

# Reaccreditation report of NGO observers to COP11

## Survey response 1

Date submitted
2025-02-26 12:41:22

### A. Contact details

A1. Name of organization
Tobacco Control Research Group (TCRG), University of Bath
A6. Website of organization
<a href="https://www.bath.ac.uk/research-groups/tobacco-control-research-group/">https://www.bath.ac.uk/research-groups/tobacco-control-research-group/</a>

### B. General information

B1. Please indicate if your organization would like to retain its status as observer to the Conference of the Parties
Yes
B2. Does your organization's mission statement specifically refer to tobacco control?
Yes
B3. If yes, please specify:
<p>TCRG is a multidisciplinary, international research group at the University of Bath. TCRG evaluates the impacts of policy change on health, provides evidence to inform the development of new policy, and has a particular focus on studying the tobacco and other industries, including their influence upon health and policy. TCRG is primarily focused on tobacco but addresses other harmful products and corporate practices including through research on the commercial determinants of health.</p> <p>In 2012, TCRG established its unique knowledge exchange platform Tobacco Tactics. The site provides accessible, rigorous academic research and monitoring findings on key issues in tobacco control, the global tobacco industry and those connected to or interacting with it. Tobacco Tactics attracts thousands of users from across the world including researchers, policy makers, journalists and advocates.</p> <p>TCRG is a Bloomberg Initiative to Reduce Tobacco Use (BI) partner, and part of the STOP (Stopping Tobacco Organizations and Products) network. STOP is a global tobacco industry watchdog whose mission is to expose the tobacco industry tactics that undermine public health. Comprised of a network of academic and public health organisations, STOP researches and monitors the tobacco industry, shares intelligence to counter its tactics, and exposes its misdeeds to a global audience. STOP is funded by Bloomberg Philanthropies as part of the BI.</p>
B4. Does your organization have regional branch(es) to enhance activities in different regions or groups of countries?
Yes
B5. If yes, please provide details
TCRG is based at the University of Bath in the UK but has team members and works with consultants covering the Eastern Mediterranean region, the Region of the Americas, and elsewhere. TCRG is also a part of the global tobacco industry watchdog STOP.
B6. Does your organization regularly convene meetings or conferences for its membership?
No
B7. If yes, is tobacco control covered in these meetings?
N/A

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## C. Participation in WHO FCTC meetings and contributions to other tobacco control related events

C1. Please indicate the meetings organized by the Convention Secretariat at which your organization was represented (sessions of the Conference of the Parties, meetings of intersessional groups, NGO meetings, etc.)

- ☒ COP 10 sessions
- ☒ MOP 3 sessions
- ☒ Meetings with NGO Observers to the COP and the MOP
- ☒ Regular meetings with GATC (FCA) to coordinate monitoring of tobacco industry interventions around COP/MOP

TCRG monitored tobacco industry-related news and social media activity before and during COP 10, reported daily monitoring insights during COP to the Convention Secretariat, and to the GATC network. TCRG summarised tobacco industry interference at COP10 and MOP3 (<https://tobaccotactics.org/article/cop10-mop3-interference/>), highlighted tobacco harm reduction as the tobacco industry's latest Trojan horse around COP (<https://exposetobacco.org/resource/cop-harm-reduction/>), was interviewed in the media (<https://www.tbsnews.net/world/fight-over-vaping-lobbyists-campaigners-clash-summit-786322>), and published a paper on COP10/MOP3:

- ☒ Silver, K., Matthes, B., Alaouie, H., Gatehouse, T., Maynard, R., Mehegan, J., Elmitwalli, S., Bertscher, A., & Alebshehy, R. (2024). Attempts to undermine global public health: observations from the WHO Framework Convention on Tobacco Control's COP10. *Health Promotion International*, 39(2), Article daae038. <https://doi.org/10.1093/heapro/daae038>

