



Global Center for
Good Governance
in Tobacco Control

Eastern Mediterranean
Tobacco Industry Interference
Index 2023

Acknowledgements

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Introduction

This is the second Eastern Mediterranean Regional report on Tobacco Industry Interference Index. Nine countries (Egypt, Iran, Iraq, Jordan, Kuwait, Lebanon, Oman, Pakistan and Sudan) participated and recorded various forms of tobacco industry (TI) interference and governments' responses to these instances of meddling. While some governments did not allow the TI to interfere in policy development, others were open to input from the industry, some governments received and endorsed charity from the TI, collaborated with the industry, participated in its events and allowed new tobacco products to be sold in the country.

Some governments gave recognition to the TI through awards, portraying it as an exemplary industry. These instances of interference are similar to those found elsewhere in the world as reflected in the Global Tobacco Industry Interference Index 2023.¹

The TI regards the Eastern Mediterranean region as a lucrative market for their products and an opportunity for expansion as reflected in the acquisitions of local companies by transnational tobacco companies and their operations in sales of their products (see Table 1).

Evidence from the nine countries for the period April 2021 to March 2023 were documented and reviewed for compliance of governments in implementing Article 5.3 Guidelines.² The questionnaire used by countries in the preparation of their respective reports was developed by the Southeast Asia Tobacco Control Alliance (SEATCA)³ based on the specific recommendations from Article 5.3

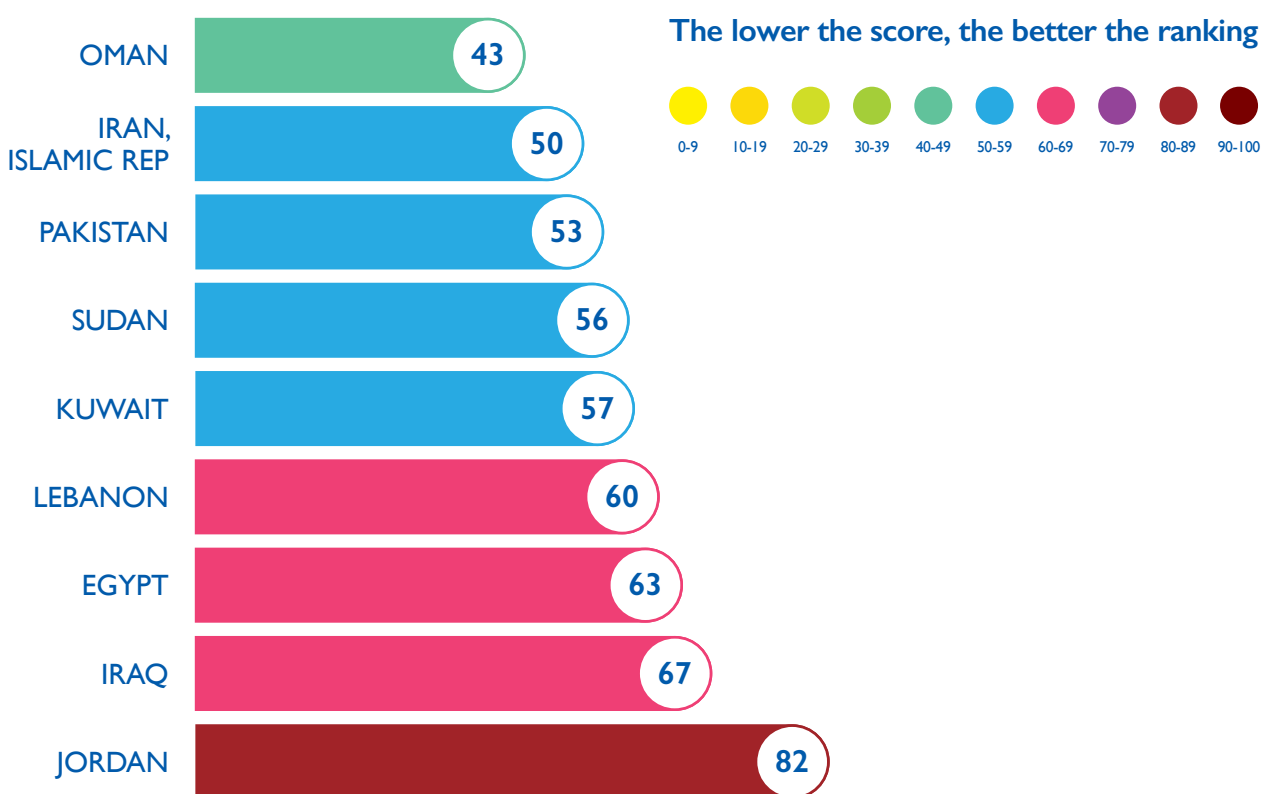
Guidelines. All information used in the Index are obtained from the public domain. The Index covers seven indicators based on the recommendations of Article 5.3 Guidelines. Countries are ranked from lowest scores to highest scores, where lower scores indicate better compliance with Article 5.3 Guidelines.

Figure 1 shows the ranking of the countries with **Oman** achieving the lowest score and less industry interference, compared to **Jordan** showing high interference with the highest score (Summary Table). The other countries show industry interference also exists and governments continue to succumb to industry lobbying in various ways.

Table I: Main tobacco companies operating in nine countries

Egypt	Eastern Company SAE, Philip Morris International (PMI), British American Tobacco (BAT)
Iran (Islamic Republic)	Iran Tobacco Company (ITC), Japan Tobacco International (JTI), BAT
Iraq	The State Company for Tobacco and Cigarettes and local distributors of international brands
Jordan	PMI, JTI, BAT
Kuwait	National Brand Owners, company licensed to distribute brands on behalf of a Global Brand Owner (GBO) of the transnational tobacco companies: PMI, BAT, JTI and Imperial Brands
Lebanon	Regie Libanaise de Tabacs et Tombacs (Regie), PMI, JTI
Oman	Local distributors: Khimji Ramdass (PMI brands), Enhance Oman, (BAT brands)
Pakistan	BAT, PMI, Imperial Brands
Sudan	JTI (Haggar Cigarette & Tobacco Factory), BAT (Blue Nile Cigarette Company)

