the WHO FCTC, **interactions between public officials and the TI should occur only when strictly necessary for regulation** and must be conducted with full transparency<sup>171</sup>. Despite this clear standard, unnecessary engagements remain common. These can include attending social or cultural events sponsored by tobacco companies, participating in industry-organised conferences or site visits, or accepting invitations to discuss matters outside the scope of regulation and enforcement. Such interactions, even when perceived as harmless or routine, risk legitimising the industry and undermining public health policies.

Concerning high-level meetings with the TI, in **Poland**, on 18 June 2024, Deputy Prime Minister met with PMI CEO at the Chancellery of the Prime Minister while the Health Ministry was drafting a bill on tobacco control<sup>172</sup>. In **Belgium**, high-level officials, including the Federal Minister of Economy and the Minister of Finance, attended a reception organised by Perstablo, the Flemish federation of press shops, where the tobacco manufacturers' federation, Cimabel, was also present<sup>173</sup>.

When it comes to industry-linked events and forums, in **Bulgaria**, government representatives took part in economic and environmental forums where the

TI was active<sup>174,175</sup>, whilst in **Turkey**, the President and other officials attended the “Export Champions” award ceremony hosted by the Turkish Exporters Assembly, which includes tobacco companies among its members<sup>176</sup>.

In **Germany**, numerous incidents involving senior decision-makers and the TI have been documented. In January 2025, the Finance Minister, Hamburg's First Mayor, and the Head of the Federal Chancellery attended the Hamburg Press Ball, sponsored by PMI<sup>177</sup>.

In 2024, the German Chancellor, the Defence Minister, Finance Minister and Agriculture Minister took part in the Seeheim Circle's asparagus trip, co-sponsored by BAT, JTI, PMI, Reemtsma and the Federal Association of the Cigar Industry<sup>178</sup>. The Foreign Minister and other cabinet members also spoke at the Körber Foundation's Berlin Foreign Policy Forum in 2024<sup>179</sup>. In 2023, the Health Minister appeared at the PMI-sponsored “ZEIT für Forschung” conference, despite opposition from health organisations<sup>180</sup>, and another politician from SPD attended a Seeheim Circle event sponsored by tobacco companies<sup>181,182,183</sup>.

### Best practice examples

In **Slovenia**, **Norway**, and **Bosnia and Herzegovina**, no official information was found indicating that top-level government officials attended events, ceremonies,

or functions organised or sponsored by the TI or entities furthering its interests. In Norway, the government's new tobacco strategy explicitly commits to fully implementing WHO FCTC Article 5.3, with no evidence of partnerships, assistance, or endorsements involving the industry. In Bosnia and Herzegovina, while the Administration of Indirect Taxation continued the "Stop the Smuggling" campaign supported by major tobacco companies, no formal partnerships or endorsements were identified during the reporting period<sup>184</sup>.

## **Worst ranked countries**

**Romania (15/15):** On 5 September 2023, the Prime Minister attended the 30th anniversary celebration of PMR, held at the company's Otopeni facility<sup>185</sup>. In the same month, the government, including senior officials, publicly endorsed PMI EUR 130 million investment to expand the Otopeni factory<sup>186</sup>. On 14 November 2024, under the Prime Minister's patronage, the ANPC signed a formal collaboration agreement with major tobacco companies and retail associations to prevent youth access to nicotine products. The event was witnessed by high-level officials, including the head of the Prime Minister's Chancellery<sup>187,188</sup>.

