



Review of accreditation of nongovernmental organizations with the status of observer to the Meeting of the Parties

Report by the Convention Secretariat

Purpose of the document

This report provides a summary of the work reported by the nongovernmental organizations (NGOs) that are accredited as observers to the Meeting of the Parties (MOP) to the Protocol to Eliminate Illicit Trade in Tobacco Products as part of the review of their accreditation by the MOP.

Action by the Meeting of the Parties

The MOP is invited to note the present report and consider adopting the draft decision contained in Annex 2 of the report.

Contribution to the Sustainable Development Goals (SDGs): All SDGs; in particular, SDG 3 and Target 3.a, as well as SDGs 16 and 17.

Link to Workplan and Budget item: 2.3.3.

Additional financial implications if not included in the Workplan and Budget: None.

Related document(s): Rules of Procedure of the Meeting of the Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products.

Background

1. The review of accreditations of nongovernmental organizations (NGOs) with observer status to the Meeting of the Parties (MOP) to the Protocol to Eliminate Illicit Trade in Tobacco Products is governed by Rule 31.2 of the Rules of Procedure of the MOP, which requires that the MOP reviews the accreditation of each NGO at any of its regular sessions, and determines the desirability of maintaining its observer status.
2. Observer status to the MOP was granted to the first NGO applicants at its second session through decision FCTC/MOP2(3). The Third session of the MOP (MOP3) was thus the first to review the accreditations, and the MOP maintained the observer status of eight NGOs (FCTC/MOP3(11)).
3. The Fourth session of the MOP will be the second to review the accreditations of NGOs with the status of observer to the MOP; the review will include three additional NGOs to which observer status was granted in decision FCTC/MOP3(7).
4. Further, decision FCTC/MOP3(11) requested the Convention Secretariat to develop and propose for adoption by the MOP, at its fourth session, a process to facilitate the review of accreditation of NGOs with observer status to the MOP; and a standard reporting questionnaire for use by NGOs for future reviews of accreditation.
5. The present report provides an analysis of the reports submitted by NGOs that are accredited as observers to the MOP, including examples of the work carried out by them to support Parties with implementation of the Protocol. It contains the recommendations of the Bureau on whether to maintain, suspend or discontinue the observer status of accredited NGOs to the MOP.
6. In addition, the report includes the process and questionnaire proposed by the Convention Secretariat to be used for future reviews of accreditation of NGOs with observer status to the MOP.

Review of reports submitted by NGOs that are accredited as observers to the MOP

7. To facilitate the review process, the Convention Secretariat followed the same approach used for the review of accreditations of NGOs with observer status to the Conference of the Parties (COP) to the WHO Framework Convention on Tobacco Control (WHO FCTC). In 2023, the Secretariat used a standard questionnaire for the NGOs accredited as observers to the MOP to review their accreditation, taking into account the provisions of the Protocol, as reported by the Secretariat at the Second session of the MOP in document FCTC/MOP/3/12. This questionnaire was used again in the 2025 cycle.
8. On 4 February 2025, the Convention Secretariat invited the 11 NGOs that are accredited with observer status to the MOP to submit their reports via the online questionnaire by 28 February 2025.