Figure I: Tobacco industry interference overall ranking



Key Findings

- Though several countries do not allow the TI to be involved in tobacco control policy development, the industry still finds ways, such as through the national standardization body, to influence policy such as setting standards and allowing sales of new products and to delay implementation of tobacco control laws.
- **Iran** has banned tobacco related CSR activities and the governments of **Iraq, Kuwait** and **Sudan** do not endorse such activities.
- While **Oman** offered no benefits to the TI, the other countries gave the industry benefits such as tax exemptions, delays in implementation of legislation and establishment of a new factory.
- All nine countries allow international travellers to bring certain quantity of duty-free tobacco into the country which is a benefit to the industry.
- Government officials of **Sudan** do not endorse any tobacco event nor enter into any partnership with the industry, while officials in most of the countries engaged with the TI in various ways.
- None of the countries have established a procedure for interacting with the TI. Lobby groups and individuals funded by the TI in these countries are not registered nor their links publicly disclosed.
- Four countries, **Egypt, Iran, Iraq** and **Lebanon**, have state-owned tobacco enterprises where the governments will be conflicted when ensuring the protection and growth of the industry while simultaneously implementing the WHO FCTC to reduce tobacco use.
- Most of the governments have not adopted/implemented a code of conduct for public officials prescribing the procedure when interacting with the tobacco industry. There is no record in the public domain that the governments have adopted a program to consistently raise awareness on Article 5.3 for other departments.
- **Lebanon** and **Oman** show the most improvement in implementing Article 5.3 Guidelines, while **Iran, Sudan, Jordan, Pakistan** and **Iraq** have deteriorated in their scores compared to the 2021 Index.

I. The Tobacco Industry Interfered in Policy Development and Implementation

Though several countries in the region do not allow the TI to be involved in tobacco control policy development, the industry still finds ways to influence policy (Figure 2). The industry has influenced policy supportive of new products and delayed implementation of tobacco control laws.

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

In **Kuwait**, after the agent for Marlboro approached the Ministry of Commerce and Industry to liaise with the Ministry of Health to approve the specifications based on the UAE for non-traditional tobacco products,⁴ a Ministerial Decree No 8/2020 on the “Importation of Electronic Nicotine Delivery Systems and Analogous products” was issued in June 2020 and the specifications were approved in 2021.⁵

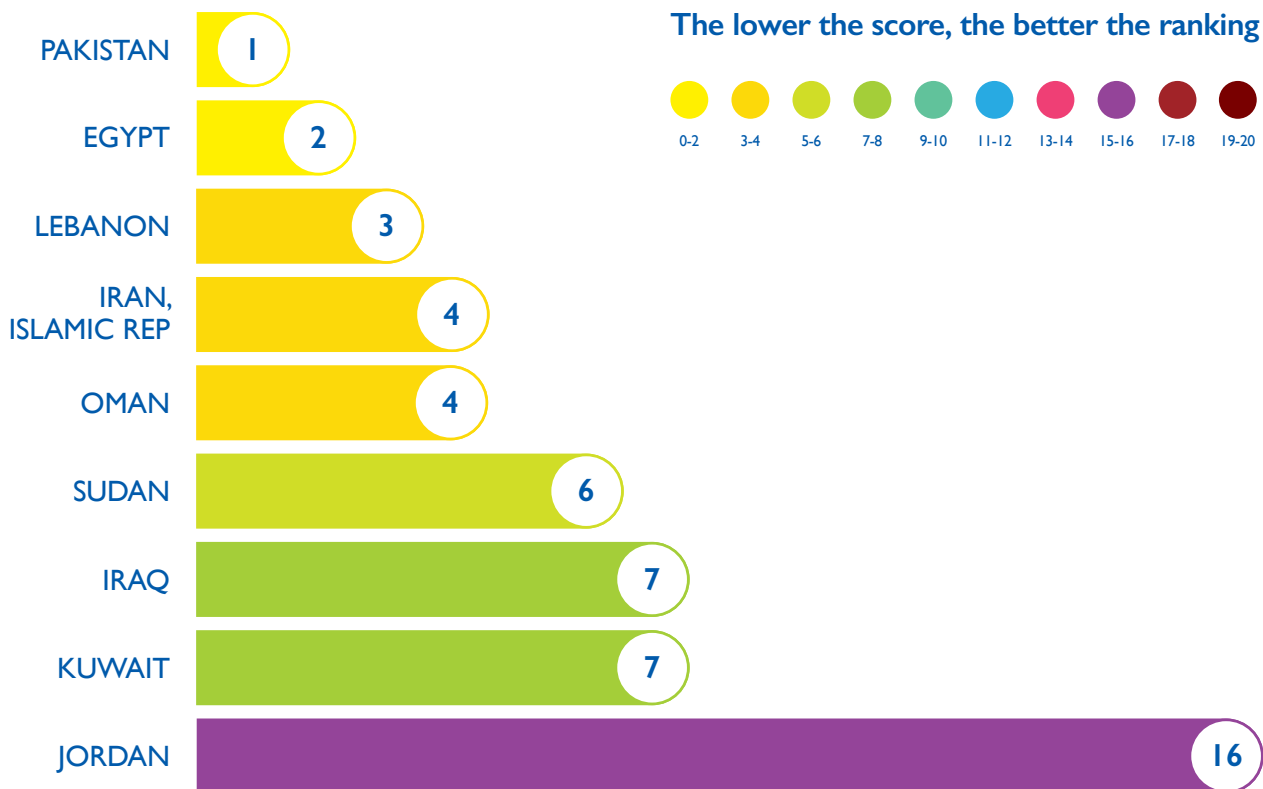
In **Iraq**, despite objections from the Ministry of Health, the TI is represented in the Central Organization for Standardization and Quality Control (COSQC)⁶ through the Cigarette Importers Association to attend meetings to set Iraqi standards related to imported or manufactured tobacco products. These representatives have voting rights and are allowed to participate in the decision-making process. The extent of influence exerted by the TI remains

unclear due to the lack of publicly available information. However, there is the possibility these companies are hindering the issuance of an amendment to the Law on Combating the Harms of Tobacco, which has been under discussion within the government for the past three years.

Similarly in **Jordan**, the TI is a member of the Jordan Metrology and Standards Organization (JSMO), represented by JTI in the committee meetings, and thus able to comment on, propose changes to, and vote on the draft of the standards and technical regulations related to tobacco products, including e-nicotine products and heated tobacco products.⁷ In **Sudan**, three representatives from tobacco companies sit on five committees of the Sudanese Organization for Standardization and Metrology. This Standardization Organization has convened meetings for more than a year to develop specifications on increasing the size of the pictorial health warning as the law requires, but till now have not completed the task.