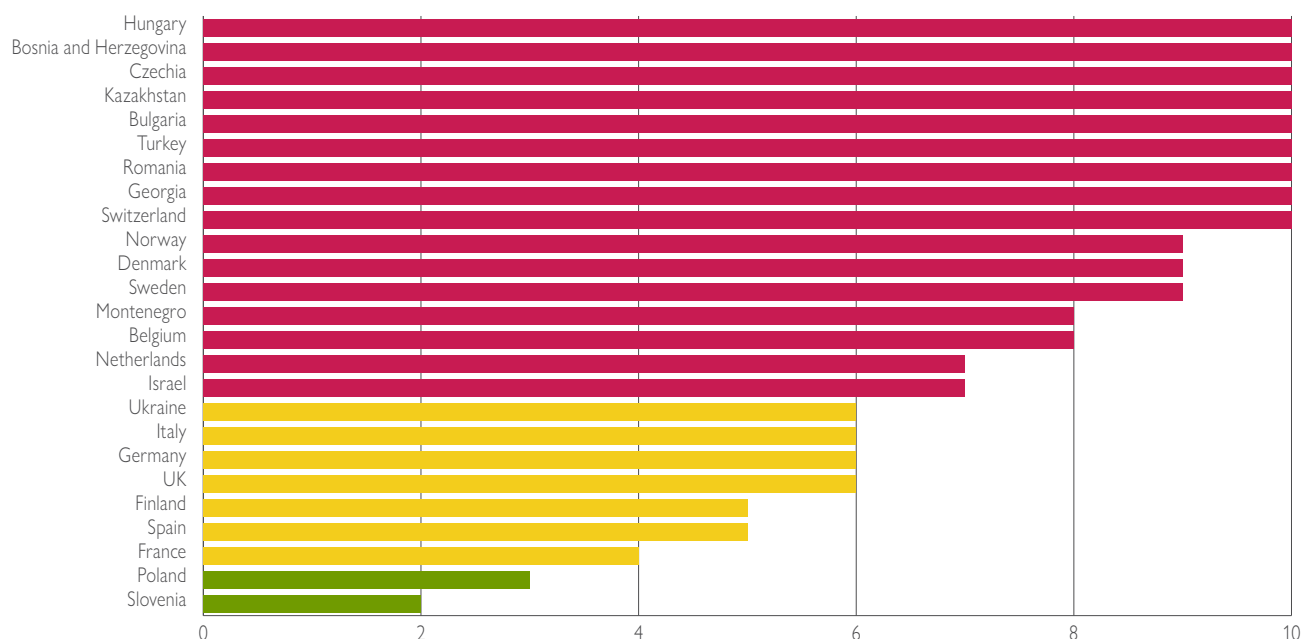
**Switzerland (13/15):** Throughout the year, numerous high-level government officials have engaged with tobacco companies, with several meetings between parliamentarians or other public officials and the industry remaining undeclared. The Commission for Fairness, a private body overseeing self-regulation of commercial advertising, has maintained a voluntary, non-binding agreement with Swiss Cigarette, BAT, JTI, and PMI since 1992<sup>189,190,191</sup>. In addition, an ongoing partnership between PMI and the Swiss Federal Institute of Technology Zurich, first flagged in the 2023 Index, continues to raise concerns over the

normalisation of industry influence in academic and policy spaces.

**Italy (13/15):** In May 2023, PMI officially opened its Digital Information Service Center in Campania, a facility focused on digital services and customer care for smoke-free products. The event was attended by the Minister for European Affairs, among other officials<sup>192</sup>. In June of the same year, the Minister of Enterprises and Made in Italy, together with the President of the Friuli-Venezia Giulia Region and other institutional representatives, attended the inauguration of the "Trieste Innovation Hub", a major investment by BAT for the production of new tobacco and nicotine products, including Velo nicotine pouches<sup>193,194</sup>. A Member of the Social Affairs and Health Commission of the Parliament also participated in the CoEHAR National Conference in 2024. CoEHAR is a research center created by industry-linked funding via the Foundation for a Smoke-Free World, and presented its initiatives on harm reduction<sup>195</sup>.

**Spain (12/15):** Numerous high-level meetings with the TI have been documented. In December 2023, the President of the Canary Islands met with PMI executives to discuss shifting part of its cigarette production to Gran Canaria<sup>196</sup>. In early 2024, senior officials including the Minister of Territorial Policy, the Vice President of the Canary Islands, and the Mayor of Las Palmas participated in public forums sponsored by PMI or JTI<sup>197,198</sup>. Members of the People's Party also pledged parliamentary support for the local tobacco sector<sup>199</sup>. In January 2025, the Civil Guard signed a cooperation agreement with the Mesa del Tabaco to combat illicit trade, institutionalising collaboration with the industry. In addition, a 2016 agreement between the regional government of Extremadura and PMI included provisions on tobacco farming, innovation, and visibility for heated tobacco products, though its current status remains unclear.

## Indicator 5: Transparency



Ranking for indicator 5: Transparency.

**Guidelines for implementing Article 5.3 of the WHO FCTC call on Parties to make public the agendas and minutes of all meetings between government officials and the TI<sup>200</sup>.** Such disclosure strengthens transparency and accountability, enabling civil society to act as a watchdog and keeping the public informed about industry interference.

However, the latest data reveal that most countries still fail to adopt these measures. Many governments either do not document such interactions or keep the information inaccessible to the public, leaving significant gaps in oversight. This persistent lack of transparency allows the TI to continue lobbying behind closed doors.

Several countries continue to face significant gaps in transparency. In **Norway**, there are no specific measures to ensure public disclosure of meetings or communications with TI representatives. Recent reforms to the “Golden Key” system now limit former MPs’ unrestricted access to Parliament, requiring declarations against lobbying, security screening, guest limits, and sanctions for violations, steps aimed at preventing undue influence but not addressing broader transparency gaps<sup>201</sup>. **Montenegro** has no record of meetings during the reporting period, yet it publishes information on some events, like the American Chamber of Commerce, without noting links to the TI. In **Belgium**, interactions with the industry remain

largely unreported, with only a general parliamentary lobby register that excludes ministerial contacts<sup>202</sup>.

