



SOUTH EAST ASIA TOBACCO INDUSTRY INTERFERENCE INDEX



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- » India: Health Related Information Dissemination Amongst Youth (HRIDAY)
- » Indonesia: Indonesian Public Health Association (IPHA)
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- » Myanmar: People's Health Foundation (PHF)
- » Nepal: Health Rights and Tobacco Control District Network (RECPHEC)
- » Sri Lanka: Alcohol and Drug Information Centre (ADIC)
- » Thailand: Action on Smoking or Health (ASH) Thailand
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This Index borrows from its precursor, the Asian Tobacco Industry Interference Index. We hope this Index generates discussion and facilitates action to counter tobacco industry interference, which undermines and delays tobacco control efforts. We encourage governments to work in collaboration with civil society partners and other stakeholder groups to strengthen implementation of Article 5.3 of the WHO FCTC.

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INTRODUCTION

World Health Organization Framework Convention on Tobacco Control (WHO FCTC) Article 5.3 empowers governments to protect their public health policies from tobacco industry interference.¹ In 2008, guidelines to Article 5.3,² were adopted by Parties to the FCTC and these provide specific measures that governments can put in place to reduce and prevent tobacco industry (TI) interference. It has been about ten years since the adoption of Article 5.3 guidelines but the tobacco industry remains a big challenge to governments. The industry has been identified as the greatest barrier to the implementation of the FCTC by many Parties.³

This TI Interference Index is a civil society review of how governments have been implementing the recommendations in Article 5.3 guidelines. The Index covers nine (9) countries from the South East Asian (SEA) region, namely, Bangladesh, India, Indonesia, Maldives, Myanmar, Nepal, Sri Lanka, Thailand and Timor-Leste.⁴

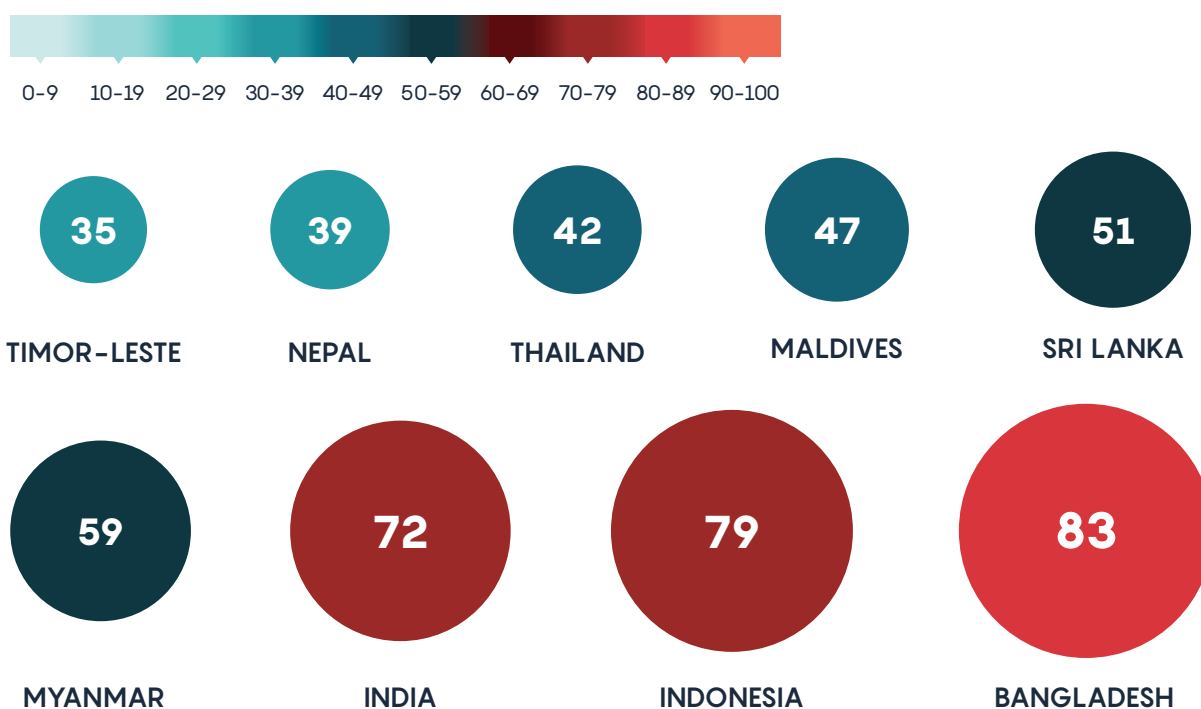
The questionnaire and scoring method developed by the Southeast Asia Tobacco Control Alliance (SEATCA)⁵ used in the ASEAN⁶ TI Interference Indices, were utilised in this survey and cover the period 2017-

2018. This Index is developed from publicly available evidence to support choice of scores accorded. The nine countries have been ranked accordingly. Limitations are acknowledged in that the evidence is based on publicly available information only and hence, are incomplete.