Lebanon's 2011 tobacco control law, though outdated, remains unimplemented. Since the Regie is state-owned, there is an opportunity for the industry to interfere in its implementation.

Figure 2: Tobacco industry interferes in policy development



II. Tobacco-Related CSR Activities Increased Access to Senior Government Officials

WHO FCTC Article 5.3 recommends to denormalize tobacco related corporate social responsibility (CSR) activities, and Article 13 Guidelines recommends banning them because they are a form of sponsorship. The TI uses them to buy public goodwill and to repair its image as a harmful industry.

Iran has banned tobacco related CSR activities while the governments of **Iraq**, **Kuwait** and **Sudan** do not endorse such activities.

In **Egypt**, the Eastern Co donated to Tahya Misr Fund to support initiatives in poor villages in a number of governorates, equipped hospitals affiliated to the Ministry of Health and Population and university hospitals, and supported a number of urban development plans, health care, education, and economic empowerment programs.⁸

In **Lebanon**, CSR activities sponsored by Regie in various municipalities are usually endorsed by politicians and religious figures. The Regie contributed USD 100,000 to the Lebanese Army. The donation was handed to the Lebanese Armed Forces Commander at his office in the Ministry of Defence.⁹

Since **Jordan** and **Pakistan** have not banned CSR activities, the industry actively conducted several events, especially on environment, endorsed by federal

and municipality officials. In **Jordan**, the Minister of Agriculture endorsed a tree planting activity sponsored by JTI, in partnership with Madaba municipality.¹⁰ In **Pakistan**, the Khyber Pakhtunkhwa (KPK) Forest Department, Ministry of Climate Change and District Government Islamabad, collaborated with Pakistan Tobacco Company on various initiatives such as planting saplings and reforestation programs.^{11, 12}

In **Oman**, the distributor for PMI, Khimji Ramdas, presents himself as a family-run business with a CSR arm, Eshraqa, and engaged in a number of sponsored activities with several ministries and government institutions. High level government officials, including the Royal Family and Undersecretaries from the Ministries of Education, Labour and Social Development, participated in several of them and expressed their appreciation for Eshraqa's efforts to serve the community.^{13, 14, 15}

III. Benefits Given to the Tobacco Industry

Although Article 5.3 Guidelines states the TI should not be granted incentives to establish or run its business, the industry received various types of benefits and incentives. While **Oman** offered no benefits to the TI, the industry received benefits in the other countries such as tax exemptions, delays in implementation of legislation and establishment of a new factory.

In **Iraq**, the government provided various financial and logistical support to the national TI, including tax exemptions, customs waivers, and financial facilities. To protect the local industry and boost sales of locally produced cigarettes, the Council of Ministers approved a four-year extension of the additional 100% customs duty on imported cigarettes thereby making them more expensive.¹⁶

In **Lebanon**, the Regie subsidised tobacco farming through a price support system with a fixed quota and price. The Regie, in coordination with the Speaker of the House and the Ministry of Finance, enabled the crops for the 2022 season to be purchased in USD to maintain the farming sector and support tobacco farmers.¹⁷

Pakistan government's decision not to change the excise rate in the 2021-2022 budget had a positive outcome for the TI. Pakistan Tobacco Company had reported, "Stable excise rates helped in growing PTC's volume and owing to this, the Company's overall financial position has remained healthy".¹⁸ In addition, the Prime Minister's Advisor on Finance and Revenue had reportedly blocked a proposal from the Ministry of National Health Services, Regulations & Coordination to impose a health hazard tax on tobacco and sugar-sweetened beverages.¹⁹

In **Iraq**, the proposed new tobacco control law, which addresses the gaps in the old law, was submitted by the Ministry of Health to Parliament in 2016 and has since remained in limbo.²⁰ While there is no conclusive evidence that the TI is behind the obstruction of the new draft law, the industry appears to be the only beneficiary of this delay. In **Sudan**, the new regulation to increase the size of pictorial health warnings on tobacco packs from 30% to 75% was published in the Gazette of the Ministry of Justice in March 2021. Accordingly, the Standardization Organization convened meetings to develop the specifications, however there is a delay, and the regulations are not ready.

In **Jordan**, in 2022, the Ministry of Industry recommended lifting the longstanding ban on opening molasses/ cigarettes/ tobacco manufacturing facilities within the customs areas. Additionally, these recommendations included granting authorization for new manufacturing facilities to be established and operated outside the free trade zones and development areas.²¹ This resulted in the establishment of a new partnership between BAT and Regie (a Lebanese tobacco company) launched in January 2023 which was endorsed by high-level officials from the Ministry of Industry and Trade, the Ministry of Investment, the Income and Sales Tax Department.²²

DUTY FREE TOBACCO FOR INTERNATIONAL TRAVELLERS

All nine countries allow international travellers to bring certain quantity of duty-free tobacco into the country which is a benefit to the industry (see Table 2). **Lebanon**, **Kuwait** and **Oman** allow a significantly higher quantity of tobacco compared to other countries. The purpose of duty-free tobacco is to encourage more purchases, and this runs contrary to the objective of WHO FCTC to reduce tobacco use.

Table 2: Duty-free allowance for international travellers²³

Egypt	200 cigarettes or 25 cigars or 200g of tobacco
Iran (Islamic Republic of)	200 cigarettes or 50 cigars or 200g of tobacco
Iraq	200 cigarettes or 25 cigarillos or 10 cigars or 250g of tobacco
Jordan	200 cigarettes or 200g of tobacco
Kuwait	500 cigarettes or 2 pounds of tobacco products
Lebanon	800 cigarettes or 50 cigars or 100 cigarillos or 1kg of tobacco
Oman	400 cigarettes
Sudan	200 cigarettes or 50 cigars or 450g of tobacco



Looking back at the historical conduct of the tobacco industry in EMR countries as well as their current virulent practices especially in the Gulf Cooperation Council countries, it becomes clear that the industry has not changed much. Therefore, profiling their practices through the TI Interference Index is very important and provides a documentation and evidence that this industry is unlikely to change unless deterrence is introduced into tobacco control practices in EMR and Article 19 of the FCTC is implemented in full and to its maximum potential.