C2. Please list any other meetings or conferences with a focus on tobacco control attended by your organization
<p>TCRG is a group of 23 staff and 2 PhD students. TCRG members attend and present research and monitoring findings at tobacco control related scientific conferences and meetings. TCRG's knowledge exchange platform 'tobaccotactics.org' has over 1,000 published pages (891 articles, 111 news items) on the tobacco industry and its allies, products, and tactics. Recent TCRG meeting and conference presentations include:</p> <ul style="list-style-type: none"> <li>• January 2024, to the European Respiratory Society on tobacco industry interference with endgame policies, and to a GATC/Corporate Accountability webinar on maximising transparency around COP10/MOP3.</li> <li>• February 2024, to the European Parliament on introducing tobacco control style regulation for the fossil fuel industry (<a href="https://www.bath.ac.uk/announcements/anna-gilmore-presents-to-eu-parliament-on-tobacco-control-style-regulation-for-fossil-fuel-industry/">https://www.bath.ac.uk/announcements/anna-gilmore-presents-to-eu-parliament-on-tobacco-control-style-regulation-for-fossil-fuel-industry/</a>), to WHO Journalism Training on Noncommunicable Diseases and Injuries webinar on tobacco industry tactics and newer products, to a Southwest Public Registrars tutorial on tobacco control and commercial influences, to a Turkish Respiratory Society webinar on the health implications of today's globalised tobacco industry, and to the New Zealand ASPIRE Aotearoa summer school on tobacco industry strategies to disrupt policy.</li> <li>• March 2024, Annual Meeting of the Society for Research on Nicotine &amp; Tobacco (SRNT) plenary on 'Tipping Points, Tobacco Control and the Commercial Determinants of Health', and presenting to Taipei Medical University on newer nicotine and tobacco products.</li> <li>• April 2024, WHO Workshop on Addressing Interference by Tobacco and Related Industries in the Philippines, and presenting to a WHO organised meeting of regulators on flavours in nicotine and tobacco.</li> <li>• May 2024, to the Wales Tobacco or Health Network / ASH Wales about newer nicotine and tobacco products, to the Partnership for Young London on exposing tobacco industry tactics and warning young people of the dangers of tobacco industry products, SRNT webinar on policy implementation to reduce tobacco industry interference and improve tobacco control advocacy, presenting to the UK Office for Health Improvement and Disparities (OHID) on tobacco industry interference and endgame policy, and at the launch of the Industry Interference Hub of Colansa Brazil on effective monitoring of tobacco industry activities.</li> <li>• June 2024, delivering training to the Africa Centre for Tobacco Industry Monitoring and Policy Research, and to the London Tobacco Control Network on the UK Tobacco Industry Interference Index 2023.</li> <li>• July 2024, to the Centre for Combating Tobacco (CCT) in Sri Lanka on global evidence and experience related to effective strategies against tobacco promotion and advertising.</li> <li>• August 2024, to the Nordic Tobacco Control Network about tobacco industry interference and the UK Tobacco and Vapes Bill, and to the 7th Corpora &amp; Discourse International Conference (CADS 2024) on discourses around tobacco product use.</li> <li>• September 2024, at the World Cancer Congress in Geneva on documenting tobacco industry activity, on extending tobacco taxation based on lessons from Europe, and contributing to the plenary on 'Shaping the future: preventing cancer and NCDs'. Also presenting to a Transparency International / Friends of the Earth workshop on the possibility of an WHO FCTC Article 5.3 for the fossil fuel industry, to a Bloomberg partners meeting on tobacco industry acquisitions of pharma companies, to a workshop for Brazilian journalists on tobacco industry tactics around e-cigarettes in the UK, and to a GATC webinar for the EMRO region on evidence standards regarding industry interference for Tobacco Tactics and the UK Tobacco Industry Interference Index.</li> <li>• October 2024, to the General Assembly Allianz 'Gesunde Schweiz' on minimum unit pricing using tobacco as an example, to the International Confederation of Alcohol, Tobacco and other Drugs Research Associations (ICARA) 2024 Annual General Meeting on broadening perspectives on commercial determinants of health via LMIC experiences, to the Oceania Tobacco Control Conference 2024 in Queensland Australia, and to the ENSP-ECTC Athens on methods for the UK Tobacco Industry Interference Index.</li> <li>• November 2024, to the Johns Hopkins Bloomberg School of Public Health Institute for Global Tobacco Control on tobacco control (170 people, 37 countries), chairing a panel on combatting big tobacco at The Union World Conference on Lung Health in Bali Indonesia (participants from India, Indonesia, Singapore, Thailand, UK), at the European Public Health Conference in Lisbon Portugal on the global tobacco supply chain and undermining of tobacco control policies post-adoption, at the Commerce, Economy, Trade &amp; Public Health Conference (CETPH) 2024 in Australia on public health implications of the global tobacco supply chain, to the Arab Summit on Tobacco Control in Cairo Egypt on tobacco industry activities, and to advise Al Jazeera on investigating tobacco industry corruption.</li> <li>• December 2024, to participate in training on tobacco industry interference for WHO country leads from Africa, Europe, Middle East, with WHO, Vital Strategies, and Marathon Strategies.</li> <li>• January 2025, to diplomats and ambassadors of WHO EMRO countries with permanent missions in Geneva on 'Willing to be orchestrated by tobacco industry when requested', and to the WHO/Europe first public health hearing on shaping the European Programme of Work on non-communicable diseases related to tobacco and other health-harming products.</li> </ul>