Figure 1 shows ranking of countries, from the lowest to the highest level of TI interference. The lower the score means a lower level of interference, and augurs well for the country. Table 1 provides the total scores for the nine countries in South East Asia.

FIGURE 1: TOBACCO INDUSTRY INTERFERENCE

The lower the score, the better the ranking



SUMMARY FINDINGS

1. LOW LEVEL OF INTERFERENCE — STRONG TOBACCO CONTROL

Thailand – protecting the government from industry interference

Although Thailand owns a tobacco monopoly, Tobacco Authority of Thailand, the government does not accept recommendations, collaborate in policy development, or endorse the TI's corporate social responsibilities (CSR) activities, nor entertain requests for longer implementation period for tobacco control measures. The Ministry of Health has rules for interacting with the TI to protect itself from interference. There is no unnecessary interaction between policymakers and the TI. The new Tobacco Products Control Act 2017 requires manufacturers and tobacco importers to report on volume of production, importation, market share and marketing expenses.

Nepal - persevering through challenges from the tobacco industry

In 2015, Nepal became the first country in the world to adopt 90% PHW on cigarette packs.

Two years earlier (2013) Nepal's legislation on 75% pack warnings was challenged by the tobacco industry – a legal battle where the government lost in the Supreme Court. Despite significant pressure from both cigarette and *bidi* manufacturers, Nepal has managed to limit its interactions with the industry, not accept its recommendations, nor collaborate with it in policy development. There is no record of Nepal's senior officials joining the tobacco industry upon their retirement.

Timor-Leste - demonstrating political will in a poor setting

Timor-Leste, one of the poorest countries in the world, has a high smoking prevalence with two out of three men smoking. This has spurred the government to adopt the world's largest pictorial health warnings (85% front, 100% back) on cigarette packs. While other countries, such as Sri Lanka, India and Thailand faced legal challenges from the tobacco industry for passing prominent PHW legislation, Timor-Leste went ahead with their large pack warnings generally unopposed. Its strong political will to protect public

health, and readiness to counter any challenges from the industry earned them the WHO World No Tobacco Award in 2016.⁷

2. LACK OF RESPONSE TO INTERFERENCE — WEAK PUBLIC HEALTH MEASURES

Bangladesh: unnecessary interactions opens the lobbying door

Handing out awards to the tobacco industry, such as the highest tax payer,⁸ or participating in social events, opens the door for lobbying against tobacco control policies. High level officials from the Ministry of Commerce, Ministry of Finance, the National Bureau of Revenue and Parliament have been particularly vulnerable to participating in such events. These ministries are influential in determining the outcome of tobacco control policies, as such tobacco taxes in Bangladesh have remained low.

Indonesia: only Asian non-Party to the WHO FCTC

Indonesian officials are open to recommendations from the tobacco industry and have among the weakest tobacco control measures in South East Asia.

3. TI NOT PART OF INTERNATIONAL TOBACCO CONTROL NEGOTIATIONS

It is a good achievement for the region that none of the countries had TI representative on their delegation to FCTC related meetings, such as the FCTC Conference of the Parties (COP) and negotiations related to the Protocol to Eliminate Illicit Trade on Tobacco Products.

4. WHO IS THE TOBACCO INDUSTRY?

The WHO FCTC defines the "tobacco industry" to include tobacco manufacturers, wholesale distributors and importers of tobacco products. Maldives and Timor-Leste demonstrate the importance of identifying who the tobacco industry is since the industry is represented through tobacco distributors and importers. No country in the region has a register of TI affiliates and organisations or their lawyers and consultants acting on the industry's behalf.

TABLE 1: SUMMARY: TI INTERFERENCE INDEX ON SOUTH EAST ASIAN COUNTRIES

INDICATORS	BD	IN	ID	MV	MM	NP	LK	TH	TL
Level of Participation in Policy Development									
1. 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)	4	3	5	0	1	0	1	1	0
2. The government accepts, supports or endorses legislation drafted by/ collaboration with the tobacco industry (Rec 3.4)	3	0	5	0	2	0	0	1	0
3. The government allows the tobacco industry to sit in multi-sectoral committee/ advisory group that sets public health policy (Rec 4.8) 1 Never 5 Yes	5	3	5	5	1	1	0	1	1
4. 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)	0	0	0	0	0	0	0	0	0
Subtotal	12	6	15	5	4	1	1	3	1
So-called CSR activities									
5. 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)	5	4	5	0	4	2	2	4	0
Subtotal	5	4	5	0	4	2	2	4	0
Benefits to the tobacco industry									
6. The government accommodates requests from the industry for longer implementation time or postponement of tobacco control law (Rec 7.1)	5	0	5	3	4	2	2	0	0
7. The government gives privileges, incentives, exemptions or benefits to the tobacco industry (Rec 7.3)	5	5	5	5	3	3	2	2	0
Subtotal	10	5	10	8	7	5	4	2	0
Forms of unnecessary interaction									
8. 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	3	5	2	0	2	4	0	0
9. The government accepts assistance/ offers of assistance from the tobacco industry on enforcement (Rec 3.1 & 4.3)	4	5	5	2	0	0	4	2	0
10. The government accepts, supports, endorses, or enters into partnerships or agreements with the tobacco industry (Rec 3.1)	5	4	2	0	1	0	0	0	0
Subtotal	14	12	12	4	1	2	8	2	0