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

IV. Unnecessary Interactions Occurred Between Governments and the Industry

According to Article 5.3 Guidelines, unnecessary interactions with the TI occur when government officials attend social functions sponsored by the industry or when the government forms a partnership with them. Government officials of **Sudan** do not endorse any tobacco event nor enter into any partnership with the industry (see Figure 3), while officials in most of the countries surveyed engaged with the TI in various ways.

The **Iraqi** Minister of Industry and Minerals visited the Bagdad Tobacco Factory and expressed his support for the business. He held a meeting with the chairmen of the company and directed them to continue to make effort and implement measures to increase the capital of the company, and add modern and advanced production lines.²⁴ In **Egypt**, the Minister of Manpower witnessed the signing of a labor agreement that benefited Eastern Company's workers at the ministry's headquarters in the government district in the New Administrative Capital.²⁵ The Eastern Company was among 100 companies honoured at 7th session of "Egypt for Better Summit", endorsed by the Prime Minister.²⁶

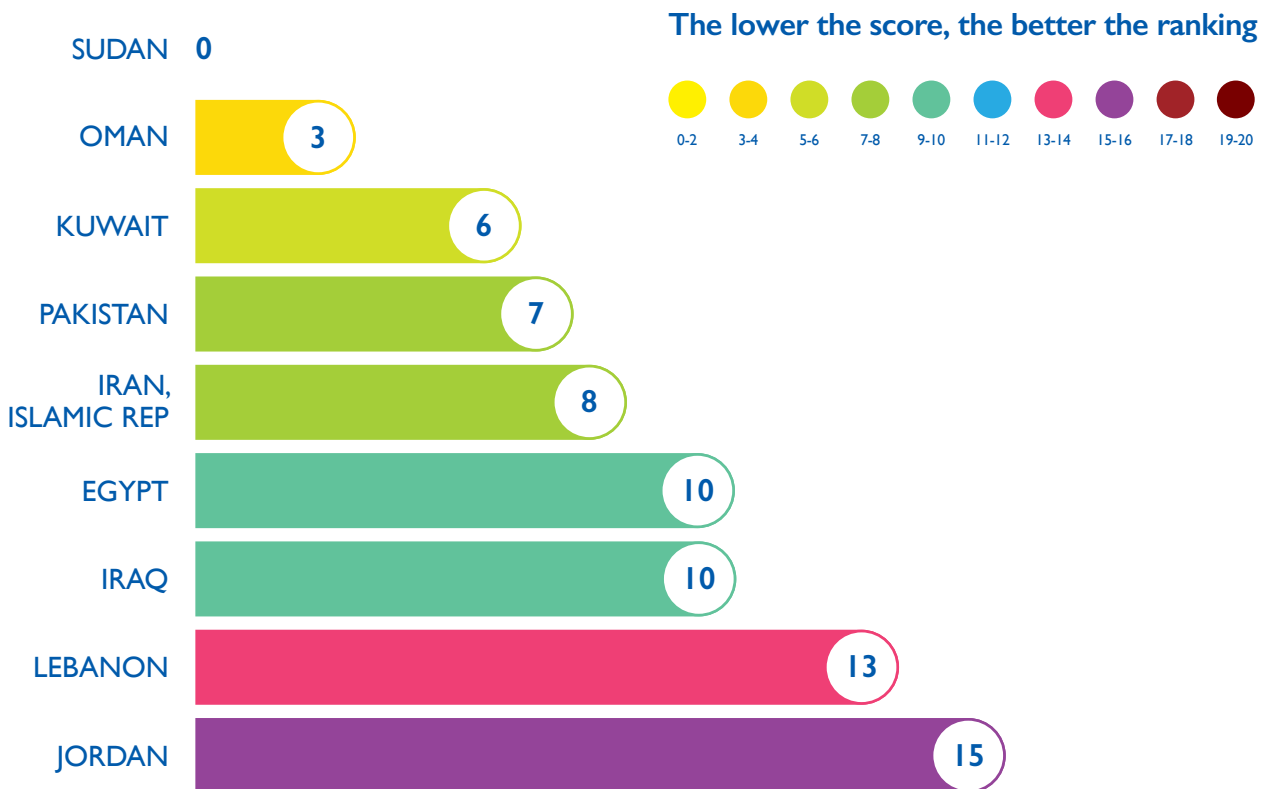
The Customs Authority of **Egypt**, in cooperation with Philip Morris Egypt, held a technical training course for a number of Egyptian customs officials in Alexandria, aimed at helping them distinguish between original products and counterfeit counterparts as part of an agreement.²⁷ In **Jordan**, PMI conducted a public campaign, endorsed

by the government, targeting children and minors by having labels and posters indicating sales of tobacco products to adults only and no sales to those under 18 years.²⁸

In **Lebanon**, executives from Regie visited the Minister of Finance, Government Commissioner and the Financial Controller, and briefed the Ministry about the conditions of the tobacco sector. The head of the parliament visited Regie, expressed his support for tobacco and described it as a successful institution that benefitted the country.²⁹ The Commander of the Army presented the Regie an honorary shield and a certificate of appreciation for supporting the Army.³⁰

In **Pakistan**, BAT invested in a shared business services setup and inaugurated its Islamabad office in September 2021 which was officiated by the federal Minister for Planning, Development and Special Initiatives.³¹

Figure 3: Governments engaged in unnecessary interaction with the tobacco industry



V. Lack of Transparency and Accountability in Interaction with Industry

Article 5.3 Guidelines establishes two principles on accountability and transparency: 1) Parties, when dealing with the tobacco industry or those working to further its interests, should be accountable and transparent; 2) Parties should require the tobacco industry and those working to further its interests to operate and act in a manner that is accountable and transparent.

None of the countries surveyed have established a procedure for interacting with the TI (see Figure 4). Lobby groups and individuals funded by the TI in these countries are also not registered nor publicly disclose their links with the industry.

In **Lebanon**, in 2021 the government issued the Public Procurement Law 244 / 2021 to ensure sound financial governance, transparency and accountability³² within public institutions. The Regie, considered this as a hurdle that obstructs its work and production of tobacco.³³

In **Iraq**, the lack of transparency is a major obstacle to tobacco control efforts because the Supreme Committee for Smoking Control (SCSC), which is under the Ministry of Health, does not have the authority to list TI entities or individuals, or to require them to disclose their activities. Tobacco companies are free to lobby government officials and to influence them without being held accountable for their actions.