## D. Your organization's activities to support implementation of the WHO FCTC

D1. Article 5 (General obligations)?
Yes

D2. If yes, please provide details
<p>Relevant to Article 5, TCRG authored the 2023 UK chapter of the Global Tobacco Industry Interference Index, monitoring UK compliance with Article 5.3: <a href="https://www.bath.ac.uk/case-studies/the-uk-tobacco-industry-interference-index-2023/">https://www.bath.ac.uk/case-studies/the-uk-tobacco-industry-interference-index-2023/</a></p> <p>In June 2024, a European Parliament Working Group on Tobacco white paper disseminated TCRG research recommendations to strengthen the transparency register of European institutions by requiring registered organisations to provide information on the identity of their members and the composition of the structures to which they are affiliated, to avoid concealment of lobbying efforts by tobacco industry-affiliated bodies (<a href="https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/">https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/</a>).</p> <p>Dr Allen Gallagher of TCRG is a member of the WHO Informal Tobacco Control Expert Group for the next Global Tobacco Control Report (2025).</p> <p>TCRG published numerous papers relevant to Article 5, including on developing methods to monitor tobacco industry interference, and calling for policymakers to address conflicts of interest between industry and public health:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> Assunta, M., &amp; Chamberlain, P. (2024). Ensuring a safe, tobacco free future for the young: protecting children from tobacco industry interference. <i>Tobacco Control</i>, 33(3), 281-282. <a href="https://doi.org/10.1136/tc-2024-058698">https://doi.org/10.1136/tc-2024-058698</a></li> <li>• <input type="checkbox"/> Bertscher, A., Nobles, J., Gilmore, A., Bondy, K., Van Den Akker, A., Dance, S., Bloomfield, M. J., &amp; Zatonski, M. (2024). Building a Systems Map: Applying Systems Thinking to Unhealthy Commodity Industry Influence on Public Health Policy. <i>International Journal of Health Policy and Management</i>, 13(1), 1-17. Article 7872. <a href="https://doi.org/10.34172/ijhpm.2024.7872">https://doi.org/10.34172/ijhpm.2024.7872</a></li> <li>• <input type="checkbox"/> Bertscher, A., Matthes, B., Nobles, J., Gilmore, A., Bondy, K., Van Den Akker, A., Dance, S., Bloomfield, M. J., &amp; Zatonski, M. (2024). Complex Interventions for a Complex System? Using Systems Thinking to Explore Ways to Address Unhealthy Commodity Industry Influence on Public Health Policy. <i>International Journal of Health Policy and Management</i>, 13(1), 1-20. <a href="https://doi.org/10.34172/IJHPM.2024.8033">https://doi.org/10.34172/IJHPM.2024.8033</a></li> <li>• <input type="checkbox"/> Elmitwalli, S., Mehegan, J., Gallagher, A., &amp; Alebshehy, R. (2024). Enhancing Sentiment and Intent Analysis in Public Health via Fine-Tuned Large Language Models on Tobacco and E-cigarette-Related Tweets. <i>Frontiers in Big Data</i>, 7, Article 1501154. <a href="https://doi.org/10.3389/fdata.2024.1501154">https://doi.org/10.3389/fdata.2024.1501154</a></li> <li>• <input type="checkbox"/> Elmitwalli, S., &amp; Mehegan, J. (2024). Sentiment analysis of COP9-related tweets: a comparative study of pre-trained models and traditional techniques. <i>Frontiers in Big Data</i>, 7, Article 1357926. <a href="https://doi.org/10.3389/fdata.2024.1357926">https://doi.org/10.3389/fdata.2024.1357926</a></li> <li>• <input type="checkbox"/> Elmitwalli, S., Mehegan, J., Wellock, G., Gallagher, A., &amp; Gilmore, A. (2024). Topic Prediction for Tobacco Control based on COP9 Tweets using Machine Learning Techniques. <i>PLoS ONE</i>, 19(2), Article e0298298. <a href="https://doi.org/10.1371/journal.pone.0298298">https://doi.org/10.1371/journal.pone.0298298</a></li> <li>• <input type="checkbox"/> Gilmore, A. B., Alebshehy, R., &amp; Bialous, S. (2024). How Could We Establish Monitoring and Surveillance of Health-Harming Corporations and Can Governments Be Trusted to Do It? Comment on "National Public Health Surveillance of Corporations in Key Unhealthy Commodity Industries - A Scoping Review and Framework Synthesis". <i>International Journal of Health Policy and Management</i>, 13(1), 1-5. <a href="https://doi.org/10.34172/ijhpm.8621">https://doi.org/10.34172/ijhpm.8621</a></li> <li>• <input type="checkbox"/> Gilmore, A. B., &amp; van den Akker, A. (2024). Protecting future generations from commercially driven health harms: lessons from tobacco control. <i>The Lancet</i>, 404(10449), 221-223. <a href="https://doi.org/10.1016/S0140-6736(24)01128-0">https://doi.org/10.1016/S0140-6736(24)01128-0</a></li> <li>• <input type="checkbox"/> Silver, K., Gatehouse, T., &amp; Alebshehy, R. (2024). The UK Tobacco Industry Interference Index 2023: Lessons, challenges and ways forward. <i>Tobacco Prevention and Cessation</i>, 10(Suppl. 1). <a href="https://doi.org/10.18332/TPC/194420">https://doi.org/10.18332/TPC/194420</a></li> <li>• <input type="checkbox"/> Alebshehy, R., Silver, K., &amp; Chamberlain, P. (2023). A "willingness to be orchestrated": Why are UK diplomats working with tobacco companies? <i>Frontiers in Public Health</i>, 11, Article 977713. <a href="https://doi.org/10.3389/fpubh.2023.977713">https://doi.org/10.3389/fpubh.2023.977713</a></li> <li>• <input type="checkbox"/> Gilmore, A. B., Fabbri, A., Baum, F., Bertscher, A., Bondy, K., Chang, H.-J., Demaio, S., Erzse, A., Freudenberg, N., Friel, S., Hofman, K. J., Johns, P., Abdool Karim, S., Lacy-Nichols, J., de Carvalho, C. M. P., Marten, R., McKee, M., Petticrew, M., Robertson, L., ... Thow, A. M. (2023). Defining and conceptualising the commercial determinants of health. <i>The Lancet</i>, 401(10383), 1194-1213. <a href="https://doi.org/10.1016/S0140-6736(23)00013-2">https://doi.org/10.1016/S0140-6736(23)00013-2</a></li> <li>• <input type="checkbox"/> Matthes, B., Kumar, P., Dance, S., Hird, T., Carriedo Lutzenkirchen, A., &amp; Gilmore, A. (2023). Advocacy counterstrategies to tobacco industry interference in policymaking: A scoping review of peer-reviewed literature. <i>Globalization and Health</i>, 19(1), 1-15. Article 42. <a href="https://doi.org/10.1186/s12992-023-00936-7">https://doi.org/10.1186/s12992-023-00936-7</a></li> <li>• <input type="checkbox"/> Maynard, R., &amp; Alebshehy, R. (2023, Jan). Exposing the tobacco industry's allies: an investigation by STOP. <a href="https://blogs.bmj.com/tc/2023/01/26/exposing-the-tobacco-industrys-allies-an-investigation-by-stop/">https://blogs.bmj.com/tc/2023/01/26/exposing-the-tobacco-industrys-allies-an-investigation-by-stop/</a></li> <li>• <input type="checkbox"/> Poole, N. L., van Straaten, B., van den Brand, F. A., Gilmore, A. B., Willemsen, M. C., &amp; Nagelhout, G. E. (2023). Content analysis of Dutch newspaper coverage of three tobacco control policies, 2017-2019. <i>BMJ Open</i>, 13(2), Article e057912. <a href="https://doi.org/10.1136/bmjopen-2021-057912">https://doi.org/10.1136/bmjopen-2021-057912</a></li> <li>• <input type="checkbox"/> Ulucanlar, S., Lauber, K., Fabbri, A., Hawkins, B., Mialon, M., Hancock, L., Tangcharoensathien, V., &amp; Gilmore, A. (2023). Corporate political activity: Taxonomies and model of corporate influence on public policy. <i>International Journal of Health Policy and Management</i>, 12(1), 1-22. Article 7292. <a href="https://doi.org/10.34172/IJHPM.2023.7292">https://doi.org/10.34172/IJHPM.2023.7292</a></li> </ul>
D3. Article 6 (Price and tax measures to reduce demand for tobacco)?
Yes