INDICATORS	BD	IN	ID	MV	MM	NP	LK	TH	TL
Transparency									
11. The government does not publicly disclose meetings/ interactions with the tobacco industry where such interactions are strictly necessary for regulation. (Rec 2.2)	3	5	5	3	4	5	5	3	0
12. 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	5	5	3	3	4	4
Subtotal	8	10	10	8	9	8	8	7	4
Conflict of interest									
13. 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	5	5	5	5	5	5	5	5
14. Retired senior officials work for the tobacco industry (Rec 4.4)	4	4	5	3	3	0	0	5	0
15. Current government officials and their relatives hold positions in the tobacco business including consultancy positions (Rec 4.5, 4.8 & 4.10)	4	5	1	1	2	1	4	4	0
Subtotal	13	14	11	9	10	6	9	14	5
Preventive measures									
1: Yes, 2: Yes but partially only, 3: Policy/program being developed, 4: Committed to develop such policy/program, 5: None									
16. The government has a procedure for disclosing records of the interaction with tobacco industry and its representatives. (Rec 5.1)	5	4	5	1	5	5	5	2	5
17. 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	4	2	3	5	4	4	2	5
18. 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	5	2	3	5	3	3	2	5
19. 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)	4	3	5	2	5	2	4	2	5
20. 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	5	2	4	4	1	3	2	5
Subtotal	21	21	16	13	24	15	19	10	25
TOTAL	83	72	79	47	59	39	51	42	35

Several countries in South East Asia, namely, Thailand, Nepal, and Timor-Leste are internationally renowned for their significant achievements in tobacco control. Thailand is noted for being the first in Asia to ban cigarette pack display at points of sale (POS), apply large (85%) pictorial health warnings (PHW), and recently passed legislation to implement plain packaging. Timor-Leste and Nepal currently have the largest PHW on packs (90%) in the world. These three countries have fared reasonably well in implementing Article 5.3. as shown in Figure 1.

On the other hand, countries with weak tobacco control measures such as Bangladesh, which has low tobacco tax and smaller health warnings, and Indonesia which has not ratified the FCTC, show high level of industry interference and poor implementation of Article 5.3. This Index will provide some details on how governments responded to TI interference and the effort they made to protect their policies, the gaps where action is needed, and recommendations on the way forward.



Low and middle income countries struggle to combat a tobacco industry seeking to pursue new markets, often through shameless interference with public health policy making.”

