

2025

**Global Progress Report
on Implementation of the
Protocol to Eliminate Illicit
Trade in Tobacco Products**



PROTOCOL
TO ELIMINATE
ILLCIT TRADE IN
TOBACCO PRODUCTS



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2025 Global Progress Report on Implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products



F C T C

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ON TOBACCO CONTROL

S E C R E T A R I A T

2025 Global Progress Report on Implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products.

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Foreword

The 2025 Global Progress Report on Implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products is the third in the series since the Protocol entered into force on 27 September 2018. This reporting cycle coincides with the 20th anniversary of the entry into force of the WHO Framework Convention on Tobacco Control (WHO FCTC), whose Parties developed the Protocol, and it demonstrates the tangible progress that Parties have achieved in the seven years since its entry into force.

For the first time, this report is based on data submitted by Parties through the new, revised reporting instrument adopted at the Third session of the Meeting of the Parties (MOP3) to the Protocol, and via the new online reporting platform established under decision FCTC/MOP3(17). These enhancements are expected to have improved the reporting experience, and the Convention Secretariat remains committed to further refining the reporting system in collaboration with the Parties.

This report was compiled through the analysis of reports submitted by the Parties to the Protocol in the 2025 reporting cycle. It presents comprehensive data, examples and analysis across 22 substantive articles of the Protocol, reflecting the evolving landscape of global efforts to combat illicit trade in tobacco products. In addition to having the potential to serve as a reference document for discussions at MOP4 in November 2025, this report will allow Parties to identify the areas where progress has been achieved in the implementation of the Protocol; it will also help them to learn from each other's experience, with the ultimate aim of closing their critical implementation gaps and further aligning their legal frameworks with the Protocol's obligations.

The report provides an in-depth analysis of certain topics on the MOP agenda, including tracking and tracing systems, the criminal justice response, implementation assistance and international cooperation. The findings captured in this report also highlight the ongoing challenges that continue to hinder full implementation. These challenges include the need for enhanced institutional capacity, greater coordination among national authorities and more robust systems to address the growing complexity of illicit trade.

Illicit trade in tobacco products undermines public health, deprives governments of essential tax revenue and fuels transnational criminal activity. The Protocol provides a comprehensive legal and institutional framework to confront these challenges, strengthen governance and reinforce the integrity of tobacco control measures. As this report demonstrates, Parties have shown commendable commitment to fulfilling their obligations and advancing the shared goal of eliminating illicit trade. The reporting process is an important element of international collaboration under the Protocol, and the Parties' engagement and transparency in that process are vital to understanding global implementation trends and to promoting collective progress.

As the global community reflects on two decades of implementation of the WHO FCTC, this report on the Protocol serves as both a record of achievement and a call to action. The continued success of the Protocol depends on sustained cooperation, innovation and commitment from all Parties. Together, we can strengthen enforcement, safeguard public health and move decisively towards ending the illicit trade in tobacco products worldwide.

The Convention Secretariat

Executive summary

This report provides a comprehensive assessment of the implementation status of the Protocol to Eliminate Illicit Trade in Tobacco Products among reporting Parties. Drawing primarily on the analysis of reports of the Parties to the Protocol in the 2025 reporting cycle, the 2025 Global Progress Report reviews progress made in implementing the Protocol's provisions, identifies existing gaps and implementation barriers, and highlights promising practices that can inform future action.

The Convention Secretariat conducted the 2025 reporting cycle for the Protocol in accordance with decision FCTC/MOP1(10) between January and March 2025, in line with the reporting cycle of the WHO FCTC. Of the 69 Parties obliged to report in the 2025 cycle, 46 (67%) formally submitted their implementation reports (Annex 1).

The Protocol establishes a global framework to address illicit trade in tobacco products by strengthening supply chain control measures, enhancing enforcement and deterrence tools, and promoting international cooperation. Full implementation is critical, because

illicit trade undermines tobacco control and fuels organized crime, while simultaneously depriving governments of tax revenue that can be used to support public health.

This 2025 edition reveals significant progress, particularly in strengthening supply chain controls through improved licensing and secure markings, and in criminalising conduct listed in the Protocol. However, significant challenges remain, including financial and technical constraints, gaps in legal frameworks, limited enforcement capacity, interference by the tobacco industry and difficulties in international cooperation.

To reflect the holistic scope of the Protocol, this executive summary provides key takeaways for specific articles. It begins with the supply chain control measures (Articles 6–13), followed by offences, enforcement and related matters (Articles 14–19), international cooperation (Articles 20–31) and technical assistance needed and barriers and challenges to implementation (Article 32). Each section highlights both the level of implementation and examples provided by Parties, drawing attention to areas where collective progress has been achieved and where urgent support is still required.



Photo courtesy of National Tax and Customs Administration of Hungary

Supply chain control

• **Licensing, equivalent approval or control systems (Article 6).**

Licensing is most widespread for cigarettes, cigars and cigarillos, reflecting their high market demand and priority in control measures. However, coverage is notably weaker for manufacturing equipment, waterpipe tobacco and smokeless tobacco, leaving vulnerabilities for illicit production. Less than half of Parties (46%) reported requiring import licences for electronic nicotine delivery systems (ENDS), while authorities observe their rapid market expansion. Renewal periods vary widely across jurisdictions, with many Parties not requiring periodic renewal of licences, which may undermine sustained oversight. On a positive note, most Parties report that competent authorities hold the legal mandate to suspend, revoke or cancel licences, ensuring an essential enforcement safeguard.

• **Due diligence (Article 7).** Implementation of due diligence obligations remains incomplete. Fewer than half of Parties (44%) reported requiring full due diligence across all supply chain actors, leaving gaps in accountability. Only 41% of Parties reported requiring monitoring to ensure that sales align with market demand; the lack of such monitoring creates risks of diversion to illicit channels. The requirements to report to the competent authorities are the weakest area, with just 35% of Parties indicating that they require reporting to authorities when customers are suspected of engaging in illicit trade. Strengthening monitoring and reporting represents a major opportunity to close supply chain vulnerabilities and improve compliance with the Protocol's preventive objectives.

• **Tracking and tracing (Article 8).** The majority of Parties (70%) reported applying tax stamps or fiscal marks containing unique identification markings (UIMs) to cigarette packaging; however, there are gaps in the information that these UIMs contain. Many Parties also extend UIM requirements to cigars, cigarillos and rolling tobacco, although fewer include smokeless, heated tobacco products (HTPs) or waterpipe tobacco. Only about half of Parties establish aggregation links (parent–child relationship) between product levels (packs, cartons, master cases and pallets), limiting effective supply chain traceability. Information is typically captured at manufacture,

but substantially fewer Parties record data at export, shipment or import, weakening oversight once products cross borders. Encouragingly, most Parties prohibit industry involvement in UIM systems, reducing conflicts of interest and aligning with Protocol safeguards.

• **Record-keeping (Article 9).** The majority of Parties reported requiring record-keeping and access to supply chain information (74%), but the information recorded continues to vary. In particular, many Parties reported not requiring record-keeping of transactions regarding tobacco manufacturing equipment.

• **Security and preventive measures (Article 10).** Parties have made progress in adopting preventive measures, although reporting obligations under Article 10 are unevenly applied. Reporting cross-border cash transfers are the most mandated security measure, reflecting widespread recognition of the risks posed by financial flows linked to illicit trade. However, other obligations (e.g. reporting suspicious transactions and limiting supply to align with market demand) are less frequently required. These gaps leave potential vulnerabilities in preventing diversion of tobacco products into illicit markets, underlining the need for Parties to broaden the scope of preventive requirements beyond financial reporting alone.

• **Sale by Internet, telecommunication or other evolving technology (Article 11).** Over half of all Parties (63%) reported prohibiting technology-based sales of tobacco products, representing an important step in limiting illicit trade through emerging digital channels. However, with more than one third of Parties still permitting such sales, the risk of unregulated or weakly regulated online markets remains. Ensuring stronger oversight of Internet and telecommunication sales is critical, given the growing reliance on these platforms and their potential to bypass traditional supply chain controls.

• **Free zones and international transit (Article 12).** Most Parties report the existence of free zones and permit the international transit of tobacco products, yet the application of supply chain control measures in these contexts remains inconsistent. The more frequently applied measures are licensing, record-keeping and due diligence; marking requirements are less common, creating weak points in monitoring

product movement. Few Parties reported prohibiting the intermingling of tobacco with non-tobacco products upon removal from free zones, leaving opportunities for concealment and evasion. Furthermore, although international transit and trans-shipment are widely allowed, only about half of Parties reported applying supply chain controls to such movements, underscoring persistent vulnerabilities in free zones and transit operations.

- **Duty free sales (Article 13).** Duty free sales remain a mixed area of implementation. About one third of Parties reported prohibiting them outright. Among Parties that allow duty free sales, most apply relevant Protocol measures (e.g., product markings and supply chain controls) to reduce risks. However, the fact that not all duty free sales are fully regulated highlights ongoing vulnerabilities. Without consistent global enforcement, duty free channels may be exploited for illicit trade, reinforcing the need for harmonized approaches across jurisdictions.

Offences

- **Unlawful conduct, liability, sanctions and jurisdiction (Articles 14–16, 26).** Most Parties reported classifying the key offences under the Protocol (e.g. smuggling, illicit manufacturing, non-payment of duties and use of false markings) as criminal acts rather than merely administrative or unlawful behaviour. Conduct linked to money laundering is also widely criminalized, demonstrating the recognition of illicit trade as part of broader organized crime.
- Sanctions vary; although imprisonment is available in many jurisdictions, the most common responses are financial, including freezing, seizure or confiscation of property, and monetary fines. Administrative sanctions, particularly licence suspension or revocation, are frequently used to address technology-based offences and the intermingling of tobacco with non-tobacco products. Importantly, most Parties reported extending liability beyond individuals to corporations and legal entities, underscoring acknowledgement of the role that companies can play in enabling illicit trade.
- Jurisdiction is most consistently asserted over offences committed within national territories, but fewer Parties reported extending jurisdiction to offences committed

on flagged vessels, against the Party or outside the territory, with the intent to commit an offence. This reflects the practical challenges of extraterritorial enforcement and highlights the limitations of global reach in prosecutions.

International cooperation

- **Enforcement information sharing (Article 21).** Enforcement information sharing remains underutilised. Fewer than half of Parties (41%) reported actively exchanging enforcement data with other Parties, despite mechanisms existing under the Protocol. The limited uptake suggests gaps in capacity, trust or technical systems for sharing law enforcement information. Strengthening these exchanges is essential to improve the detection, investigation and prosecution of cross-border illicit trade activities, where national-level efforts alone cannot address the problem effectively.

- **Information sharing: confidentiality and protection of information (Article 22).** Only 30% of Parties reported having formally designated a competent national authority to manage exchanged information, and just over half (52%) reported having legal frameworks in place to guarantee confidentiality protections. Without strong domestic frameworks for information security, Parties may be reluctant to share data, limiting the effectiveness of international cooperation. Expanding confidentiality laws and institutional designations is therefore a key area for improvement to build the trust necessary for robust global collaboration.

- **Training, technical assistance and scientific/technical cooperation (Article 23).** Technical assistance under the Protocol is limited in scope. Only 33% of Parties reported receiving such support, suggesting either underutilisation of available resources or a lack of clearly identified needs. Where assistance was provided, the Convention Secretariat played the central role (supporting 92% of recipients), followed by peer-to-peer assistance from other Parties (64%). Assistance was not limited to bilateral exchanges but also targeted regional organizations (50%) to strengthen institutional capacity. The relatively small number of Parties accessing assistance indicates substantial room for scaling up capacity-building efforts globally.

- **Assistance and cooperation in investigations and prosecutions (Article 24).** Cross-border investigative cooperation remains limited. Only one third of Parties (33%) reported engaging with other Parties to investigate criminal offences linked to illicit tobacco trade. By contrast, 71% of Parties reported having established domestic coordination mechanisms to facilitate information sharing and joint work among relevant authorities, including customs, law enforcement and health agencies. This highlights a stronger emphasis on national-level coordination compared with international collaboration, which remains less operationalized in practice.

Law enforcement cooperation (Article 27). Law enforcement cooperation is one of the stronger areas of implementation. About 72% of Parties reported having mechanisms in place to ensure effective cooperation, and 54% reported active operational collaboration with other Parties. However, levels of effectiveness vary considerably across regions, with some Parties reporting more advanced systems of intelligence sharing and joint operations than others. The findings suggest that while the majority of Parties have taken steps to build frameworks for cooperation, systematic and consistent global enforcement remains incomplete.

- **Mutual administrative assistance (Article 28).** Seventeen Parties (37%) reported providing or making available mutual administrative assistance to ensure proper application of customs and other relevant laws. Although this shows some progress, the majority of Parties have yet to engage in systematic administrative assistance, suggesting barriers in either capacity, legal frameworks or willingness to operationalize this form of cooperation.

- **Mutual legal assistance (Article 29).** Mutual legal assistance is even less developed than administrative cooperation. Only 22% of reporting Parties indicated that they provided legal assistance to another Party or Parties. The low uptake demonstrates the limited integration of the Protocol's legal cooperation mechanisms into national judicial practices. Capacity gaps, the absence of specific legal frameworks and the need for intergovernmental agreements all contribute to this shortfall, highlighting an urgent area for strengthening.

- **Extradition and measures to ensure extradition (Articles 30–31).** Half of reporting Parties reported having established extradition measures under Article 14, but actual use of these mechanisms is rare. Only two Parties have reported extraditing an individual for criminal offences under the Protocol or in efforts to eliminate illicit tobacco trade. Clearly, extradition remains the exception rather than the rule, underscoring the gap between legislative frameworks and operational practice.

Reporting

- **Technical assistance needed and barriers and challenges to implementation (Article 32).** Parties' self-reporting under Article 32 of the Protocol demonstrates both progress and persistent challenges. Twenty-eight Parties (61%) indicated a need for technical assistance, while 22 (48%) identified significant constraints or barriers to implementation. Requested support spanned a wide range, including training and capacity-building for customs, police, health and judicial officials; implementation of tracking and tracing systems; legislative and regulatory guidance; technological resources; and frameworks for regional cooperation.

- Constraints most frequently cited included limited political will, inadequate financial and human resources, tobacco industry interference, technical and operational challenges, legal and regulatory complexity and weak international coordination. Although many Parties have undertaken advocacy efforts, partnerships and technical engagements to mitigate these barriers, it is clear that implementation remains uneven and dependent on external support for sustainable progress.

Needs and gaps

Despite notable progress, significant needs and gaps remain in the full implementation of the Protocol. Licensing and due diligence systems are in place for most high-demand products but remain incomplete or inconsistently applied to novel and emerging tobacco and nicotine products such as ENDS and HTPs. Tracking and tracing systems are advancing, yet gaps persist in aggregation mechanisms, downstream supply chain coverage and data monitoring. Enforcement frameworks also require strengthening to ensure proportional sanctions, consistent liability for legal persons

Looking ahead, the priority is not only to close existing implementation gaps but to future-proof the Protocol against emerging risks, including increasingly sophisticated trafficking networks and the rapid evolution of new and emerging tobacco and nicotine products.

and effective interagency coordination. Limited resources, uneven technical capacity and insufficient training continue to undermine operational effectiveness, while cross-border cooperation mechanisms, though established, are not yet fully operationalized. Addressing these shortcomings will require enhanced technical assistance, sustained investment in digital and enforcement infrastructure, and stronger political commitment to integrate illicit trade control measures into broader public health and fiscal governance strategies.

Challenges and barriers

Despite progress, implementation remains hindered by several persistent challenges. Limited political commitment, resource constraints and insufficient technical capacity continue to undermine enforcement and compliance efforts. Tobacco industry interference, inconsistent legal frameworks and gaps in international coordination further impede progress.

Some Parties face difficulties in establishing comprehensive licensing and tracking and tracing systems, maintaining trained personnel and securing stable funding for enforcement. In several cases, fragmented governance structures and competing policy priorities have delayed or diluted implementation. Overcoming these barriers will require high-level political engagement, dedicated funding, and greater regional and global cooperation to sustain the Protocol's momentum.

Conclusions

The findings of this report highlight both the tangible progress and the unfinished agenda in achieving the Protocol's full potential. Implementation efforts have strengthened legal frameworks, improved oversight of supply chains and demonstrated the Protocol's value as a global tool for disrupting illicit trade.

Nevertheless, the persistence of regulatory inconsistencies, limited cross-border cooperation and uneven enforcement capacity combine to underscore that progress remains fragile without sustained investment and political will.

Looking ahead, the priority is not only to close existing implementation gaps but to future-proof the Protocol against emerging risks, including increasingly sophisticated trafficking networks and the rapid evolution of new and emerging tobacco and nicotine products. Consolidating technical expertise, ensuring adequate resourcing and embedding illicit trade prevention within broader fiscal, health and criminal justice strategies will be critical.

Through coordinated action, Parties can utilize the Protocol not only as a compliance framework, but also as a proactive instrument for global public health, fiscal integrity, and transnational law enforcement cooperation. 1.

1. Introduction

The year 2025 marks the 20th anniversary of the WHO Framework Convention on Tobacco Control (WHO FCTC), a milestone that celebrates two decades of global commitment to protect present and future generations from the devastating health, social, environmental and economic consequences of tobacco use. The WHO FCTC has been instrumental in establishing evidence-based policies, legal frameworks and international cooperation mechanisms to reduce tobacco consumption and exposure to tobacco smoke. Within this framework, the Protocol to Eliminate Illicit Trade in Tobacco Products represents a relatively young yet critical instrument. Despite only having been in force for seven years, the Protocol addresses the persistent and complex challenge of illicit trade in tobacco products that, if not properly tackled, undermines the effectiveness of tobacco control efforts worldwide. By targeting the illicit production, smuggling and diversion of tobacco products outside regulated channels, the Protocol strengthens the integrity of national tobacco control measures and enhances the health, economic and social outcomes of the WHO FCTC.

Illicit trade in tobacco products poses profound consequences for both public health and governance. Products diverted through illegal channels often evade regulatory standards – including health warnings, ingredient disclosures and product safety requirements

– exposing consumers to heightened health risks. Illicit trade undermines the impact of health education campaigns, weakens taxation and pricing strategies designed to reduce consumption, and diverts critical revenue away from health systems and public services.

In addition, such trade fuels organized crime networks, contributing to corruption, money laundering and other forms of cross-border crime; in turn, these factors place additional burdens on law enforcement, judicial and customs authorities. Addressing these challenges is therefore not only a matter of tobacco control but also a broader imperative for public health, social stability and economic security.