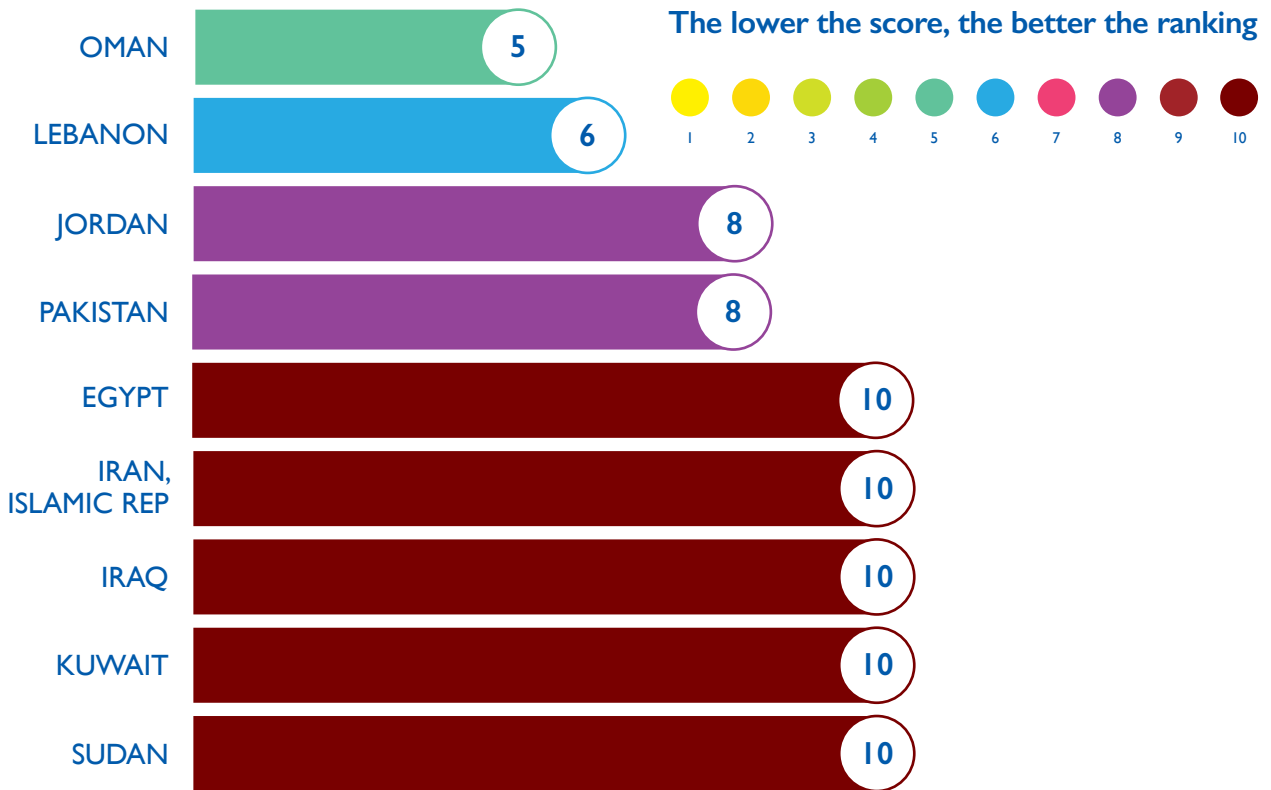
In **Iran**, it is not clear if the tobacco companies provide the mandatory reports to the National Tobacco Control Headquarters and if these reports are made available to the tobacco control committee. According to the bylaw of National Tobacco Control Headquarter, Iran Tobacco

Company is obliged to provide a comprehensive report on the production of domestic products, co-productions, and imports every six months and request for specific permits for any new contracts with international companies, or for increasing the production. The last meeting was held in 2013 and they have not provided any reports to that office since. The lack of transparency and statistics about tobacco consumption has made it possible for the TI to increase their production.

In **Jordan**, the Ministries of Trade, Industry and Finance did not disclose their meetings with the TI. The JSMO and the Jordanian Food and Drug Administration held private meetings with the TI and interactions were kept private and not disclosed.³⁴ NGOs (particularly philanthropic ones) who are influential and known to receive grants from the TI do not readily disclose their source of funds.

In **Sudan**, the Ministry of Health previously disclosed their interactions with the TI however, there has been no disclosure since 2016. The registered union for Tombak (smokeless tobacco) traders have held meetings with the government on tobacco trade and agriculture but these are not disclosed.

Figure 4: Lack of Transparency



VI. Public Officials Vulnerable in Conflicts of Interest Situation

Article 5.3 Guidelines calls on Parties to treat state-owned tobacco industry in the same way as any other TI. Four countries, **Egypt, Iran, Iraq and Lebanon**, have state-owned tobacco enterprises (see Table 3) where the governments will be conflicted when ensuring the protection and growth of the industry while simultaneously implementing the WHO FCTC to reduce tobacco use. Figure 5 shows all the countries faced conflict of interest situations. The conflict can be experienced in several ways.

Egypt, Iraq, Lebanon, Pakistan and **Sudan** do not prohibit contributions from the TI and these contributions do not need to be disclosed.

In **Iran**, the National Tobacco Control Law does not allow any contributions from the TI or any entities working to further its interest. After the privatization of the Iranian Tobacco Company, half of its shares were acquired by a governmental pension fund, managed by the Ministry of Cooperatives, Labour, and Social Welfare.³⁵ The board of directors of this company is appointed by the ministry and this can have an influence on the enforcement of the national tobacco control policies.

In **Jordan**, a new senator appointed in 2021 is known to have investments in waterpipe molasses manufacturing and tobacco trade, among other investments.³⁶ In Oman, the Director of the Khimji Ramdas Group (local distributor of tobacco) was appointed by Royal Decree as an advisor for foreign trade and international cooperation at the Ministry of Commerce, Industry and Investment Promotion.³⁷



The WHO FCTC Article 5.3 is a powerful tool that can stop the tobacco industry in its tracks from sabotaging tobacco control policies. It is totally irresponsible that certain governments refrain from utilizing these guidelines to protect their citizens. The longer we delay, the more we allow the industry to win. Governments must act to fast-track its implementation to push the industry back and firewall their efforts to protect public health.

