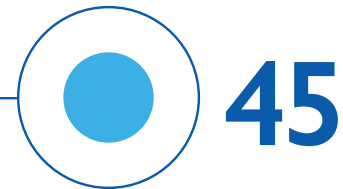


United Kingdom



SUMMARY OF FINDINGS

1. Industry Participation in Policy Development

The tobacco industry (TI) and associated organizations are permitted to submit responses to public consultations and calls for evidence, including on tobacco control issues. There was also significant interaction between parliamentarians and the TI on matters of policy development. Transparency records from multiple government departments identified meetings with TI representatives; however, only limited details are made publicly available rather than full minutes. The Scottish Parliament lobbying register shows that many of the recorded lobbying meetings related to issues such as a ban on disposable vape products and the UK Tobacco and Vapes Bill.

2. Industry CSR Activities

Multiple Members of Parliament (MPs) across parties sponsored parliamentary receptions and events for companies such as Philip Morris International (PMI), Japan Tobacco International (JTI), and the pro-smoking group Forest. Several MPs also participated as panelists in Institute of Economic Affairs (IEA) and JTI-sponsored events. One MP wrote an article in *LabourList*, sponsored by JTI, during his term in Parliament. Several MPs reportedly attended a lunch hosted by Forest, while parliamentary staff received invitations to a JTI-hosted “Parliamentary Staff Christmas Drinks” event at a cricket club in London.

3. Benefits to the Industry

The UK Government applied a zero percent duty on imports of cigars, cheroots, and cigarillos from multiple countries, including those within the Comprehensive and Progressive Agreement for Trans-Pacific Partnership. Major tobacco companies have continued to pay very low corporate taxes in the UK, although low corporation tax payments are not unique to the TI or to the UK.

4. Unnecessary Interaction

A wide range of unnecessary interactions between parliamentarians and the TI and associated organizations were recorded. Industry participation at fringe and side events at party conferences was frequent. Evidence was also found of several local council pension funds investing in the TI.

5. Transparency

In Scotland there is an official lobbying register in which all regulated lobbying (that is, face-to-face) must be recorded. The Ministerial Code requires government departments to publish details of ministers' gifts, hospitality, overseas travel, and meetings on a quarterly basis. This requirement is reflected in the Central Government Corporate Transparency Commitments. Additionally, the Department of Health and Social Care (DHSC) guidance for adherence to Article 5.3 of the WHO FCTC notes that all UK government departments or bodies should



publish correspondence received from TI representatives, replies sent, and minutes of any meetings. Compliance with these requirements, particularly regarding meeting minutes, appears lacking.

6. Conflict of Interest

There is no legislation prohibiting the TI from donating to political parties, candidates, or campaigns. General rules regulate political contributions and require disclosure, with donations over £7,500 to national political parties declared. Several MPs received money or gifts from the TI or its associates during the period under review. A senior former MP also took employment at British American Tobacco (BAT) less than a year after leaving Parliament.

7. Preventive Measures

Several policies across government departments aim to regulate government interactions with the TI, as outlined in previous editions of this Index. A positive development since the publication of the 2023 Index is the DHSC's guidance to all UK Government officials on adhering to Article 5.3 of the WHO FCTC.

RECOMMENDATIONS

1. Create and maintain a legally binding and publicly accessible register covering all lobbying and policy influence activity across UK administrations. Require all organizations involved in policy discussions to register and disclose their funding before lobbying.
2. Ensure consistent application of Article 5.3 of the WHO FCTC across all consultation processes. Specifically, consultations on public health should identify and publish TI responses separately and outline measures to ensure that TI's commercial and vested interests do not influence policy development.
3. Prevent conflicts of interest by prohibiting the TI and related entities from making contributions to political parties and public officials. Prohibit public officials from holding positions in or being seconded to the TI, or from taking up posts with the TI for at least five years after leaving public service.
4. Prevent the TI and vested interests from influencing governments through sponsorship of events at political party conferences and other venues.
5. Fully implement DHSC guidance by ensuring that details of all meetings, including minutes, with the TI and vested interests are published across all government departments and levels, and that such meetings occur only when strictly necessary.