Viewed through a wider lens, tackling illicit trade in tobacco products represents a vital effort to further the Sustainable Development Goals (SDGs). In particular, illicit trade in tobacco products hinders progress in the areas of SDG3 (Good Health and Well-Being), SDG8 (Decent Work and Economic Growth), SDG16 (Peace, Justice and Strong Institutions) and SDG17 (Partnerships). ¹ Underscoring these links, the Second session of the Meeting of the Parties (MOP2) to the Protocol to Eliminate Illicit Trade in Tobacco Products in 2021 called on Parties to encourage international and regional organizations to support the implementation of the Protocol in line with the achievement of the 2030 Agenda for Sustainable Development.



Photo courtesy of National Tax and Customs Administration of Hungary

1. United Nations Department of Economic and Social Affairs, The Sustainable Development Goals report 2023: special edition. United Nations; 2023. doi: 10.18356/9789210024914; United Nations General Assembly, Transforming our world: the 2030 agenda for sustainable development. (<https://sdgs.un.org/2030agenda>); United Nations Development Programme and Secretariat of WHO FCTC, The WHO Framework Convention on Tobacco Control: an accelerator for sustainable development. (<https://www.undp.org/publications/who-framework-convention-tobacco-control-accelerator-sustainable-development>).

Ultimately, this report underscores the importance of a coordinated, multilevel approach in tackling illicit trade. It reinforces that the Protocol is not merely a regulatory instrument but a practical framework for enhancing public health protection, reducing criminal activity and supporting sustainable governance in the context of global tobacco control.

To strengthen efforts to combat illicit trade in tobacco products alongside advancing progress in relevant SDGs, the purpose of this report is to provide a comprehensive assessment of the implementation of the Protocol by Parties, highlighting progress, gaps, trends and illustrative examples of enforcement. By synthesizing data collected from Parties' self-reported information, case studies and examples of operational measures, the report offers a detailed overview of how the Protocol's articles are being applied in practice. It examines key components of the Protocol such as supply chain control measures, deterrence and enforcement mechanisms, prosecutions and sanctions and international cooperation.

This report also evaluates implementation in the context of regional and global trends, providing examples of significant seizures and enforcement operations, investigative techniques and emerging patterns in illicit trade. It identifies the most and least implemented measures, highlights persistent challenges and showcases practices that may serve as models for other Parties. Although the Protocol is much younger than the WHO FCTC, its effective implementation is essential to safeguard public health, ensure regulatory compliance and strengthen the global response to illicit trade. By presenting both quantitative data and qualitative insights, the report

seeks to inform policymakers, enforcement authorities and international organizations about the current state of implementation of the Protocol, the effectiveness of existing measures, and opportunities for targeted technical assistance, capacity-building and international collaboration.

This third edition reflects in particular developments in the reporting process as a result of decision FCTC/MOP3(17) taken at the Third session of the MOP.² Through that decision, the MOP adopted a new, more streamlined reporting instrument and called upon the Convention Secretariat to develop a new online reporting platform that incorporates features to make it as user-friendly as possible.

Ultimately, this report underscores the importance of a coordinated, multilevel approach in tackling illicit trade. It reinforces that the Protocol is not merely a regulatory instrument but a practical framework for enhancing public health protection, reducing criminal activity and supporting sustainable governance in the context of global tobacco control. The findings presented here aim to contribute to a more strategic and evidence-based approach to implementation, helping Parties to maximize the Protocol's impact and advance the goals of the WHO FCTC on its 20th anniversary.

² [https://fctc.who.int/resources/publications/i/item/fctc-mop3\(17\)-improving-the-reporting-system-of-the-protocol-to-eliminate-illicit-trade-in-tobacco-products](https://fctc.who.int/resources/publications/i/item/fctc-mop3(17)-improving-the-reporting-system-of-the-protocol-to-eliminate-illicit-trade-in-tobacco-products)

From the Panama Declaration to MOP4: strengthening global action against illicit trade in tobacco products

MOP3 was held in Panama City, Panama in February 2024. At that meeting, Parties adopted the Panama Declaration, reaffirming their collective commitment to strengthen implementation of the Protocol and accelerate global action against illicit trade in tobacco products.

The Declaration underscored that the illicit tobacco trade not only undermines public health objectives by increasing the affordability and accessibility of tobacco products, but also destabilizes economies, fuels organized crime and erodes government revenues. MOP3 emphasized the need for comprehensive and coordinated international action, including the establishment of tracking and tracing systems, the development of a global information-sharing focal point and enhanced cooperation – both among Parties and with relevant international organizations. It also reiterated the obligation to protect public health policies from interference by the tobacco industry and other commercial actors with vested interests.

Since MOP3, several key developments have contributed to progress in both implementation of the Protocol and understanding of the impact of illicit trade in tobacco products. First, a global information-sharing focal point has been launched, developed by the Convention Secretariat and the United Nations International Computing Center (UNICC), with contributions from the Parties. Second, the Convention Secretariat has engaged in interdisciplinary research with the UN Office on Drugs and Crime (UNODC) to better understand how illicit trade in tobacco products intersects with other forms of crime, and with the UN Development Programme (UNDP) to analyse the ways in which combating illicit trade in tobacco products contributes to advancing the SDGs. Further, the Convention Secretariat has collaborated with 14 Parties to carry out needs assessment exercises with the aim being to better implement the Protocol in national contexts.

Building on the momentum of MOP3, the upcoming Fourth session of the MOP, to be held in Geneva in November 2025, will feature a high-level segment focused on strengthening the responses and actions from justice systems to eliminate illicit trade in tobacco products. This theme highlights the growing recognition that robust enforcement and prosecution are essential to both achieving the objectives of the Protocol, and to ameliorating the organized crime that is often entwined with and supported by illicit trade in tobacco products. Actions that are critical for comprehensive implementation of the Protocol are sharing best practices and strategies for legal action, identifying gaps and challenges in legislation, reinforcing political commitment to tackling illicit trade and strengthening legal and cross-border cooperation.

By aligning the vision of the Panama Declaration with the action-oriented agenda of MOP4, Parties reaffirm their commitment to a unified approach by linking law, policy and enforcement, to make the elimination of illicit trade a defining element of global tobacco control and health protection.

Methodological notes

The 2025 Global Progress Report presents implementation rates of the measures required under the Protocol; these rates were obtained by analysing the responses that Parties provided to the online reporting instrument of the Protocol. Unless specified otherwise, the implementation figures stated for key provisions (indicators) of the Protocol refer to the percentage or number of Parties that submitted a report in the 2025 reporting cycle. The complete list of indicators used in the reporting instrument and the implementation rates for those indicators are presented in the supplementary documents that accompany this report.

The Convention Secretariat conducted the 2025 reporting cycle for the Protocol in accordance with decision FCTC/MOP1(10) between January and March 2025, in parallel with the reporting cycle of the WHO FCTC. Of the 69 Parties obliged to report in the 2025 cycle, 46 (67%) formally submitted their implementation reports.

The measures applied by a Party should apply to the entire territory, as appropriate. In cases where regional economic integration can be considered – for example, in the case of the European Union (EU) – measures are considered to apply to the region. Subnational information does not constitute a Party's affirmative response to whether a requirement under the Protocol has been met; even so, it is considered as part of the analysis. In addition, analysis reflects the implementation of requirements in the manner reported by the Parties.

All data available in the submitted implementation reports are used in the analysis

of this edition of the report. Other data sources were used to complement data received from the Parties in their official reports. For example, information collected by the Convention Secretariat in collaboration with Parties during needs assessments for the Protocol has been included where relevant. External data, including reports from international organizations, were also consulted.

Given that this edition was created using a substantially different reporting instrument to the one used in the previous reporting cycle, the resulting analysis and findings differ markedly from those of the 2023 Global Progress Report. Although the 2025 reporting instrument used substantially fewer open-ended questions, examples of implementation are presented where they are available.

Some limitations apply to the findings in this report. Where implementation reports contain references to laws and regulations that detail how implementation, enforcement or compliance is carried out, they have not been systematically validated against the text of the laws, regulations and/or policy documents.

All figures and tables in this document were prepared by the Convention Secretariat, based on data received during the 2025 reporting cycle, unless otherwise indicated.

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2. Overall implementation status

The analysis of the Parties' implementation reports submitted in the 2025 reporting cycle indicates that Parties to the Protocol continue to make steady progress in implementing key measures to combat illicit trade in tobacco products, although significant variation remains across articles, and among regions and individual Parties. Addressing these gaps will require continued political commitment, targeted capacity-building, resource mobilization and enhanced cross-border cooperation.

Across reporting Parties, certain groups of provisions of the Protocol have been implemented more consistently, reflecting both feasibility and regulatory priority. There are **relatively high levels of implementation** for certain articles concerning supply chain control (Articles 6–13), covering licensing, record-keeping, tracking and tracing, preventive measures, technology-based sales, free zones, transit and duty free sales. For example, most Parties apply licensing and import/export controls for cigarettes, cigars and cigarillos; also, record-keeping obligations and preventive measures are widely established. Over half of Parties prohibit technology-based sales of tobacco products. A large proportion of Parties has implemented the use of unique identification markings (UIMs) for cigarette units, although the UIMs contain differing levels of information and are applied less consistently for other products.

A second cluster of articles reflects **moderate implementation**; typically, these are articles where obligations are more complex or resource-intensive, or require multiagency coordination. This cluster includes Articles 14–16 and 24–27, covering unlawful conduct, liability of legal persons, prosecutions, sanctions, law enforcement cooperation, and mechanisms for investigation and prosecution of offences. Most Parties criminalize fundamental offences and extend liability to legal persons; however, extraterritorial jurisdiction, systematic operational collaboration and coordinated investigative efforts vary considerably.

Similarly, there is **partial implementation** of another set of articles, Articles 20–23, which cover general information sharing, enforcement information, confidentiality and technical assistance. Although some Parties actively exchange data and receive assistance, significant gaps remain in establishing national authorities, reporting trends and fully leveraging technical support. These moderately implemented articles indicate both progress and persistent challenges in harmonizing national measures with the Protocol's transnational objectives.

Finally, certain provisions remain **least implemented**, often due to legal, administrative or financial constraints. Articles 28–32 – which cover mutual administrative and legal assistance, extradition and reporting and exchange of information – are operational in a minority of Parties. For example, only 22% of Parties have provided mutual legal assistance, 37% have provided administrative support to other Parties and only 50% have formal extradition measures in place. Reporting obligations under Article 32 also show substantial gaps, with less than half of Parties reporting to the MOP fully on seizures, production and trends, and many requiring technical assistance to comply. These gaps highlight the areas where capacity-building, legal harmonization and enhanced international cooperation are most urgently needed to strengthen global implementation of the Protocol.

The categories given here should be analysed with caution. On the one hand, for some of the articles, the reporting instrument included only one question regarding its subject matter (with only a yes/no option as an answer); hence, the responses cannot be indicative of the comprehensive implementation of the measures under those articles. On the other hand, some articles with an affirmative answer have not been implemented comprehensively by most of the Parties. For example, where Parties have indicated that they use a UIM to track and trace tobacco products, the UIM may contain only limited information, may not be secure or may not be equally accessible to all authorities. 3. Implementation of the Protocol by provisions

3. Implementation of the Protocol by provisions

The article-by-article implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products was assessed based on information and data submitted by 46 Parties in their implementation reports in 2025.

The reporting cycle carried out in early 2025 was the third reporting cycle for the Protocol. Implementation rates for the substantive articles of the Protocol were calculated based on the information received through the online reporting platform, assessed as of 17 June 2025. The list of indicators that were included in the analysis on which the text of this 2025 Global Progress Report is based, across 22 substantive articles of the Protocol, can be found in the supplementary documents accompanying this report, available on the WHO FCTC website.

Supply chain control

Licence, equivalent approval or control system (Article 6)

Key observations

- **Licensing, particularly for manufacturing and import, is most widespread for the most conventional products: cigarettes, cigars and cigarillos.**
- **Fewer than half of reporting Parties (46%) reported requiring import licences for other tobacco and nicotine products,³ despite their rapid market growth and the aggressive targeting of youth.**
- **Many more Parties reported requiring licensing for import than licensing for export.**

Implementation of a licence, equivalent approval or control system: activities and products

Article 6 of the Protocol represents a cornerstone of supply chain control, requiring each Party to establish a licensing, equivalent approval or control system for tobacco products and manufacturing equipment. Such systems are essential for tackling illicit trade because they support transparency, accountability and oversight across the entire supply chain. Competent authorities tasked with administering these systems carry wide-ranging responsibilities, including issuing and renewing licences, monitoring operators, collecting fees, investigating fraudulent practices, obliging licensees to report operational changes and, where necessary, ensuring the destruction of manufacturing equipment.

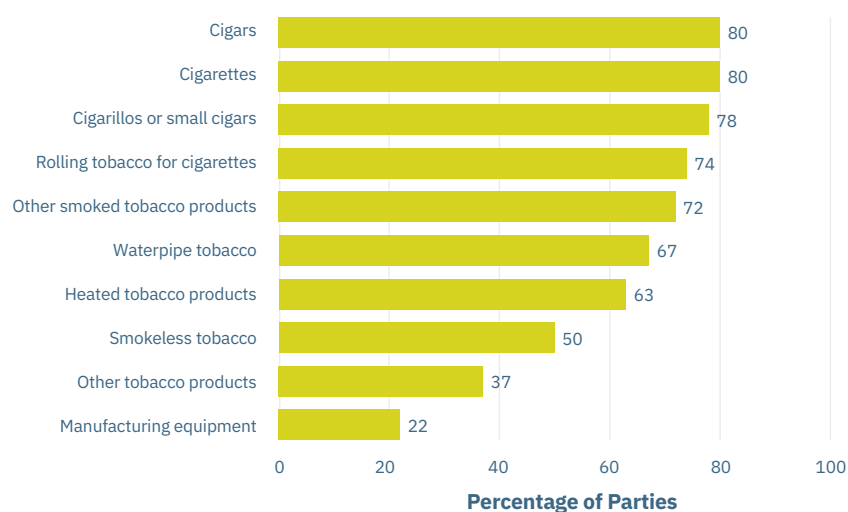
Requiring a licence or equivalent approval system

Under Article 6 of the Protocol, Parties demonstrated considerable variation in the activities and product types subject to licensing (**Fig. 1**). With respect to **licences for manufacturing**, about 80% of reporting Parties indicated that they require a licence for cigarettes (37 Parties), cigars (37) and cigarillos (36). This proportion was lower for other tobacco products: about 67% (31 Parties) reported requiring licences for waterpipe tobacco and only half (23) for smokeless tobacco. Licensing for manufacturing equipment is far less common, with just 10 Parties (around 22%) reporting such a requirement.

A similar pattern emerges with **import licensing**. Most reporting Parties reported that they require licences to import cigarettes (41 Parties), cigars (39) and cigarillos (40). By contrast, fewer Parties reported that they regulate the import of other tobacco products (**Fig. 2**). Notably, fewer than half (21 Parties) reported that they require a licence to import other products such as electronic nicotine delivery systems (ENDS), commonly known as e-cigarettes or vapes.

³ Parties reported on a wide variety of conventional and novel and emerging tobacco and nicotine products, using a variety of terms to describe them, and assigning them to various product categories, defined in their national legislations; this made the interpretation of such legislation difficult.

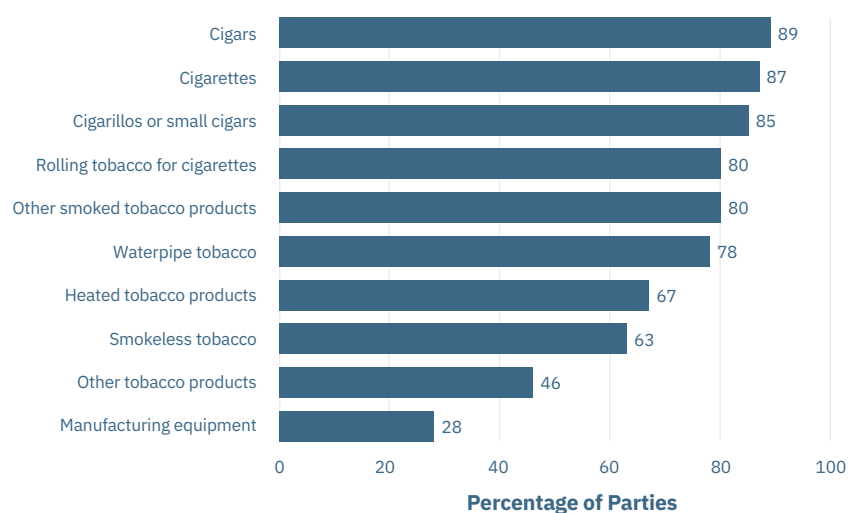
Fig. 1. Parties reporting licence, equivalent approval or control system for manufacturing, by product, n= 46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties to the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

Fig. 2. Parties reporting licence, equivalent approval or control system for importing, by product, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

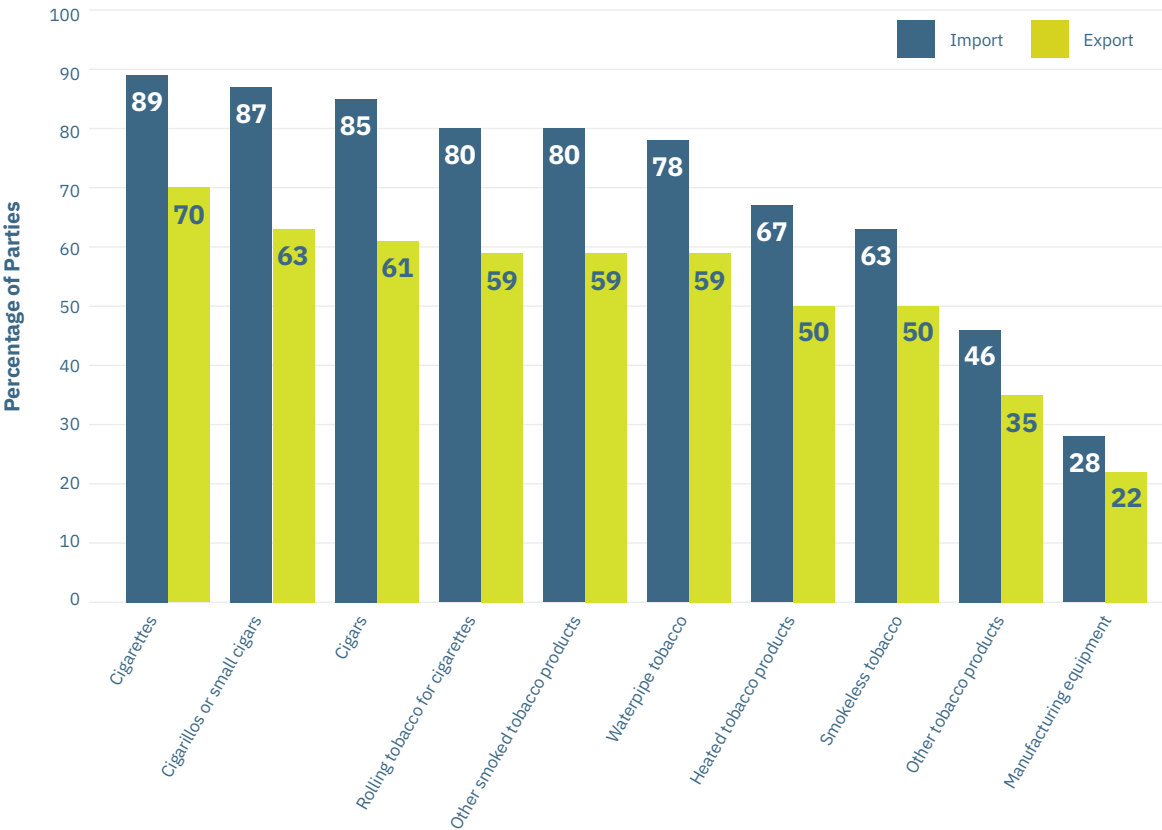
Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

With respect to the **import of tobacco manufacturing equipment**, requirements remain limited, with only 13 Parties (28%) reporting that they require a licence. Compared with the broad base of countries that import and consume tobacco products, the number of manufacturing and initial exporting countries was smaller, which may explain why licensing for export is less common than for import (**Fig. 3**). For instance, although 89% of reporting Parties required a licence to import cigarettes, just 70% reported requiring one for export. A similar gap was seen for waterpipe tobacco, where 78% of Parties reported that they require an import licence but only 59% reported that they require an export licence. Consistent with other areas of economic

activity, only a small number of Parties (10; 22%) reported licensing requirements for the export of tobacco manufacturing equipment.

