

**BEHIND CLOSED
DOORS**

**HOW THE
TOBACCO**

**LOBBY
INFLUENCES
THE EUROPEAN
UNION AND
BEYOND**



A GLOBAL
TOBACCO
INDUSTRY
WATCHDOG

**CONTRE
FEU**

L'ALLIANCE
CONTRE
L'INDUSTRIE
DU TABAC

EXECUTIVE SUMMARY

The tobacco industry lobbies governments all over the world to delay, weaken or block policies that could hurt its profits, and to promote policies that would perpetuate the tobacco epidemic, which kills 7 million people every year.

Parties to a global treaty, the World Health Organization Framework Convention on Tobacco Control (WHO FCTC), are obliged to implement a set of measures designed to protect present and future generations from the harms of tobacco products and the tobacco industry. This involves protecting health policies from the tobacco industry, notably through transparency measures. Analysis shows that the European Union, a Party to the treaty and a region heavily affected by the tobacco epidemic, is not fully adhering to these measures, and that the tobacco industry is exploiting these gaps to influence policies and harm health both in the EU and beyond.

To document the industry's extensive lobbying presence and activity in the EU, Contre-Feu and STOP analysed data published on the EU Transparency Register, the official public database where lobbyists are required to declare their activities; the database of meetings between Members of the European Parliament and lobbyists; and documents obtained through a series of freedom of information (FOI) requests concerning interactions between different Directorates-General (DGs) of the European Commission (EC) and the tobacco industry.

The analysis shows that industry lobbying is ever-present, not always publicly declared and may be derailing lifesaving policies; tobacco use is increasing in the EU, according to the 2025 WHO global report on trends in prevalence of tobacco use.¹

KEY FINDINGS

— **The tobacco industry has a large and active presence in the EU.** At least 49 organisations are actively seeking to influence European policymakers and civil servants on behalf of the tobacco industry. Together, these organisations reported employing at least 139 people and spending nearly €14 million (US \$16.2 million) per year on lobbying activities targeting EU decision-makers.

— **In recent years, new lobby groups promoting the industry's self-serving version of 'tobacco harm reduction' have multiplied, reflecting the reorientation of part of the industry's lobbying efforts towards promoting new tobacco and nicotine products, which it claims are safer.** 8 of the 15 organisations in this category were established within the past three years.

— **Current transparency rules aren't working.** In the European Parliament, 257 meetings with tobacco lobbyists were recorded between 2023 and 2025. As for the EU Commission, it has only declared five meetings with the industry in that period, while Contre-Feu and STOP uncovered multiple additional but undeclared interactions, particularly with DG TRADE, the European Commission department that manages trade policy and the EU's trade relations with non-EU countries.

— **Countries the industry has invested in tend to be its strongest advocates.** For example, the tobacco industry claims to have invested several hundred million euros in factories to manufacture heated tobacco products (HTPs) in several Member States, primarily Italy and Greece. These Member States have since defended industry positions at the EU Council level.

— **The tobacco industry is trying to use the European Commission as a lever to challenge tobacco control policies in non-EU countries, including in low- and middle-income countries.** Documents uncovered in FOI requests to the European Commission suggest ongoing industry attempts to mobilize EU institutions against public health policies in countries such as Argentina, Brazil, India, Japan, Mexico, Singapore, Taiwan, Thailand, Türkiye and Vietnam, often by framing these policies as trade barriers.

Current rules to limit industry influence are falling short and European policymakers continue to be heavily lobbied by the tobacco industry and those working on its behalf.

The concerns raised by the European Ombudsman in 2023 that the European Union was not sufficiently transparent in its dealings with the tobacco industry are still relevant today. In this respect, the EU is failing to fully honour its commitment to the WHO FCTC, particularly to Article 5.3, which mandates that Parties must limit their interactions with the tobacco industry to those which are strictly necessary, and must make all interactions transparent.

RECOMMENDATIONS

To ensure full transparency, protect policies and public health and ensure that the industry no longer uses the EU for its own benefit:

01

The EU and all of its institutions must further implement and ensure compliance with Article 5.3 of the FCTC. Current transparency measures are often restricted to specific meetings and individuals (such as staff in management positions or certain departments or DGs of the European Commission), when they should apply to all staff who have any contact with the tobacco industry. Moreover, these obligations should be accompanied by dissuasive sanctions and strict controls. Finally, interactions with decision-makers should only occur when strictly necessary.

02

Improved compliance to Article 5.3 must also result in more transparency with respect to freedom of information (FOI) requests made by civil society concerning contacts with the tobacco industry. The commercial interests of the tobacco industry cannot take precedence over the disclosure of documents concerning contacts between lobbyists and public decision-makers, as has been the case with the documents in this report.

03

The EU must commit to safeguarding its diplomatic influence, particularly in the field of international trade, from being exploited by the industry to challenge or undermine tobacco control measures implemented by other countries, particularly those that are signatories to the FCTC. As such, no discussions between EU institutions and the tobacco industry regarding tobacco control policies implemented by third countries should be permitted. Governments around the world must also reject the tobacco industry's attempts to use trade as a means of influencing health policy.

These recommendations should not only be enacted as a code of conduct or informal internal rules; they must also be amended in the form of directly applicable and binding legislative or regulatory texts. In this case, this could mean making an explicit reference to the tobacco industry and the FCTC in both the Interinstitutional Agreement of 20 May 2021 and Regulation No. 1049 of 30 May 2001 on public access to documents of the institutions of the European Union as well as in the Rules of Procedure of the European Parliament.

As the tobacco industry steps up its efforts to renew its customer base and continue its deadly trade, which has caused considerable damage across Europe and beyond, it is crucial that EU institutions lead by example in implementing the FCTC.

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INTRODUCTION

The tobacco industry: a deadly and environmentally destructive business operating within the European Union

As revealed by a World Health Organization (WHO) global report in October 2025, Europe ‘has the highest prevalence of tobacco consumption—and is projected to hold that position for years to come’.² The EU is indeed one of the regions most affected by the tobacco epidemic: Smoking accounts for approximately **700,000 premature deaths annually**.³ Beyond this immense human tragedy, the tobacco industry also imposes a **substantial economic burden** on society. In 2009, tobacco use cost the EU **€544 billion**,⁴ equivalent to about **4.6% of the combined GDP of the EU Member States**. The harm extends well beyond public health. Tobacco cultivation and waste contribute to tremendous environmental degradation—from deforestation to plastic and chemical pollution in oceans and waterways.⁵ The tobacco supply chain is also tainted with human rights abuses, including child exploitation and forced labour in tobacco farming.⁶

Despite causing health, economic and environmental harms, selling tobacco and nicotine products remains highly lucrative for the industry. According to Tobacco Europe, one of the industry’s main lobby groups in Europe (representing British American Tobacco, Imperial Brands and Japan Tobacco International, among others),⁷ consumers in the EU spend **€151.3 billion a year** on tobacco and nicotine products, representing about **2.5% of the region’s total consumer expenditure**.⁸ Although these figures should be treated with caution as they form part of the tobacco industry’s lobbying strategy to promote its economic importance, they nevertheless highlight the high economic stakes for the tobacco industry, incentivizing manufacturers to ensure they maintain sales and revenues.

This is why the WHO Framework Convention on Tobacco Control (FCTC), a legally binding treaty with 183 Parties, including the EU, recognizes in its guidelines a **‘fundamental and irreconcilable conflict between the tobacco industry’s interests and public health policy interests’**.⁹

Considering the devastating health, environmental and social consequences caused by tobacco and nicotine products, stronger **policies to reduce supply and consumption are necessary and justified**. As these policies would threaten the industry’s profits, tobacco companies invest heavily in **communication strategies and lobbying efforts** to preserve a legislative environment favourable to their activities.

The tobacco industry’s history of deceptive science, communication and lobbying strategies is well documented. For decades, it has concealed the dangers of its products, misled the public and manipulated policymakers to protect its profits.¹⁰ It continues these practices today, adapting its products, messages and methods in response to current political and social contexts.

In the EU, the tobacco lobby’s efforts are focused on preventing or delaying regulations developed to protect European citizens, especially youth. The industry tries to extend its influence beyond the health sector to various EU policy areas that may affect its business, such as the economy, transport, the environment and agriculture. Thus, it engages with a wide range of stakeholders and responds strategically to European Commission (EC) consultations (Philip Morris International [PMI] has, for example, responded to a large number of consultations carried out by the European Commission on topics ranging from tobacco to food waste and the European forests strategy).

Finally, faced with overwhelming scientific evidence on the harms of tobacco, increasingly strict regulations and growing pressure from civil society, this industry has sought to **reinvent itself by developing new products, such as heated tobacco products (HTPs), e-cigarettes and nicotine pouches**, spending a growing proportion of its **communication and lobbying efforts** on these products using ‘harm reduction’ rhetoric, co-opted from legitimate public health strategies used to prevent overdose from narcotics. This strategy is nothing new: The tobacco industry has always manipulated the facts and spread misinformation to increase sales. Contrary to the industry’s claims, there is currently no conclusive independent evidence that its new products, particularly HTPs, help people to quit smoking or are less harmful to health.¹¹

This cynical shift is evident in the data presented in this report, **which examines the industry’s attempts to influence policy within the EU and leverage the EU’s diplomatic influence to promote regulations that favour its interests, particularly regarding HTPs**.

BACKGROUND AND OBJECTIVES

Article 5.3 of the global treaty, the WHO FCTC, and its guidelines mandate that contact between the tobacco industry and political institutions must be strictly limited and, where such contact is necessary, that it be fully transparent to prevent industry interference in public health policy. Therefore, the Parties to the treaty, including the institutions of the European Union, must commit to ensuring that communications and meetings between the tobacco industry and political institutions are subject to special monitoring in order to protect public health measures from undue influence.

In 2023, following work carried out by numerous NGOs and investigations by the EC's own departments, the European Ombudsman, Emily O'Reilly, raised concerns that EU institutions were not sufficiently transparent in their interactions with the tobacco industry and highlighted a troubling efficacy of the industry's influence.¹² This concern stemmed from findings that numerous Commission departments, beyond Directorate-General (DG) HEALTH, had engaged in undocumented or non-transparent interactions with tobacco lobbyists, in breach of the Commission's Article 5.3 obligations in what O'Reilly concluded was 'maladministration'.

Following this report, Contre-Feu and STOP sought to examine more closely whether EU

institutions have taken adequate measures to uphold transparency and protect policymaking from undue tobacco industry influence. To this end, our organisations analysed data published on the EU Transparency Register, the official public database where lobbyists and others are required to declare their activities; the database of meetings between Members of the European Parliament and lobbyists; and through a series of freedom of information (FOI) requests concerning exchanges between the tobacco industry and different Directorates-General (DG TRADE, DG AGRI, DG SANTE, DG TAXUD, DG ENV).¹³ Documents were requested that contained correspondence such as emails, preparatory documents, meeting minutes or reports, notes, and logs of phone calls. Contre-Feu filed two rounds of FOI requests with the EC. As documents released by the Commission mentioned countries outside the EU, the NGO ACT Brazil filed two rounds of FOI requests with Anvisa (Brazil's national health regulatory agency) and several ministries within the Brazilian government; and the regional civil society organisation PODER filed two requests with several ministries within the Mexican government. The documents obtained from Contre-Feu's requests, a significant number of them related to DG TRADE, form the main focus of this report.