D4. If yes, please provide details
<p>Relevant to Article 6, in February 2025 the Kenya Revenue Authority announced it was investigating possible tax evasion or avoidance by BAT Kenya based on research conducted by The Investigative Desk, Tax Justice Network Africa, and TCRG (<a href="https://www.tuko.co.ke/business-economy/579471-kra-responds-report-showing-bat-kenyas-ksh-36b-tax-discrepancies">https://www.tuko.co.ke/business-economy/579471-kra-responds-report-showing-bat-kenyas-ksh-36b-tax-discrepancies</a>, <a href="https://www.bath.ac.uk/announcements/new-report-reveals-potential-28-million-tax-discrepancy-involving-british-american-tobacco-in-kenya/">https://www.bath.ac.uk/announcements/new-report-reveals-potential-28-million-tax-discrepancy-involving-british-american-tobacco-in-kenya/</a>).</p> <p>In June 2024, a European Parliament Working Group on Tobacco white paper disseminated TCRG research recommendations that European policy-makers should consider raising tobacco taxes, and bring taxation of roll-your-own tobacco in line with the levels of taxation on cigarettes to deter consumers from moving to these lower priced products rather than considering quitting (<a href="https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/">https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/</a>).</p> <p>Additionally in May 2024, TCRG submitted evidence to the UK HM Treasury Vaping Products duty consultation on new taxation for nicotine products and noted that UK inconsistencies in taxing different tobacco products should be remedied.</p> <p>TCRG published papers on price and tax measures to reduce tobacco demand, addressing the African, European, Western Pacific regions:</p> <ul style="list-style-type: none"> <li>•<input type="checkbox"/>López-Nicolás, Á., Branston, R., &amp; Ross, H. (2025). An assessment of proposals for reforming the European Union's Tobacco Tax Directive. <i>International Journal of Drug Policy</i>, 137, Article 104724. Advance online publication. <a href="https://doi.org/10.1016/j.drugpo.2025.104724">https://doi.org/10.1016/j.drugpo.2025.104724</a></li> <li>•<input type="checkbox"/>Sheikh, Z., Branston, J. R., van der Zee, K., &amp; Gilmore, A. (2025). How has the tobacco industry passed tax changes through to consumers in 12 Sub-Saharan African countries? <i>Tobacco Control</i>, 34, 48-52. Article tc-2023-058054. <a href="https://doi.org/10.1136/tc-2023-058054">https://doi.org/10.1136/tc-2023-058054</a></li> <li>•<input type="checkbox"/>López-Nicolás, Á., Branston, J. R., &amp; Ross, H. (2025). Tobacco Taxation in Spain: A tax laggard with a brighter possible future. <i>Nicotine &amp; Tobacco Research</i>, 27(1), 46-53. Article ntae162. <a href="https://doi.org/10.1093/ntr/ntae162">https://doi.org/10.1093/ntr/ntae162</a></li> <li>•<input type="checkbox"/>Hopkinson, N., Agrawal, S., Thakar, R., Griffiths, C., Walker, I., Branston, J. R., &amp; a further 203 organisations and individuals (2024). Achieving a smoke-free country-a best buy for the UK chancellor. <i>BMJ (Clinical research ed.)</i>, 387, q2231. <a href="https://doi.org/10.1136/bmj.q2231">https://doi.org/10.1136/bmj.q2231</a></li> <li>•<input type="checkbox"/>Kunji Koya, R., Branston, J. R., &amp; Gallagher, A. WA. (2024). Exploring the Value in Variations of the Relative Income Price (RIP) for Calculating Cigarette Affordability: An Illustration using Malaysia. <i>PLoS ONE</i>, 19(11), Article e0313695. <a href="https://doi.org/10.1371/journal.pone.0313695">https://doi.org/10.1371/journal.pone.0313695</a></li> <li>•<input type="checkbox"/>Gendall, P., Gendall, K., Branston, J. R., Edwards, R., Wilson, N., &amp; Hoek, J. (2024). Going "Super Value" in New Zealand: Cigarette pricing strategies during a period of sustained annual excise tax increases. <i>Tobacco Control</i>, 33, 240-246. Article 057232. <a href="https://doi.org/10.1136/tc-2021-057232">https://doi.org/10.1136/tc-2021-057232</a></li> </ul>
D5. Article 8 (Protection from exposure to tobacco smoke)?
No
D7. Article 9 (Regulation of the contents of tobacco product) and/or Article 10 (Regulation of tobacco product disclosures)?
Yes
D8. If yes, please provide details
<p>Regarding Articles 9 and 10, TCRG published research addressing regulation and disclosure of tobacco product contents:</p> <ul style="list-style-type: none"> <li>•<input type="checkbox"/>Braznell, S., Van Den Akker, A., Metcalfe, C., Taylor, G., &amp; Hartman-Boyce, J. (2024). Critical appraisal of interventional clinical trials assessing heated tobacco products: a systematic review. <i>Tobacco Control</i>, 33(3), 383-394. <a href="https://doi.org/10.1136/tc-2022-057522">https://doi.org/10.1136/tc-2022-057522</a></li> <li>•<input type="checkbox"/>Braznell, S., Campbell, J., &amp; Gilmore, A. B. (2024). What can current biomarker data tell us about the risks of lung cancer posed by heated tobacco products? <i>Nicotine &amp; Tobacco Research</i>, 26(3), 270-280. Article ntad081. <a href="https://doi.org/10.1093/ntr/ntad081">https://doi.org/10.1093/ntr/ntad081</a></li> <li>•<input type="checkbox"/>Braznell, S., Branston, J. R., &amp; Gilmore, A. (2023). Corporate communication of the relative health risks of IQOS through a webchat service. <i>Tobacco Control</i>, 32(e2), e205-e211. <a href="https://doi.org/10.1136/tobaccocontrol-2021-056999">https://doi.org/10.1136/tobaccocontrol-2021-056999</a></li> <li>•<input type="checkbox"/>Robertson, L., Hoek, J., &amp; Silver, K. (2023). Industry Watch: PMI New Zealand conflates IQOS heated tobacco products with electronic nicotine delivery systems. <i>Tobacco Control</i>, 32(4), 534-536. <a href="https://doi.org/10.1136/tobaccocontrol-2021-056964">https://doi.org/10.1136/tobaccocontrol-2021-056964</a></li> </ul>
D9. Article 11 (Packaging and labelling of tobacco products)?
Yes