Reports received by the Convention Secretariat

9. All 11 NGOs currently accredited as observers to the MOP and listed below responded to the online questionnaire:

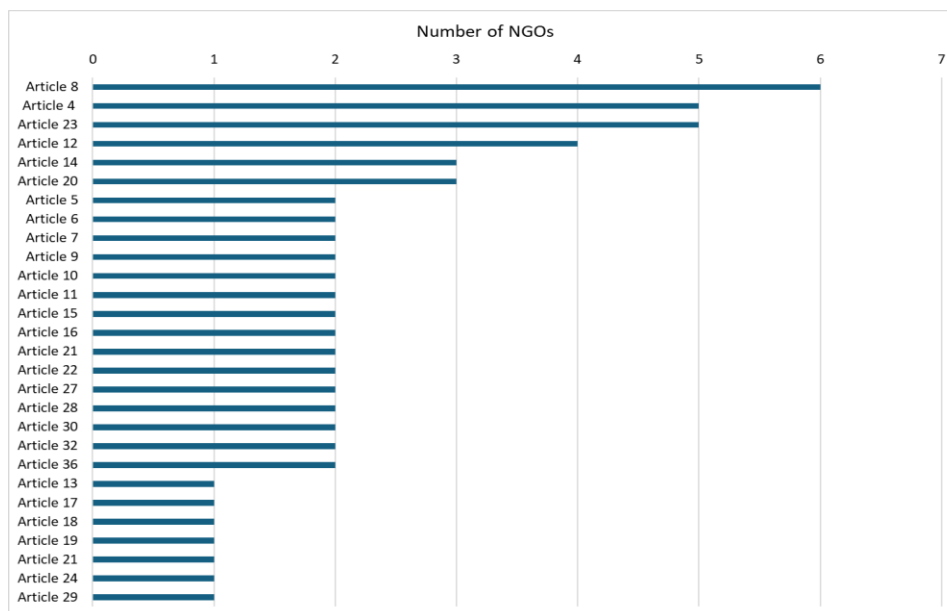
- African Tobacco Control Alliance
- Campaign for Tobacco-Free Kids
- Corporate Accountability
- European Network for Smoking and Tobacco Prevention
- Global Alliance for Tobacco Control
- InterAmerican Heart Foundation
- International Union Against Tuberculosis and Lung Disease
- Smoke Free Partnership
- Tobacco Control Research Group
- Tobacco Free Portfolios
- Union for International Cancer Control

Summary of the analysis of reports received and examples of recent work of NGO observers

10. This summary is based on the reports received from the 11 NGOs that are accredited with observer status to the MOP, and focuses on:

- (a) the contribution of NGOs to support implementation of the Protocol by the Parties; and
- (b) examples of activities that were reported by the NGOs in their reports.

11. The graph below shows how many NGO observers, out of the total of 11, indicated that they worked on various articles of the Protocol.



12. The graph shows that Article 8 (Tracking and tracing) received the most attention: six NGOs reported that they had assisted Parties in implementation of this article. This was followed by Article 4 (General obligations) and Article 23 (Assistance and cooperation: training, technical assistance and cooperation in scientific, technical and technological matters): five NGOs reported working on each of these areas. Four NGOs reported working on Article 12 (Free zones and international transit) and three NGOs on Article 20 (General information sharing) and Article 14 (Unlawful conduct including criminal offences). Only a few NGOs reported having focused on the remaining articles.

13. The following paragraphs outline some examples of the work reported by NGO observers. For more detailed information on these activities, and for information on all the activities reported by NGO observers, the individual reports are available on the Convention Secretariat's website.¹

(a) In relation to Article 8 (Tracking and tracing) the Tobacco Control Research Group (TCRG) is mapping the tobacco global supply chain, including the actors that play a role in it. The Tobacco Supply Chain Database, developed by TCRG, "enables tobacco control researchers and advocates to understand what the supply chain is, where it is located and who is involved", as indicated by the NGO. TCRG has also recently published several papers that help improve understanding of the tobacco supply chain, include those entitled *Hosting the tobacco industry supply chain and political interference* and *Independent companies in the tobacco supply chain: transparency and environmental social governance*.

(b) Also in relation to Article 8, in June 2023 the Smoke Free Partnership published a report entitled *The status of the tracking and tracing system required under the WHO FCTC Protocol to Eliminate Illicit Trade in Tobacco Products*. This outlines the progress in and challenges of implementing tracking and tracing systems under the Protocol.

(c) Again under Article 8, the Global Alliance for Tobacco Control reported publication, on 20 June 2024, of a policy brief entitled *Tracking and tracing systems, including the global information-sharing focal point*.

(d) In relation to Article 11 (Sale by Internet, telecommunication or any other evolving technology), the Campaign for Tobacco-Free Kids (CTFK) reported having provided assistance to Parties to draft legislation that contains, inter alia, regulation for remote sales including Internet and other remote means. CTFK has also produced reports on the tobacco industry's social media marketing efforts, which include direct sales from those platforms, including the *#SponsoredByBigTobacco* report.

