



Section A: A. Contact details

A1. A1. Name of organization

Mandatory question

The Tobacco Control Research Group (TCRG), University of Bath

A2. A2. Mailing address

Mandatory question

Claverton Down, Bath BA2 7AY

A3. A3. Contact person responsible for the report

First name, Family name.

Mandatory question.

Raouf Alebshehy

A4. A4. Telephone

Please enter the full number (example: +41 123 456 7890)

Mandatory question

+44077842519147

A5. A5. Email

The e-mail format is "xxxx@yyyy.zzz"

Mandatory question

Ra915@bath.ac.uk

A6. A6. Website of organization

The URL format is "http://xxxx".

<https://www.bath.ac.uk/research-groups/tobacco-control-research-group/>



A7. A7. Email

The e-mail format is "xxxx@yyyy.zzz"

Mandatory question

tobacco-admin@bath.ac.uk

Section B: B. General information

B1. B1. Please indicate if your organization would like to retain its status as observer to the Protocol to Eliminate Illicit Trade in Tobacco Products

Yes ☒

No ☐

B2. B2. Does your organization's mission statement specifically refer to tobacco control or to countering/fighting illicit trade in tobacco products?

Yes ☒

No ☐

B3. B3. If yes, please specify:

TCRG is a multidisciplinary, international research group at the University of Bath. Our work focuses on the commercial determinants of health. We specifically examine how major corporations influence health and policy; evaluate the impacts of policy change on health; and provide evidence to inform the development of new policy. As such, our work is closely linked with the aims and objectives of the FCTC, as well as the Protocol. Within. While our work is principally focused on tobacco, we are expanding our research to other sectors including food and alcohol.

TobaccoTactics is a knowledge exchange platform, established by TCRG in 2012. TobaccoTactics is a unique resource, providing rigorous academic research and monitoring data on the tobacco industry and its allies. The site attracts thousands of users from across the world including researchers, policy makers, journalists and advocates.

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 organisations, 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 (BI). TCRG is a BI partner, and part of the STOP network.

B4. B4. Does your organization have regional branch(es) to enhance activities in different regions or groups of countries?

Yes ☒

No ☐

B5. B5. If yes, please provide details

The Tobacco Control Research Group is based within the UK but has team members and works with consultants covering the Eastern Mediterranean region, the Region of the Americas, and elsewhere. The group is a part of the global tobacco industry watchdog STOP.



B6. B6. Does your organization regularly convene meetings or conferences for its membership?

Yes ☐

No ☒

B7. B7. If yes, please indicate frequency:

Monthly ☐

Quarterly ☐

Biannually ☐

Annually ☐

Biennially ☐

Others (not on a regular basis, meet when required, etc.) ☐

B8. B8. If Others, please provide details

B9. B9. If yes, is tobacco control or countering/fighting illicit trade in tobacco products covered in the meetings/conferences?

Yes ☐

No ☐

Section C: C. Participation in meetings organized under the auspices of the Protocol and contributions

Participation in meetings organized under the auspices of the Protocol and contributions to other tobacco control related events

C1. C1. Please indicate the meetings organized by the Convention Secretariat at which your organization was represented (sessions of the Meeting of Parties, meetings of inter-sessional groups, working groups, NGO events, etc.)

Title and date

In February, STOP responded to a query from WHO FCTC Secretariat, relating to work on MOUs between the industry and customs authorities.

In May, in response to a request from WHO FCTC Secretariat, the TCRG presented on tobacco industry involvement in illicit trade at a webinar organized following a request for technical assistance from the government of Ecuador regarding their national tracking and tracing system. Other interventions at the session focused on characteristics of the national tracking and tracing system; costs and benefits of implementing T&T systems, and intersectoral coordination to implement the Protocol.

In July, following a request from WHO EMRO, the TCRG contributed to an EMRO Regional Training session on Scaling up Ratification/Accession to the Protocol to Eliminate Illicit Trade in Tobacco Products. The training objectives were 1) Strengthening the knowledge and raising awareness about the needed technical and procedural steps at national and international level to ratify/accede to and implement the protocol (legislative- political- executive- partnership – procedural and other measures); Engaging decision makers including parliamentarians in the policy dialogue, Establishing better coordination at national level to eliminate illicit trade in tobacco products; and Identifying jointly next steps at national level for the ratification/accession and implementation of the protocol.



C2. C2. Please list any other meetings or conferences with a focus on tobacco control or countering/fighting illicit trade in tobacco products attended by your organization.