### Best practice examples

Some countries have taken more concrete steps toward transparency. In **Slovenia**, the official Varuh integrated platform, managed by Transparency International Slovenia in cooperation with the Commission for the Prevention of Corruption, provides consistent public disclosure of meetings with the TI. A review of major media outlets and official platforms between April 2023 and March 2025 found no cases where required disclosures were missing. In **Poland**, the Government Legislation Center publishes records of TI interactions as part of public consultations on draft legislation, and a publicly accessible lobbying register lists all individuals and organisations engaged in professional lobbying, updated annually<sup>203</sup>.

**France** has also introduced targeted measures. Transparency rules cover relations with the tobacco sector, particularly for high-level decision-makers, and include specific provisions for lobbying activities. Since January 2016, manufacturers, importers, distributors of tobacco products, and their representatives must publicly declare expenses related to influence or interest representation activities.



## Worst ranked countries

**Turkey (10/10):** The government does not publicly disclose its meetings or interactions with the TI. There is no requirement to register or disclose TI entities, affiliated organisations, or individuals acting on their behalf, including lobbyists. No such policy is in place or under consideration.

**Switzerland (10/10):** There is no law requiring the government to proactively disclose meetings or interactions with the TI. Federal and cantonal transparency laws provide only limited disclosure through freedom of information requests. In its 2023 annual report<sup>204</sup>, KS/CS noted that in May 2023, members of the “Market and Advertising” Parliamentary group met with KS/CS premium members (including JTI, PMI and BAT)<sup>205</sup>. Article 11 of the Federal Act on the Federal Assembly requires members to declare professional and consultancy activities, as well as certain affiliations<sup>206</sup>. However, this rule is general, not tobacco-specific, applies only to the Federal Assembly, and contains major loopholes. It omits tobacco stock holdings, limits consultancy disclosures to “permanent” roles, and relies on unenforced self-reporting omissions, making it unreliable. Moreover, no comprehensive rule exists requiring policymakers to disclose all ties to the TI or its lobbyists, and no such policy is currently being developed.

**Romania (10/10):** Romania allows citizens to request meeting data retrospectively, but there is no requirement for proactive disclosure of agendas, attendees, or minutes<sup>207,208,209</sup>. No rule mandates advance publication or open-access records for meetings with the TI, nor the registration of tobacco companies, affiliates, lobbyists, or those acting on their behalf<sup>210</sup>. The lobby register, managed by the Ministry of Justice, is non-sector-specific and voluntary<sup>211</sup>.

**Kazakhstan (10/10):** There is no system to register or require disclosure of TI entities, affiliates, or individuals acting on their behalf, including lobbyists. Front groups are widespread and actively oppose public health measures through media, public events, and participation in working groups.

**Hungary (10/10):** Hungary does not adhere to the transparency best practices even when conducted for legitimate regulatory purposes. There is no publicly

available documentation or official protocol to ensure the proactive or retrospective publication of such engagements. No register exists for TI entities, their affiliates, or individuals acting on their behalf, including lobbyists, and there are no requirements for disclosing meeting agendas, participants, or outcomes. No new policy is being developed to address these gaps.

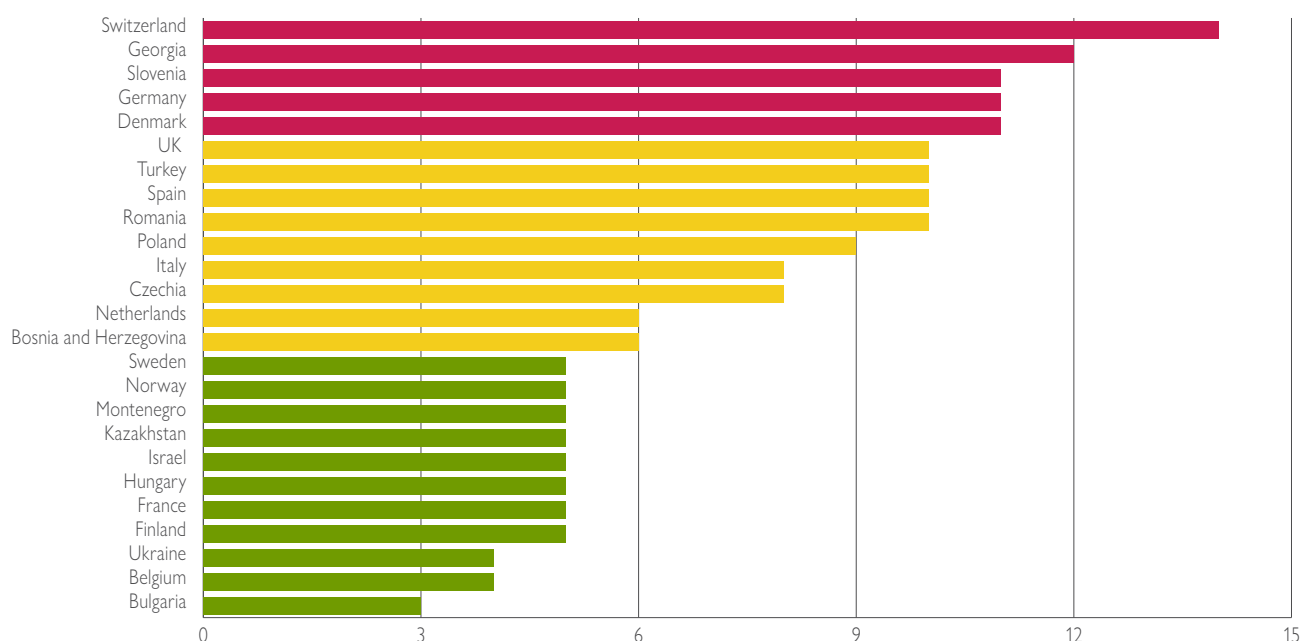
**Georgia (10/10):** Interactions between the government and the TI are not disclosed. Industry representatives hold closed meetings with members of Parliament, Ministry of Economy and Sustainable Development, Ministry of Finance, Business Ombudsman Office, Ministry of Health, and the Administration of the Prime Minister, in contradiction to Article 5.3 of the WHO FCTC<sup>212</sup>. In 2018, the National Center for Disease Control, together with the Tobacco Control Alliance, drafted a decree to introduce transparency requirements. It was sent to the Administration of the Prime Minister for approval but, more than seven years later, remains under consideration. No regulations exist to require disclosure or registration of TI entities, affiliates, or individuals acting on their behalf, including lobbyists.