– Dr. Vera Luiza da Costa e Silva, Head of WHO FCTC Secretariat

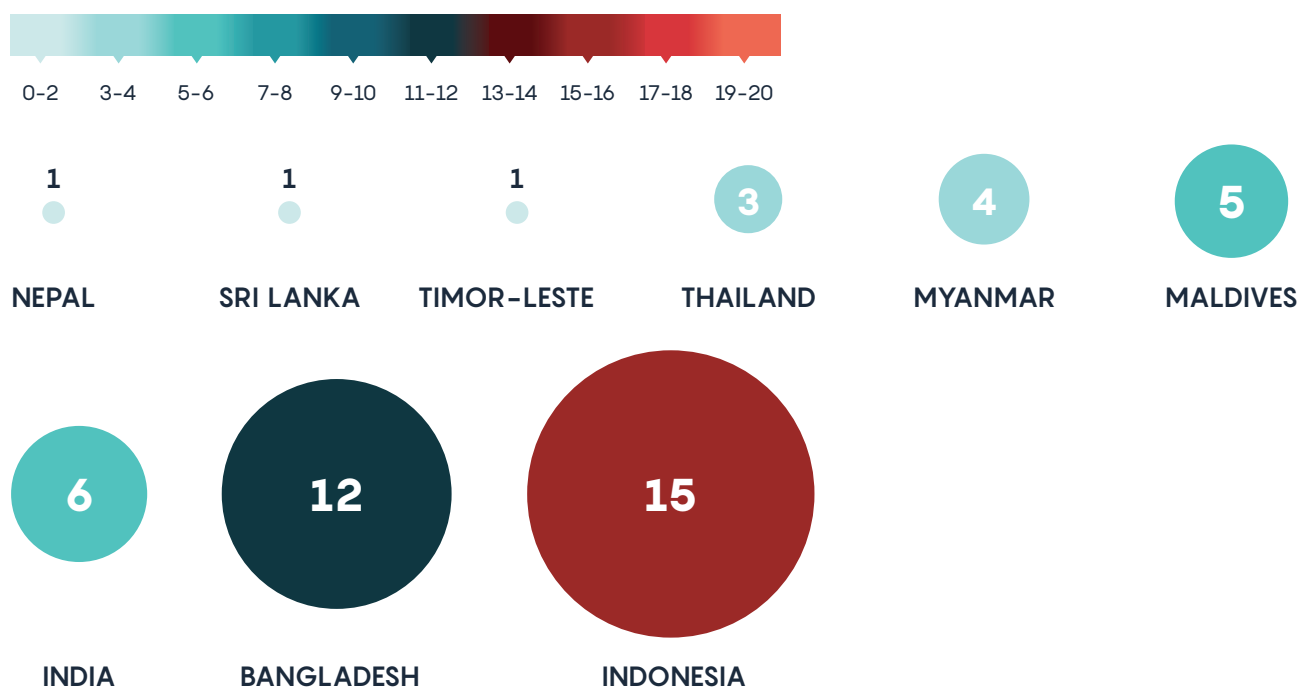
TI INTERFERENCE INDEX

I. TOBACCO INDUSTRY PARTICIPATION IN POLICY DEVELOPMENT

Overall, South East Asian governments (Nepal, Sri Lanka, Thailand and Timor-Leste) do not accept or endorse any offer for assistance or collaboration with the tobacco industry in implementing tobacco control policies. These government also do not allow the tobacco industry to sit in multi-sectoral committee/ advisory group that sets public health policy (Figure 2).

FIGURE 2: PARTICIPATION IN POLICY DEVELOPMENT

The lower the score, the better the ranking



In Bangladesh, while the Ministry of Health (MOH) and the National Board of Revenue (NBR) proceed to implement tobacco control measures, the tobacco industry conducts interference through a pro-tobacco think tank organization, Policy Research Institute (PRI) and the Ministry of Agriculture. The Finance Ministry was influenced by recommendations from the tobacco industry and reduced the proposed tax for *bidi* from 35% to 30% in the 2017-2018 budget.⁹ The Ministry of Agriculture's Pricing Advisory Committee

also consults with the tobacco companies on tobacco leaf pricing policies.

In India, the Ministry of Finance revised the tax structure in 2017 to impose taxes on previously unlevied *bidi*, *bidi* wraps (*tendu* leaves) and other tobacco products. However, *bidis* were finally taxed at 28% and were exempted from additional excise taxes after hearing pleas from the industry in the Goods and Service Tax (GST) Council Meetings.¹⁰

None of the governments in South East Asia allow representatives from the tobacco industry (including State-owned) in the delegation to the Conference of the Parties (COP) or its subsidiary bodies or accept their sponsorship for delegates to attend any FCTC related meetings.

II. TOBACCO RELATED CSR ACTIVITIES

With the exception of Maldives and Timor-Leste, tobacco related corporate social responsibility (CSR) activities remain a problem throughout SEA. In Bangladesh, British American Tobacco Bangladesh (BATB) has made payments to the Bangladesh Labour Welfare Foundation Fund (BLWFF).¹² The money was deposited through the Labour Secretary. This is based on the Labour Act 2006 (amendment 2013), where corporations have to deposit 1% of their net profit to the BLWF. Similarly in India, the Company's (Amendment) Act 2017 makes it mandatory for corporate companies to invest 2% of their benefits in CSR activities.¹³ Consequently, big tobacco companies conduct their CSR in primary education, sanitation schemes, health promotion programmes and they also support government schemes by funding partners to work in alignment with government programmes.^{14,15}

Tobacco companies pick vulnerable communities to conduct their CSR as such activities have potential to get more attention from high-level government officials. In Myanmar, the Department of Rural Development endorsed BAT's CSR activities among poor communities by cooperating in providing the list of villages, while Japan Tobacco International (JTI)'s CSR was to provide drinking water for refugees in Kayin State.¹⁶

As long as there is no legislative ban on CSR activities by the tobacco industry, it will utilise occasions like natural disasters to sponsor such activities making it difficult for governments to reject them. In Sri Lanka, government agencies and officials have participated in such tobacco industry sponsored CSR activities. Ceylon Tobacco Company, for example, sponsored relief aid activities for flood victims of monsoon rain in Matara area, which saw endorsement and participation of the Police and Special Task Force Officers.¹⁷ In Nepal, although there is no formal government endorsement of CSR activities with the tobacco industry, however, during natural disasters (such as an earthquake in 2015) some tobacco companies are involved directly in relief operations. More recently, SNPL (Surya Nepal Pte Ltd) has aligned its CSR activities *"under the government of Nepal,*

*identified promotion of small and medium-sized enterprises as the mainstay of the country's socio-economic development."*¹⁸

As seen in other countries, in Thailand, the Tobacco Authority of Thailand (formerly Thai Tobacco Monopoly or TTM) contributed funds towards flood's victims in Southern Thailand by handing over a check to the Prime Minister, televised by National Broadcast Thailand and Thai PBS TV stations in the Parliament House in 2017.¹⁹ More recently in January 2019, TAOT handed a check to the Prime Minister to assist victims of hurricane *Pabuk*.²⁰ The TAOT's hospital also offered mobile medical units to provide services during the 78th anniversary of the monopoly.²¹ As of July 2017, tobacco related CSR activities are not allowed to be publicised.