This report aims to:

— Draw a detailed portrait of tobacco industry lobbying in the European Union, identifying the types of organisations involved, their scale in terms of numbers and resources, and the frequency and nature of their interactions with EU institutions.

— Examine whether mechanisms such as transparency obligations, the EU Transparency Register and internal safeguards have been strengthened following the Ombudsman's recommendations.

— Highlight key examples of the tobacco industry's lobbying strategy, particularly its efforts to use the EU's international trade interests and diplomatic influence to overturn and shape regulations in third countries in favour of international trade in HTPs, one of the industry's newer products.

KEY FINDINGS

Based on our research, we identified:

— At least **49 organisations** actively seeking to influence European policymakers on behalf of the tobacco industry. Together, these organisations reported employing at least **139 people** and spending nearly **€14 million** (US \$16.2 million) **per year** on lobbying activities targeting EU decision-makers.

— **A cynical shift towards 'harm reduction' lobby groups:** The emergence of organisations advocating for the industry's misleading version of 'tobacco harm reduction' illustrates the **reorientation of part of its lobbying efforts** towards promoting new tobacco and nicotine products. Simultaneously, the industry is downplaying the fact that it continues to sell hundreds of billions of cigarettes across Europe and beyond. **Eight of the 15 organisations** in this category were established within the past three years.

— **Transparency gaps across institutions:** Despite strengthened rules in recent years, current transparency frameworks remain insufficient to shield EU institutions from undue tobacco industry influence. The Council of the EU remains structurally opaque, with no available data on meetings. In the **European Parliament, 257 meetings with tobacco lobbyists were recorded between 2023 and 2025**. As for the EU Commission, it has only declared five meetings with the industry on that period, while Contre-Feu and STOP uncovered multiple additional but undeclared interactions, particularly with DG TRADE, exposing significant gaps in the Commission's transparency framework.

— **Instances of economic leverage shaping political influence:** By channelling substantial investments into specific EU Member States, the tobacco industry ensures favourable treatment within the EU's policymaking machinery. For example, cigarette companies claim to have invested several hundred million euros in factories to manufacture HTPs in several Member States, primarily Italy and Greece. These states have subsequently defended industry positions at the Council level of the EU.

— **Tobacco industry attempts to instrumentalize the political and diplomatic power of the European Commission to challenge or weaken tobacco control and other policy measures adopted by countries outside the EU, including some low- and middle-income countries:** Evidence points to industry attempts to mobilize EU institutions against public health initiatives in countries such as Argentina, Brazil, India, Japan, Mexico, Singapore, Taiwan, Thailand, Türkiye and Vietnam. By framing these measures as barriers to trade or obstacles to market access, the industry attempts to use the Commission's diplomatic channels to exert pressure on governments implementing strong public health protections.

THE STRUCTURE, RESOURCES AND REACH OF THE TOBACCO LOBBY IN THE EU

01

THE MAPPING OF AN INFLUENTIAL GROUP

The tobacco lobby in the European Union comprises a wide range of stakeholders: international and local cigarette companies, tobacco leaf companies, lobbying consultants and trade associations. Their repeated and regular contacts with EU institutions reveal this lobby's easy access to the EU's main decision-making centres. These organisations are numerous and the links connecting them often overlap, creating a **complex network of influence**.

This network of industry lobbyists extends beyond the traditional tobacco sector. Our research confirms that it also encompasses a growing number of organisations presenting themselves as advocates of 'harm reduction' or promoters of heated tobacco and other nicotine products. These allies (mostly funded by the industry or with the industry among its members) are part of the tobacco industry's strategy to try to rehabilitate **its image and gain political support for its new products**, using the public health concept of reduced risk in a misleading way for their own benefit.

This analysis is based primarily on data from the EU Transparency Register, the official public database in which all organisations seeking to influence policymaking in EU institutions, including lobbyists, trade associations and consultancies, are required to declare their activities. They are required to declare their lobbying budgets, the number of staff engaged in lobbying and the specific areas of policy they seek to influence.

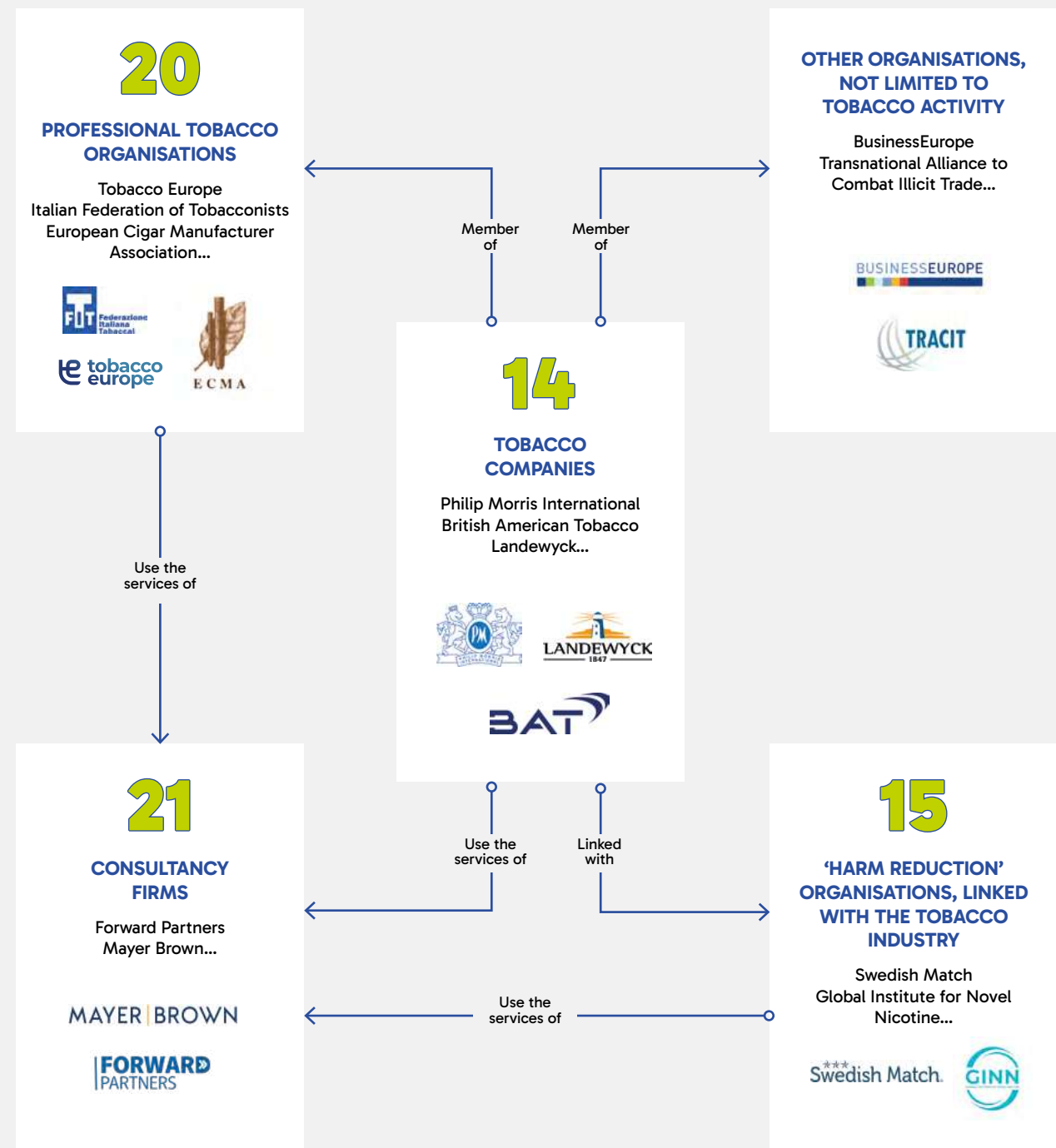
However, this information is self-reported and relies on the good faith of the declarants and therefore provides only a partial view of the scale and reach of the tobacco lobby. Nevertheless, the Transparency Register remains to date the most complete public source available for analysing EU lobbying activities.

The database of meetings between Members of the European Parliament (MEPs) and lobbyists, available on the European Parliament website, was also used, as MEPs are required to declare such meetings.

How the tobacco lobby is organized

Contre-Feu and STOP have identified at least 49 organisations actively seeking to influence European policymakers on behalf of the tobacco industry. To help map this lobbying ecosystem, we have divided these actors into four categories that are often interconnected through personal, financial or structural ties. For example, professional associations often bring together multiple manufacturers or distributors, creating overlapping networks of influence that amplify the industry's reach. The list of these organisations is available in the Annex at the end of the report.

In 2012, when the NGO Corporate Europe Observatory (CEO) mapped the tobacco lobby in Brussels, only 31 organisations were listed.¹⁴ This new, much higher tally demonstrates the unchecked growth of this lobby's power in Europe, despite restrictions on its trade.



Among the lobby groups we identified were:

14 companies producing or marketing tobacco products. This group covers the four major international cigarette companies, Philip Morris International (PMI), British American Tobacco (BAT), Japan Tobacco International (JTI) and Imperial Brands, as well as two distributors, including Logista, which is part of Imperial Brands. It also encompasses European manufacturers specific to individual Member States, such as the Scandinavian Tobacco Group and Landewyck of Luxembourg.

20 professional organisations. These organisations function as **umbrella groups**, representing multiple manufacturers or distributors. These organisations focus solely on promoting tobacco products. They tend to be based in Brussels, close to the centre of European decision-making, so they can move quickly to defend their members' interests before EU institutions.

Examples include Tobacco Europe AISBL,¹⁵ which brings together major companies such as BAT, JTI, and Imperial, and ESTA (European Smoking Tobacco Association),¹⁶ which presents itself as representing the interests of smaller and mid-sized European manufacturers, distributors and importers of fine-cut tobacco. However, its membership also includes large companies like Imperial, Tobacco Trading International Bulgaria and Tobacco Trading International Hungary. Organisations representing local retailers are also included, such as the Italian Federation of Tobacconists (Federazione Italiana Tabaccai).

Some of these organisations are active at the EU level but are not currently registered in the EU Transparency Register, such as UNITAB, a trade organisation representing tobacco growers in various Member States. The transparency platform Lobbyfacts.eu indicates that UNITAB exchanged emails and held meetings with the European Commission in 2023.¹⁷

21 lobbying consultancies or public affairs firms. Tobacco companies and associations hire professional lobbying firms to mobilise external expertise and navigate the complex Brussels policymaking environment. They employ highly experienced lobbyists who act as intermediaries to articulate and amplify their interests. Engaging consultancies also allows the industry to multiply the number of spokespeople advocating for its positions, extending its reach and influence across multiple channels. Examples include Forward Partners, Must & Partners, Transatlantic Public Affairs and Mayer Brown.