Title and date

In January, the TCRG presented about Article 5.3 and the Index to the Welsh cross-parliamentary group on smoking and health, attended by 60+ senior politicians, members of the Revenue Service and senior staff from Trading Standards, following info about an event on illicit organised by JTI.
Also in January, the TCRG presented at an International Legal Consortium (ILC) webinar on illicit trade to a team of lawyers, specialising in tobacco control, who work with the Campaign for Tobacco Free Kids to draft and defend tobacco control laws across the world.
In May, the TCRG presented at a CTFK webinar on the Protocol to Eliminate Illicit Trade in Tobacco Products. The webinar was aimed at International Legal Consortium members from Africa.

Section D: D. Work encouraging Parties to the WHO FCTC to become Party to the Protocol

D1. D1. Have you supported any Party or Parties to the WHO FCTC to become Party to the Protocol?

Yes ☒
No ☐

D2. D2. If yes, please indicate which one(s):

In July, following a request from WHO EMRO, the TCRG contributed to an EMRO Regional Training session on Scaling up Ratification/Accession to the Protocol to Eliminate Illicit Trade in Tobacco Products. The training objectives were 1) Strengthening the knowledge and raising awareness about the needed technical and procedural steps at national and international level to ratify/accede to and implement the protocol (legislative- political- executive- partnership – procedural and other measures); Engaging decision makers including parliamentarians in the policy dialogue, Establishing better coordination at national level to eliminate illicit trade in tobacco products; and Identifying jointly next steps at national level for the ratification/accession and implementation of the protocol.

Section E: E. Your organization's activities to support the Parties in their implementation of the Protocol

E. Has your organization conducted any work/activity in relation to the following provisions of the Protocol? E1. Part II: General obligations

E2 Part III: Supply chain control

E3 Part IV: Offences

E4. Part V: International cooperation

E5. Part VI: Reporting

E6. Part VII: Institutional arrangements and financial resources

E1. E1.a. Article 4: General obligations:

Yes ☒
No ☐

E2. E1.b. Article 5: Protection of personal data:

Yes ☐
No ☐



E3. E1.c. If you responded YES to any of above, please provide details:

The TCRG authored the UK Tobacco Industry Interference Index: <https://www.bhth.ac.uk/case-studies/the-uk-tobacco-industry-interference-index-2021/>
The TCRG contributed to the work of the Global Tobacco Industry Watchdog STOP in terms of providing Rapid Engagement Action support (REACT service) to more than 20 countries, and providing STOP grants to more than 20 countries, where local advocates were supported to counter the tobacco industry interferences.
The TCRG led an investigation carried out by global tobacco industry watchdog STOP has resulted in the addition of 23 new organisations to its Tobacco Industry Allies database. The database, launched in 2019, now includes 153 groups across 31 countries.
The TCRG played a key role in producing a brief on greenwashing in conjunction with the WHO, which was translated into ten languages. STOP further hosted the joint webinar on greenwashing with the WHO, and was quoted in various newspapers and web platforms.
The TCRG published many papers relevant to implementing this Article including:
•(Because Big Tobacco bearing gifts: tobacco industry corporate social responsibility activities in Greece, Tobacco Control
•(Policy changes needed for tobacco control, Institute of Policy Research
•(Philip Morris International's questionable financial flows, University of Bath
•(What role do British American Tobacco's secretive UK subsidiaries play in facilitating tax avoidance?, University of Bath
•(Corporate communication of the relative health risks of IQOS through a webchat service, Tobacco Control
•(Evaluating tobacco industry 'transformation': a proposed rubric and analysis, Tobacco Control
•(Understanding the long-term policy influence strategies of the tobacco industry: two contemporary case studies, Tobacco Control
•(Waterpipe tobacco smoking (WTS) control policies: global analysis of available legislation and equity considerations, Tobacco Control
•(Menthol and flavoured tobacco products in LMICs: A growing menace, Tobacco Induced Diseases
•(To be honest, I'm really scared': perceptions and experiences of intimidation in the LMIC-based tobacco control community, Tobacco Control
•(The Lebanese Regie state-owned tobacco monopoly: Lessons to inform monopoly-focused endgame strategies, BMC Public Health

Further, here are a number of our research papers, published in 2022 which acknowledge usefulness of The Protocol and its obligations:
Gomis B, Gallagher AWA, Rowell A, et al

Turning a threat into an opportunity: British American Tobacco's weakening of the Protocol to Eliminate Illicit Trade in Tobacco Products
Tobacco Control 2022;31:40-49.

Hind TR, Gallagher AWA, Evans-Reeves K, et al. Understanding the long-term policy influence strategies of the tobacco industry: two contemporary case studies
Tobacco Control 2022;31:297-307.