III. BENEFITS TO THE TOBACCO INDUSTRY

Benefits to the tobacco industry can take various forms including accommodating requests from the industry for longer implementation time for tobacco control measures or even postponement of a tobacco control law. In Nepal for example, there are still cigarette packs being sold that are not compliant with the 90% PHW requirement; however, no punitive action has been taken against the manufacturing companies concerned as there are no penalties for violation by wholesalers and retailers in the law. Delayed legislation also benefits the tobacco industry. For example, although Maldives' Attorney General approved their PHW legislation requiring 75% sized warnings in September 2017,²² it was not until January 2019 when the law was finally endorsed and gazetted, after a delay of more than one year due to influence from the tobacco business.

Granting tax exemptions and providing subsidies to the tobacco industry is also a form of benefit to encourage its business. In Bangladesh, the National Board of Revenue (NBR) has waived a 25% tax on export of tobacco products from factories located in the Export Processing Zones (EPZ).²³ Although the government has banned subsidized fertilisers to be used for tobacco farming since 2010, areas such as Bandarban still continue to use them.²⁴ The government has retained the value added tax (VAT) exemptions for unprocessed tobacco in the budget for fiscal year 2017-2018. In India, tax exemption for *bidi* manufacturers has effectively widened under the goods and services tax (GST) regime from the units that produced less than two million sticks to units with less than INR 2 million (rupees)

in annual turnover. Tax exemption is also given to small registered manufacturing companies with less than 20 workers.²⁵

Indonesia remains a non-Party to the FCTC and continues to make decisions that favour and promote the tobacco industry. Tobacco advertisements continue to be screened on televisions. A draft bill prepared by the Commission IX in Parliament in 2017 had a clause to ban tobacco advertisements in the broadcast media. However, during the harmonisation process in the Legislative Body of the House of Representative, the clause was omitted and Parliament reverted to the decision to allow cigarette advertising in broadcast media. The government also does not apply the full 10% value added tax (VAT) on tobacco products; VAT is

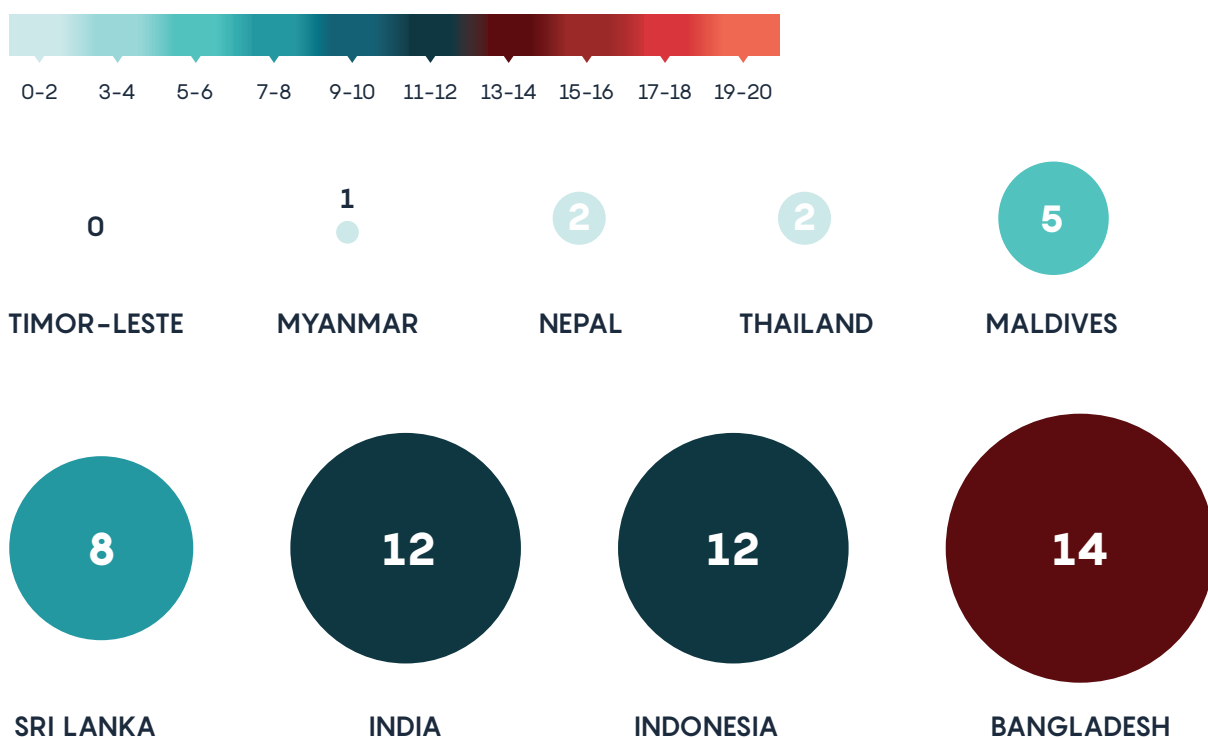
now 9.1%. Recommendations to simplify the complex 12-tiered taxation system was rejected by the Customs and Excise Department after being persuaded by the tobacco industry that it will worsen smuggling,²⁶ kill the small-scale tobacco producers^{27,28} and cause a loss of revenue for the government. All tobacco companies continue to prosper and increase their profits.