Beyond manufacturing, import and export, **licensing requirements for other activities** are less common. Just over half of reporting Parties (24) reported that they require a licence to retail tobacco products. Fewer still reported that they require licences for primary production and movement. Only 10 Parties (22%) reported licensing requirements for tobacco growing and 12 Parties (26%) for the transport of commercial quantities of tobacco products. Licensing for the transport of manufacturing equipment was the least common, reported by just five Parties (11%) (**Fig. 4**).

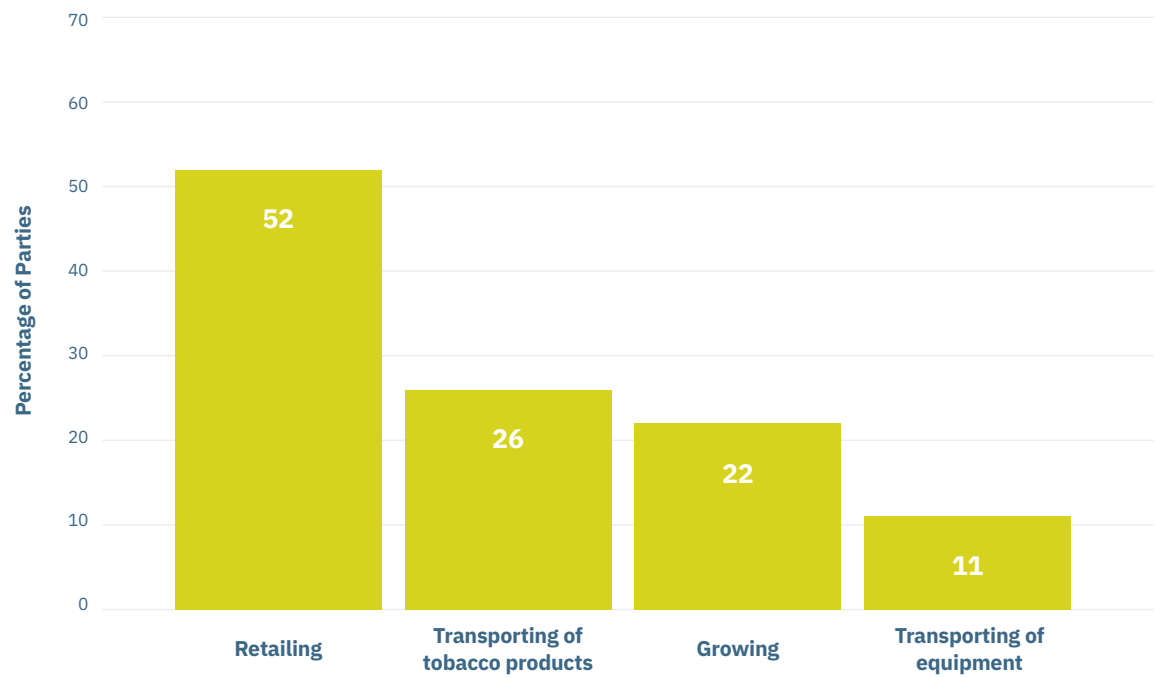
Fig. 3. Parties reporting licence, equivalent approval or control system for importing vs exporting, by product, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

Fig. 4. Parties reporting licence, equivalent approval or control system for other activities, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.



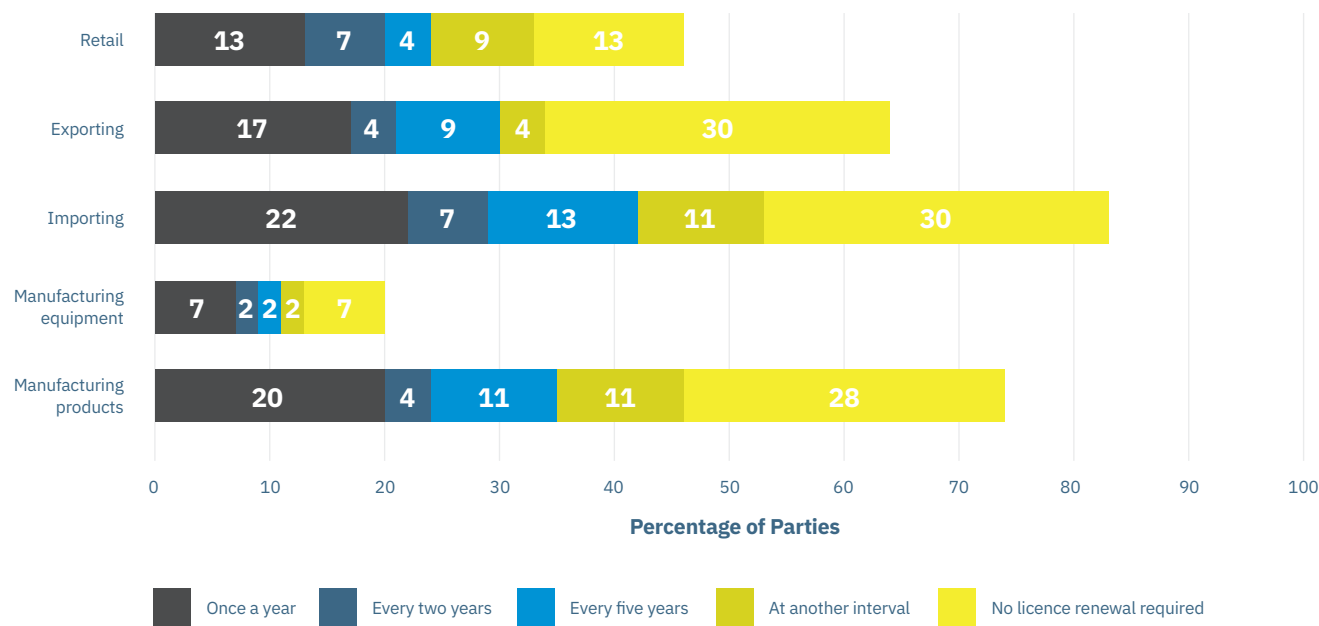
Photo courtesy of His Majesty’s Revenue and Customs, United Kingdom of Great Britain and Northern Ireland

Periodic renewal requirements and licensing fees

Periodic renewal of licences among the Parties requiring a licence varied considerably with the activity considered. Regarding manufacturing, among the Parties that reported requiring a licence, 38% reported no obligation for periodic renewal, whereas 15% reported requiring renewal every five years and 6% every two years (Fig. 5).

Some Parties apply alternative schedules. In Nigeria, manufacturers must renew every four years, whereas in Fiji, operators may choose the validity period themselves, for a period of up to five years, with fees adjusted according to the duration selected. Overall, the majority of Parties (70%) reported imposing a licensing fee for manufacturing.

Fig. 5. Parties reporting periodic renewal durations, by activity, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol. In this particular case, the remaining Parties (i.e. up to 100%) reported that they do not require any licensing for the particular activity.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

For **import licence renewals**, a similar picture emerged. About 37% of Parties reported that they impose no renewal requirement, 16% reported that they require renewal every five years and 8% every two years. Nearly three quarters (70%) of Parties also charge a fee for obtaining an import licence. There was even greater variation regarding **export licences**. Almost half (47%) of Parties reported that they require no renewal, while about a quarter (27%) stipulate annual renewal. Other intervals were less common. The requirement of a licensing fee was evenly split, with half of reporting Parties imposing one and the other half not.

Some Parties adopt unique approaches to renewal for import licences. In Madagascar, an import authorization must be obtained for each shipment of tobacco products. Similarly, in Mauritius, importers must secure a permit from both the National Agricultural Products Regulatory Office under the Ministry of Agro-Industry, Food Security, Blue Economy and Fisheries and from the Customs Division of the Revenue Authority each time they import tobacco products.

Retail licensing was another aspect where there was wide divergence. About 29% of Parties reported that they do not require periodic renewal, while an equal share mandate annual renewal. Most Parties that reported requiring retail licensing also impose a fee (81%). In several jurisdictions, renewal periods are set at subnational or municipal levels. For example, in Saudi Arabia, municipalities determine the duration, provided it is no less than one year and no more than five years. In India, renewal requirements are delegated to state and union territory authorities, each of which sets its own rules.

Licensing authorities

In most of the Parties, responsibility for overseeing tobacco-related licensing generally lies with customs and excise agencies, or with particular ministries (e.g., finance, economic affairs, trade, health, agriculture or tobacco control). Most Parties reported that their competent authorities have the power to suspend, revoke or cancel licences in cases of non-compliance, a critical safeguard for enforcement.

Most of the European Parties that submitted reports indicated that customs, excise and revenue agencies are the primary licensing bodies. However, some countries have opted for other authorities. Lithuania, for instance, mandates the Drug, Tobacco and Alcohol Control Department, while Norway places responsibility with the Directorate of Health.

In the World Health Organization (WHO) Region of the Americas, it was more common for health ministries and agencies to be reported as being entrusted with this role. Nicaragua has designated the National Health Regulatory Authority, while Costa Rica relies on the Ministry of Health, reflecting a stronger public health framing in regulatory oversight.

In other WHO regions, responsibilities are more diverse. For example, in Benin and Burkina Faso, the Ministry of Commerce holds licensing authority, whereas in the Islamic Republic of Iran, oversight rests with the Centre for Planning, Organizing and Monitoring Tobacco Affairs under the Ministry of Industry, Mines and Trade. In some Parties, licensing is shared across several agencies. For example, in Jordan, licensing responsibilities are jointly managed by the Food and Drug Administration, the Customs Department, the Ministry of Investment and the Ministry of Environment.

Due diligence (Article 7)

Key observations

- **Less than half of reporting Parties (44%) reported that they require full due diligence for all supply chain actors, highlighting a substantial gap between the Protocol's expectations and actual practice.**
- **Only 41% of Parties reported that they require monitoring sales to ensure that they are commensurate with market demand, leaving room for diversion or over-supply.**
- **The requirement to report customers engaged in activities contravening the Protocol was the least implemented aspect of Article 7, with just 35% of Parties imposing it.**

Under Article 7 of the Protocol, Parties are required to ensure that all natural and legal persons involved in the supply chain of tobacco, tobacco products and manufacturing equipment conduct due diligence both before entering into a business relationship and during the course of that relationship. This includes monitoring sales to confirm that quantities are commensurate with demand in the intended market, and reporting to authorities any evidence that customers are engaged in activities that contravene their obligations under the Protocol.

Implementation of Article 7 for the various actors in the supply chain remains uneven. Only 20 Parties (44%) reported that they require due diligence for all actors in the supply chain, both before and during business relationships. Regional variations were relatively modest, with the requirement imposed by 57% of reporting Parties in the WHO Region of the Americas, 47% in the European Region, 40% in the Eastern Mediterranean Region and 38% in the African Region.

Monitoring of sales to ensure that they align with legitimate market demand was reported as being required by slightly fewer Parties; 41% reported such measures. Notably, the WHO African Region is an exception; in that region 54% of Parties reported that they require sales monitoring. In other regions, the proportion of Parties requiring monitoring was

between 5% and 20% lower than the baseline due diligence figures.

The obligation to report evidence of customers acting in contravention of the Protocol was the least widely implemented element of Article 7. Overall, 35% of Parties reported that they require such reporting. Regional disparities were pronounced, with only 14% of reporting Parties in the WHO Region of the Americas imposing this obligation, whereas 46% of Parties in the African Region reported requiring it.

Tracking and tracing (Article 8)

Key observations

- **Thirty-two Parties (70%) reported that they apply markings (e.g., tax stamps, fiscal marks, banderols or other types of marking) on units of tobacco packaging for cigarettes.**
- **Most Parties reported that they apply the same UIM requirements to cigarettes, cigars, cigarillos and rolling tobacco, but far fewer extend those requirements to smokeless tobacco, waterpipe tobacco or heated tobacco products (HTPs).**
- **UIMs most often provide the basic required details required under Article 8, but fewer Parties capture subsequent purchaser or shipment route information, potentially leaving critical blind spots for tracing diversion points.**

To strengthen supply chain security and support investigations into illicit trade, each Party is required to establish a tracking and tracing system. This system mandates that unique, secure and non-removable identification markings (UIMs) be affixed to, or form part of, all unit packets, packages and outer packaging of cigarettes within five years of the Protocol's entry into force for that Party, and for all other tobacco products within 10 years.

These markings must include information sufficient to determine the origin of tobacco products, identify points of diversion, and monitor their movement and legal status. The final aim is to have the recorded information accessible via the global information-sharing focal point, to ensure transparency and facilitate cross-border cooperation.

Unique identification markings

Regarding cigarettes, the majority of reporting Parties (70%) reported that they require UIMs to be affixed or form part of the packaging. Of the 32 Parties that reported applying such markings, 24 indicated that they incorporate at least one security feature verifiable by the naked eye, including colour-changing inks, holograms, latent images, watermarks or security threads. The same Parties additionally indicated that these markings are visible/readable to enforcement authorities outside their jurisdictions.

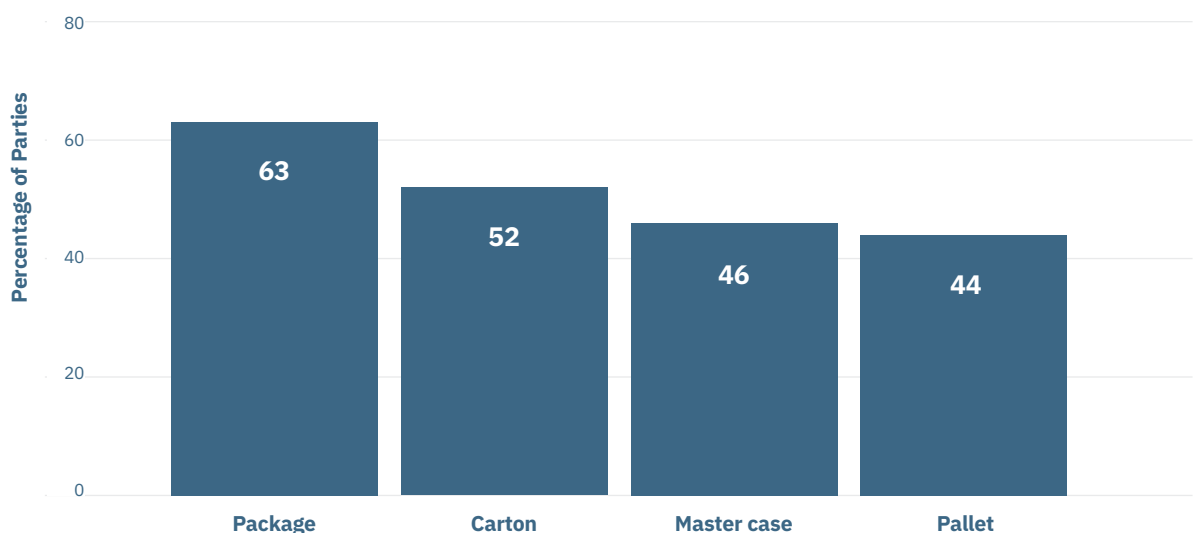
About 60% (27) of reporting Parties also reported using security features that require specialized electronic readers or laboratory analysis to verify, providing an additional layer of protection against counterfeiting.

Cigarette unit markings

Where UIMs are applied to cigarette packaging – whether features are visible to the naked eye or require specialized verification – markings must include a unique identifier for each unit, making every item distinct and distinguishable. Unit packaging encompasses packs, cartons, master cases and pallets.

To strengthen supply chain security and support investigations into illicit trade, each Party is required to establish a tracking and tracing system.

Fig. 6. Parties reporting application of UIMs, by type of unit packaging, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

Application of unique identifiers varied slightly across these forms (Fig. 6). Just over half of Parties (29, 63%) reported that they include a unique identifier on each individual pack, while slightly fewer (24) reported that they apply them to each carton. Similar proportions reported that they extend these identifiers to master cases (21) and pallets (20).

