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Industry
Brief



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Brazil Targeted by the Global Tobacco Lobby: PMI Pressures International Bodies to Open the Brazilian Market to Heated Tobacco

Highlights

- Brazil emerges as a target of international lobbying strategies identified in the report **Behind Closed Doors: How the Tobacco Lobby Influences the European Union and Beyond**, by Contre-Feu and STOP.
- Following Anvisa's decision to uphold the ban on electronic smoking devices (ESDs), Philip Morris International sought to internationalize Brazil's regulatory debate.
- Documents obtained through Brazil's Access to Information Law reveal that representatives of Philip Morris International discussed with officials from the Ministry of Development, Industry, Trade and Services (MDIC) the possibility of establishing a heated tobacco product manufacturing facility in Brazil.
- At least nine meetings with MDIC involved discussions on electronic smoking devices, heated tobacco products, or related regulatory matters.
- The industry relies on arguments related to "harm reduction," job creation, tax revenue, investment, and international trade to advocate for regulatory changes.
- During the preparatory period for COP11 of the Framework Convention on Tobacco Control, the industry expanded its engagement with the National Congress, the federal executive branch, and Brazilian diplomatic missions in efforts aimed at influencing the Brazilian delegation's position in favor of industry interests and at the expense of public health.

Lobbying the EU to Circumvent Brazil's Regulations on Electronic Smoking Devices

The tobacco industry lobby exerts global influence and directly impacts Brazil. As the world's third-largest tobacco producer and leading exporter, the country has become a strategic target of lobbying efforts that extend beyond its borders.

The investigation **Behind Closed Doors: How the Tobacco Lobby Influences the European Union and Beyond**¹, conducted by Contre-Feu in partnership with STOP, reveals how the industry seeks to use the European Commission as a platform to pressure tobacco control policies in different countries, including Brazil. According to the report, the sector maintains a structured presence within European Union institutions, mobilizing at least 49 organizations and investing approximately 14 million euros per year in lobbying activities.

The documents analyzed show that the industry has been framing public health measures as "trade barriers." Brazil is explicitly identified among the target countries of these initiatives. In this context, Philip Morris International (PMI) stands out as one of the leading actors seeking to weaken health regulations and create favorable conditions for the entry of products whose commercialization is banned in the country.

Since the first edition of the Tobacco Industry Interference Index² in 2019, Brazil's score has risen from 34 to 65 points in 2025, placing the country among those with high levels of industry interference in public policy. The result highlights the industry's continuous and coordinated engagement across different institutional arenas.

According to documents brought to light by the Tobacco Industry Interference Index, domestically, companies have intensified efforts to reverse the ban on electronic smoking devices (ESDs). This strategy has been accompanied by the promotion, in public debate, of narratives centered on the misleading image of “harm reduction”³ conveyed by the industry and on combating the illegal market, while the sector expands its engagement with the National Congress and executive branch agencies.

Despite the ban on these products in Brazil since 2009, Philip Morris International (PMI) continues to view the country as a strategic market for heated tobacco

products. Documents analyzed by STOP and Contre-Feu indicate that, following Anvisa’s decision to uphold the ban on electronic smoking devices (ESDs), the company sought to internationalize Brazil’s regulatory debate.

In this context, PMI engaged the Directorate-General for Trade (DG Trade), the European Commission body responsible for the European Union’s trade policy and the conduct of international negotiations. According to the records^{4,5}, the company requested that the Brazilian restrictions be addressed within the framework of trade negotiations, alleging a possible violation of World Trade Organization commitments.

Image 1. Example of a document referring to a previously undisclosed meeting between DG TRADE and PMI held in September 2023.



Investment Promises in Exchange for Weakening Public Health Policy

Documents obtained through access to information requests⁶ reveal that, during an official mission to Japan in 2025, the Executive Secretary of Brazil's Ministry of Development, Industry, Trade and Services (MDIC) met with representatives of PMI. During the meeting, the company expressed interest in establishing a heated tobacco product (HTP) manufacturing facility in Brazil, contingent upon the establishment of a specific regulatory framework. The Executive Secretary reportedly stated that he would bring the matter to the Minister's attention and highlighted Brazil's potential to become a regional hub for production and exports to the European Union⁷. He also requested additional information, including details on the Japanese regulatory model, and stressed that any progress would depend on a concrete investment plan involving the establishment of a manufacturing facility and job creation, as well as the development of a regulatory framework that would take into account economic, industrial, and public health impacts. Despite the opening of this channel of dialogue, there is no subsequent record of further developments or renewed formal contact from the company.

Documents obtained from the MDIC⁸ through Brazil's Access to Information Law identified at least nine meetings and interactions between ministry officials and representatives of the tobacco industry or affiliated entities between 2023 and 2025. Of these, at least six dealt directly with electronic smoking devices (ESDs), heated tobacco products, or related regulatory proposals. Although it is expected that the ministry maintain dialogue with different sectors of the economy, the meetings identified raise concerns regarding attempts by the tobacco industry to interfere in public policy. During these meetings, industry representatives advanced arguments in favor of regulatory relaxation, the promotion of supposedly "reduced-risk" products, job creation, tax revenue generation, and investment attraction, strategies frequently used by the sector to influence government decision-making processes.

The latest edition of the Tobacco Industry Interference

Index in Brazil⁹ exposes a troubling pattern: the tobacco industry not only operates aggressively in Brazil and abroad, but also benefits from gaps in transparency and oversight of public policies. The record of 27 meetings between the federal government and industry representatives between 2023 and 2025, without public disclosure of their content, points to limitations in transparency mechanisms governing interactions between public officials and the industry in a matter with direct implications for the formulation of tobacco control policies.

This evidence reinforces the importance of strengthening transparency mechanisms and safeguards against tobacco industry interference, in line with Article 5.3 of the Framework Convention on Tobacco Control. As a signatory to the treaty, Brazil must ensure transparency in its interactions with the industry. Recent initiatives, such as industry interaction protocols developed by Conicq and guidelines on interactions during COPs and MOPs, as well as measures adopted by the Federal Revenue Service¹⁰, represent important advances, but still require consistent implementation, continuous monitoring, and greater institutional transparency.

Endnotes

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10. BRAZIL. Receita Federal do Brasil. Handling Institutional Matters Related to the Tobacco Sector before the Federal Revenue Service. Available at: <https://www.gov.br/pt-br/servicos/tratar-assuntos-do-setor-do-tabaco>



About STOP (Stopping Tobacco Organizations and Products)

STOP is a global tobacco industry watchdog whose mission is to expose the tobacco industry tactics that undermine public health. Comprised of a network of academic and public health organizations, STOP researches and monitors the tobacco industry, shares intelligence to counter its tactics, and exposes its misdeeds to a global audience. STOP is funded by Bloomberg Philanthropies as part of the Bloomberg Initiative to Reduce Tobacco Use. For more information, visit exposetobacco.org.



About ACT Promoção da Saúde

Atuamos na promoção e na defesa de políticas de saúde pública, especialmente nas áreas de controle do tabaco, alimentação saudável, controle do álcool e promoção da atividade física. Esse trabalho é realizado por meio de ações de advocacy, que incluem incidência política, comunicação, mobilização, formação de redes e produção de conhecimento, entre outras. Para mais informações, visite actbr.org.br.