**Czechia (10/10):** Czechia lacks a formal system for disclosing or registering TI entities, affiliated organisations, or lobbyists<sup>213</sup>. However since 2025, the Government Office has started to provide information on its website about negotiations with the TI<sup>214</sup>.

**Bulgaria (10/10):** There are no disclosure requirements for meetings or interactions with the TI. The Ministry of Finance, Ministry of Economy and Industry, and Ministry of Education confirmed they have issued no orders or rules regulating public disclosure of such interactions. The Ministry of Finance acknowledged holding working meetings with the TI, including on amendments to the Excise and Tax Warehouses Act, without keeping minutes or recordings. No ministry has taken steps to regulate this issue, despite it being raised in previous surveys.

**Bosnia and Herzegovina (10/10):** The government does not publicly disclose meetings with the TI, despite a legal requirement to do so under the Federation of Bosnia and Herzegovina tobacco control law. There is no regulation requiring the disclosure or registration of TI entities, affiliates, or individuals acting on their behalf, including lobbyists, as no lobbying law exists.

## Indicator 6: Conflict of Interest



Ranking for indicator 6: Conflict of interest.

Conflicts of interest can occur when the TI donates or contributes to political parties, hires current or former government officials, or appoints them to its boards. To address this risk, the **Guidelines for Article 5.3 of the WHO FCTC call on Parties to adopt policies for the disclosure and management of such conflicts among those involved in public health policy**<sup>215</sup>. Despite the potential for these contributions and relationships to influence policy decisions, most countries still allow them.

### Best practice examples

In **Bulgaria**, political parties are prohibited from accepting donations from legal entities, sole proprietors, religious institutions, foreign governments, and related entities<sup>216,217</sup>. Campaign financing is limited to party funds, candidate contributions, and donations from individuals, with financing by legal entities declared unconstitutional. Parties must maintain a public donor registry.

In **Ukraine**, legislation prohibits all forms of TI financial or other support to political parties, politicians, and related activities, regardless of publicity. Senior officials are prohibited from joining the TI for one year after leaving office, and confirmed conflicts of interest must be resolved within three days<sup>218,219</sup>.

In **Belgium**, sponsorship by tobacco products is prohibited. While there is no direct ban on retired officials joining the industry, former officials serve on the board of the Belgian Public Affairs Community, which includes TI members and indirectly represents industry views<sup>220,221,222,223,224,225,226</sup>. Belgium maintains a lobby register and plans a transparency register under the Interfederal Strategy for a Smoke-Free Generation 2022–2028<sup>227,228</sup>.

### Special mention: These countries prohibit political contributions from the TI

- **Poland** – The law explicitly prohibits political contributions from the TI, but it also bans sponsorship of sports, cultural, educational, health, and socio-political activities. That is broader than just political donations as it is a prohibition on certain forms of promotion and CSR activities as well<sup>229</sup>.
- **Israel** – The prohibition is part of the Political Parties Financing Law, so it is purely about political contributions (from any corporation)<sup>230</sup>.
- **France** – There are rules also strictly about political financing donations and loans to political parties or candidates.

## Worst ranked countries

**Switzerland (15/15):** Switzerland has no national legislation prohibiting contributions from the TI to political candidates, parties, or campaigns, and remains the only country in the Council of Europe without regulation on political funding. Links between political actors and the TI are often opaque. There are no rules preventing members of Parliament from holding positions with, or consulting for the TI.