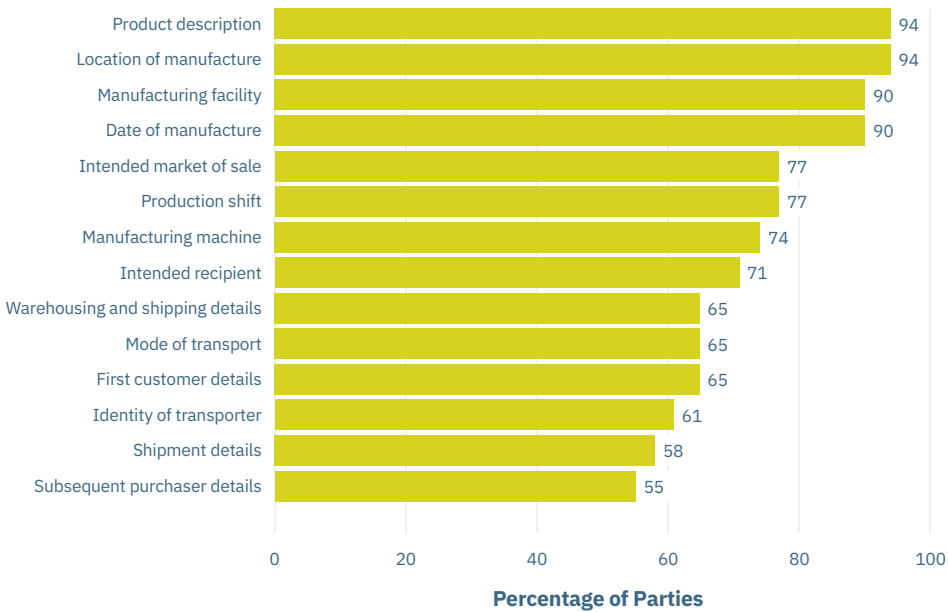
Among Parties that reported implementing unique identifiers across packs, cartons, master cases or pallets, 52% (24) reported the existence of a parent–child aggregation link system, linking identifiers across packaging levels to enhance traceability and facilitate the monitoring of supply chains.

Information available made by marking
Under Article 8.4 of the Protocol, UIMs on each unit of cigarette packaging must contain

certain core information, including the date and location of manufacture, the manufacturing facility, the product description and, where available, the intended retail market. Ideally, UIMs would also capture additional details such as the manufacturing machine, the identity of any known subsequent purchaser and the intended shipment route.

Among reporting Parties, the most commonly retrievable information from UIMs concerns the location of manufacture and the product description, reported by 29 Parties (63%). Over half (28, 61%) indicated that authorities can access the date of manufacture and the manufacturing facility. Other information outlined in Article 8.4 is less frequently included; for example, the smallest share of Parties (17, 37%) reported capturing information on known subsequent purchasers (**Fig. 7**).

Fig. 7. Parties reporting information contained in UIMs on each unit of tobacco packaging for cigarettes, by type of information, n=31, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.

Access to UIM data varied by authority. Among Parties allowing competent authorities to retrieve UIM information, customs authorities were most frequently granted access (26, 87%), followed by revenue or tax authorities (21, 75%), and border control agencies (17, 61%). Health officials had the least access, reported by only nine Parties (32%).

Parties report using different platforms to make information available. For example, Greece has recently undertaken initiatives to strengthen and use the National Register of Tobacco Products (EKMEA), which is maintained by the Independent Authority for Public Revenue, and serves as a centralized digital platform for the registration, monitoring and fiscal oversight of all tobacco sales points in Greece. The EKMEA platform has significantly improved transparency, traceability and compliance monitoring.

Timing of information recording

Information contained in UIMs may be captured at different points as a product moves through the supply chain. Among Parties that include information within UIMs, almost all (27, 93%) reported that they record information at the time of manufacture of products for sale within their jurisdiction.

This share decreased when recording information at other points. About 79% of Parties (22) reported that they record UIM information at the time of manufacture for export products. Slightly fewer Parties indicated that they record information at the time of first shipment (18, 72%) or upon import into their territory (21, 75%).

Information sharing

Parties reported that they make available information contained in UIMs on units of tobacco packaging for cigarettes not only to national authorities but also, in some cases, to authorities outside the jurisdiction of the Party. Among Parties that include accessible information in their UIMs, external authorities most commonly have access to product description and location of manufacture (21, 70%). By contrast, the least accessible types of information to outside authorities are the identity of the transporter (14, 47%) and the mode of transportation (15, 50%).

Similarly, information contained in the UIMs may also be made available for sharing specifically to other Parties to the Protocol. A total of 16 Parties (57%) reported that data about manufacture, location of manufacture, intended market and product description are made available for sharing to other Parties to the Protocol. Further, of those Parties reporting that information is available for sharing, nine (64%) reported that they have shared information contained in the UIMs with other Parties to the WHO FCTC.

Security and application of markings

Article 8.3 of the Protocol requires that UIMs on units of tobacco packaging for cigarettes be tamper-proof or non-removable. Among Parties that have implemented UIMs, nearly all (29, 97%) reported incorporating such security features. The predominant method of compliance involved integrating markings directly into the packaging, for example, through direct printing (21, 84%). Besides applying markings to the packaging (e.g. stickers), two Parties (9%) employ alternative approaches. For instance, Lithuania applies different methods depending on the type of marking: unique codes for unit packets and larger retail packages are typically printed directly, whereas tax stamps and other unique codes are affixed.

The application of UIMs also varied depending on whether products are imported, domestically manufactured or designated for export. Most Parties (26, 93%) reported that they apply markings to units of imported tobacco packaging for cigarettes, whereas a smaller number of Parties (22, 79%) reported that they apply them to domestically manufactured products. In addition, about 64% of Parties (18) indicated that markings are applied to units intended for export. Among the Parties applying UIMs to imported units, about half (11, 52%) reported that they affix the UIMs at the point of importation, while a slightly larger share (14, 64%) reported that they apply the markings at the manufacturing stage.

Financing of supply chain control measures

Supply chain control measures (e.g., licensing, applying UIMs and monitoring routes and movement of products) are financed through a range of methods across Parties. Most Parties reported that they do not finance measures

using funding from the tobacco industry. Only 15 Parties (41%) reported that they use licensing fees from actors in the supply chain and 12 (32%) that they use funding from tobacco manufacturers through the sale of compulsory tax stamps. Other Parties reported different ways of financing supply chain control measures. For example, in Cyprus, Slovakia and Montenegro, measures are supplementally financed using the government-allocated budget.

Prevention of tobacco industry involvement

A high proportion of Parties reported that the tobacco industry is not involved in most aspects of implementing supply chain measures. In particular, over 80% of Parties reported that they do not allow the tobacco industry to generate UIMs or supply software to generate UIMs (38, 83%). In addition, most Parties indicated that they have measures to prevent tobacco industry access to information designated for authorities.

Requirements for other tobacco products

Under Article 8.3, UIMs must also be applied to other tobacco products within 10 years of the Protocol's entry into force in a Party's jurisdiction. In practice, the extent of application varies across product categories. A majority of Parties (23, 77%) reported that rolling tobacco, cigarillos and cigars are subject to the same requirements as cigarettes. A somewhat smaller share of Parties indicated the same for waterpipe tobacco (21, 70%), smokeless tobacco products (18, 62%) and HTPs (19, 63%). The smallest proportion of Parties (12, 43%) reported that they extend the same requirements to other tobacco products more broadly.

In May 2024, the EU expanded its tracking and tracing system to include all tobacco products, not just cigarettes and hand-rolled tobacco. As a result, all operators in the supply chain of tobacco products are required to comply with Directive 2014/40/EU, Commission Implementing Regulation (EU) 2018/574 and Commission Delegated Regulation (EU) 2018/573. Thus, each unit pack of tobacco products must be marked with a UIM, and operators must record and transmit information regarding product movement to the system. This expansion modifies the EU-wide tracking and tracing system that became

operational in 2019. Data transmitted by operators is made accessible to the authorities of the EU and to the European Commission for the purposes of enforcement and cooperation.

Serbia also reported that it has strengthened enforcement against illicit trade in tobacco products by implementing a new tracking and tracing system. The system became operational in October 2025. It tracks the movement of cigarettes and smokeless tobacco using production codes affixed to the products, tracking movement from the manufacturer to the retailer.

Laws and/or measures establishing tracking and tracing systems

The establishment of tracking and tracing systems varied across Parties. Many Parties have only recently included tracking and tracing systems in national legislation. Thus, although Parties may have legislation enacted to establish tracking and tracing systems, the development of those systems may be in the early stages or may not yet have started.

In the Republic of Moldova, the Law on Tobacco Control was amended in 2023 to introduce provisions to align with Article 8 of the Protocol. As a first step, the Republic of Moldova has implemented UIMs in the form of QR codes, to form the foundation for a national traceability system. Meanwhile, in Eswatini, although a tracking and tracing system is still in development, the Tobacco Products Control Act provides a basis for the competent Minister to establish regulations that facilitate the monitoring of tobacco products throughout the distribution chain, from manufacture to the point at which all relevant duties and taxes have been paid, including the use of scannable markings.

In Senegal, an Interministerial Order was adopted in 2021 establishing a tracking and tracing system for tobacco products, complete with the use of irremovable UIMs. Although the system is not yet operational, the Order places the system's establishment and management under the competent authority of the Ministers responsible for Finance and Budget, Industrial Development and Small and Medium-Sized Industries and Trade and Small and Medium-Sized Enterprises.

In January 2022, Côte d'Ivoire adopted Decree No. 2022-76, which establishes the legal basis

for monitoring, traceability and tax verification of tobacco products. Subsequently, the country has been working towards planning the design, financing, implementation, operation and maintenance of a tracking and tracing system. In October 2024, Côte d'Ivoire approved a contract to establish a system and a tax stamp to be affixed to tobacco products. Further, specifications were made available to manufacturers and importers, demonstrating progress and commitment to meeting the requirements of Article 8.

In Parties with more established legislation, the tracking and tracing systems are more advanced, and implementation is in later stages. For example, in Brazil, a Normative Instruction adopted in 2007 requires that cigarette manufacturers install relevant equipment and use the Cigarette Production Control and Tracking System, also known as Scorpions. Although Scorpions has not yet expanded to include movement along the entire supply chain, it already enables product tracking throughout the country, to identify origin and suppress illegal production and import, as well as the sale of counterfeit products using UIMs. The system imposes several obligations on manufacturers to control, register and report information regarding quantity of cigarettes manufactured.

Record-keeping (Article 9)

Key observations

- **Most Parties reported that they require record-keeping and access to supply chain information.**
- **There are significant regional disparities among the Parties, with lower implementation in the WHO African Region and the Region of the Americas.**

Article 9 of the Protocol requires Parties to oblige all natural and legal persons engaged in the supply chain of tobacco, tobacco products and manufacturing equipment to maintain complete and accurate records of all relevant transactions. Such record-keeping is intended to ensure transparency across the supply chain, facilitate monitoring by competent authorities and strengthen enforcement against illicit trade. Records

should include, at a minimum, details of all transactions, quantities and the identities of customers and suppliers, and should be made available to the competent authorities upon request.

Among Parties reporting for the current cycle, 34 (74%) reported explicitly stipulating record-keeping of transactions. A similar proportion of Parties (72%) reported requiring that entities subject to a licensing system provide, upon request, information to authorities regarding volumes, trends, forecasts and other relevant data.

Regional implementation shows notable variation. Record-keeping requirements were most widely reported in the WHO European Region (84%) and the Eastern Mediterranean Region (80%), while adoption was lower in the Region of the Americas (57%) and the African Region (54%). These disparities highlight ongoing challenges in achieving consistent global compliance and comprehensive monitoring of tobacco supply chains.

Record-keeping requirements often vary in terms of information recorded. In Fiji, for example, manufacturers, importers, wholesalers, distributors, retailers and vendors of suki (traditional, air-dried tobacco) are required to maintain complete and accurate records of all relevant transactions. Currently, however, record-keeping of transactions regarding tobacco manufacturing equipment is not required.

In other Parties, record-keeping is not specific to tobacco-related activities; rather it is a general requirement applied to all trade within the jurisdiction. In Congo, all traders, including natural and legal persons, are required to record all daily business transactions as well as provide accounting documents. In Montenegro, all persons are obliged to record all transactions using various accounting methods. Similarly, in Madagascar, all commercial enterprises are required to prepare financial statements at the end of each financial year that include a summary of financial transactions as well as a statement of the sureties, endorsements, guarantees and real securities granted by the company.

Security and preventive measures (Article 10)

Key observations

- **Although most Parties reported that they require some preventive measures under Article 10, reporting obligations are unevenly applied.**
- **Reporting of cross-border cash transfers is the measure that is most commonly mandated, whereas reporting of suspicious transactions and limiting supply to match market demand are less frequently required.**

In accordance with Article 10 of the Protocol, Parties shall require licensed economic operators to implement adequate security and preventive measures throughout the supply chain of tobacco, tobacco products and manufacturing equipment. These measures are intended to minimize diversion into illicit markets and ensure that entities engaged in the supply chain operate under conditions that reduce the risk of unlawful activity.

In particular, each Party shall require that entities subject to a licensing system take necessary steps to prevent diversion of tobacco products into illicit trade channels. This includes reporting to competent authorities any cross-border transfer of cash as stipulated under national law, as well as all suspicious transactions. In addition, licensed entities must supply tobacco products and manufacturing equipment only in quantities commensurate with the demand in the intended market of sale or use. Further, payments should only be allowed in the currency and in the same amount as the invoice, and only through legal modes of payment from financial institutions located on the territory and not through alternative remittance systems.

Of the preventive measures under Article 10, 54% of Parties reporting in the current cycle indicated that they require licensed entities to report cross-border transfers of cash in amounts stipulated under national law. Reporting of suspicious transactions was reported as required by 46% of Parties, while only 33% reported mandating that licensed entities supply tobacco products and manufacturing equipment in quantities

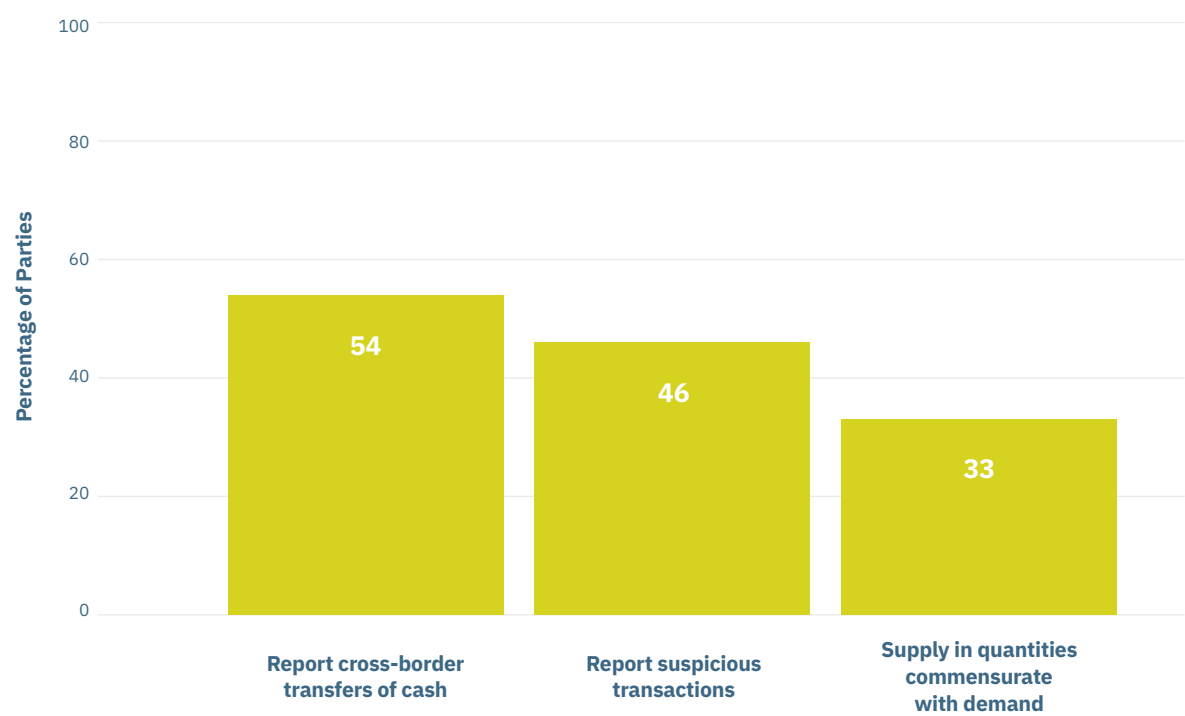
commensurate with demand in the intended market of retail sale or use.

A similar pattern for the three measures was seen in the different WHO regions. Reporting of cross-border cash transfers was the measure most commonly reported as being required in most regions. In the WHO African Region, about 69% of reporting Parties mandate such reporting, compared with 60% in the Eastern Mediterranean Region and 53% in the European Region. In the WHO Region of the Americas, a similar share of Parties reported that they require both reporting of cross-border cash transfers and of suspicious transactions, indicating partial adoption of the full suite of preventive measures across jurisdictions.

There was some variation in application of Article 10 across Parties, particularly in relation to cross-border payments. In Gabon, legislation requires all natural and legal persons to make payments in Central African CFA (Communauté Financière Africaine) francs via financial institution and only for the amount listed on the invoice; in contrast, in Madagascar, the system of monitoring of cross-border payments requires financial institutions to undertake an identification procedure and attach the information regarding the originator and the beneficiary to the wire transfer for verification.

In other Parties, Article 10 measures fall under the wider scope of anti-money laundering and countering the financing of terrorism (AML/CFT) efforts. In Paraguay, under legislation amended in 2022, companies engaged in tobacco-related activities are “obliged entities” of the Secretariat for the Prevention of Money or Asset Laundering (SEPRELAD). As entities of SEPRELAD, they must be subject to the country’s AML/CFT regulations, including those requiring identification of customers, due diligence measures and reporting of suspicious transactions. Similarly, in Ghana, under the Anti-Money-Laundering Act 2020, financial institutions must observe due diligence requirements, including customer and beneficial owner identification, enhanced monitoring of high-risk customers, record-keeping and the reporting of suspicious transactions within 24 hours.

Fig. 8. Parties reporting security and preventative measures, by type of requirement, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle.



Photo courtesy of the Federal Revenue Service of Brazil

Sale by Internet, telecommunication or any other evolving technology (Article 11)

Key observations

- **Almost two thirds of reporting Parties indicated that they ban technology-based sales of tobacco products.**
- **Three quarters of reporting Parties indicated that their regulations ensure that technology-based sales comply with all relevant obligations of the Protocol.**

Article 11 requires Parties to take measures to prevent the sale of tobacco products through the Internet, telecommunication networks or other emerging technologies in ways that contravene the Protocol’s objectives. Each Party shall ensure that all technology-based sales comply with all relevant obligations covered by the Protocol. In addition, Parties are encouraged to consider banning such retail sales altogether. These measures aim to restrict access to tobacco products, particularly by minors, and to prevent diversion into illicit markets. Regulatory frameworks may include age verification, restrictions on cross-border sales and mechanisms to monitor and track online transactions.

