

Reaccreditation report of NGO observers to MOP4

Survey response 1

Date submitted
2025-02-26 16:37:20

A. Contact details

A1. Name of organization
Tobacco Control Research Group (TCRG)
A6. Website of organization
https://www.bath.ac.uk/research-groups/tobacco-control-research-group/

B. General information

B1. Please indicate if your organization would like to retain its status as observer to the Protocol to Eliminate Illicit Trade in Tobacco Products
Yes
B2. Does your organization's mission statement specifically refer to tobacco control or to countering/fighting illicit trade in tobacco products?
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. The TCRG's remit includes exploring the relationship between illicit tobacco trade (and related policy) and the tobacco industry.</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
The Tobacco Control Research Group is based within the UK but has team members and works with consultants covering the Eastern Mediterranean region, the Region of the Americas, and elsewhere. The group is also a part of the global tobacco industry watchdog STOP.
B6. Does your organization regularly convene meetings or conferences for its membership?
No
B9. If yes, is tobacco control or countering/fighting illicit trade in tobacco products covered in the meetings/conferences?
N/A

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

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

- ☒ MOP 3 sessions
- ☒ Meetings with NGO Observers to the MOP

TCRG summarised tobacco industry interference at COP10 and MOP3 (<https://tobaccotactics.org/article/cop10-mop3-interference/>) and provided commentary on MoP3 (<https://tobaccocontrol.bmj.com/content/33/3/283>)

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

TCRG is a group of 23 staff and 2 PhD students, and TCRG members attend and present research and monitoring findings at tobacco control related scientific conferences and meetings. TCRG's knowledge exchange platform 'tobaccotactics.org' now contains 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:

- ☒ 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.
- ☒ 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.
- ☒ August 2024, to the Nordic Tobacco Control Network about tobacco industry interference and the UK Tobacco and Vapes Bill, and to the 7th Corpora & Discourse International Conference (CADS 2024) on discourses around tobacco product use.

-Joint Action on Tobacco Control 2 (JATC2) conference, September 2024, Keynote speaker on 'Tobacco Industry Interference and Tricks' & panellist on 'JATC2 Closing Session - Next Steps in Tobacco Control in Europe'.

-4th Calisia World Conference on Family Health, University of Kalisz, October 2024, Tobacco Industry 'transformation' narratives: a barrier to the tobacco endgame.

Union World Conference on Lung Health, November 2024, Chair of Special Session titled "Combatting Big Tobacco: Uniting against industry influence on public health".

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

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

No

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

E. Has your organization conducted any work/activity in relation to the following provisions of the Protocol?

E1. Part II: General obligations

E1.a. Article 4: General obligations:

Yes

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

No

E1.c. If you responded YES to any of above, please provide details:
<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. TCRG also published research papers on illicit trade, addressing the African, Eastern Mediterranean, and Western Pacific regions:</p> <ul style="list-style-type: none"> • Singh, A., Dobbie, F., Gallagher, A., Ross, H., Boateng, O. A., Logo, D. D., Bauld, L., Gilmore, A. B., & 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. https://doi.org/10.18332/tpc/195578 • Gallagher, A. W. A., Sheikh, Z. D., Khan, Z., Aftab, U., Rahim, M., Ullah, A., Ullah, S., Ul haq, H., & 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. https://doi.org/10.1093/ntr/ntae133 • Bin Kunji Koya, W., Branston, J. R., Gallagher, A. W. A., Bui, W. K. T., Ross, H., & 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. https://doi.org/10.1136/tc-2023-058333 • Gomis, B., Gallagher, A. W. A., Alebshehy, R., & 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. https://doi.org/10.31389/jied.223 • Singh, A., Ross, H., Dobbie, F., Gallagher, A., Kinnunen, T., Logo, D. D., Boateng, O. A., Gilmore, A., Bauld, L., & 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. https://doi.org/10.1136/bmjopen-2022-062476 <p>The TCRG also contributed to a chapter on illicit trade, within the E-cigarettes and harm reduction: An evidence review, Royal College of Physicians, 18 April 2024, https://www.rcp.ac.uk/policy-and-campaigns/policy-documents/e-cigarettes-and-harm-reduction-an-evidence-review/</p>
E2 Part III: Supply chain control
E2.a. Article 6 (Licence, equivalent approval or control system):
No
E2.b. Article 7 (Due diligence):
No
E2.c. Article 8 (Tracking and tracing):
Yes
E2.d. Article 9 (Record keeping):
No
E2.e. Article 10 (Security and preventive measures):
No
E2.f. Article 11 (Sale by Internet, telecommunication, or any other evolving technology):
No
E2.g. Article 12 (Free zones and international transit):
Yes
E2.h. Article 13 (Duty free sales):
No