**Georgia (12/15):** Georgia does not prohibit political contributions from the TI or its affiliates, and such donations are not publicly disclosed. Transparency International Georgia has documented cases linking senior officials to the industry, including former Minister of Economy and his son, owner of “Tbilisi Tobacco”<sup>231</sup>. The current Deputy Minister of the Economy and Sustainable Development previously served as commercial director for Imperial Brands in Georgia and Moldova<sup>232</sup>. No mechanisms exist to prevent or disclose conflicts of interest arising from these connections.

**Denmark (11/15):** The government does not prohibit contributions from the TI, or any entity working to further its interests, to political parties, candidates, or campaigns, nor does it require full disclosure of such contributions. There is no documentation that retired senior government officials (former Prime Minister, Minister, Attorney General) form part of the TI. However, two former political advisors to senior government officials now hold executive positions in the TI<sup>233,234</sup>. There are no current officials or relatives holding positions in the tobacco business. However, three government officials simultaneously held positions within the TI, and numerous current and former politicians, Ministers of the Parliament, and Special Advisors of Ministers have previously worked in lobbying firms representing the TI<sup>235</sup>. Further, a former Head of Business Affairs in a major tobacco company is now an adviser for the current Minister of Health.

**Germany (11/15):** Contributions from the TI to political parties remain permitted, both in the form of donations and sponsorship. In 2023, several political parties received at least EUR 120,000 in donations<sup>236</sup> with PMI significantly increasing its contributions compared to previous years. Sponsorship, often amounting to larger sums, is not systematically disclosed, though the BVTE has supported CDU party conferences in 2024 and 2025<sup>237</sup>. The revolving

door between politics and the TI further illustrates conflicts of interest: former SPD Minister-President of Schleswig-Holstein became Head of External Affairs at PMI in 2023, responsible for lobbying and regulatory affairs, while maintaining close ties with senior SPD figures including the current Chancellor<sup>238</sup>.

**Slovenia (11/15):** Based on Slovenia’s existing political financing regulations, election laws, and transparency guidelines drawing on sources such as the Commission for the Prevention of Corruption (KPK), Varuh integritete, and Slovenian electoral authorities, no specific legislation was identified that explicitly prohibits TI contributions to political parties, candidates, or election campaigns. However, the country has documented cases where high-ranking former government officials transitioned into roles within the TI, raising potential conflict-of-interest concerns<sup>239</sup>. Notable examples include a former State Secretary who became listed as a representative for Philip Morris in Ljubljana. The official Chamber of Commerce website (June 2023) shows him on its tobacco products working group roster<sup>240</sup>, indicating his role with PMI. And a former public relations officer affiliated with the government (SDS Party) who worked as a local assistant of MEP in the European Parliament, who joined JTI.

**Turkey (10/15):** There is no prohibition on contributions from the TI. Notwithstanding, a former high-level public official previously served as Head of Department at the Prime Ministry Undersecretariat of Treasury in Türkiye and later as Chief Economic Counsellor at the Turkish Embassy in London<sup>241</sup>. He held the position of Government Relations Director at JTI Türkiye and later transitioned into a senior management role within the company.

**Romania (10/15):** Romania does not explicitly prohibit contributions from the TI, or affiliated entities to political parties, candidates, or election campaigns<sup>242</sup>. In 2022, PMR appointed a former senior adviser at the Romanian Ministry of Health, as its new Head of Scientific and Medical Affairs. She currently leads PMR’s efforts to support the company’s shift from traditional cigarettes to alternative products, which are claimed to be less harmful<sup>243</sup>.