The same number of Parties (29) as in 2023 reported banning sales of tobacco products through the Internet, telecommunication or other evolving technologies, while 15 Parties (33%) reported no such ban. The majority of Parties (74%) indicated that regulations ensure technology-based sales comply with all relevant obligations covered by the Protocol.

Regionally, about half of reporting Parties in the WHO European Region (53%) and the Region of the Americas (57%) prohibit technology-based sales. In contrast, the share of Parties imposing such bans is higher in the WHO African Region (77%) and the Eastern Mediterranean Region (80%), reflecting differing regulatory priorities and enforcement approaches across regions.

Free zones and international transit (Article 12)

Key observations

- **Although most Parties report the existence of free zones and permit international transit of tobacco products, implementation of supply chain control measures within these contexts is uneven.**
- **Licensing, record-keeping and due diligence are applied more frequently than marking requirements, and few Parties prohibit intermingling of tobacco products with non-tobacco products, highlighting persistent vulnerabilities in free zones and transit operations.**
- **Although most Parties allow international transit and/or trans-shipment within their territories, only about half of these Parties apply supply chain control measures to such movement.**

Article 12 of the Protocol requires Parties to implement effective controls over all tobacco-related activities in free zones and during international transit. Within three years of the Protocol’s entry into force, each Party shall establish measures to regulate tobacco in free zones using all relevant provisions of the Protocol, and to prohibit the intermingling of tobacco products with non-tobacco products in a single container at the time of removal from such zones. In addition, control and verification measures must be applied to tobacco products in international transit or trans-shipment within a Party’s territory. These requirements aim to prevent diversion of tobacco products into illicit trade, ensure proper monitoring of storage and movement, and maintain the integrity of supply chain controls.

Despite progress, enforcement challenges remain. Free zones and international transit points continue to pose vulnerabilities, particularly where regulatory oversight is limited or fragmented across multiple authorities. Ensuring effective coordination between customs, trade and law enforcement authorities is critical to prevent illicit diversion and to maintain compliance with the Protocol.

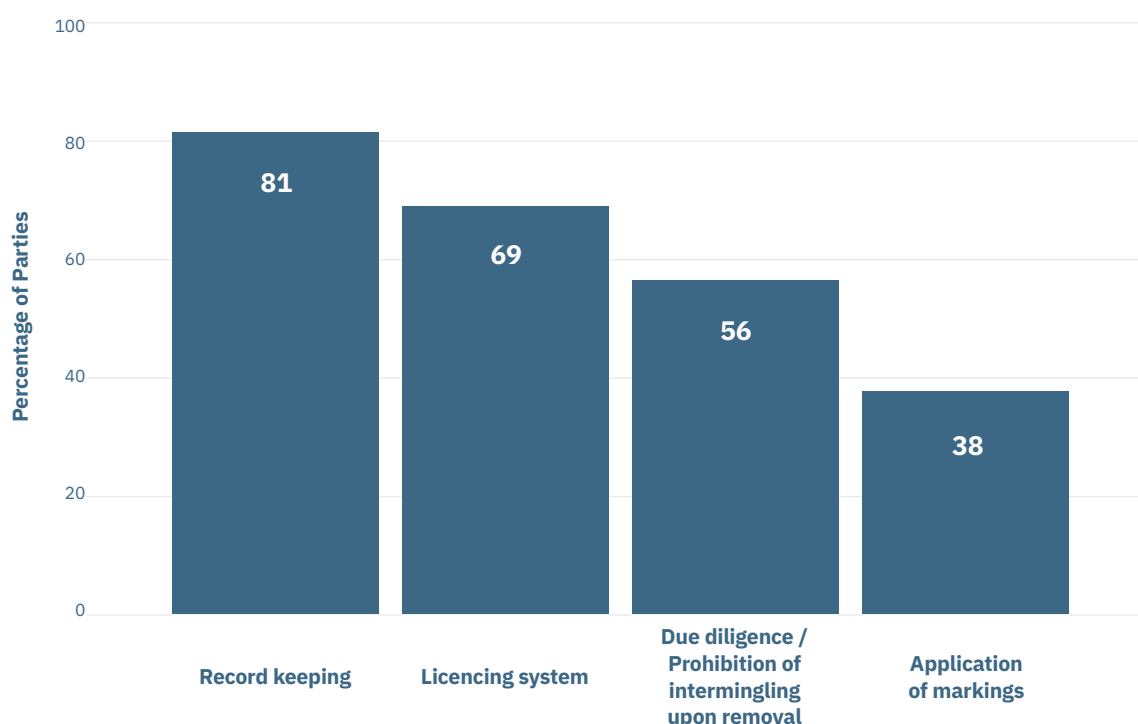
The majority of Parties (70%) reported the existence of a free zone within their territories. Of these, about half reported permitting the manufacturing of tobacco products within their free zones. However, only some of these Parties indicated that supply chain control measures are applied to such activities. Thirteen Parties impose a record-keeping requirement, 11 reported that they maintain a licensing system and only six reported that they require markings to be applied to units of tobacco packaging. Similarly, only a quarter of Parties (8) reported prohibiting the intermingling of tobacco products with non-tobacco products in a single container upon removal from free zones.

These differences can be viewed in the practical application of measures. For example, in the Republic of Moldova, the import of tobacco and tobacco products into free zones and the

production of tobacco products in these zones are strictly prohibited, in accordance with the country's Law on Free Economic Zones. Moreover, control and verification measures in the free zones include inspections that are either planned or unplanned, depending on the circumstances. However, the intermingling of tobacco and non-tobacco products upon removal is not yet banned. Meanwhile, in Eswatini, under the Special Economic Zones Act 2018 and the Tobacco Products Control Act 2013, authorities are empowered to conduct inspections and investigations within free zones, but intermingling is not currently banned.

Regardless of whether a free zone exists, the international transit and trans-shipment requirements of Article 12 apply. Although most Parties (40, 93%) reported that they allow movement of tobacco products and manufacturing equipment within their territories,

Fig. 9. Parties reporting application of the Protocol within free zones, by supply chain measure, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties of the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle

only about half of these (23, 58%) reported that they implement supply chain control measures. The measures most commonly reported were record-keeping (18), due diligence (17) and licensing (15), while only seven Parties reported that they require the application of markings on units of tobacco packaging.

Implementation of control measures varies across regions. In Mauritius, products transiting through ports must be accompanied by documents detailing origin, destination, shipment route, consignee and batch number, as well as an indication that the products are not intended for the Mauritian market. In Saudi Arabia, authorities verify the transit control process by placing secure electronic tracking devices on trucks from entry until they reach the customs exit point.

In 2024, Brazil adopted Normative Instruction of the Brazilian Federal Revenue Service (RFB) No. 2.231/2024. The regulation aims to control the customs transit of goods passing through Brazil destined for neighbouring countries, the objective being to prevent these goods from returning to Brazil via smuggling. It defines rules for the control and transit of goods in transit, and establishes conditions for customs approval to be granted. The RFB seeks to prevent goods that enter Brazil for export to neighbouring countries from being diverted and then returned to the country illegally.

Duty free sales (Article 13)

Key observations

- A third of reporting Parties prohibit duty free sales outright.
- Most Parties that indicated permitting duty free sales apply relevant Protocol measures to those sales, including the requirement for markings and supply chain controls.

Article 13 addresses the sale of tobacco products in duty free sale settings; it requires Parties to implement measures to prevent these sales from facilitating illicit trade. Parties are called upon to regulate duty free sales to ensure that tobacco products sold in such outlets comply with all relevant obligations under the Protocol, including licensing, record-keeping and monitoring of volumes. The provisions aim

to safeguard the integrity of the supply chain and prevent diversion of duty free products into domestic or international illicit markets.

Thirty-three percent of Parties submitting reports for the current cycle reported that they prohibit duty free sales of tobacco products entirely. Among Parties that allow such sales, a majority ensure that these transactions are subject to all relevant provisions of the Protocol, with 69% reporting that they apply comprehensive supply chain measures. A similar proportion (65%) reported that they require markings, such as tax stamps or unique identifiers, on units of tobacco packaging for cigarettes sold duty free; this supports traceability and reduces the risk of diversion into illicit markets.

Offences

Unlawful conduct including criminal offences (Article 14), liability of legal persons (Article 15), prosecutions and sanctions (Article 16) and jurisdiction (Article 26)

Key observations

- Most Parties classify fundamental offences under the Protocol, such as smuggling, illicit manufacture, non-payment of duties and use of false markings, as criminal offences rather than merely unlawful. Conduct related to money laundering is also widely criminalized, reflecting the cross-cutting nature of illicit trade enforcement.
- Although imprisonment is applied in many jurisdictions, sanctions more frequently involve freezing, seizure or confiscation of property, as well as monetary fines.
- The majority of Parties extend liability to corporations and other legal entities. This applies consistently across offences – including smuggling, illicit manufacture, failure to apply markings and use of false stamps – highlighting recognition of the role of legal persons in the illicit trade ecosystem.

To combat illicit trade effectively, each Party must clearly define actions related to tobacco, tobacco products and manufacturing equipment that are unlawful under national law. Also, Parties must decide which of these actions are

considered criminal offences, providing a legal foundation to hold perpetrators accountable.

Parties must ensure that such measures cover a range of acts, including the production, import, export, sale, transport or possession of tobacco products in violation of the Protocol. The objective is to create a clear legal framework that deters illicit activity, provides for proportionate penalties and allows for effective enforcement across all stages of the supply chain.

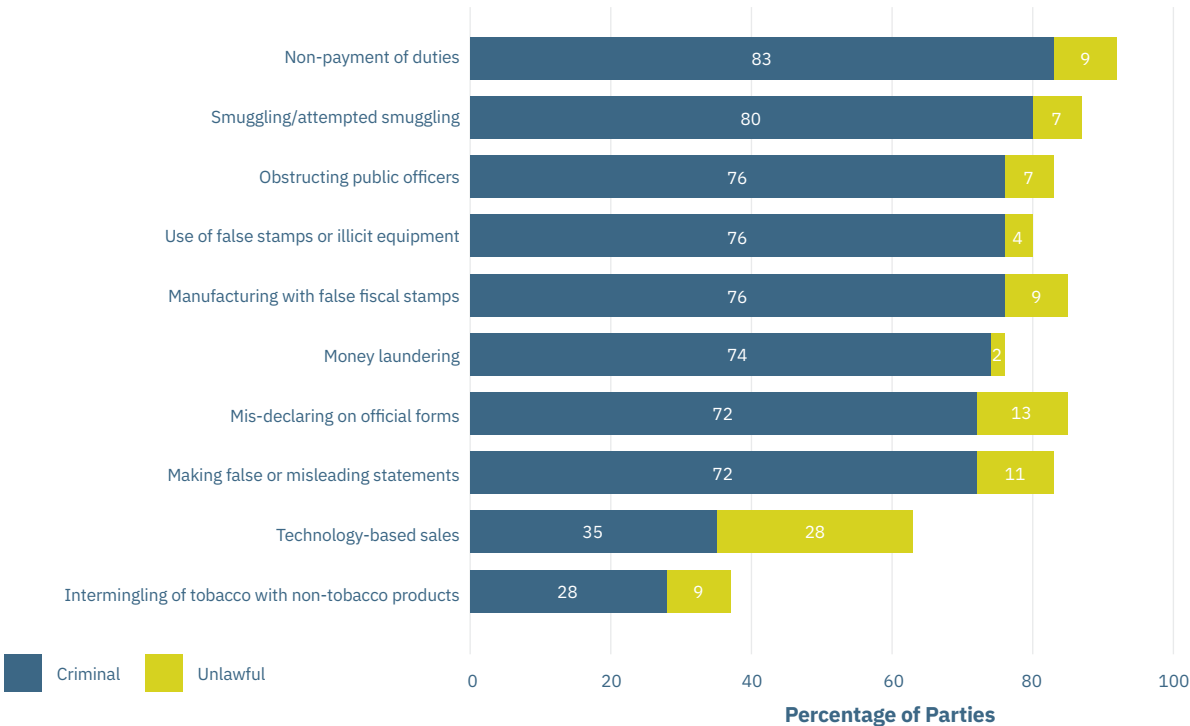
Liability under the Protocol is not limited to individuals; it also extends to companies and other legal entities. Both natural and legal persons can face sanctions that are effective, proportionate and designed to deter wrongdoing. These may include criminal, administrative and/or civil sanctions and fines, ensuring that all actors in the supply chain are accountable for unlawful conduct.

Jurisdiction over offences is established for acts committed within a Party’s territory, as well as under additional circumstances outlined in Article 26(2), while respecting the principles of sovereign equality. This framework allows for consistent enforcement and prosecution across different jurisdictions, supporting international cooperation in tackling illicit trade.

Unlawful conduct, prosecutions and sanctions

Several areas of conduct are considered to be in contravention of the Protocol. Activities such as non-payment of duties, failure to apply markings and smuggling apply specifically to offences involving illicit tobacco, tobacco products and manufacturing equipment. Other activities, such as money laundering, apply not only to the trade in illicit tobacco, but also to the wider ecosystem of combating illicit trade in multiple goods and organized crime.

Fig. 10. Parties reporting classification of conduct as unlawful vs criminal, by offence, n=46, 2025



Note: The above data represents only that which has been submitted to the Convention Secretariat; the data do not represent all Parties to the Protocol.

Source: Convention Secretariat elaboration of national data submitted by Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products, supplementing the WHO FCTC for the reporting cycle

Many Parties apply multiple sanctions in tandem and may prosecute conduct under Article 14 of the Protocol using various domestic laws. For example, in Austria, non-payment of duties, taxes or other levies at any point in the supply chain is classified as unlawful and a criminal offence. Prosecution can proceed under the Financial Criminal Code, the Customs Law Implementation Act, the Administrative Penal Code and the Tobacco Monopoly Act. Sanctions include imprisonment of varying lengths, property seizure or confiscation, fines and other administrative penalties.

Similarly, in Kenya, the Tax Procedures Act allows authorities to penalize unpaid taxes and imposes responsibility on individuals or entities that fail to deduct or remit taxes to the Commissioner. At the same time, the Value Excise Duty Act allows authorities to seize excisable goods if duties have not been paid or if goods have been mis-declared or unlawfully represented.

Globally, the classification of conduct as unlawful versus criminal varies depending on the offence. The majority of Parties regard as criminal offences the non-payment of duties, smuggling or attempted smuggling, manufacturing of products or packaging with false fiscal stamps, use of false stamps or illicit equipment, obstruction of public officers, and the making of false or misleading statements and misdeclarations on official forms.

Specifically, 83% of Parties (38) reported that they classify nonpayment of duties as criminal, 81% that they classify smuggling as criminal, 76% (35) that they classify use of false markings or illicit equipment as criminal, and 72% (33) that they classify misstatements and misdeclarations as criminal. Similarly, most Parties (34) reported that they consider money laundering to be a criminal offence (74%)

Most Parties apply a combination of sanctions for conduct classified as criminal under domestic law. However, a slightly greater number of Parties rely on freezing, seizure or confiscation of property and/or fines rather than on imprisonment. For instance, smuggling or attempted smuggling, which is considered a criminal offence in 37 Parties, can carry a penalty of imprisonment for less than four years in 22 Parties and for four years or more in 26 Parties. A total of 27 Parties allow for confiscation of property and 33 impose fines.

Similarly, illicit manufacture, criminalized in 35 Parties, carries a penalty of imprisonment in 23 Parties, freezing or seizure of property in 24, confiscation in 26 and fines in 30.

In relation to sales involving banned technology, 13 Parties consider this to be unlawful but not criminal whereas 16 consider it to be criminal. Where such sales are treated as unlawful, the most common sanctions are fines (10), and administrative penalties such as suspension or revocation of licences (8). Similarly, the intermingling of tobacco with non-tobacco products is considered either non-unlawful (10) or criminal (13). For Parties treating intermingling as criminal, the main sanctions include freezing or seizure of property (11), fines (12) and other administrative penalties (10).

Liability of individuals and legal persons

Under Article 15, Parties are required to extend liability for unlawful conduct, including criminal offences listed under Article 14, to legal persons such as corporations and organizations. The share of Parties recognizing liability for legal persons is broadly consistent across types of conduct. For instance, 32 Parties (70%) reported imposing liability for legal persons for failure to apply markings or for smuggling, 31 Parties (67%) for illicit manufacture and 29 Parties (63%) for the use of false markings or stamps.

Jurisdiction considerations

Article 26 establishes that a Party has jurisdiction over criminal offences when committed within its territory or on board a Party-registered or represented vessel or aircraft. Jurisdiction can also be asserted when an offence is committed against the Party, by a national of the Party, by a stateless person with habitual residence in the Party's territory, or outside the Party's territory with the intent to commit an offence within it.

The majority of Parties (34, 74%) reported jurisdiction over offences committed within their territory. This proportion decreased for other scenarios: 25 Parties (54%) reported that they claim jurisdiction over offences on a vessel flying their flag, 20 Parties (44%) for offences committed against them and only 15 Parties for offences committed outside their territory but intended to be carried out within it.

Implementation and enforcement

In the current cycle, many Parties provided examples of successful implementation and enforcement of the Protocol. Enforcement of the Protocol's core provisions regarding unlawful conduct, liability of legal persons and sanctions continues to be a critical area of focus for Parties, reflecting both the severity of illicit trade and the need for coordinated action across law enforcement and regulatory agencies. Many Parties have established comprehensive legal frameworks to criminalize key offences such as illicit manufacture, smuggling, use of false markings and obstruction of investigations, while also extending liability to corporations and other legal entities. Enforcement practices vary significantly, reflecting both differences in resource capacity and the diverse approaches to sanctioning non-compliance. Examples are given below.

Brazil demonstrates strong operational enforcement along its borders. The Federal Police, in cooperation with the Revenue Office and local law enforcement, regularly intercept and arrest individuals involved in illicit trade. These measures also target organized criminal activity in illicit cigarette factories, including cases in which foreign workers are held in exploitative conditions.

Kenya reported two cases involving unlawful conduct under Article 14 of the Protocol. In the first, the Kenya Revenue Authority imposed penalties on a company for undervaluation of imported goods and failure to comply with customs declaration requirements. In this case, the court highlighted the importance of adherence to customs regulations and the accountability of businesses in ensuring compliance along the supply chain. In the second case, individuals were charged with smuggling prohibited goods across the

border, violating the customs laws under the East African Customs Management Act. The court found the defendants guilty, leading to substantial fines and imprisonment.