In 2025, PMI and BAT used six and nine lobbying firms, respectively, to promote their positions to the institutions of the EU.

15 organisations promoting ‘smokeless products’, with direct or indirect links to the tobacco industry. A thorough study of industry lobbying must also consider organisations that do not directly lobby for traditional tobacco products, but which are indirectly involved through material or financial links with the industry, or because they promote a product category sold by the industry. Their presence reflects the industry’s strategic expansion towards also selling HTPs, e-cigarettes and nicotine pouches under the guise of a misleading narrative of harm reduction.

For example, Swedish Match lobbies for its flagship product, nicotine pouches, but is a direct subsidiary of PMI. The Global Institute for Novel Nicotine presents itself as an organisation that promotes non-traditional tobacco products, openly advocating for the commercialisation of nicotine pouches and HTPs, and is led by a former PMI executive.

Eight of these organisations were only created in the last three years (since 2022). The Centre of Excellence for the Acceleration of Harm Reduction, created in 2018, has received more than US \$16 million from Global Action to End Smoking (formerly the Foundation for a Smoke-Free World) which, recent analysis shows, is still mainly funded by PMI and remains aligned with its interests.^{18,19}

Finally, there are numerous organisations to which several tobacco manufacturers belong, but whose objectives extend beyond defending the interests of the tobacco trade. As these organisations are not strictly limited to tobacco products, they are not included in the accounting of financial or human resources of the organisations in this report. Some of these organisations are listed on Tobacco Tactics, part of the University of Bath’s Tobacco Control Research Group.²⁰ They include BusinessEurope, the European Carton Makers’ Association and the Transnational Alliance to Combat Illicit Trade (TRACIT). One of the most active organisations is the Consumer Choice Center (CCC), which is partly funded by the tobacco industry and funds other organisations, such as the World Vapers’ Alliance.^{21,22} While not exclusively focused on tobacco, CCC has held several meetings on the subject in Brussels and is known to lobby on behalf of the industry.²³

In 2025, PMI belonged to more than eight organisations in this category, including BusinessEurope and the Transatlantic Policy Network.

This mapping focuses on organisations directly or indirectly linked to the tobacco industry, however, it can only provide an illustration, rather than the full scope of the industry’s lobbying ecosystem.

First, the EU’s transparency register has many limitations: Some organisations may not register, or they may only disclose partial information. Second, organisations may lobby on behalf of tobacco companies without disclosing it or any financial ties to the industry.

The tobacco lobby's vast resources

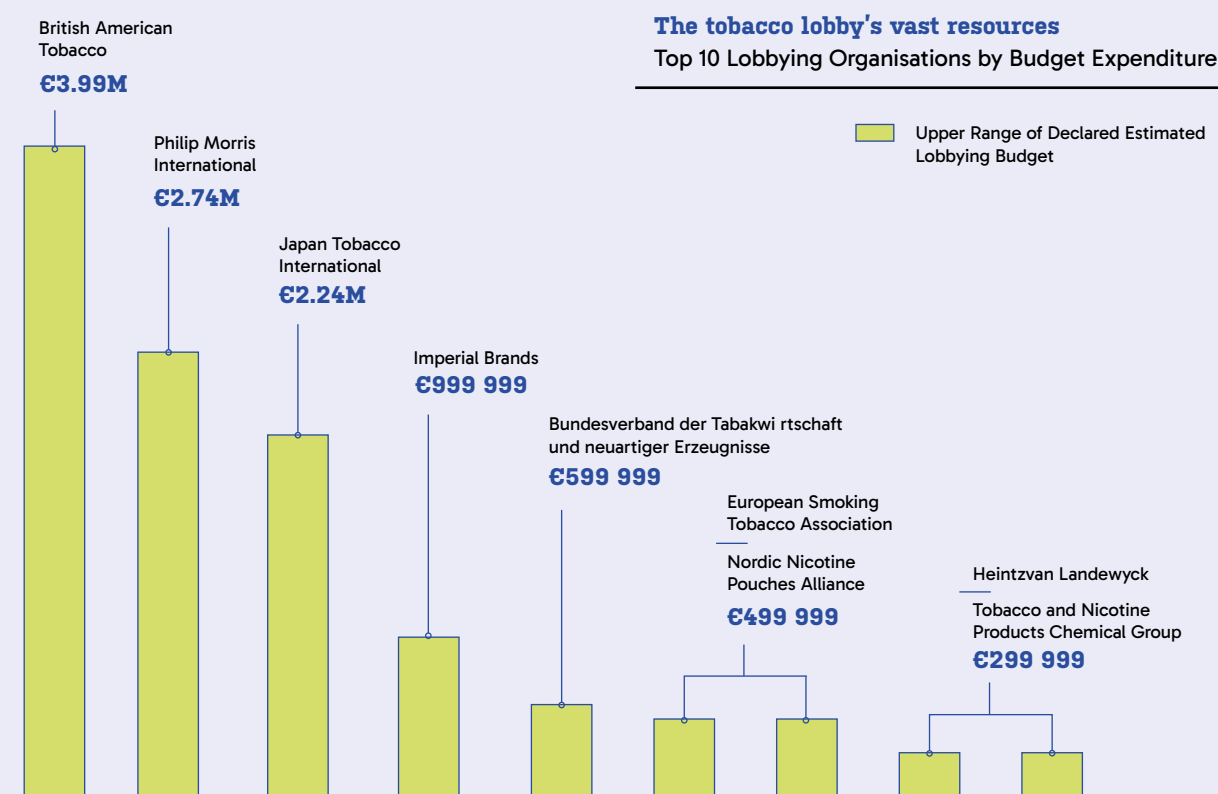
The organisations identified above (excluding general professional organisations) have declared spending nearly **€14 million (US \$16.2 million) per year on lobbying activities targeting European public decision-makers** (including the cost to organisations of purchasing consultancy services).

In terms of human resources, **the industry and the organisations listed above (excluding general professional organisations) have declared that they currently employ at least 139 people whose main responsibilities are to influence EU public decision-makers.** This refers to staff employed directly by these organisations but does not include employees of the **21 consultancy firms** these organisations also retain to promote the industry’s interests, who may work on issues other than tobacco.

According to Corporate Europe Observatory’s 2012 report, there were 97 full-time lobbyists and a total annual lobbying budget of €5.3 million (US \$6.1 million) at that time. This means that the industry has increased its expenditure on lobbying the EU by 164%.²⁴

It should be noted again that these figures are self-reported and therefore are very likely to be far below the true total. Additionally, some newly created organisations have not provided the relevant information.

Further historical data (2018-2023) is available on the website of Smoke Free Partnership, a tobacco control NGO based in Brussels that monitors and annually reported on the material and financial resources associated with the tobacco lobby’s activity in the EU.²⁵



Unsurprisingly, the major **transnational cigarette companies**, who all have offices in Brussels, **allocate the largest resources to these activities**. PMI, BAT and JTI each report spending between **€2 and €4 million (US \$2.3 and \$4.6 million) annually on lobbying European institutions**, and together with Imperial Brands, collectively employ more than 35 people to influence EU institutions. These companies, being the biggest, have the most to lose from stronger tobacco control regulation.

Professional tobacco industry groups, or umbrella organisations, also represent a **significant financial lobbying force**, as three of them report budgets dedicated to lobbying ranging between **€200,000 and €600,000 (approximately US \$231,500 and \$694,600) per year**. These organisations, by pooling resources and coordinating the interests of their members, can exert considerable influence on European decision-making processes, complementing the efforts of individual tobacco companies.

According to data available in the Transparency Register, manufacturers, professional organisations and research institutes that **promote newer tobacco and nicotine products** linked to the tobacco industry **employ 35 people for lobbying activities**. A full analysis of the expenditure by this group is not possible, as **eight out of the 15 relevant organisations were created within the past three years** and some have not yet reported their budgets.

Countries with stronger economic links to the industry host the greatest number of tobacco industry lobbying organisations. Switzerland, for instance, houses the headquarters of PMI and JTI, while the United Kingdom is home to BAT and Imperial Brands. Germany hosts numerous tobacco manufacturing factories, and Sweden, benefiting from the marketing exemption for snus, has become a central hub for the promotion of smoke-free products (in particular snus and nicotine pouches). In countries such as Italy, Spain, Hungary and Greece,²⁶ the presence of lobbying organisations is largely explained by the extensive areas of tobacco cultivation. These commercial and economic connections with Member States are also reflected in the positions these countries take within the EU, discussed in more detail later in this report.

THE TOBACCO LOBBY IS EVERYWHERE, ALL THE TIME

Lobbying activities generally focus on the main institutions of the European Union, which are the European Commission (the main executive body of the European Union, which proposes legislation and ensures that it is applied), the European Parliament (comprising parliamentarians from the various Member States) and the Council of the European Union (which represents the governments of the Member States).

The European Commission is divided into several departments called Directorates-General (DGs), which are responsible for different areas (transport, environment, health, etc.). Apart from DG HEALTH, which deals with issues such as smoking in the EU, the other DG mentioned in this report is DG TRADE, which is responsible for the EU's trade relations with the rest of the world.

The European Union, as a Party to the legally binding WHO FCTC, is required to safeguard public policy from the inherently detrimental influence of the tobacco industry. The guidelines of Article 5.3 of the FCTC require that interactions with the tobacco industry or its representatives be limited to a strict minimum and that full transparency be ensured whenever such interactions occur:²⁷

'In setting and implementing their public health policies with respect to tobacco control, Parties should interact with the tobacco industry only when and to the extent strictly necessary to enable them to effectively regulate the tobacco industry and tobacco products.'

'When interaction is necessary, it should be conducted transparently.'

However, as numerous media and NGO investigations have shown,²⁸ the tobacco industry continues to exert significant influence within European institutions, maintaining close ties with the European Commission, members of the European Parliament and the Council of the European Union. One of the most recent and striking examples was in 2023 when the European Ombudsman found maladministration in the interactions between the EU and tobacco industry representatives:

'(...) failure by the Commission to ensure a comprehensive approach across all its departments to transparency of meetings with representatives of the tobacco industry constitutes maladministration.'

*This includes the Commission's failure to ensure a systematic assessment, across all directorates-general, as to whether potential meetings are needed with representatives of the tobacco industry.'*²⁹

This reality underscores the continuing challenge of insulating public policy from a determined industry whose interests are fundamentally opposed to those of public health.