IV. FORMS OF UNNECESSARY INTERACTIONS AND TRANSPARENCY

The governments of Timor-Leste, Nepal and Thailand do not have any partnership with the tobacco industry for any activities, nor do the governments accept any assistance from the industry for any tobacco control activities (Figure 3).

FIGURE 3: FORMS OF UNNECESSARY INTERACTION

The lower the score, the better the ranking



However, unnecessary interactions can occur in an innocuous manner. For example, in 2018, Surya Nepal tobacco company (SNPL) received a “Best Tax Payer” award from the government.²⁹ An award for corporate governance was also given to BAT Bangladesh by the Institute of Chartered Secretaries of Bangladesh (ICSB). While the award was by ICSB, it was handed to BAT by the Prime Minister’s Advisor.³⁰ In India in 2017, at an award event by the Tobacco Institute of India, the Agriculture Minister, members of Parliament, members of Legislative Assembly, and members of Tobacco Institute of India and Indian Tobacco Board endorsed the “best tobacco farmers” of three states in India.³¹

Transparency remains a problem across the countries as they do not have a procedure in place when meeting with the tobacco industry and minutes of these interactions are not made public. In addition, countries still do not have rules or procedure for disclosure or registration of tobacco industry entities, affiliated organizations, and individuals acting on their behalf including lobbyists.

Indonesia is more flagrant about their interaction with the tobacco industry. There were instances of interaction where several ministers and senior government officials attended functions organised by the tobacco industry. The Entrepreneurship Development Center Sampoerna Expo in 2017 was officially opened by the Minister of Manpower and witnessed by Malang City government officials.³² The Directorate General of Customs and Excise supported an education program on prevention of illegal cigarette trading and the “Stop Illegal Cigarettes”, a campaign launched jointly by Gaprindo (Indonesia White Cigarette Producers Association), Gapri (Cigarette Manufacturers Association) and Formasi (Indonesia Tobacco Industry Community Forum). The Director General of Customs and Excise endorsed the campaign saying, *“The involvement of the tobacco industry is needed to provide solution.”*³³