Panama reported that authorities carried out a customs enforcement operation that discovered false declarations that altered the quantity and type of the products arriving from Colombia. When National Customs Authority officials inspected the container at the port in Panama, they discovered that the products declared as umbrellas, toothbrushes, playing cards and picture frames were actually alcoholic beverages and 1342 packages of cigarettes. In line with Article 14 of the Protocol, the court sanctioned the importer with a fine of US\$ 10 000 and an accessory penalty of US\$ 2000, payable to the national treasury within a period of two years.

In Sweden, enforcement has extended to administrative sanctions targeting corporate actors. Several companies were found to be non-compliant with regard to traceability and security features. Enforcement actions included prohibition of sales, injunctions requiring correction of record-keeping and traceability practices, and administrative fines.

In Nigeria, the Federal Competition and Consumer Protection Commission (FCCPC) initiated an investigation in 2020 into British American Tobacco Nigeria and affiliates for suspected violations of the Federal Competition and Consumer Protection Act and the National Tobacco Control Act. The investigation identified unlawful competition, illicit trade activity and obstruction of justice. In December 2023, the FCCPC imposed a fine of US\$ 110 million, demonstrating the use of significant financial sanctions to enforce compliance and deter future violations.

Seizure payments (Article 17)

Key observations

- **A total of 27 Parties (59%) reported that they allow the levying of an amount proportionate to lost taxes and duties from entities involved in the trade of illicit tobacco, tobacco products or manufacturing equipment.**

Article 17 calls on Parties to consider measures that allow authorities to recover amounts proportionate to lost taxes and duties from producers, manufacturers, distributors, importers or exporters of seized tobacco, tobacco products or manufacturing equipment.

This provision aims to ensure accountability and deter entities from participating in the illicit trade by making them financially responsible for the revenue losses caused by seized goods.

In relation to Article 17, over half of reporting Parties (59%) reported that they have adopted measures to allow authorities to levy amounts proportionate to lost taxes and duties from economic actors from whom tobacco has been seized. From a regional perspective, of the Parties that submitted reports, 63% of Parties (12 Parties) in the WHO European Region reported allowing for seizure payments, 57% in the Region of the Americas (4) and 54% in the African Region (7).

The ways in which Article 17 are carried out vary. In Madagascar, for example, legislation has established a Public Treasury lien for the recovery of debts and empowered the Treasury to pursue the recovery of amounts owed. In Paraguay, legislation establishes a fine equal to twice the value of seized tobacco products and twice the amount of duties evaded.



Photo courtesy of His Majesty's Revenue and Customs, United Kingdom of Great Britain and Northern Ireland

2023 Illicit Trade Report of the World Customs Organization

The World Customs Organization (WCO) publishes its Illicit Trade Report annually. Since the first edition in 2012, the report has become the WCO's flagship publication on enforcement matters. It consolidates data and analysis across multiple domains of illicit trade, including tobacco, drugs, cultural heritage, environmental crimes, intellectual property rights, revenue fraud and security threats. The report is based on seizure data submitted by WCO Members through the Customs Enforcement Network and is publicly available on the WCO website.

The most recent edition available is the Illicit Trade Report 2023, which was officially released in June 2024. The report provides a comprehensive analysis of illicit trade trends based on data collected throughout 2023.

In 2023, customs administrations worldwide reported a significant increase in seizures and enforcement activity related to the illicit trade in tobacco products. The WCO identified tobacco as one of the top enforcement priorities, with 35 Member countries rating it as an "essential priority" and 49 as a "high priority". This reflects growing recognition of the trade's impact on public health, tax revenue and organized crime.

A total of 38 022 tobacco-related cases were reported by 86 countries in 2023. Cigarettes dominated the seizures, accounting for 66.7% of all cases, with over 3.1 billion individual cigarettes intercepted. Other tobacco products (e.g. hand-rolling tobacco and chewing and dipping tobacco) and ENDS also saw increases in both the number of seizures and the quantities involved.

Smugglers employed increasingly sophisticated concealment methods. Vehicles and air transport were the primary conveyance modes, responsible for 92.9% of all seizures. Tactics included hiding cigarettes in fruit boxes and water bottles, or stuffing raw tobacco into furniture.

Detection methods were largely based on routine controls (58.4%) and risk profiling (38.3%), though intelligence-led investigations, while still limited, showed a slight increase. Most seizures occurred at the point of import (88.7%), underscoring the importance of border controls and customs vigilance.

The report also highlighted the growing role of digital platforms in the illicit trade, particularly for ENDS and small consignments. Social media and courier services are increasingly exploited by traffickers, complicating enforcement and requiring new strategies and partnerships.

To address these challenges, the WCO emphasizes the need for enhanced international cooperation, intelligence sharing and adoption of advanced technologies (e.g. data visualization tools). The 2023 data paints a picture of a dynamic and deeply entrenched illicit tobacco trade, underscoring the importance of a coordinated global response to protect public health, secure revenue and disrupt criminal networks.

The report is available at: <https://www.wcoomd.org/en/media/newsroom/2024/june/wco-releases-illicit-trade-report-2023.aspx>

Disposal or destruction (Article 18)

Key observations

- **Forty-three Parties (94%) reported that they destroy or dispose of all confiscated tobacco, tobacco products and manufacturing equipment.**
- **Thirty-one Parties (84%) reported that the methods used to destroy or dispose of all confiscated items are environmentally friendly.**

Article 18 obliges Parties to ensure that all confiscated tobacco, tobacco products and manufacturing equipment are effectively removed from the supply chain through destruction or disposal in accordance with national legislation. The measure serves a dual purpose. First, it prevents seized goods from re-entering the market, which could undermine regulatory controls; second, it reinforces the enforcement of the Protocol by ensuring that

illicit products are permanently eliminated. Recognizing the potential environmental impact of large-scale destruction, Parties are encouraged to adopt environmentally friendly methods wherever possible (e.g. controlled incineration with emission safeguards or other safe disposal techniques). By balancing enforcement with environmental responsibility, Article 18 contributes to both public health protection and sustainable regulatory practice.

The majority of Parties (43, 94%) reported in the current cycle that they destroy or dispose of all confiscated tobacco, tobacco products and manufacturing equipment. Among these, only six Parties (16%) indicated that environmentally friendly methods were not used. Regionally, the WHO European Region reported a particularly high share of Parties (84%) employing environmentally responsible approaches; in the Region of the Americas, 71% of Parties reported using environmentally friendly methods for destruction or disposal.



Photo courtesy of the Federal Revenue Service of Brazil

Environmental risks of disposal or destruction

The disposal and destruction of tobacco, tobacco products and manufacturing equipment impose significant environmental burdens. Discarded tobacco waste, especially cigarette butts and remnants, can leach nicotine, heavy metals, polycyclic aromatic hydrocarbons and other toxic substances into soil and water, adversely affecting aquatic ecosystems, soil organisms and drinking-water quality.⁴ Many filters are made of cellulose acetate (a plastic-type material), which is slow to degrade and often breaks down into microplastics, remaining in the environment for long periods and contributing to plastic pollution.⁵

If tobacco products are incinerated incorrectly (e.g., via open burning), volatile organic compounds, particulate matter, dioxins, furans and other hazardous air pollutants may be released into the atmosphere, degrading air quality and affecting public health.⁶ In terms of physical waste, packaging (paper, foil, plastic and glass) further adds to the solid waste stream, whereas manufacturing equipment that is left unused contributes metals, plastics and other components that, if not properly managed, can end up in landfills or be dismantled in environmentally harmful ways. Moreover, the energy and resource costs of manufacturing, transporting and then destroying these products amplifies the overall carbon footprint of the tobacco supply chain.⁷

A wealth of strategies are becoming available to reduce the volume of waste needing to be incinerated, recover useful material and minimize pollutant emissions, allowing for environmentally friendly methods as called for under the Protocol.



4 Tobacco's threat to the environment. Copenhagen: WHO Regional Office for Europe; 2022 (https://cdn.who.int/media/docs/librariesprovider2/euro-health-topics/tobacco/tobacco-env-factsheet-eng.pdf?sfvrsn=1b9ced39_1&download=true).

5 Wallbank LA, MacKenzie R, Beggs PJ. Environmental impacts of tobacco product waste: international and Australian policy responses. *Ambio*. 2017;46(3):361–370 (<https://doi.org/10.1007/s13280-016-0851-0>); and Novotny TE, Lum K, Smith E, Wang V, Barnes R. Cigarette butts and the case for environmental policy on hazardous cigarette waste. *Int J Environ Res Public Health*. 2009;6:1691–1705 (<https://doi.org/10.3390/ijerph6051691>).

6 Ibid.

7 Novotny TE, Slaughter E. Tobacco product waste: an environmental approach to reduce tobacco consumption. *Curr Environ Health Rep*. 2014;1(3):208–216 (<https://doi.org/10.1007/s40572-014-0016-x>).

Reported seizures

On seizures, Parties had the opportunity to report aggregated seizure information on a diverse range of products and devices in the reporting instrument. Parties in all regions reported on seizures of tobacco and various tobacco products during the current cycle, although information was generally limited. The majority of Parties reported on seizures of cigarettes, and a few reported on tobacco, hand-rolling tobacco, cigarillos and other products.

In the WHO European Region, Parties that reported on seizures were Austria, Belgium, Cyprus, Czechia, Greece, Hungary, Latvia, Lithuania, Montenegro, the Netherlands, Norway, Slovakia, Sweden, Türkiye and the United Kingdom of Great Britain and Northern Ireland. Among these Parties, Austria reported that customs authorities had seized more than 6 million cigarette sticks valued at over €999 000 (~US\$ 1.2 million), while in the Netherlands in the first half of 2024, authorities seized 120 million sticks, which evaded over €6 million (~US\$ 7 million) in duties. Meanwhile, between April 2023 and March 2024 in the United Kingdom, authorities seized 1.36 billion sticks totalling £678.5 million (~US\$ 908.8 million) in lost revenue and 92 435 kg of hand-rolling tobacco totalling £41.9 million (~US\$ 56 million) in lost revenue.

In the WHO African Region, Parties that reported on seizures were Côte d'Ivoire, The Gambia, Kenya, Mauritius, Seychelles and Togo. Côte d'Ivoire, for example, reported that authorities had seized 50 tonnes of tobacco valued at over 2 billion West African CFA francs (~US\$ 3.5 million).

In the WHO Region of the Americas, Parties that reported on seizures were Brazil, Ecuador, Panama, Paraguay and Uruguay. Brazil reported seizing over 171 million units of 20-pack units valued at over 860 million Brazilian reals (~US\$ 158 million) and evading over 688 million (~US\$ 126 million) in duties. Panama reported that authorities seized over 181 million units valued at around 36.5 million Panamanian balboas (~US\$ 36.5 million) and 86.8 million (~US\$ 86.8 million) in evaded duties, while Uruguay reported seizing 21.8 million cigarillos along with other products, totalling a value of around US\$ 5.6 million and evading about US\$ 3.9 million in duties.

In other WHO regions, the Islamic Republic of Iran, India and Fiji reported on seizures. For example, India reported that authorities seized over 217 million cigarette sticks valued at about 4.5 billion Indian rupees (~US\$ 51 million).

In summary, only a limited number of Parties currently submit comprehensive seizure data – detailed, high-quality information remains scarce. It is therefore essential that, in future reporting cycles, Parties provide more comprehensive seizure data or references to publicly accessible sources.

Special investigative techniques (Article 19)

Key observations

- **Thirty-one Parties (67%) reported that their national legislation allows for special investigative techniques.**

Article 19 of the Protocol encourages Parties to employ advanced enforcement methods, where allowed under national law, to detect, investigate and prevent illicit trade in tobacco products. These special investigative techniques are designed to complement conventional law enforcement tools by enabling authorities to gather evidence in situations where overt monitoring or traditional inspections may be insufficient. Examples include controlled deliveries, which allow authorities to monitor the movement of illicit goods; the aim is to identify key actors in the supply chain and undercover operations, and thus enable law enforcement to infiltrate networks involved in illicit trade.

The use of these techniques strengthens the ability of Parties to dismantle organized criminal operations, secure evidence suitable for prosecution and ultimately disrupt the flow of illicit tobacco products before they reach consumers. By integrating such measures into enforcement strategies, Parties can more effectively combat complex and evolving forms of tobacco-related crime, while maintaining compliance with domestic legal safeguards and procedural fairness.

CASE STUDY

HUNGARY

Hungary carries out operations to uncover illicit cigarette factories and warehouses

In 2024, the Hungarian National Tax and Customs Administration (NAV) initiated operations to detect illicit tobacco, particularly illicit manufacturing facilities. As a result, NAV discovered three illicit tobacco factories manufacturing cigarettes. In addition, NAV coordinated raids of warehouses, identifying several involved in the storage of illicit tobacco and tobacco products. Primarily, these facilities were located in Hungary's main tobacco-growing counties of Szabolcs-Szatmár-Bereg and Hajdú-Bihar. NAV authorities seized nearly 75 million cigarettes and 95 tonnes of tobacco in total from the factories and warehouses.

Authorities discovered that perpetrators, who were local to the region, used their knowledge of when and where leaves are harvested and stored to steal tobacco for subsequent illicit production in both large-scale factories and smaller, home-based setups.

Moreover, NAV authorities noted that cigarette smuggling is increasing, and the modus operandi of perpetrators is varied, advanced and creative. Methods include hiding products in vehicle compartments (e.g., in the chassis and seats), inside consumer products (e.g. in tins of cheese) and smuggling using drones, particularly across the country's border with Ukraine.



Photo courtesy of National Tax and Customs Administration of Hungary

In the current cycle, 31 Parties (67%) reported that their national legislation allows for such techniques. Similar methods are used across regions. The Netherlands, Belgium, the United Kingdom (Gibraltar) and Togo reported the use of controlled deliveries, while Benin and Belgium cited the use of informant reports. Panama and the Netherlands reported employing telephone and other technology-based surveillance to detect illicit trade.

Ecuador indicated that authorities use “simulated purchases”, in which officials

act as purchasers, to verify compliance with regulations. Greece reported that authorities undertake targeted field inspections and border surveillance operations to curb illicit trade. Finally, in Jordan, authorities have relied on plain-clothes officers, confidential informants and random audits of factories to detect illicit activity.

These approaches demonstrate the diversity and adaptability of the investigative strategies employed by Parties to effectively combat illicit tobacco trade.

Effective monitoring and enforcement require not only domestic vigilance but also the timely exchange of relevant data across borders, given the transnational nature of illicit tobacco trade.

International cooperation

General information sharing (Article 20)

Key observations

- **Only nine Parties (20%) reported significant changes in illicit trade methods over the past two years; this suggests that either changes are not systematically detected or reporting practices remain uneven.**
- **The majority of Parties reported concealment in vehicles, shipping containers, postal packages and passenger baggage as dominant methods, showing continuity in long-standing smuggling strategies.**
- **Some Parties highlighted innovative concealment methods – including the use of drones, hot air balloons and electronic jamming devices – demonstrating traffickers are adapting to enforcement measures.**

Article 20 of the Protocol underscores the critical importance of information sharing among Parties as a foundational tool in combating illicit trade in tobacco products. Effective monitoring and enforcement require not only domestic vigilance but also the timely exchange of relevant data across borders, given the transnational nature of illicit tobacco trade.

In line with this provision, Parties are called upon to report, consistent with domestic law, comprehensive information on seizures, imports, exports, transits, tax-paid and duty free sales, as well as the quantity or value of production. Beyond raw data, Parties are also expected to report on observable trends, concealment methods and the modus operandi employed by actors involved in illicit trade. UNODC: research on illicit trade in tobacco products

UNODC: research on illicit trade in tobacco products

In collaboration with the Convention Secretariat, the United Nations Office on Drugs and Crime (UNODC) has expanded its research efforts to address the illicit trade in tobacco products. Building on its experience with wildlife and drug trafficking, UNODC is applying a data-driven approach to better understand and combat this issue.

A key initiative has been the piloting of a global tobacco seizure database using publicly available information scraped from the Internet. This pilot provided valuable insights but also revealed significant gaps in media reporting, particularly in certain regions, highlighting the need for official data sharing mechanisms.

In addition to global data collection, UNODC is conducting country-specific and regional studies. A forthcoming report based on seizure data provided by the Government of Brazil will offer a focused analysis of illicit tobacco activity in that country. Meanwhile, funding from Australia's Office of the Commissioner on Illicit Tobacco and E-Cigarettes has enabled UNODC to launch a comprehensive threat assessment for South-East Asia and the Pacific. This research will contribute to a broader regional assessment of transnational organized crime, scheduled for publication in 2026, with a dedicated report on illicit tobacco trade to follow in 2027.

Recognizing the complexities introduced by clandestine manufacturing, UNODC is also exploring forensic methods to trace the geographic origin of seized tobacco samples. This initiative aims to support law enforcement in identifying sources and improving accountability.



UNODC

United Nations Office on Drugs and Crime



Photo courtesy of the National Health Surveillance Agency of Brazil

The scope of information sharing under Article 20 is deliberately broad, to ensure that authorities can anticipate emerging risks, detect vulnerabilities in the supply chain and respond effectively to new patterns of illicit activity. Moreover, the Protocol encourages Parties to collaborate not only in the exchange of information but also in building mutual capacity to collect, analyse and disseminate such information efficiently. This capacity-building element ensures that even Parties with limited resources can contribute meaningfully to the collective effort, fostering a global network of cooperation that enhances both domestic and international enforcement of anti-illicit trade measures.

Nine Parties (20%) reported significant changes detected over the past two years in the methods or operations used in the illicit trade of tobacco, tobacco products and tobacco manufacturing equipment.

The reporting instrument required Parties to describe the common methods or operations used (e.g., concealment methods) in the illicit trade of tobacco, tobacco products and tobacco manufacturing equipment. Parties were also required to report any significant changes in the past two years in the methods or operations used.

In terms of examples reported, across the WHO European Region, Parties reported a wide range of concealment methods and illicit trade trends. In Austria, authorities identified smuggling through concealment in vehicles, false declarations, postal packages and transit fraud. A major case in April 2025 resulted in the seizure of 1.6 million cigarettes at Vienna Airport, transported via air cargo and passenger baggage, and detected through customs scanning.

Belgium reported encountering a similar modus operandi, noting only minor alterations in routing or cover loads, whereas Czechia highlighted concealment in vehicles and the use of GPS and GSM (Global System for Mobile Communications) jammers.

In Cyprus, although the use of small or deep-sea vessels has declined, cases of smuggling in passenger luggage and parcels have sharply increased. A notable seizure in March 2024

involved 9.5 million undeclared cigarettes in a container at Limassol Port, concealed using false documentation.

Hungary reported highly mobile illicit manufacturing facilities operated by organized crime groups, which required international cooperation to dismantle. Latvia noted that smugglers increasingly use rural roads, unregistered properties and garages to conceal and distribute products in small quantities. Lithuania reported concealment in trucks and warehouses, with emerging use of drones and hot air balloons.