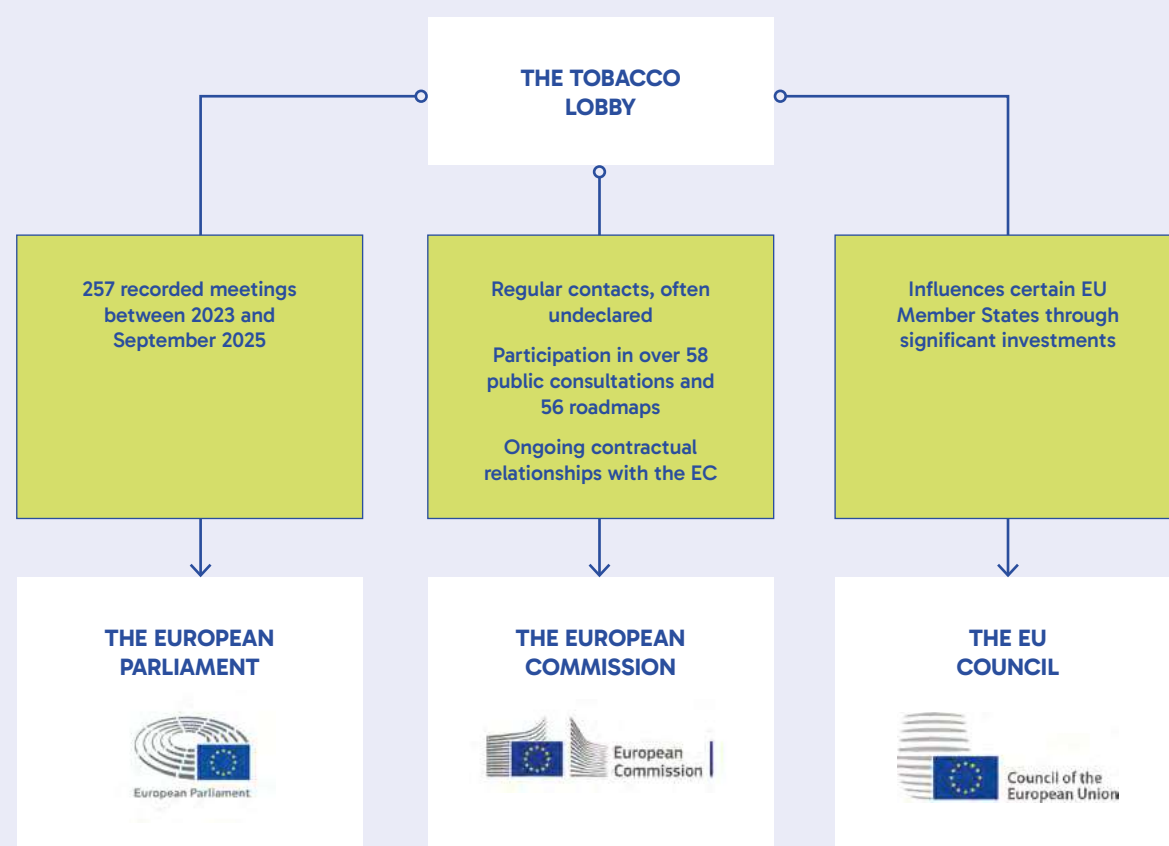
Current transparency rules governing relations between lobbyists and EU institutions fall short of effectively countering pressure from powerful interest groups such as the tobacco industry:

Regarding the European Parliament, in response to the Qatargate scandal (a corruption case benefiting Qatar, involving several members of the European Parliament), all MEPs are now required to declare their meetings with ‘interest representatives’. However, MEPs can still meet with representatives not registered in the EU Transparency Register.

Regarding the European Commission, following pressure from civil society, and particularly in the wake of Qatargate, standards of transparency have been strengthened since January 2025, requiring certain Commission officials to be more transparent about their lobbying meetings.³⁰ However, these standards still apply only to a restricted number of staff, primarily those in management positions, and it is only mandatory to report interactions that meet certain criteria.

The Council of the EU remains the least transparent EU institution. Its sole formal transparency requirement is that meetings between interest representatives and senior staff of the General Secretariat are subject to prior registration in the EU Transparency Register.

The tobacco lobby is everywhere, all the time



The extent of tobacco industry interactions with EU institutions and Member States: hundreds of interactions (that we know of)

The data below was collected from the Transparency Register, the respective websites of the European Parliament and the EC, and through a series of FOI requests regarding interactions between tobacco industry representatives and the Commission in 2023 and 2024, notably DG TRADE and DG AGRI.

The tobacco lobby's influence in the European Parliament

Between January 2023 and September 2025, there were 257 recorded meetings between tobacco industry lobbyists and Members of the European Parliament (MEPs). The high number of meetings, particularly in the months following the European elections in June 2024, prompted the NGOs Corporate Europe Observatory and Smoke Free Partnership to write to the President of the European Parliament in 2024 to express their concern.³¹

Among the most influential tobacco organisations, **PMI alone had more than 121 meetings with MEPs to try to influence parliamentary decisions in only three years.** In contrast, the Smoke Free Partnership, representing European tobacco control associations, had only 12 meetings with MEPs during the same period.

Some MEPs have established particularly close ties with the tobacco industry. **From 2023 to September 2025, the Danish far-right MEP Anders Vistisen met with PMI on seven occasions.**³² Another far-right MEP, the Netherlands' Auke Zijlstra had six meetings with industry lobbyists in the first nine months of 2025 alone,³³ three with PMI, two with an industry group and one with JTI (this possibly being related to his previous employment with BAT). In another example, in 2023, Polish MEP Krzysztof Jurgiel reportedly acted as a mediator between UNITAB and DG AGRI to advance the tobacco industry's objectives.³⁴

The EU Transparency Register is inadequate for accurately monitoring these interactions. The data entered into the Register often does not correspond with the information recorded on the European Parliament's website nor in the registers of individual Directorates-General or committees. This makes it extremely difficult to accurately track data on meetings between industry lobbyists and MEPs, even when they are declared.

These numbers only refer to formal meetings with MEPs. MEPs receive numerous requests from all of the above organisations, primarily via email or phone calls. Even if these requests do not always result in a meeting, they contribute to political pressure. Below is an example of an email sent by an industry representative to a Member of Parliament.

Sample e-mail from an industry representative (this is an email sent by a BAT representative to a Member of the European Parliament)

Je vous écris au nom de British American Tobacco France afin de partager avec vous leurs préoccupations concernant les politiques actuelles en matière de tabac et vous proposer d'en discuter.

Nous comprenons votre position, guidée par des préoccupations légitimes de santé publique. Toutefois, nous pensons qu'une approche différente pourrait permettre de mieux répondre aux enjeux sanitaires et sociétaux dans son ensemble.

Les effets néfastes du tabagisme sont bien connus mais des mesures trop restrictives risquent d'encourager le recours à des marchés parallèles non contrôlés, au détriment de la santé des consommateurs. Une régulation équilibrée, associée à des actions d'information et d'accompagnement à l'arrêt du tabac, nous semble plus efficace.

Plutôt que restreindre excessivement ou une interdiction totale, une approche basée sur la réduction des risques pourrait être plus bénéfique. Cela permettrait de respecter les choix individuels tout en minimisant les conséquences négatives sur la santé publique.

Les alternatives comme la cigarette électronique et / ou les sachets de nicotine présentent un potentiel réel pour réduire les méfaits liés au tabac combustible. Favoriser leur utilisation encadrée pourrait avoir un impact positif.

Translation of this mail

I am writing on behalf of British American Tobacco France to share their concerns regarding current tobacco policies and propose a discussion.

We understand that your position is guided by legitimate public health concerns. However, we believe that a different approach could address health and societal issues more effectively.

While the harmful effects of smoking are well known, overly restrictive measures risk encouraging the use of uncontrolled parallel markets to the detriment of consumer health. We believe that balanced regulation combined with information and support for smoking cessation is a more effective approach.

Rather than imposing excessive restrictions or a total ban, a risk-reduction approach could be more beneficial. This would respect individual choices while minimising negative consequences for public health.

Alternatives such as e-cigarettes and nicotine pouches offer real potential for reducing the harm associated with combustible tobacco. Encouraging their regulated use could have a positive impact.

The tobacco lobby's influence within the European Commission

In 2025, the tobacco industry declared participation in over **58 public consultations and contributions to 56 'roadmaps' related to EU policy.**

These covered areas ranging from public health tobacco control regulations (such as the Tobacco Taxation Directive or the Smoke-Free Environment Recommendation) to sustainability (sustainable consumption of goods, promoting repair and reuse and sustainable corporate governance) and environmental issues (deforestation and food waste). This strategy allows the tobacco industry to not only delay the adoption of measures harmful to its business, but also to normalize its presence across a wide range of policy areas to present itself as a legitimate stakeholder.

Between 2023 and 2025, the EU Commission has only declared five meetings with the industry. This figure, however, is likely a significant underestimation. Indeed, it is hardly believable that a company allocating nearly €2 million (US \$2.3 million) annually to EU lobbying activities, like PMI, would have met the Commission only twice over three years, as reported. This underreporting is largely due to the limited scope of the transparency obligations that apply to the EC.

Moreover, documents obtained by Contre-Feu indicate that DG TRADE met with the tobacco industry on at least three occasions in 2023 and five in 2024, none of which were reported in the Transparency Register or on DG TRADE's website. For instance, on 15/03/2024, Tobacco Europe, Imperial Brands, JTI and BAT met with two people from TRADE E.3.³⁵ On 16/04/2024, a videocall occurred between three people from PMI and four people from TRADE Unit F/1.³⁶

In addition to these formal meetings, the tobacco lobby maintains ongoing informal contacts with the European Commission that are not always categorized as meetings under the transparency rules. Civil society organisations and EU institutions, including the European Ombudsman, have repeatedly raised concerns about this lack of transparency. Between 2021 and 2023, the Ombudsman reported that the industry maintained regular contacts with DG TRADE, DG CLIMA and DG GROW. Contre-Feu's FOI-collected data show that such contacts continued throughout 2023 and 2024, often without any public disclosure. The documents detailed later in this report, reveal a close working relationship, including exchanges of information and advice, multiple emails, ongoing multi-year monitoring of issues and telephone calls.

Finally, a distinctive feature of the tobacco lobby is its ongoing contractual relationships with the EC—a highly questionable arrangement that raises concerns about conflicts of interest and compliance with Article 5.3. Unlike Member States or other EU institutions, the Commission maintains several formal contracts with the tobacco industry or related entities, including:

- **Anti-smuggling contracts.** These are currently held with BAT and Imperial Brands (running until 2030).³⁷ These contracts are concluded between the EC, Member States and tobacco manufacturers, obliging the latter to comply with a set of requirements, including the management of a track and trace system.
- **Traceability contracts** with Dentsu. This contract concerns part of the traceability system set up in the EU to combat illicit trade in tobacco products. However, the Dentsu company, which was awarded a contract by the European Commission to manage part of this system, has documented ties to the tobacco industry which have prompted public scrutiny over its role.³⁸

These arrangements have been questioned publicly by MEPs, including through formal parliamentary questions, highlighting the potential for ongoing influence by the tobacco industry within the Commission.³⁹

— The tobacco lobby's influence on European Member States and neighbouring countries

The most powerful tobacco industry lobbying organisations are based in Member States and neighbouring countries that are closely tied to the sector's economic interests, whether as hosts of major cigarette company headquarters, as tobacco-growing countries or as home to a significant number of tobacco factories. These countries include Switzerland, the United Kingdom, Germany, Sweden, Italy, Spain, Hungary and Greece.