D10. If yes, please provide details
<p>Relevant to Article 11, in January 2025 TCRG submitted written evidence to the UK consultation to extend standardised packaging regulations to all tobacco products.</p> <p>In December 2024, TCRG co-authored a BMJ blog addressing tobacco packaging in Pakistan and Sudan:  <a href="https://blogs.bmj.com/tc/2024/12/23/tobacco-10-packs-a-failed-deal-between-bat-ptc-in-pakistan-and-sudan/">https://blogs.bmj.com/tc/2024/12/23/tobacco-10-packs-a-failed-deal-between-bat-ptc-in-pakistan-and-sudan/</a></p> <p>TCRG published research about graphic health warnings in Bangladesh:</p> <p>•<a href="#">[7]</a>Shahriar, M. H., Hasan, M. M., Alam, M. S., Matthes, B. K., Gilmore, A., &amp; Zubair, ABM. (2024). Tobacco industry interference to undermine the development and implementation of graphic health warnings in Bangladesh. <i>Tobacco Control</i>, 33(5), 587-595.  <a href="https://doi.org/10.1136/tc-2022-057538">https://doi.org/10.1136/tc-2022-057538</a></p>
D11. Article 12 (Education, communication, training and public awareness)?
Yes
D12. If yes, please provide details
<p>Regarding Article 12, TCRG/STOP has regularly responded to inquiries from the WHO FCTC Secretariat and the WHO on tobacco industry linked events, organizations or personnel.</p> <p>TCRG, with STOP, raised awareness by producing an award-winning film, Tobacco Slave, highlighting neo-colonialist exploitation in tobacco leaf farming in Malawi, involving low pay, child labour, and poor working conditions. During 2023/24, the film was shown to policymaker, public health, advocate, media, and public audiences in Brazil, Jordan, Kenya, UK, and USA, and TCRG produced material to support use of the film in Germany and Sweden (<a href="https://www.bath.ac.uk/campaigns/tobacco-slave-documentary/">https://www.bath.ac.uk/campaigns/tobacco-slave-documentary/</a>).</p> <p>TCRG published blog articles on education for youth and public awareness:</p> <p>•<a href="#">[7]</a>Fitzpatrick, I. (2024, December 2). How big tobacco firms are using e-cigarettes to try to improve their image. <i>The Conversation</i>. <a href="http://theconversation.com/how-big-tobacco-firms-are-using-e-cigarettes-to-try-to-improvetheir-image-199131">http://theconversation.com/how-big-tobacco-firms-are-using-e-cigarettes-to-try-to-improvetheir-image-199131</a></p> <p>•<a href="#">[7]</a>Braznell, S. 2024. Fighting for attention: How to educate youth about the dangers of e-cigarettes? Available from:  <a href="https://blogs.bath.ac.uk/tcrg/2024/02/23/fighting-forattention-how-to-educate-youth-about-the-dangers-of-e-cigarettes/">https://blogs.bath.ac.uk/tcrg/2024/02/23/fighting-forattention-how-to-educate-youth-about-the-dangers-of-e-cigarettes/</a></p> <p>TCRG contributed to a coordinated global effort by researchers, advocates and journalists to raise awareness of tobacco industry funding of professional development courses on smoking cessation on Medscape. This led to the courses being withdrawn (see <a href="https://doi.org/10.1136/bmj.q948">https://doi.org/10.1136/bmj.q948</a>, <a href="https://doi.org/10.1136/bmj.q830">https://doi.org/10.1136/bmj.q830</a>).</p>
D13. Article 13 (Tobacco advertising, promotion and sponsorship)?
Yes
D14. If yes, please provide details
<p>TCRG published various outputs relevant to Article 13, addressing tobacco and nicotine advertising, promotion and sponsorship:</p> <p>•<a href="#">[7]</a>Assunta, M., &amp; Chamberlain, P. (2024). Ensuring a safe, tobacco free future for the young: protecting children from tobacco industry interference. <i>Tobacco control</i>, 33(3), 281–282. <a href="https://doi.org/10.1136/tc-2024-058698">https://doi.org/10.1136/tc-2024-058698</a></p> <p>•<a href="#">[7]</a>Alaouie, H. Lebanon: Tobacco industry ignores marketing and advertising regulations, in Evans-Reeves, K., &amp; Canty, R. (2024). <i>World Wide news and comment</i>. <i>Tobacco Control</i>, 33(1), 3–6. <a href="https://doi.org/10.1136/tc-2023-058499">https://doi.org/10.1136/tc-2023-058499</a></p> <p>•<a href="#">[7]</a>Fitzpatrick, I., Byrne, D., Gilmore, A. B., Hasan, F., &amp; Cranwell, J. (2024). Quantifying and characterising tobacco content in the most in-demand streamed series in 10 low/middle-income countries in 2019. <i>Tobacco Control</i>, 33(1), 45-51.  <a href="https://doi.org/10.1136/tobaccocontrol-2022-057278">https://doi.org/10.1136/tobaccocontrol-2022-057278</a></p> <p>•<a href="#">[7]</a>Tselengidis, A., Adams, S., Freeman, B., Alam, S. M., Astuti, P. A. S., &amp; Cranwell, J. (2023). Achieving a tobacco-free Bangladesh by 2040: a qualitative analysis of the tobacco advertising environment and prohibitions in Bangladesh. <i>BMJ Open</i>, 13(5), Article e069620. <a href="https://doi.org/10.1136/bmjopen-2022-069620">https://doi.org/10.1136/bmjopen-2022-069620</a></p> <p>•<a href="#">[7]</a>Lee, E., Hoek, J., Fenton, E., Joshi, A., Evans-Reeves, K., &amp; Robertson, L. (2023). An Analysis of Arguments Advanced via Twitter in an Advocacy Campaign to Promote Electronic Nicotine Delivery Systems. <i>Nicotine &amp; Tobacco Research</i>, 25(3), 533-540. Article ntac237. <a href="https://doi.org/10.1093/ntr/ntac237">https://doi.org/10.1093/ntr/ntac237</a></p> <p>TCRG contributed to a WHO article addressing harmful tobacco marketing to youth, and to STOP reporting on harmful tobacco advertising through global Formula 1 sports events and coverage:</p> <p>•<a href="#">[7]</a><a href="https://www.who.int/europe/news/item/31-05-2024-peering-through-tobacco-s-smokescreen--young-people-fight-for-clarity-and-freedom">https://www.who.int/europe/news/item/31-05-2024-peering-through-tobacco-s-smokescreen--young-people-fight-for-clarity-and-freedom</a></p> <p>•<a href="#">[7]</a><a href="https://exposetobacco.org/campaigns/driving-addiction/">https://exposetobacco.org/campaigns/driving-addiction/</a></p> <p>•<a href="#">[7]</a><a href="https://exposetobacco.org/wp-content/uploads/Race-For-Future-Generations.pdf">https://exposetobacco.org/wp-content/uploads/Race-For-Future-Generations.pdf</a></p>