HRH Princess Dina Mired, Jordan

Figure 5: Conflict of interest persists

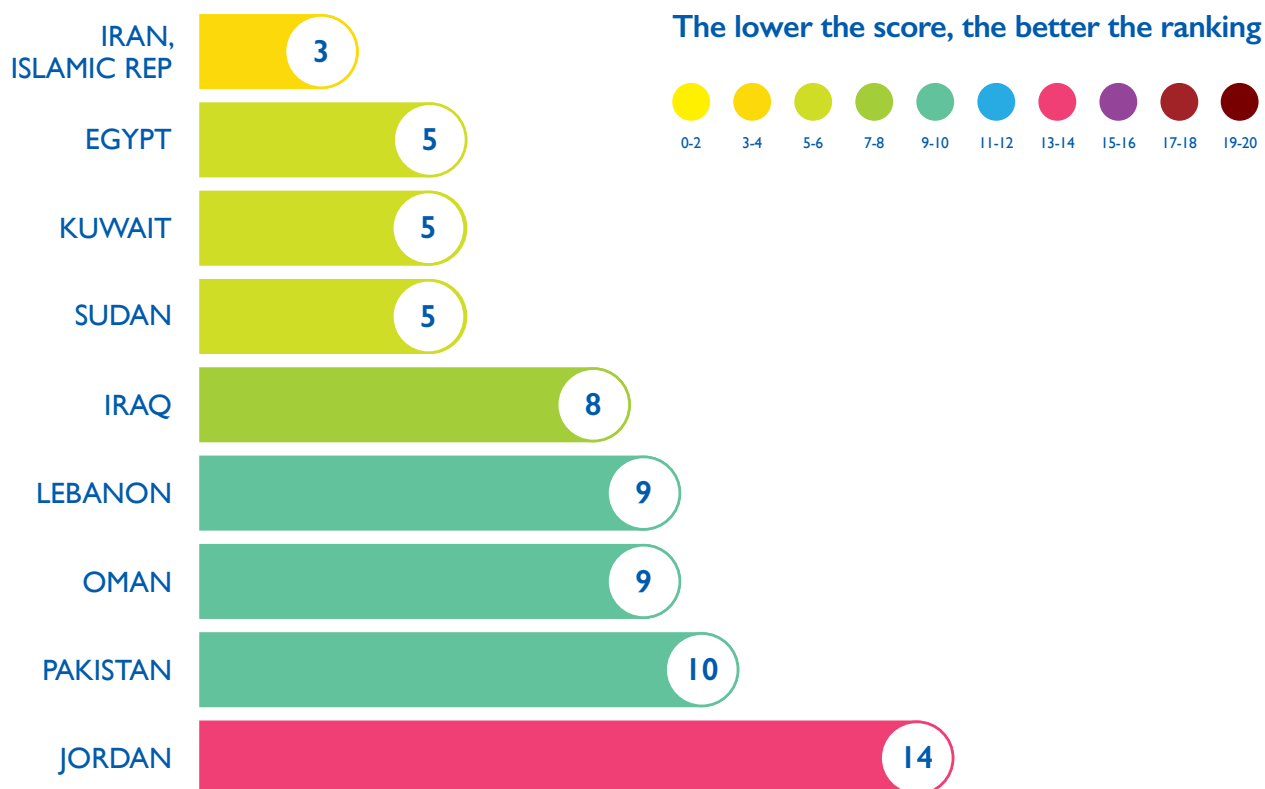


Table 3: State-owned tobacco enterprises

Egypt	State-owned Global Investment Holdings (government owned) holds 20.95% ³⁸ of Eastern Co S.A.E in 2023. In 2021, Eastern Co controlled 70% of the market. ³⁹
Iran	After the privatization of Iranian Tobacco Company (ITC), half of its shares were acquired by the pension fund of the Ministry of Cooperatives, Labour and Social Welfare. ⁴⁰ The board of directors of ITC is appointed by the ministry. They have 5% of the tobacco market. ⁴¹
Iraq	Baghdad Tobacco and Cigarette Factory is the only state-owned factory in Iraq that produces local tobacco and cigarettes. ⁴² This factory is operated by the private sector and shares its revenue with the government.
Lebanon	The Libanaise Des Tabacs Et Tombacs (Regie) is a state-owned enterprise. It is the sole entity in Lebanon legally allowed to manufacture, distribute and sell tobacco and tobac (tobacco for waterpipe) and comes under the jurisdiction of the Ministry of Finance. ⁴³ Regie controls 63% of the market. ⁴⁴

VII. How can Governments Protect Themselves From Industry Interference

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

Most of the governments have not adopted/ implemented a code of conduct for public officials prescribing the standards when interacting with the TI. There is no information available publicly that the governments have adopted a program to consistently raise awareness on Article 5.3 for other departments (see Figure 6).

Iran has a policy to not accept any form of contributions from the TI. It has a draft bylaw on Article 5.3 which has been under review since 2020.⁴⁵