The influence of lobbyists in certain Member States is also evident in the nationality of the MEPs who most frequently meet with industry lobbyists. The Integrity Watch website, developed by the NGO Transparency International, features several tools for tracking lobbying activities in Europe. **Out of the 70 meetings that Transparency International recorded between Member States and tobacco lobbyists between 2024 and 2025, 18 were with Italian MEPs, eight were with German MEPs and four were with Swedish MEPs.**⁴⁰

This is also evident in the rankings of these countries in the Global Tobacco Industry Interference Index, published biennially by the Global Center for Good Governance in Tobacco Control and STOP. **Italy, Germany and Sweden were among the worst-performing European countries in the 2025 Index, with national policymakers not doing enough to protect policy from industry influence.**⁴¹

The industry's economic influence is further wielded with substantial investments. For example, in Italy, PMI said it was investing €1 billion (approximately US \$1.15 billion) to create a new factory in Bologna. In 2023, BAT said it would invest €500 million (US \$578 million) in an 'innovation hub' in Trieste. Since 2017, PMI claims it has invested almost €700 million (US \$810 million) in a new product factory in Greece. A similar observation can be made about [Romania](#), the [Czech Republic](#) and [Hungary](#). In total, the tobacco industry claims to have invested several billion euros in these Member States, even signing agreements with certain ministries (as PMI did with the Italian government).⁴²

These commercial and economic ties are reflected in the positions that Member States take within the EU. For instance, the same countries often appear among the opponents of stricter tobacco control measures and new nicotine product regulations. In 2025, France had to notify the European Commission of its decision to ban oral nicotine products, including nicotine pouches. Following this notification, several Member States expressed their disagreement with this measure, slowing down the EC's authorization procedure. Opposition came from tobacco-growing countries such as Greece, Hungary and Italy, as well as Sweden (now positioning itself as a hub for 'harm reduction') and Romania (the EU's third-largest tobacco producer).⁴³ These same countries also opposed a Spanish decree aimed at strictly regulating the sale of nicotine pouches.⁴⁴

Owing to its considerable economic power, the tobacco industry secures political support from certain EU Member States. The EU's decision-making process amplifies this influence, as Member States, particularly through the Council, hold significant authority over legislation that applies across the Union.

A telling example is the Tobacco Taxation Directive, which requires unanimous approval by all Member States. By channelling substantial investments into specific countries, the tobacco industry ensures favourable treatment from these states within the intricate machinery of EU policymaking. Italy and Greece, two of the Member States mentioned above as benefiting from significant investment from the tobacco industry, have recently expressed their opposition to the revision of the directive, particularly to any increase in taxation on tobacco products provided for in the text.⁴⁵

PHILIP MORRIS INTERNATIONAL TRIED TO USE THE EU TO INFLUENCE PUBLIC HEALTH POLICY AROUND THE WORLD

02

This section primarily analyses the documents obtained by Contre-Feu through the freedom of information (FOI) request procedure. FOI requests in the European Union provide a formal right for individuals and organisations to access documents held by EU institutions, ensuring that decision-making is transparent and accountable. EU institutions are required to respond within fifteen to thirty working days, and to provide access to documents either in full or in part. Access may only be refused under specific circumstances, such as protecting public security, defence, financial stability, personal privacy, commercial confidentiality, internal deliberations or ongoing investigations. Denials must be justified in writing, and requesters have the right to appeal to the European Ombudsman or the General Court. FOI requests are an essential tool for maintaining transparency and public oversight, allowing stakeholders to understand how policies are shaped and ensuring that institutions operate in the public interest.

Analysis of 47 documents received from the European Commission (EC) in response to the FOI requests, including emails, reports and minutes of meetings, notes from phone calls and other documents, suggests that Philip Morris International (PMI)'s European lobbying efforts had targets far beyond the continent.

PMI is one of the world's largest transnational cigarette companies. Despite its alleged 'ultimate goal of phasing out cigarettes completely', it shipped nearly 617 billion cigarettes globally in 2024, up from almost 613 billion in 2023.^{46,47} Part of delivering its so-called 'smoke-free future' is hooking as many people as possible on its heated tobacco products (HTPs). To do this, it is lobbying to create regulatory environments around the world that are friendly to HTP usage, including overturning bans and lowering taxes on these electronic products.

Why is PMI pushing HTPs?

Heated tobacco products (HTPs) are electronic smoking devices, like e-cigarettes. Unlike e-cigarettes, however, HTPs contain tobacco. The tobacco industry markets HTPs as 'smoke-free' or 'reduced risk' compared to cigarettes, though independent studies have questioned whether they are smoke-free, and the long-term health effects of HTPs remain unknown.⁴⁸

Nonetheless, PMI has framed its HTP, IQOS, as a 'better' alternative to cigarettes and promotes the product to portray itself as a leader in 'tobacco harm reduction'—a term co-opted by Big Tobacco and used to promote its newer products. With increased regulation of cigarettes leading to declines in global smoking rates, HTPs represent PMI's latest attempt to sustain its profits by selling another addictive tobacco product while repositioning itself in a world turning away from smoking.

Convincing governments around the world to embrace HTPs, however, has been a challenge for PMI. Because of growing concern around the health risks of HTPs raised in independent studies and because HTPs are a tobacco product, many countries have banned HTPs to protect public health.

The documents uncovered in the FOI requests reveal that PMI appears to have made extensive efforts to try to use the EC, particularly DG TRADE, as a lever to overturn or interfere in health policies in third countries, including in low- and middle-income countries (LMICs). The documents also suggest that PMI had influence over which documents DG TRADE released and what information in those documents was visible. Thus, of the 59 documents that the European Commission considered relevant to the FOI requests, only 18 were disclosed in full, 29 were disclosed in part (with some parts redacted) and 12 were withheld. One of the main reasons given by the European Commission for refusing to disclose certain documents, or disclosing them only partially, was to protect the commercial interests of the company concerned—in this case, mainly PMI.

PMI and DG TRADE: a powerful influence affecting numerous countries around the world

The following countries were mentioned by PMI in the uncovered documents. PMI appeared to be primarily seeking to influence HTP bans and taxation. To make these health policies relevant to DG TRADE, PMI positioned its HTPs as EU-manufactured exports and cast the health policies as trade issues.

Below is an example of an email from documents obtained by FOI request, summarising some of PMI's requests to the European Commission.

Meeting DG TRADE F/1– Philip Morris International – 25 September 2023 – Market access issues for heated tobacco products in Mexico, Taiwan, Argentina, Brazil, Singapore, Vietnam, Türkiye, Thailand, India and Japan

Participants:

Philip Morris International (PMI):

- Article 4(1)b [redacted] Lausanne, Switzerland;
- Article 4(1)b [redacted] PMI's Brussels Office; and
- Article 4(1)b [redacted] PMI's Brussels office.

DG TRADE:

- Article 4(1)b [redacted] Unit F/1;
- Article 4(1)b [redacted] Unit F/1;
- Article 4(1)b [redacted] SEP team in Unit F/1.

Report:

DG TRADE F/1 met Philip Morris (PMI) upon the company's request to discuss **trade barriers for heated tobacco products** (HTPs) in **Mexico, Taiwan, Argentina, Brazil, Singapore, Vietnam, Türkiye, Thailand, India and Japan**. The attached presentation was shared during the meeting.

Meeting report concerning a previously undeclared meeting in September 2023 between DG TRADE and PMI. PMI wished to discuss 'trade barriers' for HTPs in Mexico, Taiwan, Argentina, Brazil, Singapore, Vietnam, Türkiye, Thailand, India and Japan. Note: Under Article 4(1)(b) of EU Regulation 1049/2001, access can be denied if releasing the document would harm an individual's privacy or integrity.

Market	Issues PMI appeared to want to influence	Local context	How PMI framed the issue	PMI's request to DG TRADE
Argentina	HTP ban	In 2023, the Ministry of Health banned the importation, distribution, commercialization and advertising of HTPs in response to the potential health risks and HTPs' appeal to children and adolescents.	Framed as an 'import ban', a protectionist measure, 'not justified' and 'not in line with' WTO rules or the future Mercosur agreement ^{49,50}	
Brazil*	HTP ban; 'selective tax'/tax reform	In 2009, Brazil's Agência Nacional de Vigilância Sanitária (ANVISA) issued a resolution banning electronic nicotine delivery systems. The definition was broad enough to cover HTPs when they arrived on the market, but ANVISA confirmed their inclusion in 2024 (after the emails) by explicitly banning HTPs.	Framed the 2009 resolution as a 'lack of regulation de facto import ban' resulting as a violation of international trade agreements via WTO and FTA frameworks; framed selective tax as an 'adverse' protectionist policy to shield the local market ⁵¹	
India*	HTP ban	In 2019, the Parliament of India passed the Prohibition of Nicotine Delivery Systems (ENDS), which includes e-cigarettes, vaping devices and 'heat not burn' devices, 'in the interest of public health, to protect the people from harm...'	Framed as a trade barrier	Asked DG TRADE to address import ban in ongoing FTA negotiations ⁵²
Japan*	Equalizing HTP tax with cigarette tax	The proposed tax reform aims to modify the taxation of HTPs to eliminate the tax burden gap between cigarettes and HTPs. According to WHO, price and tax measures are effective in reducing tobacco consumption.	Framed equalized tax as 'discriminatory' to PMI and beneficial to Japan Tobacco International; said the rule would be subject to 'the obligations of the European Union-Japan Economic Partnership' and is a 'disguised restriction on international trade' ^{53,54}	PMI asked DG TRADE for intel ('would appreciate any information you might get from Japan on this topic'); ⁵⁵ PMI also provided a document outlining a procedure the EU could follow to challenge the Japanese HTP tax measure. The document suggests that such a challenge could potentially lead to adjustments in the legislation to make it more favourable to PMI. ⁵⁶
Mexico*	HTP ban	The importation, circulation and commercialization of HTPs was banned in Mexico through a series of presidential decrees in 2019 and 2022.	Framed as a trade barrier	Expressed desire for DG TRADE to discuss the issue with Mexican authorities to 'ultimately lift the importation and commercialization prohibition'; asked for support from DG TRADE with the new administration that took office in Oct. 2024. ⁵⁷