Measuring Malaysia's Illicit Tobacco Trade: An Excise Tax Gap Analysis. Journal of illicit economies and development

E4. E2.a. Article 6 (Licence, equivalent approval or control system):

Yes ☐

No ☒

E5. E2.b. Article 7 (Due diligence):

Yes ☐

No ☒

E6. E2.c. Article 8 (Tracking and tracing):

Yes ☒

No ☐

E7. E2.d. Article 9 (Record keeping):

Yes ☐

No ☒

E8. E2.e. Article 10 (Security and preventive measures):

Yes ☐

No ☒

E9. E2.f. Article 11 (Sale by Internet, telecommunication, or any other evolving technology):

Yes ☐

No ☒

E10. E2.g. Article 12 (Free zones and international transit):

Yes ☐

No ☒

E11. E2.h. Article 13 (Duty free sales):

Yes ☐

No ☒



E12. E2.i. If you responded YES to any of above, please provide details:

In May, in response to a request from WHO FCTC Secretariat, the TCRG presented on tobacco industry involvement in illicit trade at a webinar organized following a request for technical assistance from the government of Ecuador regarding their national tracking and tracing system. Other interventions at the session focused on characteristics of the national tracking and tracing system; costs and benefits of implementing T&T systems, and intersectoral coordination to implement the Protocol.

TCRG member also involved in working group on tracking and tracing as an observer and has participated in all meetings on this topic to date.

E13. E3.a. Article 14 (Unlawful conduct including criminal offences):

Yes ☐

No ☒

E14. E3.b. Article 15 (Liability of legal persons):

Yes ☐

No ☒

E15. E3.c. Article 16 (Prosecution and sanctions):

Yes ☐

No ☒

E16. E3.d. Article 17 (Seizure payments):

Yes ☐

No ☒

E17. E3.e. Article 18 (Disposal or destruction):

Yes ☐

No ☒

E18. E3.f. Article 19 (Special investigative techniques):

Yes ☐

No ☒

E19. E3.g. If you responded YES to any of above, please provide details:

E20. E4.a. Article 20 (General information sharing):

Yes ☐

No ☒



E21. E4.b. Article 21 (Enforcement information sharing):

Yes ☐

No ☒

E22. E4.c. Article 21 (Information sharing: confidentiality and protection of information):

Yes ☐

No ☒

E23. E4.d. Article 22 (Assistance and cooperation: training, technical assistance and cooperation in scientific, technical and technological matters):

Yes ☒

No ☐

E24. E4.e. Article 24 (Assistance and cooperation: investigation and prosecution of offences):

Yes ☐

No ☒

E25. E4.f. Article 27 (Law enforcement cooperation):

Yes ☐

No ☒

E26. E4.g. Article 28 (Mutual administrative assistance):

Yes ☐

No ☒

E27. E4.h. Article 29 (Mutual legal assistance):

Yes ☐

No ☒

E28. E4.i. Article 30 (Extradition) and Article 31 (Measures to ensure extradition):

Yes ☐

No ☒



E29. E4.j. If you responded YES to any of above, please provide details:

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E30. E5.a. Article 32 (Reporting and exchange of information):

Yes ☐

No ☒

E31. E5.b. If you responded YES to any of above, please provide details:

E32. E6.a. Article 36 (Financial resources):

Yes ☐

No ☒

E33. E6.b. If you responded YES to any of above, please provide details:

Section F: F. Other relevant activities to support the work of the Protocol

F1. F1. Please provide any other relevant information that does not fit under the questions above.

Page on the Protocol on our website TobaccoTactics.org:
<https://tobaccotactics.org/wiki/illicit-trade-protocol-itp/>



Section G: G. Attachments

G1. G1. Please attach any file relevant to any of the activities reported above.

File name, file size limited to 10 MB

Section H: H. Declarations

H1. H1. Please confirm that your organization does not receive, has not received and will not receive in the future, either directly or indirectly, any financial or other contributions or assistances from the tobacco industry or its affiliates. Please also confirm that neither your members nor your partners are affiliated directly or indirectly with the tobacco industry or its affiliates or those furthering the interests of the tobacco industry.

Yes, I can confirm

☒

No, I cannot confirm

☐

H2. H2. Please confirm that the activity of your organization is in conformity with the Article 5.3 of the WHO FCTC and the 15th and 16th preambular paragraphs of the Protocol.

Yes, I can confirm

☒

No, I cannot confirm

☐

H3. H3. Through my electronic signature, I confirm that the above information is accurate and complete, to the best of our knowledge and abilities:

Signature of the Head of the organization

Prof. Anna Gilmore

Thank you for submitting the report.