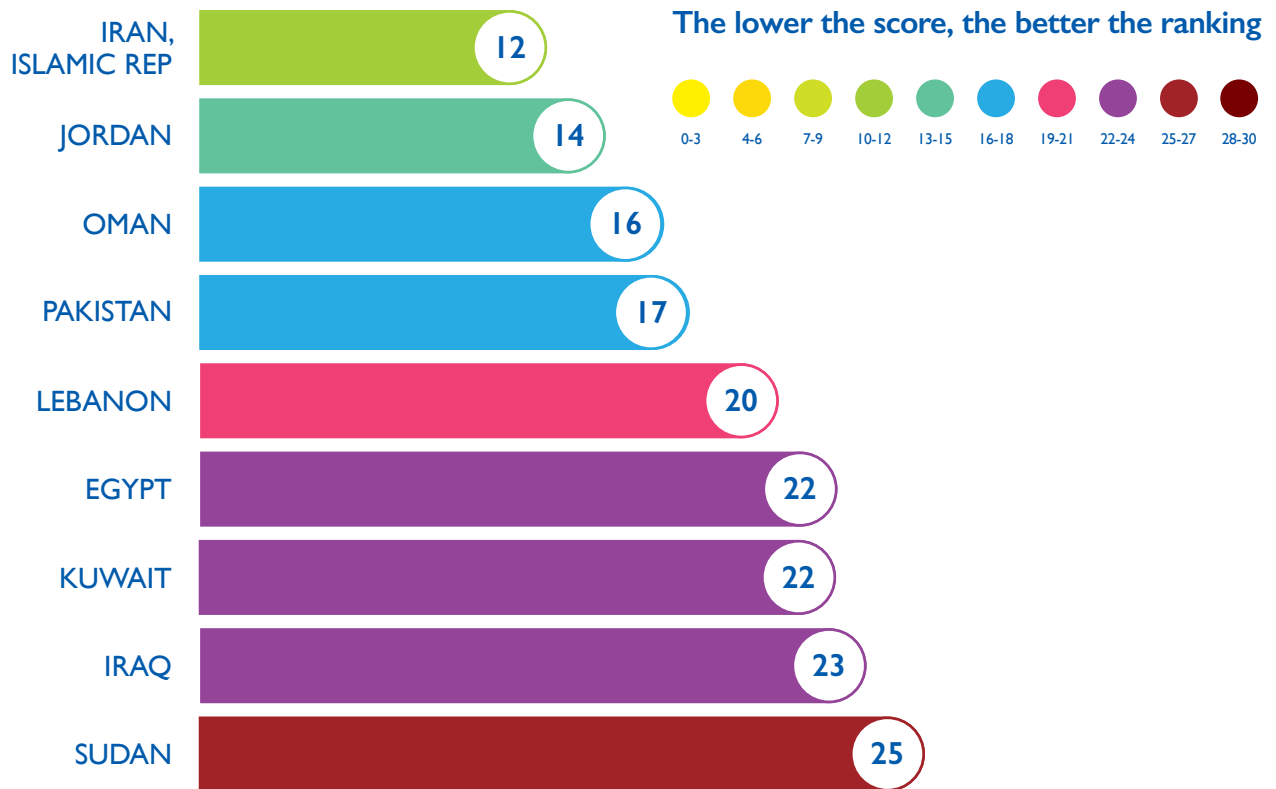
Oman has a policy to prohibit acceptance of contributions from the TI, however this is limited to members of the multisectoral national tobacco control committee and does

not apply to the whole government, leaving the door open for the TI to approach public officials in other departments.

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

Pakistan has developed a National Action Plan on TI interference however this has not been implemented yet.⁴⁶

Figure 6: Governments' action to protect themselves with preventive measures



Most-Improved and Most-Deteriorated Countries

Of the eight countries, **Lebanon** and **Oman** show the most improvement while **Iran, Sudan, Jordan, Pakistan** and **Iraq** have deteriorated in their scores compared to 2021 Index (see Figure 7).

Lebanon's improvement is mainly due to the government passing the Budget Law in 2022, which includes an article (Article 32) that prohibits public institutions from giving donations from their revenues.

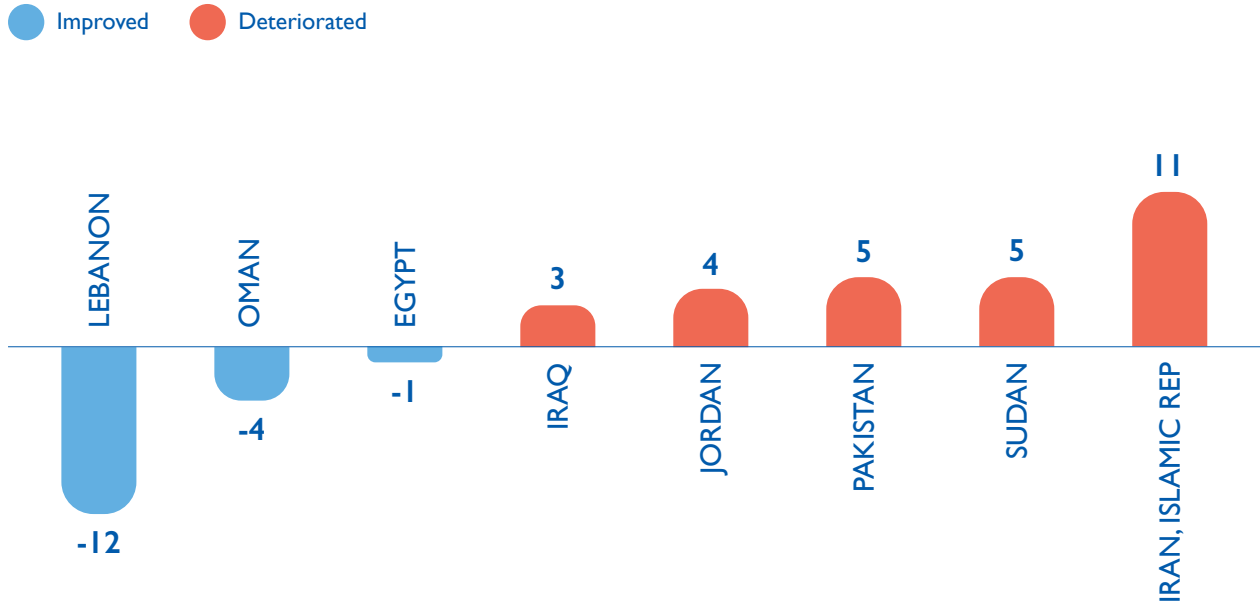
Oman's main improvement is in reducing unnecessary interactions with the TI and fast implementation of standardized packaging of tobacco products giving the distributors six months to comply, with an administrative fine of up to 1,000 Omani rials (USD 2,600) for non-compliance.

While **Iran's** National Tobacco Control Law and the Executive By-law of the National Tobacco Control Act provide strong measures to limit the influence of the industry on policy development, the lack of adequate transparency and shortcoming in enforcing the law and regulations diminishes the effectiveness of the law against TI interference. Also, as the board members of the Iran Tobacco Company are appointed by the Ministry of Industry, Mine and Trade, the TI has enough lobbying leeway to modify, moderate, mitigate, or even cancel tobacco control regulations.

Sudan's deterioration is due to the delay in the implementation of the new enlarged pictorial warnings on cigarette packs due to interference from the TI's participation in the standards body developing the warnings.