*Party to the WHO FCTC

Singapore*	HTP ban	In 2020, the Ministry of Health confirmed that the importation, sale, distribution, purchase, use and possession of HTPs, and other 'harmful imitation tobacco products', are prohibited because of their harmful effects on health.	Framed as a violation of the FTA and as 'nullifying the reduction of tariffs negotiated under the EU-Singapore FTA' ⁵⁸	Suggested that 'any message to the Singaporean authorities would be useful to remove the prohibition' given the country's 'openness to trade'. ⁵⁹
Taiwan	Health risk assessment for HTPs	The health risk assessment for HTPs in Taiwan is part of the Tobacco Hazards Prevention Act, 'enacted to prevent and control tobacco hazards to protect the health of people.'	Framed as 'burdensome, long and costly' and a contradiction with Taiwan's WTO obligations ⁶⁰	Asked for the issue to be raised at Taiwan Trade Policy Review at the WTO and the next EU-Taiwan Trade and Investment Dialogue ^{61,62}
Thailand*	HTP ban	The import and sale of all types of electronic nicotine delivery systems (including e-cigarettes and HTPs) have been banned since 2015.	Framed as a trade barrier	Expressed interest in using FTA negotiations to address the import ban ⁶³
Türkiye*	Local content requirement regulation	The government requires that at least 30% of the total tobacco used by manufacturers for cigarettes, hookah tobacco, rolled tobacco and pipe tobacco be produced in Türkiye.	Framed as a contradiction to WTO principles	Urged DG TRADE to ask questions at Trade Policy Review and possibly an upcoming WTO meeting; provided prepared list of questions ^{64,65}
Vietnam*	ENDs, including HTPs, not authorised for import, sale or distribution	ENDs were not explicitly prohibited but were not authorised for sale, distribution or import for health protection reasons, until 2024 when a resolution clarified the ban to 'protect public health.'	Framed as protectionist 'de facto import ban' addressed as a 'market access' issue ⁶⁶	Asked DG TRADE to 'consider the market access barriers for Heated Tobacco Products in your discussions' at upcoming MAAC meeting; reminded DG TRADE of 'importance of updating the Rules of Origin for HTPs in the EU-Vietnam FTA' ⁶⁷

*Party to the WHO FCTC

National bans and taxes on tobacco and nicotine products are domestic health policies, enacted by sovereign countries to protect public health. In fact, countries that are Party to the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) are obligated under the Treaty to enact policies to limit the supply and demand for tobacco. With highly restrictive policies in place it appears PMI turned to DG TRADE for help.

Did PMI Convince the European Commission to Intervene on Its Behalf on Türkiye Regulation?

One of the issues PMI appeared to try to influence was Türkiye's local content requirements (LCR), wherein the government requires that tobacco products produced for the domestic market must contain at least 30% locally produced tobacco. In the uncovered emails and meeting minutes, PMI urged DG TRADE and the Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR) to address this issue with Türkiye in World Trade Organization (WTO) meetings and EU/ Türkiye bilateral discussions. While Türkiye appears to have rebuffed these efforts, evidence shows that DG TRADE and DG NEAR may have followed through on PMI's requests, handing PMI a lobbying win.

2023

- May** • PMI expresses its interest to DG NEAR and DG TRADE in having the LCR mentioned in the Commission's 2023 report evaluating Türkiye's progress as a candidate country in aligning with the EU. It states that the issue has not been mentioned in previous reports and that its inclusion could 'help improving the situation in that country'.⁶⁸
- June** • DG NEAR says it is aware of the issue, and that the report is still in draft form.
- July** • PMI discussed the LCR with DG TRADE, framing it as 'not in line' with Türkiye's WTO commitments and suggests that DG TRADE address it at Türkiye's upcoming WTO Trade Policy Review (held in November 2023). PMI attached a prepared list of questions about the LCR that DG TRADE 'could consider' submitting before the meeting.⁶⁹ These included questions about the law's rationale and justification, and what the sanctions would be for not complying, among others. PMI also suggests edits to the text regarding tobacco taxes in the Commission's annual report on Türkiye.
- September** • PMI shares with DG TRADE that PMI had contacted DG NEAR to discuss the inclusion of the LCR in the Commission's country report in 2022, but without success.⁷⁰
- November** • Minutes of the WTO Türkiye Trade Policy Review meeting confirm that the LCR related to tobacco products was mentioned in one of the EU's advance-written questions. Mention of the LCR related to tobacco was also included in the Commission's 2023 Türkiye report. The report frames these regulations as 'market access barriers' for EU products. The text on taxation of cigarettes remained unchanged.^{71,72}
- December** • PMI thanks DG NEAR and DG TRADE for 'the actions that you took...' PMI acknowledges that the LCR was included in the Commission's report and raised during the WTO Trade Policy Review, and states that this inclusion 'is of great help for us and constitutes thus a good first step towards addressing the two measures with Turkish authorities that could ultimately lead to its removal'.⁷³

2024

Though country names were redacted in documents from 2024, PMI appears to have continued to lobby DG TRADE on this issue in April and November.^{74,75}

While the LCR is not a health policy, PMI reframed a domestic law that it likely saw as potentially harmful to its business as a trade barrier, and appeared to successfully use the European Commission to try to meddle in Türkiye's domestic policy.

PMI's approach varied based on countries' relationships with the EU

Some of the countries PMI appears to have targeted in the documents have existing free trade agreements with the EU. PMI cited these trade agreements when arguing against policies such as HTP bans or increased taxes on HTPs. The company tried to suggest that these health policies were breaches of trade agreements.

For example, PMI asked for DG TRADE's assistance in lifting the HTP ban in Mexico.

Considering the above we would appreciate if you could consider including Trade Barrier number 17442 in your discussions with Mexican authorities, in the context that you would deem appropriate, with a view to transmit this concern and ultimately lift the importation and commercialization prohibition of Heated Tobacco Products (HTPs).

Email from PMI to DG TRADE, October 2023

Notes from a meeting between PMI and DG TRADE in April 2024 showed that PMI asked DG TRADE for support with a redacted country's incoming new administration in overturning the HTP ban. While the name of the country was withdrawn, it is highly likely that PMI was referencing Mexico, whose new president took office in October 2024.

On ^{Art. (4)2 first indent} import and commercialisation prohibition of HTPs, PMI informed that the decision of the Supreme Court is still pending. PMI clarified that it is allowed to import, despite the ban, thanks to a judicial decision. PMI hoped that the situation will change ^{Art. (4)2 first indent} and asked for support with the new administration.

Meeting notes from a meeting between PMI and DG TRADE in April 2024

In other correspondence, PMI raised concerns to DG TRADE about Japan's potential equalization of taxes between HTPs and cigarettes, citing Japan as its most important HTP market.

A sudden increase – instead of a gradual, incremental change in the excise tax for HTPs as Japan did in the past for domestic products- would have a ^{Article 4(2) first indent} would be in contradiction with Good Regulatory Practices obligations under the EU-Japan FTA (Chapter 18) and subject to its final form, it could be in contradiction with Japan's international trade commitments under the WTO (for instance if the method for calculating the tax liability (e.g., weight vs. price; weight vs. units; price vs. units; differences in tax base) results in a lower tax burden on domestic HTPs or CCs compared with imported HTPs).

We will keep you updated on any new development and would appreciate any information you might get from Japan on this topic. If possible, we would be glad to share more details over a call on the trade implications of this measure including how the propose excise tax for HTPs in Japan appears to have the objective of protecting domestic cigarette production.

Email from PMI to DG TRADE, November 2023

Where trade agreements were being negotiated, PMI suggested using these negotiation platforms as leverage to request the removal of what it saw as the problematic regulation. For example, the company appeared to attempt to reclassify Taiwan's requirement for a health risk assessment of HTPs as a trade barrier. It asked DG TRADE to raise this issue during Taiwan's upcoming Trade Policy Review at the World Trade Organization (WTO) and in the context of the FTA negotiations with Taiwan.

In the meantime, in order to get more details about the Taiwan's new regulatory framework for HTPs, we would kindly ask you to take into consideration the attached draft list of questions that could be asked by the EU before the forthcoming WTO TPR of Taiwan that is scheduled to take place in Geneva on the 7-9 November. Your collaboration on liaising with the Commission's WTO Unit would be highly appreciated.

Email from PMI to DG TRADE, October 2023

Similarly, when addressing the HTP ban in India, PMI asked DG TRADE whether the matter could be brought up during the ongoing FTA negotiations. Finally, outside of any formal framework, PMI simply suggested that the European Commission intervene on the HTP ban in Singapore, stating that 'any message to the Singaporean authorities would be useful to remove the prohibition given the country's openness to trade.'

These various approaches, all pursuing the same objective, undermine the legal legitimacy of PMI's claims and demonstrate not only an attempt to misuse existing agreements and treaties but also to instrumentalize the EU's diplomatic power, particularly in the absence of such treaties, for its own commercial interests.

MINI-CASE STUDIES

PMI'S EFFORTS TO FIGHT MEXICO'S HTP BAN

Mexico is among the most advanced countries in Latin America in tobacco and nicotine regulation. Mexico banned the importation of electronic nicotine delivery systems (ENDS) in 2019, in response to growing evidence of health risks and the lack of proof of efficacy as cessation tools. In May 2022, a second presidential decree went further by prohibiting the circulation and commercialization of these products within the country, regardless of origin.

In parallel, the General Law for Tobacco Control (LGCT) was amended in May 2021, and the expanded definition of 'emissions' meant emissions from heated or vaporized tobacco products were included under the same public health protections as conventional tobacco smoke, ensuring 100% smoke- and emission-free environments.

PMI leads the tobacco market in Mexico, claiming over 60% market share.⁷⁶ With smoking rates having declined since Mexico ratified the FCTC in 2004, PMI appears to have taken action to ensure as many of its addictive products are on the market as possible, despite existing bans. Of the documents uncovered in the recent FOI requests, many mention the subject of HTPs in Mexico, suggesting that Mexico has become a priority in the company's efforts to overturn HTP bans.

In the documents, PMI communicated extensively with DG TRADE about a Supreme Court case, presented the ban as a trade barrier, requested that DG TRADE discuss the ban with Mexican authorities and expressed hope that the new administration would overturn the ban.

Two more FOI requests were made by PODER, a regional civil society organisation, to the Ministry of Foreign Affairs (SRE), the Ministry of Finance and Public Credit (SHCP), the Ministry of Economy (SE), the Office of the President of the Republic, the Ministry of Health and COFEPRIS to gather more information about interactions between various ministries in the Mexican government and 1) EU entities (the EC, DG TRADE or the EU's delegation to Mexico), and 2) PMI. The documents received did not include reference to interactions regarding the HTP ban.

PMI'S ATTEMPTS TO INFLUENCE HTP BAN AND SELECTIVE TAX IN BRAZIL

Although the sale of all types of electronic smoking devices (ESDs), including HTPs and e-cigarettes, has been prohibited in Brazil since 2009, PMI appears to still see the country as a strategic market for selling IQOS. The documents obtained via FOI requests reveal PMI's constant monitoring of Brazilian regulatory discussions and attempts to influence them through diplomatic and commercial channels.