Other examples in the region include Norway, where large vehicle inspections uncovered millions of cigarettes; in addition, smaller consignments of ENDS and HTPs were being smuggled via post and courier. Serbia and Slovakia detailed sophisticated concealment in vehicles and clandestine production facilities, with Slovakia seizing millions of illicit cigarettes and thousands of kilograms of tobacco in multiple raids between 2023 and 2024. Sweden noted that although large seizures at land borders have become less common since the pandemic, smuggling of cigarettes continues and ENDS are capturing greater market share.

Türkiye reported extensive methods, from diversion of transit goods and false declarations to misuse of passenger exemptions, with major seizures at customs in Istanbul, Kapıkule and Karasu ports. In the United Kingdom (Gibraltar), smuggling remains the central issue, with concealment in vehicles, maritime routes, and (increasingly) air passengers and freight.

Parties in the WHO African Region also reported varied methods, often linked to porous borders and informal transport. In Benin, tobacco is smuggled by motorbike, river pirogues and bush taxis. In Côte d'Ivoire, tobacco products are mixed with other goods to by-pass border checkpoints; also, authorities uncovered illicit manufacturing sites leading to the seizure of 50 tonnes of tobacco products, leaves and ENDS. In The Gambia, seizures often involved shisha pots and cigarette packs at border points and entertainment venues. Kenya highlighted misdeclaration at entry points, with

authorities also dismantling nicotine pouch manufacturing equipment linked to a major tobacco manufacturer. Madagascar reported that illicit trade has been steadily decreasing, but raids on suspected storage sites are still necessary. In Togo, concealment was commonly reported in clothing, travel bags and containers.

In the WHO Region of the Americas, illicit trade methods primarily involved smuggling and clandestine manufacturing. In Brazil, police dismantled a clandestine factory producing an estimated 150 000 cigarette packs per day. In Costa Rica, tobacco was repackaged and concealed among other merchandise to evade detection.

Other regions reported similarly varied modus operandi. In India, large-scale seizures were reported by the Directorate of Revenue Intelligence, including 6.3 million cigarette sticks concealed in gypsum cargo at Chennai seaport, and millions more seized in trucks, warehouses and retail premises across Delhi and north-eastern states. ENDS have also been intercepted at postal facilities in Delhi. In Fiji, illicit activity focused on ENDS, often falsely declared as personal use to avoid licensing requirements, with 300 such products seized at the border.

Enforcement information sharing (Article 21)

Key observations

- **Less than half of Parties (41%) reported actively sharing enforcement information with other Parties. This suggests that although mechanisms for cross-border cooperation exist, actual information exchange remains limited.**
- **Enhancing enforcement information sharing is critical for improving detection, investigation and prosecution of illicit trade – current figures indicate significant room for improvement.**

Article 21 of the Protocol emphasizes the pivotal role of targeted enforcement information sharing in combating illicit trade in tobacco products. Recognizing that effective detection and investigation often extend beyond national borders, this provision obliges Parties, consistent with domestic law and any applicable international treaties, to exchange information that is essential for law enforcement and regulatory authorities. Such information includes details on licensing, unique identification markings, records of investigations and prosecutions, payment records, and data regarding seizures of tobacco, tobacco products or manufacturing equipment.



Photo courtesy of the National Health Surveillance Agency of Brazil

CASE STUDY

LATVIA

Latvia dismantles criminal network engaged in illicit manufacturing

In a large-scale coordinated operation in December 2024, the Latvian State Police and the Latvian State Border Guard successfully dismantled a major criminal network involved in the illicit production and distribution of tobacco products. Authorities discovered a fully equipped illegal cigarette manufacturing site, complete with industrial machinery and raw materials, resulting in the seizure of nearly 300 million cigarettes and about 47 tonnes of shredded tobacco leaves. Had these products entered the Latvian market, the estimated financial loss to the state would have exceeded €75 million (~US\$ 87.4 million).

The operation, which took place across multiple cities including Riga, Ludza, Rēzekne and Daugavpils, led to the detention of 32 individuals (citizens of Latvia or a neighbouring country). In Riga, the State Police conducted 26 searches, uncovering warehouses stocked with cigarettes and detaining seven suspects. Concurrently, the State Border Guard carried out eight searches in eastern Latvia, where 25 citizens of another European country were detained at an illegal factory in Ludza.

Had these products entered the Latvian market, the estimated financial loss to the state would have exceeded €75 million (~US\$ 87.4 million).

During the raids, authorities seized 164 million cigarettes without excise stamps, equivalent to 16 semi-trailer lorry loads, along with several vehicles, cash totalling €55 000 (~US\$ 64 000), and various pieces of technical equipment including GPS signal jammers and detectors. An unregistered firearm and ammunition were also confiscated. The Border Guard further seized 132 million cigarettes without excise stamps, 47 tonnes of shredded tobacco leaves – sufficient to produce about 68 million additional cigarettes – and several lorries, counterfeit excise stamps and production materials.

The investigation was conducted with the analytical and logistical support of Europol, which facilitated coordination meetings and provided remote assistance during the searches. The Lithuanian Customs Criminal Service also contributed to the cross-border aspect of the investigation. As a result of the operation, several criminal cases related to illegal tobacco production and money laundering were initiated by Latvian authorities. Before the coordinated raids, several individuals linked to the network's financial operations had already been detained on suspicion of laundering illicit proceeds in Latvia.

This case highlights the scale and sophistication of illicit tobacco production networks operating across borders, and the importance of coordinated enforcement and international cooperation in dismantling them.

The purpose of this exchange is to enable authorities to trace and disrupt illicit trade networks, identify patterns of unlawful activity and support ongoing investigations or prosecutions. By facilitating access to critical enforcement-related data, Parties are better equipped to respond promptly to suspected violations, coordinate cross-border operations, and ensure that both civil and criminal sanctions can be effectively applied. In this way, Article 21 reinforces the Protocol's broader objective of fostering international cooperation and enhancing the overall integrity of the global tobacco supply chain.

A total of 19 Parties (41%) reported sharing enforcement information necessary for the purpose of detection or investigation of illicit trade with other Parties to the WHO FCTC.

Information sharing: confidentiality and protection of information (Article 22)

Key observations

- **Only 30% of Parties reported that they have designated a competent national authority to manage exchanged information, and just over half (52%) reported that they have laws protecting confidentiality.**

Article 22 underscores the importance of safeguarding the confidentiality and integrity of information exchanged under the Protocol. Recognizing that effective cooperation depends on trust, Parties are required to designate a national authority responsible for receiving and managing data supplied under Articles 20, 21 and 24. Such information may include details on seizures, investigations, prosecutions, licensing and other enforcement-related data.

To ensure the security of this information, the Protocol obliges Parties to implement domestic legal measures that protect confidentiality and privacy. Proper safeguards help to prevent unauthorized access, misuse or disclosure of sensitive information, while enabling the exchange of critical intelligence that is necessary for detecting and investigating illicit trade in tobacco products.

In the 2025 reporting cycle, only 14 Parties (30%) reported that they had designated a competent national authority for this purpose,

while 24 Parties (52%) reported having laws that protect confidential information exchanged with other Parties to the WHO FCTC. These figures indicate that, despite the existence of a framework for secure information exchange, there is significant scope for strengthening national systems to fully safeguard data and enhance trust in international cooperation.

Assistance and cooperation: training, technical assistance and cooperation in scientific, technical and technological matters (Article 23)

Key observations

- **Only 33% of Parties reported that they received technical assistance, indicating that the majority of Parties may not be fully accessing available support or may not have identified their specific capacity needs.**
- **The Convention Secretariat was reported as the main provider of technical assistance (92% of recipients), followed by other Parties (64%), highlighting the central role of both the Secretariat and peer-to-peer cooperation in capacity-building efforts.**

Article 23 of the Protocol underscores the importance of cooperative measures among Parties, and the presence of competent international and regional organizations, for strengthening capacities for combating illicit trade in tobacco, tobacco products and manufacturing equipment. Specifically, Parties are encouraged to provide and receive training, technical assistance and scientific, technical and technological support to achieve the objectives of the Protocol. This provision reflects the recognition that illicit trade is a transnational challenge, requiring both knowledge transfer and the development of technical and institutional expertise across jurisdictions. By facilitating capacity-building and cooperation, Article 23 aims to enhance the effectiveness of national measures and promote harmonization in implementing supply chain controls and enforcement mechanisms.

Data from the current reporting cycle indicate that only a third of reporting Parties (15) reported having received technical assistance, highlighting that significant capacity gaps remain. Among these, the Convention Secretariat was the primary

source of support, mentioned by 92% of reporting Parties; 64% of reporting Parties mentioned that they received aid from other Parties. These findings demonstrate that international organizations and peer-to-peer cooperation are central to capacity-building efforts.

Benin received support from Kenya, while Lithuania accessed assistance from EU regional law enforcement and training bodies such as Europol, the European Anti-Fraud Office (OLAF) and the EU Agency for Law Enforcement Training (CEPOL).

India reported that it is laying the foundation for a tracking and tracing system, with technical assistance from the United Kingdom. In 2024, the Goods and Services Tax (GST) Council of India, at its 55th meeting, recommended taking steps towards establishing a tracking and tracing system for cigarettes. As a result, the Government of India, through the Union Budget, has proposed amendments to the Central Goods

and Services Tax Act 2017, to introduce such a system. Further amendments would provide for penal provisions in cases of non-compliance with tracking and tracing requirements, and lay the foundation for effective enforcement and monitoring. The introduction of these provisions reflects a significant move towards digitization and better supply chain monitoring in India. To receive technical assistance, four officials from the Ministry of Finance undertook an exposure visit to His Majesty's Revenue and Customs (HMRC) in the United Kingdom, to learn about the country's tracking and tracing system. Coordination and support was provided by the Convention Secretariat, the WHO and the WHO India Office.

These patterns suggest that despite the frameworks for technical cooperation, the reach of assistance remains limited and unevenly distributed. Hence, there are opportunities for expanding and better coordinating support, to strengthen global implementation of the Protocol.



Tobacco barn. Photo courtesy of WHO.

Assistance and cooperation: investigation and prosecution of offences (Article 24)

Key observations

- **Only a third of Parties (33%) reported engaging with other Parties to the WHO FCTC to investigate criminal offences in the illicit trade of tobacco, indicating that cross-border investigative cooperation remains limited.**
- **A larger share of Parties (71%) reported that it has established national mechanisms for coordination and information exchange among relevant authorities, reflecting more robust domestic cooperation.**

Article 24 of the Protocol emphasizes the need for Parties to enhance cooperation in the investigation and prosecution of offences related to illicit trade in tobacco, tobacco products and manufacturing equipment. Parties are called upon to take all necessary measures, consistent with domestic law, to engage in multilateral, regional or bilateral arrangements that strengthen cross-border enforcement efforts. This includes ensuring that national authorities responsible for combating illicit trade maintain mechanisms for coordination, collaboration and information exchange, both domestically and internationally. Effective implementation of these provisions is crucial for creating a cohesive, transnational response to complex networks of illicit trade.

In practice, engagement in cooperative investigations remains moderate. Only 15 Parties (33%) reported that they work directly with other Parties to investigate criminal offences in the illicit tobacco trade, suggesting that collaboration on formal cross-border investigations is still limited. By contrast, coordination at the national level appears to be more robust, with 33 Parties (71%) indicating that their relevant authorities have established mechanisms to cooperate and exchange information domestically.

This highlights a discrepancy between national-level coordination and international cooperation: although domestic authorities are increasingly organized to address illicit trade, fewer Parties are actively leveraging multilateral or bilateral partnerships for investigative purposes. Strengthening international investigative cooperation could therefore enhance enforcement and support the objectives of the Protocol in addressing cross-border illicit activities.

Law enforcement cooperation (Article 27)

Key observations

- **More than two thirds of reporting Parties indicated that they have mechanisms to ensure effective law enforcement cooperation.**
- **A little above half of reporting Parties responded that they actively cooperate with other Parties in operational enforcement.**
- **Effective operational collaboration varies across regions, highlighting the potential for enhanced systematic international enforcement and intelligence exchange.**

Article 27 of the Protocol underscores the critical role of law enforcement cooperation in tackling illicit trade in tobacco, tobacco products and manufacturing equipment. Parties are required, in line with domestic law, to establish effective mechanisms to enhance information sharing, develop communication channels and foster collaboration between competent agencies concerning all aspects of criminal offences under the Protocol. Cooperation extends beyond national borders, requiring Parties to exchange relevant information and conduct joint enquiries in specific cases. Effective law enforcement cooperation ensures that authorities can respond efficiently to the complex, cross-border nature of illicit tobacco trade, disrupting criminal networks and facilitating compliance with the Protocol's obligations.

CASE STUDY

European coordination dismantles transnational illicit tobacco smuggling network ⁸

In November 2024, a large-scale joint operation coordinated by Eurojust and Europol, in collaboration with authorities from 10 countries, successfully dismantled a highly organized criminal network engaged in large-scale cigarette smuggling across Europe. The investigation revealed an intricate web of illicit operations involving the production, transport and sale of illicit cigarettes, and the importation of tobacco disguised as waste material to evade customs controls.

The network had established a cross-border infrastructure that linked several illegal cigarette factories across Europe. Initial investigations began when customs authorities intercepted large quantities of undeclared tobacco being imported into the EU under the false label of “waste tobacco”. Once inside the EU, the material was routed through customs warehouses in Belgium, Italy and Spain, before being transported to Belgium, France, Germany and the Netherlands for manufacturing and sale. In France, illegal consignments of tobacco were even discovered hidden inside printed magazines.

Further intelligence gathering found that the criminal organization operated through multiple interconnected entities. A branch based in Bulgaria coordinated the transport of non-tobacco materials such as filters, rolling papers and adhesives to Greece and Italy, while another unit in Poland managed the logistics and distribution of both raw tobacco and counterfeit cigarettes. The network also recruited individuals across Europe, including experienced criminal operatives considered “high-value targets”.

To coordinate efforts, a Joint Investigation Team (JIT) was established at Eurojust involving French, Italian and Polish authorities. Over the course of the investigation, law enforcement agencies intercepted numerous shipments of illicitly cut tobacco totalling more than 50 000 kg. Several production lines were dismantled, and millions of counterfeit cigarettes were seized, with the total value of goods confiscated estimated at €13 million (~US\$ 15.1 million).

The operation culminated in a coordinated enforcement action that was conducted simultaneously in six countries. A total of 15 suspects were arrested in Bulgaria, France, Germany, Greece and Poland. In Italy, searches resulted in the seizure of €46 000 (~US\$ 53 629) in cash, along with mobile phones, documentation and tobacco products.

The investigation brought together an extensive network of authorities across Europe, in Belgium, Bulgaria, France, Germany, Greece, Italy, Latvia, Lithuania, Poland and the Netherlands. The authorities involved included national and local police; specialized law enforcement agencies for corruption, organized crime and trafficking in persons; public prosecutor’s offices; border control officials; customs and excise agencies; and judges.

The success of the operation depended heavily on close coordination between national and regional agencies, illustrating how cooperation and coordination are needed to combat organized crime.

⁸ Information sourced from the European Union Agency for Criminal Justice Cooperation (Eurojust).

In the 2025 reporting cycle, 33 Parties (72%) indicated that they have mechanisms to ensure effective law enforcement cooperation with customs, police or other relevant agencies from other Parties. Of these 33 Parties, 25 (54%) reported actual cooperation with other Parties to eliminate illicit trade. Although the existence of mechanisms is relatively high, there is room for improvement in operational engagement.

EU Member States provide strong examples of coordinated cooperation. Austria participates in EU-level investigations, coordinated seizures and shared enforcement actions, using real-time data exchange through Europol and OLAF, and advanced risk profiling via EU-wide customs databases. Belgium, Czechia, the Netherlands, Slovakia and Sweden all participate in the European Multidisciplinary Platform Against Criminal Threats (EMPACT) Operational Action Plan Excise Fraud initiative, which targets criminal networks involved in large-scale excise fraud, particularly the production and trafficking of illicit tobacco products. Cyprus engages in joint customs and police operations, while Hungary combines judicial authorities' capacity for international criminal cooperation with the use of foreign liaison officers and attachés for direct collaboration on law enforcement. Latvia maintains a structured approach through a Law Enforcement Management Working Group, an inter-institutional expert group and criminal intelligence reporting cycles to monitor

and evaluate crime trends and coordinate responses. Sweden has implemented enforcement cases in line with EU directives on characterizing flavours in tobacco products, ensuring compliance across borders.

Other Parties in the WHO European Region also reported coordination efforts. The United Kingdom uses HMRC's International Mutual Assistance Team for Mutual Administrative Assistance and Mutual Legal Assistance, supplemented by Fiscal Crime Liaison Officers positioned worldwide. Meanwhile, Montenegro's Customs Administration engages with partner customs services through specific case inquiries and joint international operations, regularly participating in meetings to present achievements and share experiences in combating illicit cigarette trade.

Other Parties also demonstrate significant cooperation. Brazil participates in the Southern Common Market's (MERCOSUR) Framework Cooperation Agreement to establish JITs for cross-border enforcement. Uruguay shares registered tobacco product brands across MERCOSUR member states to detect illicit regional trade. The Gambia conducts nationwide quarterly joint monitoring exercises, which include oversight of illicit tobacco products alongside enforcement of smoke-free laws and health warning requirements. Mutual administrative assistance (Article 28)



Photo courtesy of the Department of Customs and Excise, Republic of Cyprus

Key observations

- **Seventeen Parties (37%) reported that they provided or made available mutual administrative assistance to other Parties to ensure proper application of customs and other relevant law in the prevention, detection, investigation, prosecution and combating of illicit trade.**

Article 28 establishes the obligation for Parties to provide mutual administrative assistance to one another, consistent with their domestic systems. Such assistance is intended to ensure the proper application of customs and other relevant law in the prevention, detection, investigation, prosecution and combating of illicit trade in tobacco products, tobacco and manufacturing equipment. Assistance may include sharing new customs and enforcement techniques, identifying emerging trends and methods of illicit trade, exchanging information on goods and perpetrators, and providing other relevant data. By enabling mutual support across jurisdictions, Article 28 aims to strengthen global capacity to detect and disrupt illicit tobacco trade, facilitating more coordinated enforcement and regulatory compliance.

In the current cycle, 17 Parties (37%) reported that they provided or made available mutual administrative assistance to other Parties. This includes sharing intelligence, technical expertise and operational insights to ensure the effective application of customs and enforcement laws.