E2.i. If you responded YES to any of above, please provide details:
<p>TCRG has mapped the tobacco industry global supply chain (https://www.tobaccotactics.org/supply-chain/) so that researchers, advocates and journalists can access information to assess and counter the harmful environmental impact of the industry. TCRG has recently published several papers relating to better understanding the tobacco supply chain:</p> <ul style="list-style-type: none"> •<input type="checkbox"/>Hiscock, R., Alaouie, H., Matthes, B., Mehegan, J., & Bloomfield, M. J. (2023). Hosting the tobacco industry supply chain and political interference. <i>Nicotine & Tobacco Research</i>, 25(12), 1847-1855. Article ntad178. https://doi.org/10.1093/ntr/ntad178 •<input type="checkbox"/>Dunwoodie Stirton F, Hiscock R, Mehegan J, et al Independent companies in the tobacco supply chain: transparency and environmental social governance. <i>Tobacco Control</i> Published Online First: 08 January 2025. doi: 10.1136/tc-2024-058978 <p>Article 8:</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 with the Protocol (https://www.bath.ac.uk/announcements/tobacco-control-research-group-members-contribute-to-european-parliament-working-group-white-paper/).</p> <p>Transparency within EU public consultation on tobacco tracking and tracing, Allen Gallagher, April 2023, European Parliament, Strasbourg. https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=fr&reference=2024/2555(RSP), https://citizenpost.fr/wp-content/uploads/2024/06/Livre-Blanc-Tabac.pdf</p> <p>Article 12: •<input type="checkbox"/>Gomis, B., Gallagher, A. W. A., Alebshehy, R., & 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. https://doi.org/10.31389/jied.223</p>
E3 Part IV: Offences
E3.a. Article 14 (Unlawful conduct including criminal offences):
Yes
E3.b. Article 15 (Liability of legal persons):
No
E3.c. Article 16 (Prosecution and sanctions):
Yes
E3.d. Article 17 (Seizure payments):
No
E3.e. Article 18 (Disposal or destruction):
No
E3.f. Article 19 (Special investigative techniques):
No
E3.g. If you responded YES to any of above, please provide details:
<p>Article 14:</p> <p>Alebshehy, R., Elsebaie, E. H., & 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. https://doi.org/10.18332/tpc/197384</p> <ul style="list-style-type: none"> •<input type="checkbox"/>Alebshehy, R., Ibrahim, R., & 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>. •<input type="checkbox"/>Singh, A., Ross, H., Dobbie, F., Gallagher, A., Kinnunen, T., Logo, D. D., Boateng, O. A., Gilmore, A., Bauld, L., & 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. https://doi.org/10.1136/bmjopen-2022-062476 •<input type="checkbox"/>Singh, A., Dobbie, F., Gallagher, A., Ross, H., Boateng, O. A., Logo, D. D., Bauld, L., Gilmore, A. B., & 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. https://doi.org/10.18332/tpc/195578 <p>Article 16: •<input type="checkbox"/>Gomis, B., Gallagher, A. W. A., Alebshehy, R., & 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. https://doi.org/10.31389/jied.223</p>

E4. Part V: International cooperation
E4.a. Article 20 (General information sharing):
No
E4.b. Article 21 (Enforcement information sharing):
No
E4.c. Article 21 (Information sharing: confidentiality and protection of information):
No
E4.d. Article 22 (Assistance and cooperation: training, technical assistance and cooperation in scientific, technical and technological matters):
Yes
E4.e. Article 24 (Assistance and cooperation: investigation and prosecution of offences):
No
E4.f. Article 27 (Law enforcement cooperation):
No
E4.g. Article 28 (Mutual administrative assistance):
No
E4.h. Article 29 (Mutual legal assistance):
No
E4.i. Article 30 (Extradition) and Article 31 (Measures to ensure extradition):
Yes
E4.j. If you responded YES to any of above, please provide details:
Article 22: In Feb 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 (the Strategy).
E5. Part VI: Reporting
E5.a. Article 32 (Reporting and exchange of information):
No
E6. Part VII: Institutional arrangements and financial resources
E6.a. Article 36 (Financial resources):
No

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

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

TCRG would like to suggest three themes for the CS and the Bureau members to potentially discuss and consider further actions:

- Production of independent illicit trade data - TCRG research has shown that the industry is a major funder of research on illicit trade and that this is often of poorer quality than independent research. (<https://tobaccocontrol.bmj.com/content/28/3/334>). Further, such reports are often disseminated via the media without the industry funding being disclosed (<https://academic.oup.com/ntr/article/26/11/1489/7685835>). Parties require an adequate understanding of the problem of illicit trade in their countries in order to address it- the dominance of inaccurate industry funded data undermines this and parties may benefit from more independent data on illicit trade both globally and in their respective countries.
- Ensuring adequate independence of tobacco tracking and tracing systems- TCRG research has identified issues with the independence requirements featured in some Parties' track and trace systems. (<https://tobaccocontrol.bmj.com/content/29/e1/e56>). In line with FCTC Article 5.3, Article 8 of the Protocol requires that governments engage with the industry only to the extent strictly necessary and do not hand over control of such systems to the industry.
- Holding industry to account – TCRG research has previously indicated that the majority of product on the illicit market stems from the supply chains of major companies, indicating that they are at best failing to control their supply chains or, at worse, intentionally facilitating illicit trade. More recent TCRG research, has raised concerns over BAT potentially breaching sanctions. (<https://jied.lse.ac.uk/articles/10.31389/jied.223>).

G. Attachments

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

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H. Declarations

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

Yes, I confirm

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

Yes, I confirm

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

Allen Gallagher