

Dear Members of the Senedd,

We are writing with regards to the 'Tackling Illicit Tobacco Sales in Wales' drop in event, scheduled for Wednesday 17th November in Tŷ Hywel. This event is being organized by Japan Tobacco International (JTI) in what may well be an attempt to garner political support.

We strongly advise Welsh Government officials and Senedd members **not to attend**, given the potential scope to influence health policy and that Wales' own efforts on this front are led by Trading Standards Wales and are fully supported by the Deputy Minister for Wellbeing, Lynne Neagle<sup>1</sup>.

We would like to remind officials of Article 5.3 of the World Health Organization's (WHO) Framework Convention on Tobacco Control (FCTC), that requires governments to take measures to protect health policy "from commercial and other vested interests of the tobacco industry"<sup>2</sup>. In this instance, we are concerned that these measures are at risk.

It is important to note that conversations around illicit tobacco are inextricably linked with the harms it poses to public health. For example, the lack of safeguards to protect children from accessing tobacco, and the fact cheap tobacco makes it harder for smokers to quit. Given this relationship, we are worried at the proximity of JTI to Government, and the health policy safeguards this breaches.

It is also important to note that within Article 5.3 guidelines, WHO explicitly warns against demonstrations of 'corporate social responsibility'. WHO characterises these demonstrations as distancing the tobacco industry's image from the lethal products it produces, in a bid to interfere with health policy:

*26. The tobacco industry conducts activities described as socially responsible to distance its image from the lethal nature of the product it produces and sells or to interfere with the setting and implementation of public health policies<sup>3</sup>.*

As Members of the Senedd, we urge you to consider the implications of attending a conference that has affiliations with one of the biggest tobacco companies in the tobacco landscape, and the associations this holds.

If you would like get involved with Wales' own efforts to address this illicit market, exempt of tobacco industry interference, please do not hesitate to get in touch. Wales addresses this illegal market on many fronts, including through the Wales Tobacco Control Alliance (WTCA) and the Cross-Party Group on Smoking and Health. These groups have the freedom to engage with health policy, and in turn properly engage with this illicit market.

Yours sincerely,

**Suzanne Cass**

**CEO ASH WALES**

**CC'd: John Griffiths MS**

**Chair, Cross-Party Group on Smoking and Health**

---

<sup>1</sup> [Ambition to make Wales smoke-free by 2030 - as smoking remains the leading cause of premature deaths | GOV.WALES](#)

<sup>2</sup> [https://www.who.int/fctc/guidelines/article\\_5\\_3.pdf](https://www.who.int/fctc/guidelines/article_5_3.pdf)

<sup>3</sup> [https://www.who.int/fctc/guidelines/article\\_5\\_3.pdf](https://www.who.int/fctc/guidelines/article_5_3.pdf)