D15. Article 14 (Demand reduction measures concerning tobacco dependence and cessation)
No
D17. Article 15 (Illicit trade in tobacco products)?
Yes
D18. If yes, please provide details
<p>Relevant to Article 15, in February 2025, TCRG members provided expert input into the Secretariat's review of the Strategy for mechanisms of assistance and financial resources to support the implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products.</p> <p>In June 2024 a European Parliament Working Group on Tobacco white paper disseminated TCRG research recommendations that Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products should ensure tracking and tracing systems are fully consistent with the Protocol and not replicate the EU model after TCRG research raised concerns regarding its compatibility (<a href="https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/">https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/</a>).</p> <p>In May 2024 a TCRG member assisted Vital Strategies to debrief a former PMI employee in China about PMI activities around illicit trade in that region.</p> <p>TCRG contributed to a chapter on illicit trade to the April 2024 Royal College of Physicians evidence review of e-cigarettes and harm reduction (<a href="https://www.rcp.ac.uk/policy-and-campaigns/policy-documents/e-cigarettes-and-harm-reduction-an-evidence-review/">https://www.rcp.ac.uk/policy-and-campaigns/policy-documents/e-cigarettes-and-harm-reduction-an-evidence-review/</a>).</p> <p>TCRG published research papers on illicit trade, addressing the African, Eastern Mediterranean, and Western Pacific regions:</p> <ul style="list-style-type: none"> <li>• Singh, A., Dobbie, F., Gallagher, A., Ross, H., Boateng, O. A., Logo, D. D., Bauld, L., Gilmore, A. B., &amp; Owusu-Dabo, E. (2025). The trade of illicit cigarettes in Ghana: Insights from a policy synthesis and qualitative study. <i>Tobacco Prevention and Cessation</i>, 11(January), Article 8. <a href="https://doi.org/10.18332/tpc/195578">https://doi.org/10.18332/tpc/195578</a></li> <li>• Gallagher, A. W. A., Sheikh, Z. D., Khan, Z., Aftab, U., Rahim, M., Ullah, A., Ullah, S., Ul haq, H., &amp; Siddiqi, K. (2024). A systematic investigation of tobacco industry sourced data relating to illicit tobacco trade featured in Pakistan's media coverage (2015-2020). <i>Nicotine and Tobacco Research</i>, 26(11), 1489–1496. Article ntae133. <a href="https://doi.org/10.1093/ntr/ntae133">https://doi.org/10.1093/ntr/ntae133</a></li> <li>• Bin Kunji Koya, W., Branstion, J. R., Gallagher, A. W. A., Bui, W. K. T., Ross, H., &amp; Mohamed Nor, N. (2024). Improving Estimates of the Illicit Cigarette Trade through Collaboration: Lessons from Two Studies of Malaysia. <i>Tobacco Control</i>, Article 23058333. Advance online publication. <a href="https://doi.org/10.1136/tc-2023-058333">https://doi.org/10.1136/tc-2023-058333</a></li> <li>• Gomis, B., Gallagher, A. W. A., Alebshehy, R., &amp; Rowell, A. (2024). Sanctions and Illicit Trade: British American Tobacco's Activities in Iran (2000–2014). <i>Journal of Illicit Economies and Development</i>, 5(1), 34-46. <a href="https://doi.org/10.31389/jied.223">https://doi.org/10.31389/jied.223</a></li> <li>• Singh, A., Ross, H., Dobbie, F., Gallagher, A., Kinnunen, T., Logo, D. D., Boateng, O. A., Gilmore, A., Bauld, L., &amp; Owusu-Dabo, E. (2023). Extent of illicit cigarette market from single stick sales in Ghana: findings from a cross-sectional survey. <i>BMJ Open</i>, 13(3), Article e062476. <a href="https://doi.org/10.1136/bmjopen-2022-062476">https://doi.org/10.1136/bmjopen-2022-062476</a></li> </ul>
D19. Article 16 (Sales to and by minors)?
Yes
D20. If yes, please provide details
<p>Regarding Article 16, TCRG published research on targeting young people via the retail environment:</p> <ul style="list-style-type: none"> <li>• Alebshehy, R., Elsebaie, E. H., &amp; Razum, O. (2025). Public's perception of policies reducing tobacco availability by regulating the tobacco retail environment: A case study in Egypt. <i>Tobacco Prevention and Cessation</i>, 11(January), Article 6. <a href="https://doi.org/10.18332/tpc/197384">https://doi.org/10.18332/tpc/197384</a></li> <li>• Alebshehy, R., Ibrahim, R., &amp; Elmitwalli, S. (Accepted/In press). Effects of retail environment regulations on reducing tobacco retailers and operating hours: a case study in Egypt. <i>Tobacco Control</i>.</li> </ul>
D21. Article 17 (Provision of support for economically viable alternative activities) and/or Article 18 (Protection of the environment and the health of persons)?
Yes