14. Some NGOs reported having provided assistance for implementation of the Protocol in more generic and broader ways – through direct assistance to a Party; through publications covering more than one implementation area of the Protocol; or through supporting research, building capacity or advocating implementation of the Protocol. Examples include the following.

(a) TCRG has published research papers on illicit trade of tobacco products, addressing the situation in the African, Eastern Mediterranean and Western Pacific Regions. These include *The trade of illicit cigarettes in Ghana: Insights from a policy synthesis and qualitative study*, *A systematic investigation of tobacco industry sourced data relating to illicit tobacco trade*

¹ See [Nongovernmental organizations reports](#) (accessed 26 June 2025).

featured in Pakistan's media coverage (2015–2020), and Improving estimates of the illicit cigarette trade through collaboration: lessons from two studies of Malaysia.

(b) The InterAmerican Heart Foundation partnered with Centro de información y educación para la prevención del abuso de drogas (a national NGO in Peru) to conduct a project entitled Sustainable Fiscal Policy and Control of Illicit Trade for Tobacco Products in Peru. The project is funded by Bloomberg Philanthropies through Vital Strategies Inc.. It has a duration of 12 months and started on 1 December 2024. Among the objectives of the project are promoting and advocating the accession of Peru to the Protocol and facilitating implementation of measures to control illicit trade in tobacco products.

(c) CTFK reported that during 2023–2024 it supported Senegal in implementation of the Protocol. Additionally, in the same biennium, CTFK provided technical support and funding to grantees to advocate tax and price policies in numerous countries, including Bangladesh, Bosnia and Herzegovina, Brazil, Cambodia, India, Mexico, Pakistan, Philippines, Senegal, Ukraine, Uzbekistan, Viet Nam and several South American countries. As part of that work, CTFK provided support related to illicit trade in tobacco products, including awareness raising for finance ministries, media advocacy and providing support to grantees on carrying out research related to illicit trade in tobacco products.

(d) The African Tobacco Control Alliance (ATCA) organizes regular training sessions for its tobacco industry monitoring and response teams and for government officials and the media. Illicit trade in tobacco products is a prominent subject in ATCA's training programmes. The Alliance's national partners, especially media professionals, are empowered to keep illicit trade in tobacco products high on their advocacy agenda in their dealings with decision-makers.

15. In addition to supporting Parties in their efforts to implement the provisions of the Protocol, four NGOs reported that they helped Parties to the WHO FCTC to become Parties to the Protocol. For example, in 2023, with financial assistance from Vital Strategies Inc., ATCA provided technical assistance to its national partner in Cameroon to produce communication materials used in a series of advocacy activities aimed at decision-makers, with a view to finalizing the ratification of the Protocol. The InterAmerican Heart Foundation reported assisting Peru to become a Party; Corporate Accountability reported providing assistance to Paraguay and Peru; and the European Network for Smoking and Tobacco Prevention continued its efforts to support European Union countries in becoming Parties to the Protocol.

16. Further, 11 NGOs indicated that they had participated in meetings or events related to illicit trade in tobacco products, or integrated this matter in meetings or conferences they had organized.

17. In summary, the reports submitted by the NGOs accredited as observers to the MOP indicate that civil society organizations are committed to contributing to and assisting with the implementation of the Protocol by the Parties. Several NGOs reported that they promoted and supported Parties in their efforts to establish tracking and tracing systems for tobacco products, which is one of the time-bound measures under the Protocol. Another significant area of contribution is that many NGOs encouraged and supported Parties to the WHO FCTC in different parts of the world to become Parties to the Protocol.

Declarations by NGO observers

Retaining the observer status

18. All 11 NGOs expressed the wish to retain their observer status to the MOP in their submitted reports.

Conflicts of interest

19. No conflicts of interest were declared in any of the NGO reports.

Process to facilitate the review of accreditations of NGOs and the reporting questionnaire

20. The Convention Secretariat recalls that to implement Rule 31.3 of the Rules of Procedure of the COP – which is identical to Rule 31.2 of the Rules of Procedure of the MOP – decision FCTC/COP5(22) requested the Secretariat to analyse the reports received from NGOs and prepare a report for the Bureau of the COP. The aim was that the Bureau could make recommendations to the next regular session of the COP on whether to maintain, suspend or discontinue the observer status of accredited NGOs. Further, decision FCTC/COP6(23) adopted the standard reporting questionnaire for use by NGOs for future reviews of accreditation.