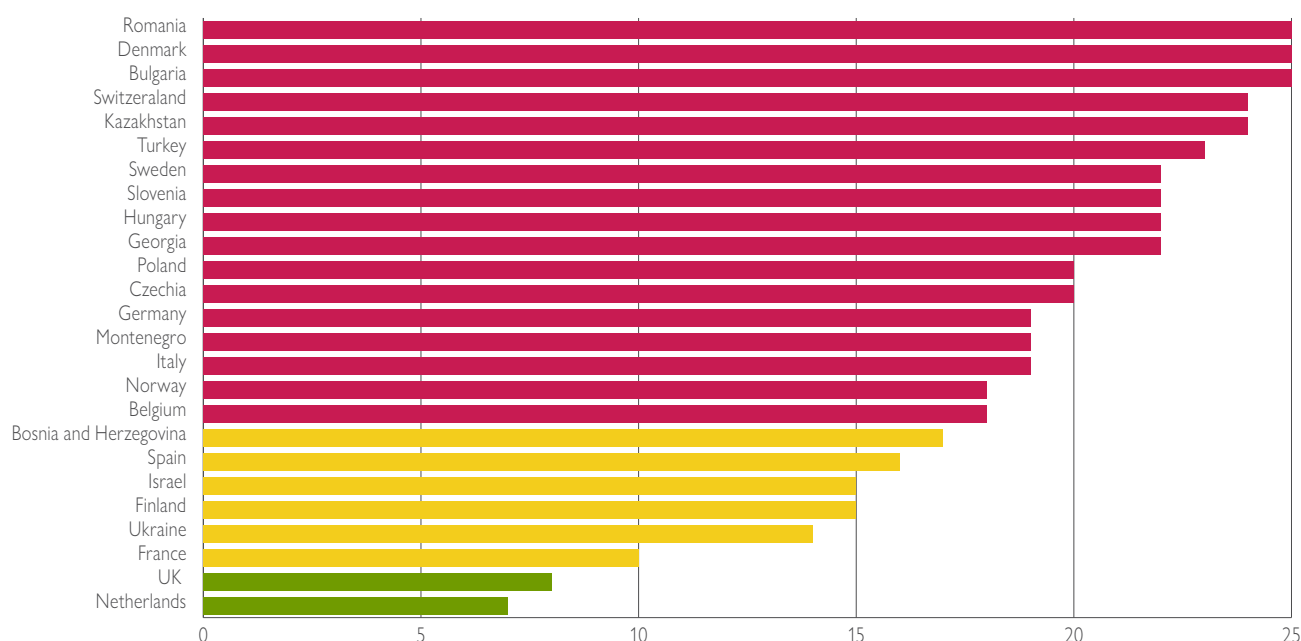
**UK (10/15):** The UK continues to face significant challenges regarding conflicts of interest with the TI. There is no legislation prohibiting the TI from making donations to political parties, candidates, or campaigns.

Although general disclosure rules require donations above GBP 7,500 (around EUR 8,700) to be declared, such payments are permitted under UK law despite WHO FCTC Article 5.3 guidelines highlighting the risks they pose.

Between April 2023 and March 2025, two MP declared receiving gifts or hospitality from JTI, including concert tickets valued at GBP 500 (EUR 580) and a business lunch<sup>244</sup>. More serious concerns relate to the involvement of senior political figures. Multiple MPs with previously identified industry links continued to

serve in the previous Prime Minister's Cabinet beyond March 2023, including the Prime Minister himself<sup>245,246</sup>. In December 2024, then Lord President of the Council, received approval from the Advisory Committee on Business Appointments to take up a paid role on BAT's Transformation Advisory Board, which she assumed in January 2025 under certain restrictions. Further, in November 2024, the Committee on Carcinogenicity of Chemicals appointed a former PMI director, despite her ongoing financial links to PMI<sup>247</sup>.

## Indicator 7: Preventive measures



Ranking for indicator 7: Preventive measures.

**To protect public health policymaking from TI interference, robust preventive measures are essential.** These should include, among others, mandatory disclosure of all interactions between government officials and TI representatives, as well as a complete prohibition on any form of contribution from the TI to public institutions.

Over half of the countries in this report have no specific provisions requiring transparency on such interactions or banning contributions. While most have a general code of conduct for public officials, they often lack clauses explicitly addressing TI's engagement. Similarly, rules governing contributions to public institutions or officials, such as funding, technical assistance, or sponsored study visits, frequently fail to prohibit these when they originate from the TI.

The TI should be required to regularly provide information on key aspects such as production, market share, and marketing expenditures, a practice that functions relatively well in most countries covered by this report. However, in the majority of countries, reporting obligations do not extend to activities such as lobbying, philanthropy, or political contributions.

None of the countries covered in this report have made public a programme or system in place to consistently raise awareness of Article 5.3 across

ministries and institutions, despite this being recommended in the guidelines. Performance on preventive measures remains weak, with an average score of 18.7 out of 25.

### Best practice examples

Since 2016, all interactions between government officials and the TI are disclosed in **the Netherlands**, in line with a national protocol for civil servants and a Code of Conduct for Integrity<sup>248</sup>. The government consistently references FCTC Article 5.3 in its communications<sup>249</sup>. However, parliament is not bound by these rules, and a 2021 motion to prohibit MP–industry contact was rejected<sup>250</sup>. Information submission by tobacco companies is regulated under the *Tabaks- en Rookwarenregeling*, but no formal programme exists to raise awareness of Article 5.3 among ministries<sup>251</sup>.

In **the UK**, the Department of Health and Social Care guidance instructs officials to avoid meetings with the TI wherever possible, requires minutes of any such meetings to be published, and prohibits attendance at industry-organised events<sup>252</sup>.

In 2023, the government confirmed that compliance with this guidance would be monitored. Tobacco companies must report detailed data on ingredients, emissions, profits, taxes, and product prices, with some



of this information made public<sup>253</sup>. A revised Ministerial Code in 2024 strengthened transparency rules, barring ministers and their families from accepting gifts or hospitality that could compromise their judgement<sup>254</sup>.