D22. If yes, please provide details
<p>Relevant to Article 18, TCRG mapped the tobacco industry global supply chain (<a href="https://www.tobaccotactics.org/supply-chain/">https://www.tobaccotactics.org/supply-chain/</a>) to assist researchers, advocates and journalists to assess and counter the harmful environmental impact of the industry. TCRG published a paper on this significant resource, and highlighted tobacco industry motivations to engage in CSR:</p> <ul style="list-style-type: none"> <li>•<input type="checkbox"/>Hiscock, R., Alaouie, H., Matthes, B., Mehegan, J., &amp; Bloomfield, M. J. (2023). Hosting the tobacco industry supply chain and political interference. <i>Nicotine &amp; Tobacco Research</i>, 25(12), 1847-1855. Article ntad178. <a href="https://doi.org/10.1093/ntr/ntad178">https://doi.org/10.1093/ntr/ntad178</a></li> <li>•<input type="checkbox"/>Taravira, N. A., Laurence, L., &amp; Filippidis, F. T. (2023). Beware big tobacco bearing gifts: tobacco industry corporate social responsibility activities in Greece. <i>Tobacco Control</i>, 32(5), 675-676. Article tobaccocontrol-2021-057143. <a href="https://doi.org/10.1136/tobaccocontrol-2021-057143">https://doi.org/10.1136/tobaccocontrol-2021-057143</a></li> </ul>
D23. Article 19 (Liability)?
Yes
D24. If yes, please provide details
<p>Regarding Article 19, in September 2024, TCRG submitted a response to the survey conducted by the Expert Group to COP11 established by Decision FCTC/COP10(13), addressing liability.</p> <p>Dr Raouf Alebshehy of TCRG is a member of the Expert Group on liability (in relation to Article 19 of the WHO FCTC).</p>
D25. Article 20 (Research, surveillance and exchange of information)?
Yes
D26. If yes, please provide details
<p>Relevant to Article 20, TCRG exchanged information with several WHO FCTC Knowledge Hubs, and participated in regular calls with key stakeholders worldwide to share research and surveillance information, including with the WHO TFI and BI partners that monitor tobacco industry 'transformation' claims. TCRG published research on industry 'transformation' claims:</p> <ul style="list-style-type: none"> <li>•<input type="checkbox"/>Mehegan, J., Gallagher, A., Elmitwalli, S., Edwards, R., &amp; Gilmore, A. (2024). Analysis of Philip Morris International's 'aspirational' target for its 2025 cigarette shipments. <i>Tobacco Control</i>, Article tc-2023-058511. Advance online publication. <a href="https://doi.org/10.1136/tc-2023-058511">https://doi.org/10.1136/tc-2023-058511</a></li> </ul>
D27. Article 22 (Cooperation in the scientific, technical and legal fields and provision of related expertise)?
Yes
D28. If yes, please provide details
<p>Regarding Article 22, TCRG delivered its Tobacco Industry Monitoring, Research and Accountability course (TIMRA) for the seventh time in July 2024, to train and build the expertise of researchers and advocates from 35 countries. TIMRA includes topics and methods like safely finding and using information to achieve impact, understanding Article 5.3 and identifying breaches, defamation, intimidation, research ethics, working with the media, tax and pricing issues, and illicit trade.</p> <p>In October 2024, TCRG worked with NGO Blueprint for Free Speech to deliver security training in South Africa for journalists and the tobacco control communities from several African countries, and supported later training in Mozambique, Zimbabwe and Angola.</p> <p>TCRG partnered in December 2024 with the Eastern Mediterranean Public Health Network (EMPHNET), Vital Strategies, Blueprint for Free Speech, and the WHO Regional Office for the Eastern Mediterranean to deliver a capacity building workshop in Jordan for NGOs and other institutions to counter the growing influence of the tobacco industry.</p>