PMI repeatedly maintained in international documents that there was no regulatory environment for the importation of HTPs, omitting, however, the regulatory review that Anvisa, the national health regulatory agency, had been conducting since 2019. In 2024, Anvisa upheld the ban and, with an update to the resolution, reinforced restrictions on the manufacture, import, transport, storage, distribution, marketing and advertising of ESDs.⁷⁷

Documents obtained via FOI requests show that, in 2023 and 2024, PMI monitored and lobbied Anvisa. A 2024 report by Agência Pública also shows that between 2021 and 2023, Philip Morris Brazil held 14 meetings with Anvisa.⁷⁸ While not all were about ESDs, according to the report, this topic was referenced in several of them.

The documents also indicate that, after Anvisa's decision, PMI sought to internationalise the Brazilian regulatory debate by involving DG TRADE, requesting that DG TRADE include the issue in the FTA negotiations, and suggesting that Brazilian restrictions be treated as an international trade issue, arguing a violation of WTO international agreements.

According to documents obtained by FOI requests, during an official mission to Japan, the Executive Secretary of Brazil's Ministry of Development, Industry, Trade and Services (MDIC) met with representatives of PMI.⁷⁹ The company expressed interest in establishing an HTP manufacturing unit in Brazil, contingent on the creation of a defined regulatory framework. In response, the Executive Secretary reportedly stated that he would take the matter to the Minister and emphasized Brazil's potential to become a regional hub and an export hub for the EU. He requested further information, including details on Japanese regulations, and highlighted that any advancement must be linked to a concrete investment plan (focused on a local factory and job creation) and the construction of a comprehensive regulatory framework that considers economic, industrial and public health impacts. Although the meeting opened a channel for dialogue on potential local production, no follow-up information or contact from PMI has been registered since.

Delays and redactions raise suspicions

Of the 59 documents that the European Commission considered relevant to Contre-Feu's FOI requests, only 18 were disclosed in full, 29 were partially disclosed and 12 were not disclosed at all. The initial set of documents requested by Contre-Feu from 2023 showed that PMI appeared to be enlisting the help of DG TRADE to persuade policymakers to create policies that were conducive to HTP use. They also indicated that these discussions had started prior to 2023. A second tranche of documents from 2024 contained similar framing and requests around HTPs, showing that HTP policy influence is an ongoing, long-term priority for PMI.

An equally alarming fact was that across the countries where researchers submitted FOI requests related to this investigation, responses and the eventual release of documents was delayed, including in FOI requests made in Mexico and Brazil. In both sets of documents released by the EC, information was redacted and certain documents were withheld, with the European Commission citing the 'protection of commercial interests' as the reason.⁸⁰ Because of this, a fully transparent record of the industry's interactions with the European Commission is not available.

Further, the second tranche of documents yielded full and partial access to fewer documents and contained significantly more redactions than the first tranche, including country names. This signals that PMI may have become aware of the FOI requests and may have influenced what information was shared. In one of the documents that detailed a phone call between PMI and DG TRADE, PMI seems to make reference to the FOI requests, stating, '[Redacted] wondered if this year's ATD request on contacts with the tobacco industry would have any impact on a possible meeting.'⁸¹

Having examined the requested documents under the applicable legal framework, **full public access is granted to 13 documents (documents 6, 7, 13, 14, 16, 22-27, 33 and 34) and partial access to 16 documents (documents 1, 3-5, 8-12, 15, 17, 18, 21, 28, 29 and 35).** No access may be granted to 6 documents (documents 2, 19, 20, 30-32). For your convenience, all documents are listed in the Annex 'List of identified documents' attached to the present reply.

Message from European Commission to Contre-Feu showing that full access would be granted to 13 documents from first tranche of documents

Having examined the requested documents under the applicable legal framework, I am pleased to inform you that **full public access is granted to 5 documents (documents 9, 16, 17, 23 and 24) and partial access to 13 documents (documents 5-8, 10, 11, 13-15, 18-21).** No access can be granted to 6 documents (documents 1-4, 12 and 22).

Message from European Commission to Contre-Feu, showing that full access would be granted to only five documents from second tranche of documents

British American Tobacco Also Sought Support from DG TRADE

The documents reveal that British American Tobacco (BAT), another one of the world's largest transnational tobacco companies, met and communicated with DG TRADE in 2024 regarding an increase on import taxes on e-cigarettes in Saudi Arabia. BAT appeared to ask the European Commission to intervene at the next WTO Market Access Committee, despite not being a European company, and not currently exporting e-cigarettes to Saudi Arabia.^{82,83}

A private company using the EU's trading power to exploit low- and middle-income countries

The analysis of the FOI documents revealed an especially concerning finding: Some of the countries PMI had targeted with its EU lobbying efforts are low- or middle-income countries (LMICs). The global burden of the tobacco epidemic falls heavily on LMICs, and lobbying against policies that would reduce tobacco use in those countries is particularly harmful.

Eighty percent of the world's smokers live in LMICs, which is not by accident.⁸⁴ Since smoking rates declined in the global north as governments implemented policies to reduce tobacco use, the industry increasingly has targeted people living in LMICs with its marketing and products. It has sued governments when they tried to enact policies to reduce smoking; has used local trade groups, such as retailer or farmer associations, to advocate for the tobacco industry; and may even be involved in intimidation of local health advocates.^{85,86,87,88}

For its part, PMI has a track record of attempting to use countries' trade policies and agreements to overturn domestic policies, such as product bans, put in place to protect people.

Tobacco use perpetuates poverty: It hinders people's economic growth when spending is diverted away from necessities like food, education and clothing, and when tobacco-related disease takes people out of the workforce. Tobacco growing degrades natural resources, can trap farmers in a cycle of debt and can keep children who work on farms from a full education.

The correspondences uncovered in this analysis suggest PMI is exploiting the significant size and economic power imbalance between the EU and some LMICs to influence domestic policy for its own commercial gain. These findings illustrate a picture of a private company that sells addictive, deadly products using the EU to interfere in LMICs' sovereignty to implement policy to protect the health of their people.

Using trade as a lever is part of the industry's global lobbying playbook

There is a long and well-documented history of tobacco companies using ministries of trade and trade agreements to fight the implementation of health policies. The findings in this report reflect the conclusions of a 2016 academic paper that examined how the industry frames its arguments around trade. It found that transnational tobacco companies 'often claim that proposed policies are inconsistent with domestic or international trade and investment law, or that public bodies introducing them are committing procedural irregularities or acting beyond their legal remit, all of which will lead to expensive litigation.'⁸⁹

For example, in 2010, PMI filed a lawsuit that claimed the introduction of graphic health warnings on cigarette packaging in Uruguay violated a bilateral investment treaty.⁹⁰ PMI filed a similar action in Hong Kong, alleging that Australia's introduction of plain packaging violated an Australia-Hong Kong trade agreement.⁹¹ Honduras and the Dominican Republic also were persuaded to file disputes with Australia at the WTO related to Australia's introduction of plain packaging.⁹²

In addition to directly lobbying policymakers, it is common for tobacco companies to try to influence 'upstream' policies, including trade treaties, to make it harder to pass public health regulations. For example, in the 1990s, British American Tobacco lobbied for changes to the EU Treaty that led to all EU policies having to go through a 'business-oriented' assessment, which ultimately made public health and tobacco control policies harder to pass.⁹³ In the 1980s, the U.S. challenged Thailand's restrictions on imports at Philip Morris' request.⁹⁴

Evidence also suggests the tobacco industry attempted to influence the content of trade and investment treaties, such as the Trans-Pacific Partnership Agreement and the Transatlantic Trade and Investment Partnership.^{95,96}

The introduction of the WHO FCTC may have influenced much of this activity at the WTO level. As countries began implementing more and stronger tobacco control policies, tobacco companies may have been looking for any levers to slow them down.

The industry's formal attempts to use trade agreements to overturn national tobacco control regulations are typically unsuccessful. Given the lack of success of these efforts, the industry may be increasing its efforts behind the scenes, as seen in the recently uncovered documents, and may be shifting its focus from only fighting policies that reduce tobacco use to also trying to open new markets for its addictive and dangerous products.

CONCLUSION & RECOMMENDATIONS

Article 5.3 of the WHO FCTC, to which the EU is a Party, aims to protect governments from undue influence by the tobacco industry. It requires Parties to limit interactions with the tobacco industry to those strictly necessary for regulation and, when such interactions occur, ensure full transparency.

However, the findings of this report demonstrate the significant presence of the tobacco industry within European Union institutions. Our analysis showed a growing number of active lobbying organisations, large lobbying budgets, the considerable number of people they employ, and a high number of emails and meetings between tobacco company representatives and EU institutions.

The findings also demonstrate that the industry is willing to exploit its influence within the EU for reasons unrelated to EU health policy. In this instance, it has used the European Commission's diplomatic power to undermine tobacco control measures implemented in other countries around the world. In some cases, it appears that the EU, despite being a Party to the FCTC, has yielded to its demands.

These findings reveal either a repeated violation of the FCTC by the European Commission or, at the very least, an insufficient implementation of the treaty's measures.

First, the EU has not sufficiently implemented Article 5.3 and its guidelines. Current transparency rules in the EU regarding the tobacco industry are both insufficient and not being followed. This is an ongoing problem. A 2021 report previously detailed the magnitude of the industry's lobbying of the European Commission and explained its calculated tactics, including preying on third countries.⁹⁷ The report highlights why, in part, this lobbying can be effective. The European Commission had not been fully adhering to its obligations under Article 5.3, as requested by the European Ombudsman; has failed to limit contact with the industry; did not fully disclose relevant information in response to these FOI requests, likely at the industry's request; and is not fully complying with transparency requirements.

Further, it is particularly alarming to witness PMI's attempts to instrumentalize the EC, through DG TRADE, to challenge public health regulations in third countries. Our findings reveal repeated instances of dialogue between DG TRADE and the tobacco industry throughout 2023 and 2024 concerning public health measures in third countries, including those that are Parties to the FCTC. In at least one instance, DG TRADE even appeared to comply with PMI's demands, further highlighting the risks of such engagement.

By allowing a platform for such exchanges, DG TRADE effectively legitimizes or supports efforts to weaken or undermine these countries' sovereign tobacco control policies. In this context, the EU must reflect on its responsibility and the international implications of its engagement with the tobacco industry. It is not sufficient for the EU to safeguard only its own public health policies from the industry's influence; as a Party to the FCTC, it must also ensure that its actions do not, directly or indirectly, enable the tobacco industry's attempts to erode public health protections in other countries.

Indeed, the guiding principles set out in Article 4 of the FCTC refer to a strong political commitment from Parties, specifically to 'support, at the national, regional and international levels, comprehensive multisectoral measures' and that 'international cooperation [...] to establish and implement effective tobacco control programmes [...] is an important part of the Convention.'