In **France**, the FCTC Article 5.3 implementation guidelines serve as a code of conduct for decision-makers, and a national procedure exists for disclosing meetings with the TI. However, the guidelines are not legally binding and remain poorly known. The National Tobacco Control Programme (2023–2027) includes developing a guide to raise awareness of transparency obligations. In addition, French officials are prohibited from soliciting or accepting gifts that could compromise impartiality, though TI reporting requirements have not expanded since the previous report.

In **Italy**, repositories exist to track official meetings between lobbyists, including those representing. A code of conduct for public officials in their dealings with the TI has not been implemented<sup>255,256</sup>. In line with EU Directive 2014/40, the industry is required to submit annual information on production, manufacture, and revenues for each product through the EU Common Entry Gate, though reporting does not extend to lobbying, philanthropy, or political contributions. In **Germany**, gifts or contributions from the TI are not prohibited.

## Worst ranked countries

**Romania (25/25):** Romania scores full marks in this category, indicating the complete absence of key preventive measures. There is no publicly accessible procedure for disclosing records of interactions with the TI and its representatives, such as agendas, attendees, minutes, or outcomes. The country lacks a dedicated code of conduct for public officials specifically addressing engagement with TI representatives. While Romanian law (Law No. 201/2016) requires disclosure of product contents and emissions from tobacco manufacturers and importers, it does not extend to broader industry activities, including lobbying, corporate social responsibility initiatives, political donations, or marketing expenditures to any government body or public registry<sup>257</sup>. Romania has no formal or implemented programme to systematically inform public officials about WHO FCTC Article 5.3 and the risks of TI interference. Moreover, existing administrative and anti-corruption statutes do not specifically prohibit gifts or contributions from the TI<sup>258,259</sup>.

**Denmark (25/25):** Denmark has not implemented the preventive measures recommended under WHO FCTC Article 5.3. There is no procedure for disclosing records of interactions with the TI and its representatives, like agendas, attendees, minutes, or outcomes, and the country has no lobbyist register<sup>260,261</sup>. No dedicated code of conduct exists for public officials regarding engagement with the TI.

The government does not require the TI to submit periodic information on production, manufacture, market share, marketing expenditures, revenues, or other activities, including lobbying, philanthropy, political contributions (CSR), or EPR initiatives. Denmark also lacks any programme or plan to consistently raise awareness among public officials about the FCTC Article 5.3 Guidelines and the risks of industry interference. Furthermore, there is no policy prohibiting the acceptance of contributions or gifts from the TI, whether monetary or in-kind, including offers of assistance, policy drafts, or invitations for study visits to government agencies, officials, or their relatives.

**Bulgaria (25/25):** The country has not established key preventive measures to protect public health policy from TI interference. The Ministry of Economy and Industry has not issued any regulation requiring the disclosure of records of interactions with the TI and its representatives. For the period 2023–2025, no amendments or additions have been made to strengthen standards of conduct, and the principles outlined in 2023 remain unchanged<sup>262,263</sup>. There is no dedicated code of conduct for public officials prescribing specific rules for their dealings with the TI. The Ministry of Economy and Industry does not require the TI to submit data on market share, marketing expenditures, lobbying, philanthropy, political contributions, CSR, EPR, or Tobacco Advertising, Promotion, and Sponsorship activities. As a result, civil society has no access to such information. While training and materials are available, it remains unclear what specific actions the state is prohibited from taking in relation to the TI and how it should enforce compliance with preventive measures under WHO FCTC Article 5.3.

**Switzerland (24/25):** The Swiss government has not implemented any preventive measures to protect public health policy from TI interference and is not developing such measures. There is no procedure for disclosing records of interactions with the tobacco or

e-cigarette industry and no code of conduct exists prescribing standards for public officials in their dealings with industry representatives<sup>264</sup>. Like in other countries already described here, there is no requirement for the TI to provide information on its activities, and the government has no programme or plan to consistently raise awareness among public officials about the WHO FCTC Article 5.3 Guidelines and the risks of industry interference. The Federal Law on the Personnel of the Confederation prohibits federal employees from accepting gifts or other advantages in the performance of their duties, but there are no explicit rules preventing officials from accepting assistance from third parties, such as draft policy documents or expert advice.

**Kazakhstan (24/25):** Kazakhstan has no specific measures to prevent TI interference. While the Law on Political Parties and the Constitutional Law on Elections (2021) set transparency requirements for political financing, including a ban on foreign funding, mandatory disclosure of all domestic contributions, and a prohibition on anonymous donations during campaigns<sup>265</sup>. These provisions do not specifically cover TI contributions. There is no code of conduct for public officials on industry engagement, no requirement for the industry to disclose its activities, and no programme to raise awareness of WHO FCTC Article 5.3 or prohibit gifts and contributions from the industry.