## E. Other relevant activities to support the work of the WHO FCTC



E1. Please provide any other relevant information
<p>In September 2024, TCRG submitted evidence to support the work of Expert Group on forward-looking tobacco control measures (in relation to Article 2.1 of the WHO FCTC).</p> <p>TCRG also wishes to suggest several themes for the Parties and the Bureau members to consider discussing:</p> <ul style="list-style-type: none"> <li>• Regarding the COP, we suggest the Parties to consider whether Parties' FCTC COP delegate declarations of interest can be made mandatory and public (as also discussed in a recent article in the Lancet to mark the FCTC20: <a href="https://doi.org/10.1016/S0140-6736(25)00336-8">https://doi.org/10.1016/S0140-6736(25)00336-8</a>).</li> <li>• Regarding Articles 6 and 19, and in alignment with the efforts of the Parties to secure sustainable funding for FCTC implementation through the investment fund, we suggest the Parties consider generating funds by holding the tobacco industry to account beyond excise duties borne by tobacco users, e.g. through use of 'polluter pays' surtaxes to create tobacco control funds, via wholesale price capping that would also have a benefit to reduce industry's profit incentive, or via a levy on transnational tobacco company international financial transfers that could also mitigate profit tax avoidance (as suggested in a recent article: <a href="https://doi.org/10.1016/S0140-6736(25)00336-8">https://doi.org/10.1016/S0140-6736(25)00336-8</a>).</li> <li>• We suggest Parties could consider what resources, training or other measures might support the tobacco control community to prevent and/or cope with intimidation. A guiding principle of the WHO FCTC is the "vital importance" of civil society participation in tobacco control efforts, and that this participation "is essential in achieving the objective of the Convention and its protocols" (Preamble, Article 4.7). Yet research shows intimidation against researchers and advocates impedes such participation (e.g. see <a href="https://doi.org/10.1038/d41586-024-04241-0">https://doi.org/10.1038/d41586-024-04241-0</a>, <a href="https://doi.org/10.1136/bmj.q2644">https://doi.org/10.1136/bmj.q2644</a>).</li> <li>• Related to implementing decision FCTC/COP8(18) to prevent use of industry-linked research in policy development, and to require disclosure of industry information about its research and funding, we suggest Parties consider ways to fund independent science. This could help counter industry influence over the global science system via funding third parties (see research on the Foundation for a Smoke-Free World, now GAES, <a href="https://doi.org/10.1136/tc-2022-057667">https://doi.org/10.1136/tc-2022-057667</a>) and via insufficient funding disclosure (see research on PMI in Japan, <a href="https://doi.org/10.1093/ntr/ntae101">https://doi.org/10.1093/ntr/ntae101</a>).</li> <li>• Regarding Article 2.1 and forward-looking measures, we suggest Parties to consider measures to regulate the retail environment. For instance, research has suggested measures such as restricting tobacco retail outlet sale hours/days, banning tobacco home delivery of tobacco and mobile sales, capping the tobacco amount per purchase, and government control of outlets with a view to gradually reduce the number of retailers (see <a href="https://doi.org/10.3389/fpubh.2023.975065">https://doi.org/10.3389/fpubh.2023.975065</a>).</li> </ul>
E2. Please attach any other relevant file(s)
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## F. Declarations

F1. Please confirm that your organization does not receive, has not received and will not receive in the future, either directly or indirectly, any financial or other contributions or assistance from the tobacco industry or its affiliates. Please also confirm that neither your members nor your partners are affiliated directly or indirectly with the tobacco industry or its affiliates or those furthering the interests of the tobacco industry.
Yes, I confirm
F2. By electronic signature I confirm that the above information is accurate and completed to the best of our abilities.
Dr Raouf Alebshehy, 26 February 2025
F3. Please confirm that the activities of your organization are in conformity with the 17th and 18th preambular paragraphs and Article 5.3 of the WHO FCTC.
Yes, I confirm