Examples from Europe demonstrate structured frameworks and long-standing networks. Austria engages through EU legal mechanisms, including the Naples II Convention and EU Directive 2023/977, to facilitate mutual administrative assistance, with a particular focus on illicit tobacco trade. The Netherlands supports such cooperation through its Law Enforcement Working Parties for Customs, which enables the structured exchange of operational information. Slovakia engages in intelligence sharing, international cooperation and JITs to coordinate enforcement activities across borders. The United Kingdom's HMRC shares intelligence through its network of almost 50 Fiscal Crime Liaison Officers worldwide.

Parties in other regions also demonstrate operational engagement. Kenya recently confiscated illicit tobacco products originating from a neighbouring country and is pursuing legal measures to prevent recurrence, reflecting active administrative collaboration. Paraguay coordinates extensively with other customs administrations by sharing information on suspicious shipments, smuggling routes and risk profiles. This coordination facilitates the monitoring of illicit shipments during transit and supports joint investigations and cross-border operations, exemplified by Operation "Frontera" in 2023. Furthermore, the 2022 Bicameral Commission of Investigation of the Paraguayan National Congress documented the involvement of the tobacco industry in cigarette smuggling, illustrating the value of coordinated investigative processes and administrative assistance.

Mutual legal assistance (Article 29)

Key observations

- **Only 22% of reporting Parties indicated that they provide mutual legal assistance, reflecting the relatively limited operationalization of this mechanism.**

Article 29 requires Parties to provide mutual legal assistance to one another in relation to investigations, prosecutions or judicial proceedings concerning criminal offences established under Article 14. This provision aims to facilitate cooperation between judicial and law enforcement authorities across jurisdictions, enabling the effective investigation and prosecution of illicit trade in tobacco, tobacco products and manufacturing equipment. By providing mutual legal assistance, Parties can overcome legal and procedural barriers that might otherwise hinder cross-border enforcement and ensure that perpetrators of illicit tobacco trade are held accountable.

Ten Parties (22%) reported that they had provided or made available mutual legal assistance to another Party under the framework of the Protocol. Although the overall share of reporting Parties engaged in such assistance is relatively low, it reflects the complexity



Photo courtesy of National Tax and Customs Administration of Hungary

of establishing formal legal cooperation mechanisms across jurisdictions, particularly in matters involving criminal offences.

Slovakia reported that it uses intelligence sharing, international cooperation and participation in JITs as mechanisms to provide mutual legal assistance. These approaches allow for coordinated collection of evidence, sharing of prosecutorial information and operational collaboration in pursuing cross-border criminal cases related to illicit tobacco trade.

to ensure their presence in extradition proceedings. By enabling extradition, these provisions strengthen cross-border enforcement against illicit trade in tobacco products and related criminal activity. They also allow Parties to overcome jurisdictional limitations, ensuring that perpetrators cannot evade justice by moving between territories. Measures may include taking a person into custody or adopting other legal steps to guarantee their appearance before judicial authorities, subject to domestic law.

Extradition (Article 30) and measures to ensure extradition (Article 31)

Key observations

- **Half of the Parties reporting in this reporting cycle indicated that they have established extradition measures under Article 14.**
- **Only two Parties reported that they have extradited a person for criminal offences under Article 14 of the Protocol or as part of efforts to eliminate illicit trade in tobacco products.**

Articles 30 and 31 of the Protocol establish the legal framework for extradition of individuals accused or convicted of criminal offences under Article 14, and measures

Half of the reporting Parties (23) indicated that they have established extradition measures for offences under Article 14 of the Protocol. Despite this, actual use of extradition remains limited; only two Parties (3%) reported that they had successfully extradited an individual in connection with criminal offences under Article 14 or related efforts to combat illicit trade.

Paraguay reported the extradition of a smuggler, who had previously been convicted in Brazil of cigarette smuggling and was identified as a member of a criminal organization. This case demonstrates the practical application of extradition mechanisms and highlights the importance of international legal cooperation in addressing transnational illicit tobacco networks.

Reporting

Technical assistance needed and barriers and challenges to implementation (Article 32)

Key observations

- **Almost two thirds of reporting Parties indicated that they could benefit from technical assistance and almost half of reporting Parties (48%) indicated that they faced constraints or barriers in implementing the Protocol.**
- **Many Parties requested assistance in the areas of training and capacity-building, tracking and tracing systems, legislative, technical and regulatory support, and regional cooperation building.**
- **Common constraints and barriers include political will, financial and resource gaps, tobacco industry interference, technical and operational challenges, legal and regulatory complexity and international coordination issues.**

Article 32 of the Protocol establishes the obligation for Parties to submit periodic reports on the implementation of the Protocol through the Convention Secretariat. These reports serve as a mechanism for transparency, accountability and mutual learning, allowing Parties to document measures taken; highlight challenges and constraints; and share information on financial and technical assistance received, requested or provided. Reporting also facilitates the collection and exchange of the information specified under Article 20, including data on seizures, import/export trends, illicit trade patterns and methods of concealment. The reporting process thus strengthens Parties' capacity to combat illicit trade in tobacco products, supports evidence-based policy-making and promotes international cooperation.

A significant share of Parties indicated a need for technical assistance and reported encountering barriers to implementation. A total of 28 Parties (61%) stated that they could benefit from technical assistance, while 22 (48%) reported constraints or challenges in implementing the Protocol. These constraints ranged from insufficient legal frameworks to lack of

coordination among relevant authorities, limited resources, and gaps in technology or expertise for tracking and tracing tobacco products.

Technical assistance needs

Parties identified a wide range of technical assistance needs to strengthen implementation of the Protocol. These can be grouped into four main areas: **training and capacity-building**, legal and regulatory support, tracking and tracing systems, and regional or interagency coordination.

Across all regions, Parties emphasized the need for targeted training and capacity-building to improve the competencies of customs, law enforcement, health and regulatory authorities responsible for implementing the Protocol. Many Parties noted that effective implementation depends on strengthening operational knowledge on monitoring, traceability and enforcement procedures, and on fostering interagency understanding of the Protocol's provisions.

Needs for **legal and regulatory support** focused on aligning national laws with Protocol obligations and other international instruments. Several Parties identified the need to draft or amend implementing regulations; domesticate the Protocol through incorporation into national law; and strengthen coordination between fiscal, health and enforcement authorities. Others requested guidance on establishing or improving licensing regimes, traceability standards and intersectoral coordination mechanisms to ensure coherence across agencies. In the area of **tracking and tracing systems**, many Parties highlighted the need for technical support to design, implement or enhance systems. Requests included assistance with developing centralized databases, introducing tax stamp standardization, building digital infrastructure, and acquiring the necessary equipment and technical expertise for effective supply chain oversight.

Finally, several Parties underlined the importance of **regional and interagency coordination**. They called for enhanced cooperation and knowledge exchange among Parties, particularly in border regions, ports and other high-risk areas. Others expressed interest in receiving practical examples of good practices, technical workshops

and digital communication platforms to improve coordination between customs, law enforcement and health authorities.

Constraints and barriers

Despite progress in implementing the Protocol, Parties continue to face a range of challenges that hinder full compliance. The constraints or barriers reported by Parties can be broadly categorized as relating to political commitment and governance, financial and resource limitations, tobacco industry interference, legal and regulatory frameworks, operational and technical capacity and international coordination, as discussed below.

Political commitment and governance

Limited political will and competing policy priorities were among the most frequently reported barriers. In several cases, public health objectives were perceived as secondary to economic or fiscal considerations, delaying the adoption or enforcement of Protocol measures. Some Parties reported efforts to improve political buy-in through advocacy with fiscal authorities and the establishment of dedicated coordination mechanisms; however, sustained high-level commitment remains uneven across regions.

Financial and resource limitations

Many Parties face resource and capacity constraints, including insufficient funding, lack of dedicated budgets, inadequate staffing and limited access to specialized training or equipment. These gaps undermine the effective implementation of licensing, and tracking and traceability systems; hence, they weaken enforcement capacity. Some Parties reported progress in mobilizing external technical assistance and reallocating domestic resources, but long-term sustainability remains a concern.

Tobacco industry interference

Interference from the tobacco industry continues to pose a major challenge to Protocol implementation. Parties reported industry interference in regulatory processes, obstruction of enforcement efforts and attempts to shape public perception around

illicit trade. To counter this, several Parties have strengthened compliance with Article 5.3 of the WHO FCTC, increased transparency, trained officials to resist industry interference, and engaged civil society and development partners to promote awareness and accountability.

Legal and regulatory challenges

Inconsistent or outdated legislation was another barrier cited by multiple Parties. Challenges include overlapping legal provisions across ministries, insufficient implementation of regulations, lack of definitions for illicit trade-related offences, and limited judicial capacity to prosecute cases effectively. Some Parties have initiated legal reforms, including updating customs and criminal codes, developing implementing texts, and studying international best practices for tracking and tracing systems to align with Protocol requirements.

Operational and technical capacity

Operational gaps remain a persistent obstacle. Parties noted insufficiently trained enforcement personnel, limited access to tracking and tracing systems, and inadequate infrastructure for monitoring the supply chain. Others cited difficulties in establishing licensing systems or ensuring proportional enforcement responses. To address these issues, some Parties have pursued targeted training, regional cooperation and exposure visits; however, capacity limitations continue to hinder consistent enforcement.

International coordination

Parties also identified barriers in cross-border cooperation and information sharing, particularly where neighbouring countries have not ratified or implemented the Protocol. Limited technical interoperability, inconsistent enforcement standards and weak communication channels complicate joint operations. Some Parties reported progress through participation in regional working groups and joint investigations, while others noted ongoing challenges related to data exchange, asset confiscation and proportional sanctions.

4. Priorities

Implementation of the Protocol has improved significantly since it first came into force, yet challenges remain. Effective enforcement and compliance with the Protocol are critical not only for public health outcomes but also for economic stability, effective law enforcement, and the integrity of national and international regulatory frameworks. Based on Parties' self-reported data, case studies and enforcement examples, the priorities outlined below have emerged as central to advancing the Protocol's objectives.

Strengthening licensing, record-keeping and due diligence requirements

Licensing and due diligence remain foundational tools for preventing illicit production and distribution; however, coverage is uneven across product types, including novel and emerging tobacco and nicotine products. Although most Parties have established basic licensing systems for high-demand products, fewer have comprehensive controls for other products. Enhancing these systems, standardizing renewal periods and extending due diligence obligations across the supply chain are critical priorities to prevent diversion, strengthen oversight and maintain compliance.

Enhancing tracking and tracing

Many Parties have taken steps towards comprehensively implementing tracking and tracing systems, particularly for cigarettes; however, gaps remain for other tobacco products, aggregation systems and downstream supply chain events. Priorities include expanding the application of unique identification markings to all product types, ensuring aggregation between packaging levels, and strengthening mechanisms for capturing shipment and purchaser data. Improved monitoring of tracking and tracing data is essential for detecting illicit movement and informing risk-based enforcement strategies.

Addressing enforcement, prosecution and sanctions

Although criminalization of fundamental offences

(e.g., smuggling, illicit manufacture and use of false markings) is widespread, the enforcement landscape is uneven. Parties report varying levels of operational capacity, coordination among law enforcement agencies and the application of sanctions. Priorities include bolstering multiagency collaboration, ensuring proportional sanctions and expanding training for law enforcement and judicial personnel.

Expanding international cooperation

Cross-border collaboration is central to combating illicit trade, yet many Parties report limited exchange of enforcement information, mutual legal assistance and joint investigative operations. Mechanisms for administrative and legal assistance exist but are not fully operationalized, and extradition remains rare. Strengthening formal agreements, standardizing information-sharing protocols and fostering regional networks for capacity-building are key challenges for improving international cooperation and ensuring coordinated responses to transnational illicit trade.

Overcoming technical, operational and resource constraints

Parties face practical constraints including limited technical capacity, insufficient financial resources and challenges in implementing controls on complex supply chains. These challenges are exacerbated by emerging products, evolving smuggling methods, and the interference of organized crime and tobacco industry actors. Priorities include targeted technical assistance, investment in advanced inspection and scanning technologies, and tailored training to strengthen operational efficiency.

Promoting policy coherence and political commitment

The effectiveness of the Protocol relies on consistent political will, and integration with broader policies on tobacco control and sustainable development. Some Parties report fragmented legislation, lack of interagency coordination and low prioritization of the elimination of illicit trade. Addressing these gaps requires high-level commitment, alignment of domestic regulations with Protocol obligations, and systematic monitoring and reporting to maintain accountability and progress.

5. Conclusions

This report demonstrates that significant progress has been made in certain areas of the Protocol, while implementation is lacking in other areas. Many Parties have implemented robust supply chain measures for high-demand products such as cigarettes and cigars, established legal frameworks that are designed to punish and deter, and developed systems for information sharing, albeit with varying degrees of comprehensiveness. Enforcement examples from around the world – including large-scale seizures, arrests and joint investigations – highlight the practical impact of the Protocol in disrupting illicit trade and holding both natural and legal persons accountable.

The report underscores persistent gaps and challenges that warrant ongoing attention. Coverage of novel and emerging tobacco and nicotine products remains uneven, supply chain controls are inconsistently applied across product categories, and international cooperation

is not yet fully operationalized in practice. Capacity limitations, resource constraints and the evolving methods employed by illicit operators further complicate enforcement efforts. These challenges highlight the importance of continued technical assistance, strengthened legal frameworks and sustained political commitment to ensure full implementation of the Protocol.

Ultimately, the Protocol's success depends on the concerted efforts of all Parties, working both domestically and collaboratively across borders. By addressing implementation gaps, prioritizing enforcement and cooperation, and leveraging data-driven insights from seizures, investigations and regulatory monitoring, Parties can protect public health, safeguard public revenues and dismantle organized crime networks. As this report illustrates, the Protocol is not merely a regulatory tool; it is a strategic framework that, when effectively implemented, strengthens the global fight against illicit trade in tobacco products and contributes directly to sustainable development.

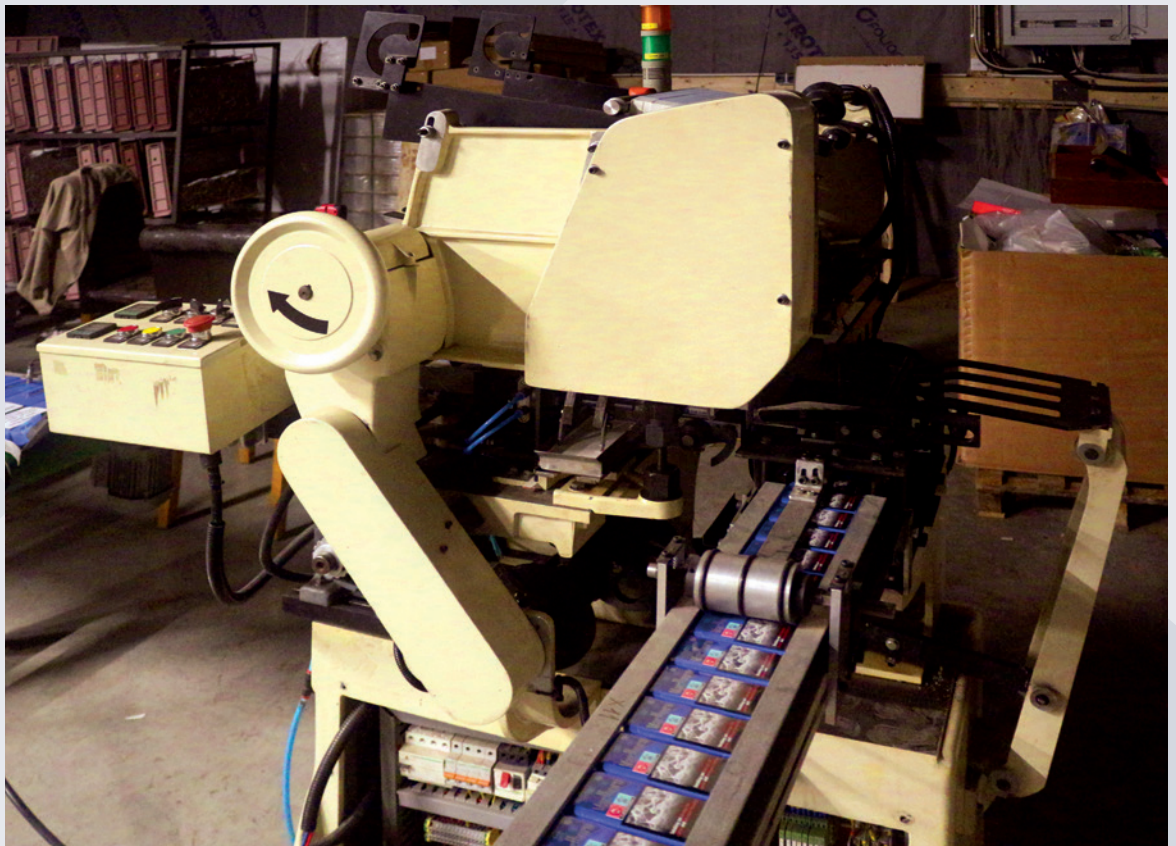


Photo courtesy of His Majesty's Revenue and Customs, United Kingdom of Great Britain and Northern Ireland

Annex 1. List of Parties that have submitted an implementation report in the 2025 reporting cycle

Region	Total number of Parties	Reports submitted	Parties that submitted reports	Parties that have not submitted reports	Percentage of reporting
African	22	13	Benin, Burkina Faso, Côte d'Ivoire, Gabon, The Gambia, Ghana, Kenya, Madagascar, Mauritius, Nigeria, Senegal, Seychelles, Togo	Cabo Verde, Chad, Comoros, Eswatini, Guinea, Mali, Niger, Congo, Rwanda	59%
Americas	7	7	Brazil, Costa Rica, Ecuador, Nicaragua, Panama, Paraguay, Uruguay		100%
South-East Asia	2	1	India	Sri Lanka	50%
Europe	27	19	Austria, Belgium, Croatia, Cyprus, Czechia, European Union, Greece, Hungary, Latvia, Lithuania, Montenegro, The Netherlands, Norway, Serbia, Slovakia, Spain, Sweden, Türkiye, United Kingdom	France, Germany, Luxembourg, Malta, Poland, Portugal, Republic of Moldova, Turkmenistan	70%
Eastern Mediterranean	8	5	Islamic Republic of Iran, Iraq, Jordan, Qatar, Saudi Arabia	Egypt, Kuwait, Pakistan	63%
Western Pacific	3	1	Fiji	Mongolia, Samoa	33%
Global	69	46	46	23	67%



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