# Conclusions

The European report demonstrates that TI interference remains a pervasive challenge across the region, with no country fully shielded from its influence. Importantly, it also reveals that no government has fully complied with Article 5.3 of the WHO FCTC, emphasising the necessity of reinforcing governance frameworks and ensuring more effective safeguards against industry influence.

The overall average score for the 25 countries assessed in the 2025 TI Interference Index is **61**, showing a modest improvement from **66** in 2023 but still indicating substantial industry influence and weak protection measures across much of the region.

This year's TII Index expanded its coverage to include **five new countries: Belgium, Denmark, Finland, Hungary, and Slovenia**.

## Overall trend compared to 2021

Looking only at the **16 countries that were already analysed in 2021 and continue through 2025**, the results point to a clear negative trend. **Twelve of these countries worsened their scores**, while only **four improved (figure number 2)**. More concretely, Ukraine, Italy, Norway and the Netherlands.

This indicates a general deterioration in performance compared to the 2021 baseline, with especially marked score increases for **the UK, Israel, Georgia, France, Spain and Poland**.

There are still areas where countries are particularly lagging behind. For example, **9 countries received the maximum score (10) on Indicator 5 (Transparency)**, highlighting a persistent **lack of transparency in their interactions with TI**. Transparency is essential to ensure greater accountability and to enable civil society and the general public to be informed about any interference taking place at national and local levels.

Another increasingly problematic area is the continued promotion of CSR activities by the TI. In the 2025 report, several countries reached the maximum score of 5, including Belgium, Kazakhstan, Italy, Switzerland, and Germany, reflecting the absence of effective restrictions on TI CSR. While some countries such as Norway maintain stronger safeguards, many are facing

new forms of indirect engagement, especially through environmental and cultural sponsorships framed as sustainability efforts. These activities enable the TI to polish its image, secure access to decision-makers, and undermine public health policy, underscoring the urgent need for governments to ban all forms of CSR by the TI, in line with Article 5.3 of the WHO FCTC.

On the other hand, there are some indicators where countries scored better. In **Indicator 6 (Conflict of Interest)**, **around a third of the countries scored below one third of the maximum (5/15)**, indicating stronger safeguards against conflicts of interest. Among them are Sweden, Norway, Montenegro, Kazakhstan, Israel, Hungary, France, Finland, Ukraine, Belgium and Bulgaria. However, most countries now score much higher, with Switzerland, Georgia, Slovenia, Germany, Denmark, UK, Turkey and Spain and Romania showing persistent or growing risks of industry influence.

Lastly, some national reports showed notable changes in their overall scores compared to the previous edition. **Ukraine** again stands out with a **further decrease of 14 points since 2021**, reflecting stronger tobacco control measures and reduced industry activity. **In contrast, many countries have seen rising scores**, with France, the UK, Israel, Sweden and Georgia showing particularly sharp increases, signalling growing TI influence.

## Annex: Detailed scores of countries

Rank	Country	Indicators							Total score		
		1 Policy Influence	2 CSR	3 Tobacco industry benefits	4 Unnecessary interactions	5 Transparency	6 Conflict of interest	7 Prevention	2025*	2023	2021
1	Finland	4	3	2	6	5	5	15	34	-	-
2	The Netherlands	3	0	3	6	7	6	7	34	32	35
3	Norway	2	1	4	2	9	5	18	41	43	44
4	France	8	3	4	8	4	5	10	42	33	32
5	UK	5	3	4	8	6	10	8	45	48	32
6	Ukraine	8	2	7	8	6	4	14	50	44	64
7	Israel	8	1	9	8	7	5	15	53	51	43
8	Hungary	4	1	6	6	10	5	22	54	-	-
9	Belgium	7	5	8	5	8	4	18	55	-	-
10	Montenegro	7	4	6	7	8	5	19	55	46	-
11	Slovenia	12	0	8	1	2	11	22	56	-	-
12	Bosnia and Herzegovina	8	3	8	3	10	6	17	57	58	-
13	Poland	9	3	8	7	3	9	20	59	62	53
14	Spain	6	4	7	12	8	10	16	60	56	54
15	Czechia	9	4	9	5	10	8	20	66	68	61
16	Kazakhstan	11	5	4	8	10	5	24	67	60	63
17	Germany	13	5	9	7	6	11	19	70	70	68
18	Sweden	12	2	10	10	9	5	22	70	61	-
19	Bulgaria	11	3	9	11	10	3	25	72	73	-
20	Denmark	12	4	8	6	9	11	25	72	-	-
21	Italy	17	5	8	13	6	10	19	76	75	79
22	Turkey	16	3	3	10	10	10	23	77	72	72
23	Romania	12	3	9	15	10	10	25	84	80	79
24	Georgia	19	3	10	11	10	12	22	89	83	80
25	Switzerland	15	5	10	13	10	14	24	96**	95	92

\* Note: The higher the score, the worse the ranking

\*\* Score adds up to 90, but is adjusted to reflect that Switzerland has not ratified the WHO FCTC

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