RECOMMENDATIONS

01

The European Union and all of its institutions must further implement and ensure compliance with Article 5.3 of the FCTC. Although transparency has improved within the three institutions, major gaps remain in fulfilling FCTC obligations, especially regarding their scope. Current transparency measures are often restricted to certain meetings and specific individuals (such as staff in management positions or certain departments or DGs of the Commission). In line with the calls of Corporate Europe Observatory and Smoke Free Partnership, they should apply to all staff who have any contact with the tobacco industry. Moreover, these obligations should be accompanied by dissuasive sanctions and strict controls. Finally, transparency alone is not sufficient: When it comes to the tobacco industry, interactions with decision-makers should only occur when strictly necessary.

02

Improved compliance to Article 5.3 must also result in more transparency with respect to freedom of information (FOI) requests made by civil society concerning contacts with the tobacco industry. The commercial interests of the tobacco industry cannot take precedence over the disclosure of documents concerning contacts between lobbyists and public decision-makers, as it has been the case with the documents in this report.

03

The European Union must commit to safeguarding its diplomatic influence, particularly in the field of international trade, from being exploited by the industry to challenge or undermine tobacco control measures implemented by other countries, particularly those that are signatories to the FCTC. As such, no discussions between EU institutions and the tobacco industry regarding tobacco control policies implemented by third countries should be permitted. We also urge governments around the world to reject the tobacco industry's attempts to use trade as a means of influencing health policy.

These recommendations should not only be enacted as a code of conduct or informal internal rules; they must also be amended in the form of directly applicable and binding legislative or regulatory texts. In this case, this could mean making an explicit reference to the tobacco industry and the FCTC in both the Interinstitutional Agreement of 20 May 2021 and Regulation No. 1049 of 30 May 2001 on public access to documents of the institutions of the European Union as well as in the Rules of Procedure of the European Parliament.

As the tobacco industry steps up its efforts to renew its customer base and continue its deadly trade, which has caused considerable damage across Europe and beyond, it is crucial that EU institutions lead by example in implementing the FCTC.

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ANNEX

LIST OF ORGANISATIONS DIRECTLY OR INDIRECTLY LINKED TO THE TOBACCO INDUSTRY, OR DEFENDING INTERESTS PARTICULARLY CLOSE TO THE TOBACCO INDUSTRY, AS CITED IN THE REPORT

Note: All links and URLs available here were accessed on November 28, 2025

1. Tobacco Organisations

- Philip Morris International Inc. ([EU Transparency Register](#))
- Imperial Brands PLC ([EU Transparency Register](#))
- Japan Tobacco International ([EU Transparency Register](#))
- British American Tobacco ([EU Transparency Register](#))
- J. Cortes Cigars N.V. ([EU Transparency Register](#))
- TTI Magyarország Nemzetközi Dohánykereskedelmi Kft ([EU Transparency Register](#))
- Logista Integral, S.A. ([EU Transparency Register](#)) – Part of Imperial Brands Group (as indicated in the Register)
- Deutscher Zigarettenverband e.V. ([EU Transparency Register](#))
- Manifatture Sigaro Toscano S.r.l. ([EU Transparency Register](#))
- Dos Santos ([EU Transparency Register](#))
- Scandinavian Tobacco Group A/S ([EU Transparency Register](#))
- Tabaqueira II ([EU Transparency Register](#)) – PMI affiliate (as indicated in the Register)
- Manufacture de Tabacs Heintz van Landewyck ([EU Transparency Register](#))
- Karelia Tobacco Company Inc ([EU Transparency Register](#))

2. Tobacco Trade Associations

- Tobacco Europe AISBL ([EU Transparency Register](#))
- Association of Independent Tobacco Specialists - This organisation is no longer recorded in the EU Transparency Register in 2025. It was registered until 2024 (as indicated on the [LobbyFacts website](#)).
- European Smoking Tobacco Association (ESTA) ([EU Transparency Register](#))
- European Shisha Community Alliance ([EU Transparency Register](#))
- European Cigar Manufacturers Association (ECMA) ([EU Transparency Register](#))
- Confédération des buralistes de France - This organisation is not recorded in the EU Transparency Register but is recorded as [meeting with an MEP in 2025](#) regarding tobacco-related policies.
- Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse ([EU Transparency Register](#))
- Association of Tobacco Sellers, Convenience Stores and Kiosks of Macedonia - This organisation is no longer recorded in the EU Transparency Register in 2025. It was registered until 2024 (as indicated on the [LobbyFacts website](#).)
- Tobaksindustrien - Tobacco Manufactures Association of Denmark - This organisation is no longer recorded in the EU Transparency Register. It was registered until January 2025 (as indicated on the [LobbyFacts website](#).)

- **Association of Independent Tobacco Specialists** - This organisation is no longer recorded in the EU Transparency Register in 2025. It was registered until 2024 (as indicated on the [LobbyFacts website](#)).
- **TOBACCO AND NICOTINE PRODUCTS CHEMICALS GROUP** ([EU Transparency Register](#)) - On November 25, 2025, the Registry indicated that this organisation's account had been suspended.
- **Vereniging Nederlandse Sigaretten- en Kerftabakfabrikanten** ([EU Transparency Register](#))
- **BDTA e.V.** ([EU Transparency Register](#))
- **Asociación Empresarial del Tabaco** ([EU Transparency Register](#))
- **UNITAB** - This organisation is no longer recorded in the EU Transparency Register in 2025, but is recorded as having meetings with the European Commission in 2023 (as indicated on the [LobbyFacts website](#)) and it continues to make [statements](#) referring to European tobacco policy in 2025.
- **Fédération Européenne des Transformateurs de Tabac** ([EU Transparency Register](#))
- **Bundesverband der Zigarrenindustrie e.V.** ([EU Transparency Register](#))
- **Federazione Italiana Tabaccai** ([EU Transparency Register](#))
- **MESA DEL TABACO** ([EU Transparency Register](#))
- **Alliance One International, LLC** ([EU Transparency Register](#)) - This organisation presents itself as having a general objective, but has been denounced as representing the tobacco industry (as indicated on the [Tobacco Tactics Website](#))

3. Organisations that do not directly lobby for traditional tobacco products, but which are indirectly involved through material or financial links with the industry, or because they promote a product category sold by the industry

- **Swedish Match** ([EU Transparency Register](#)) - PMI subsidiary (as indicated in the Register).
- **Skruf Snus AB** ([EU Transparency Register](#)) - Imperial Brands subsidiary (as indicated in the Register).
- **Svensk Snustillverkarförening (Association of Swedish Snus Manufacturers)** ([EU Transparency Register](#)) - Members include PMI, BAT and Skruf Snus (Imperial Brands) (as indicated in the Register).
- **France Vaporage** ([EU Transparency Register](#)) - Members include BAT (as indicated in the Register and this [article](#) from Mediapart).
- **International Not-For-Profit Association 'Smoking Control & Harm Reduction'** ([EU Transparency Register](#)) - Some founding members of this organisation have received funding from the tobacco industry or are affiliated with organisations funded by the PMI-funded Foundation for a Smoke-Free World, now known as Global Action to End Smoking (as indicated on [Tobacco Tactics](#)).
- **Global Institute for Novel Nicotine** ([EU Transparency Register](#)) - This organisation has multiple links with the tobacco industry (as indicated on [Tobacco Tactics](#)).
- **Center of Excellence for the Acceleration of Harm Reduction** ([EU Transparency Register](#)) - This organisation and its founder have ties, particularly financial ties, to the tobacco industry (as indicated on [Tobacco Tactics](#)).
- **European Tobacco Harm Reduction Advocates** ([EU Transparency Register](#)) -
 - » Several of its member associations were previously members of INNCO, which for several years received funding from the PMI-funded Foundation for a Smoke-Free World, now known as Global Action to End Smoking (as indicated on [Tobacco Tactics](#)).
 - » Several of its associates have participated in the Global Forum on Nicotine, which has links to the tobacco industry (as indicated on [Tobacco Tactics](#)).
 - » The organisation seeks to present a particularly positive view of heated tobacco products and nicotine pouches (as indicated in a [letter](#) to the Commission in 2025).
- **HEATED COMMUNITY HUB** ([EU Transparency Register](#)) - This organisation directly promotes all tobacco products other than cigarettes, including heated tobacco products, a category directly linked to the tobacco industry (as indicated on its [website](#)).

- **Villanypara Egyesület** ([EU Transparency Register](#))
 - » In 2022, this organisation was recorded as being a member of INNCO, which for several years received funding from the PMI-funded Foundation for a Smoke-Free World, now known as Global Action to End Smoking (as indicated on [Tobacco Tactics](#)).
 - » It has participated in and promoted several Global Forum on Nicotine events, which have links to the tobacco industry (as indicated on [Tobacco Tactics](#)).
 - » Several articles published on its website promote heated tobacco products or nicotine pouches as lower-risk products, in line with industry narratives (as indicated in this blog post from [2022](#) and this one from [2023](#)).
- **New Nicotine Alliance UK** ([EU Transparency Register](#)) - This organisation's links to the tobacco industry were [revealed](#) in a 2020 investigation by the Bureau of Investigative Journalism.
- **Nordic Nicotine Pouches Alliance** ([EU Transparency Register](#)) - Partners include BAT and JTI (as indicated on [the organisation's website](#)).
- **World Vaper's Alliance** - This organisation has proven links to the tobacco industry, as indicated on [TobaccoTactics](#). It is no longer recorded in the EU Transparency Register in 2025. It was registered until 2024 (as indicated on the [LobbyFacts](#) website).
- **Smoke Free Sweden** ([EU Transparency Register](#)) - This organisation promotes nicotine pouches. It is an initiative of Health Diplomats, which was founded by Delon Human, a South African doctor linked to the tobacco industry, particularly BAT (as indicated on [TobaccoTactics](#)).
- **We Are Innovation** - This organisation is not registered in the EU Transparency Register, but is listed as having one [meeting](#) with an MEP in 2025. In 2023 it co-organised an event at the European Parliament promoting tobacco industry narratives (as indicated by [the Smoke Free Partnership](#)) and has published numerous papers promoting heated tobacco products, snus and nicotine pouches (as indicated in this [article](#) from 2022 and this [report](#) from October 2025).

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ABOUT

Contre-Feu, the alliance against tobacco industry

Contre-Feu, the alliance against the tobacco industry (formerly ACT), is a public interest counter-lobby that has been working for over 30 years to create a world free of tobacco and nicotine products. Contre-Feu runs awareness and advocacy campaigns denouncing the strategies and manipulations of the world's deadliest business: the tobacco industry. In addition to bringing together more than 20 non-profit organisations, Contre-Feu mobilizes decision-makers, civil society actors, the media, and public opinion to see the emergence of France's first tobacco-free generation by 2032.

For more information, visit contre-feu.org

STOP

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.

For more information, visit exposetobacco.org.



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