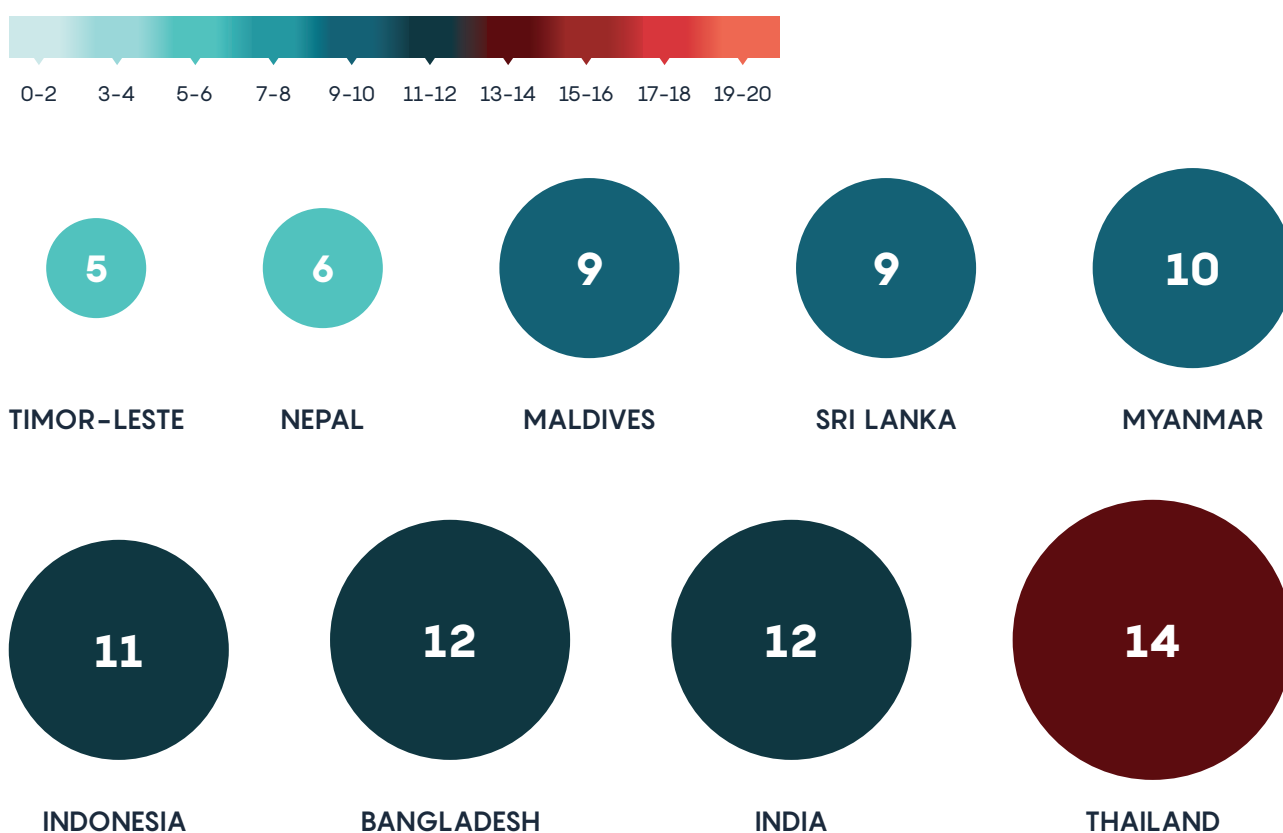
V. CONFLICT OF INTEREST

In Nepal, no current senior government officials are on the board of tobacco companies, nor any official who had retired and joined the tobacco company.

In the other countries, there are instances when senior government officials have joined the industry while still in office or upon their retirement (Figure 4). In Thailand, by virtue of the government’s ownership of the TAOT, retired senior government officials have regularly been appointed as monopoly board members. Current government officials such as a senior officer from the Excise Department and the Ministry of Finance are TAOT board members. In India, the India Tobacco Company’s profile also shows that most of the Board of Directors are linked or associated with varied government departments, ministries and governing bodies.

FIGURE 4: CONFLICT OF INTEREST

The lower the score, the better the ranking



In Bangladesh, several high-level government officials also hold positions in BAT Bangladesh (BATB). Since the government owns 10.85% shares in BATB, these officials are in conflict to advance tobacco control agenda while simultaneously promoting the tobacco business. For example, the Secretaries of the Ministry of Labour and Employment and the Ministry of Agriculture are Independent Directors of BATB.³⁴ The former Senior Secretary of the Ministry of Industries is also an Independent Director of BATB.

In Indonesia, the former Director General of Customs and Excise MOF was appointed as Chairman of the Bentoel Company Audit Committee in March 2016

for three (3) years. He formerly held several senior positions in various government departments and was the former Secretary to the Coordinating Minister for Economic Affairs in the office of Coordinating Ministry of Economic Affairs.

With the exception of Myanmar,³⁵ other countries do not have a policy to prohibit contributions from the tobacco industry or any entity working for the interests of the industry to political parties, candidates or their campaigns.