In **Pakistan**, the TI in 2022 lobbied to prevent heated tobacco products from being banned and instead pushed for their regulation. The Prime Minister also agreed to participate in a PMI-sponsored Conference in May 2021.⁴⁷

Figure 7: Comparison of 8 countries between 2021 and 2023



LIMITATIONS

This report is limited to only publicly available information, and therefore does not capture all evidence of interferences that may have occurred. Additionally, information that is publicly available may not be the most updated. Lack of government and industry transparency makes it hard to collect information on industry interference. There is no full access to the responses of governments in rejecting industry interference as the information is not in the public domain. The rankings of countries should be viewed in the context of these limitations.

Conclusion

This Index has shown that countries in the Eastern Mediterranean region are facing serious challenges from TI interference, and they are not in full compliance with the implementation of Article 5.3 Guidelines. The Index tracks progress or deterioration of countries in their efforts in implementing Article 5.3 Guidelines.

Lebanon and **Oman** show an improvement in their efforts to address TI interference reflected in their scores compared to the previous Index, while **Iran, Sudan, Pakistan, Jordan** and **Iraq** have deteriorated in the implementation of Article 5.3.

Countries have paid little attention to the importance of Article 5.3 and in utilising the guidelines as a tool to protect their tobacco control policies. The industry has gained access to the national standardization committee across the region to influence and delay tobacco control efforts. This tactic of the industry needs to be addressed.

Making information publicly available is an important component of Article 5.3 Guidelines. The Index confirms there is a lack of implementation of the Article 5.3 Guidelines that requires governments to make public their interactions with the tobacco industry, require information from the industry and set up registries of those representing the interest of the tobacco industry.



Unfortunately in EMR, the tobacco industry continues on a path to foil all attempts at implementing stronger tobacco control measures. It resorts to its usual false claims and devious tactics to perpetuate the marketing and sale of its addictive tobacco and nicotine products with little consideration of health risks to users. I urge all decision and policy makers in EMR to have strong and robust firewall against the tobacco industry interference by adopting and implementing firmly FCTC Article 5.3 guidelines.

Dr Ghazi Zaatari Chair, WHO Tobacco Regulation Study Group (TobReg)

Recommendations

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

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

Summary Table: Eastern Mediterranean Tobacco Industry Interference Index 2023

Countries/ Indicators	EG	IR	IQ	JO	KW	LB	OM	PK	SD
Participation in Policy Development									
The government accepts, supports or endorses offer for assistance by or in collaboration with the tobacco industry in implementing tobacco control policies (Rec 3.1)	0	1	1	5	5	1	0	1	0
The government accepts, supports or endorses legislation drafted by/ collaboration with the tobacco industry (Rec 3.4)	0	1	0	5	0	0	2	0	0
The government allows the tobacco industry to sit in multi-sectoral committee/ advisory group that sets public health policy (Rec 4.8)	1	1	5	5	1	1	1	0	5
The government allows representatives from the tobacco industry (including State-owned) in the delegation to the COP or subsidiary bodies or accepts their sponsorship for delegates. (Rec 4.9 & 8.3)	1	1	1	1	1	1	1	0	1
Subtotal	2	4	7	16	7	3	4	1	6
Tobacco Related CSR Activities									
The government receives contributions from the tobacco industry (including so-called CSR contributions) (Rec 6.4) The government agencies/officials endorses, forms partnerships with/ participates in tobacco industry CSR activities (Rec 6.2)	4	3	1	5	1	5	4	3	1
Subtotal	4	3	1	5	1	5	4	3	1
Benefits Given to the Tobacco Industry									
The government accommodates requests from the industry for longer implementation time or postponement of tobacco control law (Rec 7.1)	5	5	4	5	4	1	1	2	5
The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	5	5	4	5	2	3	1	5	4
Subtotal	10	10	8	10	6	4	2	7	9
Forms of Unnecessary Interaction									
Top-level government officials meet with/ foster relations with the tobacco companies such as attending social functions and events sponsored or organized by the tobacco companies. (Rec 2.1)	5	4	5	5	4	5	3	5	0
The government accepts assistance/ offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	0	1	0	5	1	5	0	0	0
The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	5	3	5	5	1	3	0	2	0
Subtotal	10	8	10	15	6	13	3	7	0

Countries/ Indicators	EG	IR	IQ	JO	KW	LB	OM	PK	SD
Transparency									
The government does not publicly disclose meetings/ interactions with the tobacco industry where such interactions are strictly necessary for regulation. (Rec 2.2)	5	5	5	5	5	5	0	3	5
The government requires rules for the disclosure or registration of tobacco industry entities, affiliate organizations, and individuals acting on their behalf including lobbyists.	5	5	5	3	5	1	5	5	5
Subtotal	10	10	10	8	10	6	5	8	10
Conflict of Interest									
The government does not have a policy (whether or not written) to prohibit contributions from the tobacco industry or any entity working to further its interests to political parties, candidates, or campaigns or to require full disclosure of such contributions (Rec 4.11)	5	1	5	5	5	5	0	5	5
Retired senior officials work for the tobacco industry (Rec 4.4)	0	1	2	4	0	0	5	4	0
Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	0	1	1	5	0	4	4	1	0
Subtotal	5	3	8	14	5	9	9	10	5
Preventive Measures									
The government has a procedure for disclosing records of the interaction with tobacco industry and its representatives. (Rec 5.1)	5	1	5	4	5	5	5	5	5
The government has formulated, adopted or implemented a code of conduct for public officials, prescribing the standards they should comply when dealings with the tobacco industry (Rec 4.2)	5	3	5	2	2	5	2	3	5
The government requires the tobacco industry to periodically submit information on tobacco production, manufacture, market share, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, and political contributions. (Rec 5.2)	2	2	3	2	5	3	5	2	5
The government has a program / system/ plan to consistently raise awareness within its departments on policies relating to FCTC Article 5.3 Guidelines. (Rec 1.1, 1.2)	5	5	5	4	5	5	2	2	5
The government has a policy prohibiting the acceptance of all forms of contributions from the tobacco industry (monetary or otherwise) including offers of assistance, policy drafts, or study visit invitations to the government, officials and their relatives. (Rec 3.4)	5	1	5	2	5	2	2	5	5
Subtotal	22	12	23	14	22	20	16	17	25
TOTAL	63	50	67	82	57	60	43	53	56

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