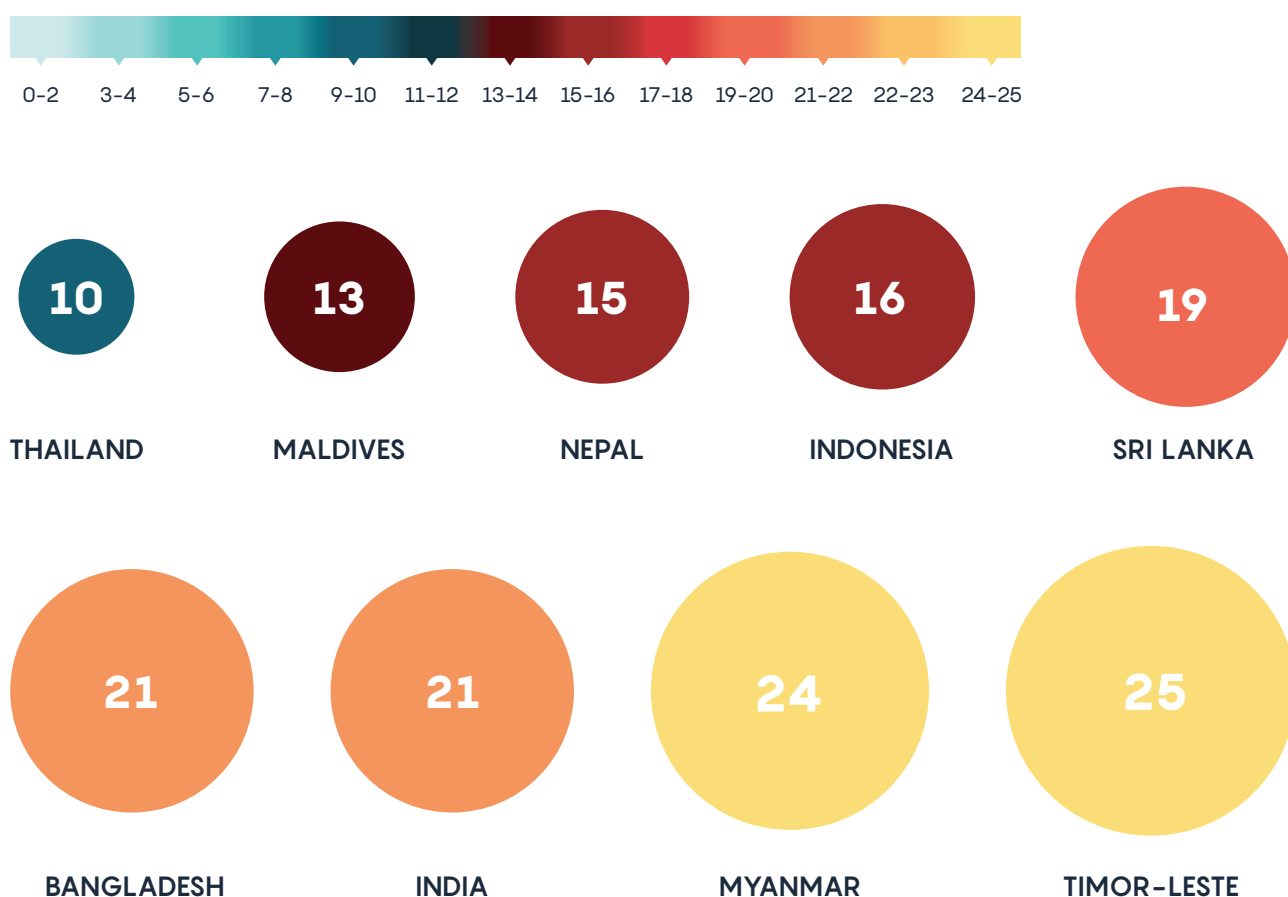
VI. PROGRESS IN PREVENTIVE MEASURES

The nine countries have made some progress putting preventive measures in place although these are still limited (Figure 5). The Ministry of Public Health of Thailand has guidelines on interacting with TI which will be extended to the whole government.

Thailand also became the first country in the region to require manufacturers or importers of tobacco products to report on the volume of production or importation, marketing expense, income and expense in their annual report, audited financial statement and any other information for the benefit of tobacco control to the National Tobacco Products Control Committee.³⁶ The rules and procedures as stipulated in the Ministerial Regulations are currently being drawn up.

FIGURE 5: PREVENTIVE MEASURES

The lower the score, the better the ranking



In Nepal, there is legal provision to disallow the acceptance of all forms of contributions/ gifts from the tobacco industry (monetary or otherwise) including offers of assistance, or study visit invitations given or offered to the government, its agencies, officials and their relatives but monitoring and enforcement is still poor.

While Nepal's MOH has allocated funds to raise awareness on Article 5.3, it is unclear how this awareness programme is being conducted with other government departments as there are no reports available to the public on this issue. There is no system in place to regularly monitor the tobacco industry's dealings with the government nor a procedure for disclosing the records of the interaction with the tobacco industry. While the government has formulated a policy to reduce interaction, a code of conduct has not been developed yet. There is periodic submission of information from the TI about its business as required by the Revenue Board, however there is no information on how much is spent on marketing and philanthropy.

In India, seven state governments have made rapid strides in enforcing Article 5.3 by issuing state orders to have meeting procedures to limit interaction and/or promote transparency of interactions with the TI. Some state governments also prohibit scholarships, rewards or gifts from tobacco companies.

Indonesia's Ministry of Health has taken a big step forward and issued guidelines on interactions with the tobacco industry. This positive measure must be extended to other departments to see advancement in tobacco control.

Myanmar passed a code of ethics in 2018 that prohibits corporations, including the tobacco companies, from providing travel assistance (which includes study visits), undertaking CSR activities, and making political contributions, among other activities.³⁷

Maldives' Tobacco Control Law provides for a procedure for disclosing any interaction with the tobacco industry. A code of conduct for all government institutions is being drafted. The TC law requires tobacco importers to provide details of their business, however the implementing regulations are not yet in place. Timor-Leste, which is similar to Maldives, has no procedure or guidelines should representatives of foreign tobacco companies want to meet with government officials.

Bangladesh and Sri Lanka have not put in place a procedure for disclosing records of interaction with the tobacco industry, nor adopted or implemented a code of conduct for public officials.

RECOMMENDATIONS

This TI Interference Index has shown that there is still room for improvement in the implementation of the Article 5.3 across the countries in the South East Asian region. Weak implementation of Article 5.3 can delay and undermine effective implementation of tobacco control measures as shown in the examples of TI interference.

The following recommendations are immediate steps governments can take to protect their tobacco control policies.

-
- a.** Ban tobacco related CSR activities and other forms of contributions and donations from the TI. Partial restrictions such as prohibiting their publicity has shown to be ineffective.

 - b.** The TI must not be given benefits, such as duty exemptions, tax cuts, etc., to conduct and expand its business.

 - c.** Ensure retired senior government officials are not immediately appointed to the tobacco industry. Similarly, former executives of the tobacco industry should not be appointed to government positions. A definitive gap time frame should be indicated.

 - d.** Transparency is key when dealing with the tobacco industry and this needs to be improved in all countries. Interaction with the TI should be limited to only when strictly necessary for regulation. Governments must put in place a clear procedure for interaction with the TI and disclose all records of interaction with the TI and its representatives.

 - e.** A code of conduct must be adopted to guide government officials when dealing with the TI.

 - f.** Tobacco companies must be made to periodically submit information on tobacco production, manufacture, marketing expenditures, revenues and any other activity, including lobbying, philanthropy, and political contributions.

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