21. At the recommendation of the previous MOP Bureau, the MOP adopted decision FCTC/MOP3(11), requesting the Convention Secretariat, “taking into account experience from the first cycle of review of accreditation of NGO observers to the MOP, to develop and propose for adoption by the MOP, at its fourth session: (a) a process to facilitate the review of accreditations of NGOs with observer status to the MOP; and (b) a standard reporting questionnaire for use by NGOs for future reviews of accreditation”.

Process to facilitate the review of accreditations of NGOs with observer status to the MOP

22. At MOP3, the Convention Secretariat informed the Parties that for the review of the NGOs accredited as observers to the MOP, the Secretariat had used the same process as that used in the reviews of NGOs with observer status to the COP. The Secretariat clarified that the proposal was to formalize the existing process for use in respect of NGO observers to the MOP, not to develop a new process.²

23. Considering the positive experience from the first cycle of review of accreditation of NGO observers to the MOP, it is suggested that the process be maintained, following the points below.

- (a) Each NGO with observer status to the MOP should be requested to submit a report on its activities for each MOP session through, and upon invitation by, the Convention Secretariat. The report should address, in particular, the activities undertaken by the NGO in support of implementation of the Protocol – preferably in respect of specific articles of the Protocol.

² [Report of the Third session of the Meeting of the Parties to the Protocol to Eliminate Illicit Trade in Tobacco Products](#) (accessed 26 June 2025).

(b) In their reports, each NGO should also be requested to confirm that the information based on which the MOP had granted observer status remains unchanged, or otherwise to communicate any changes that may have occurred.

(c) The Convention Secretariat will analyse the information submitted by the NGOs, and will share a consolidated summary report outlining this analysis with the Bureau of the MOP. Based on the report, the Bureau will make a recommendation to the next regular session of the MOP on whether to maintain, suspend or discontinue the observer status of accredited NGOs.

Standard reporting questionnaire for use by NGOs for future reviews of accreditation

24. The Convention Secretariat had developed a questionnaire for use by NGOs accredited as observers to the MOP for the review of accreditation, following the approach and structure of the questionnaire used for those accredited as observers to the WHO FCTC, and taking into account the provisions of the Protocol. The questionnaire was used successfully during the first and second cycles of review of accreditation of NGO observers to the MOP (the latter for approval by MOP4).³ The Bureau of the MOP, at its third meeting held in April 2025, provided some suggestions to improve the questionnaire, to further align it with the MOP needs. The amended questionnaire, taking into account the comments of the Bureau, is included as Annex 1 of the present document.

Action by the Meeting of the Parties

25. The MOP is invited to note the present report and, following the recommendation of the Bureau to maintain observer status of the 11 NGOs accredited as observers to the MOP, as well as the proposal for a process and standard reporting questionnaire in relation to the review of accreditations of NGO observers to the MOP, to consider adopting the draft decision contained in Annex 2 of the present report.

³ The questionnaire was included as Annex 1 of the report FCTC/MOP/3/12.

Annex 1

Questionnaire for the review of accreditation of NGOs with the status of observer to the Meeting of the Parties

A. Contact details

- A1. Name of the organization:
- A2. Mailing address:
- A3. Contact person responsible for completing the report:
- A4. Function/title of the contact person:
- A5. Telephone:
- A6. Email:
- A7. Website of the organization:

B. General information

- B1. Does your organization's mission statement specifically refer to tobacco control or to countering/fighting illicit trade in tobacco products? Yes/No
- B2. If yes, please specify/provide details:
- B3. Does your organization have regional branch(es) to enhance activities in different regions or groups of countries? Yes/No
- B4. If yes, please provide details:
- B5. Does your organization regularly convene meetings or conferences for its membership? Yes/No
- B6. If yes, please indicate frequency:
Monthly/Quarterly/Biannually/Annually/Biennially/Others (not on a regular basis, meet when required, etc.)
- B7. If yes, is tobacco control or countering/fighting illicit trade in tobacco products covered in the meetings/conferences? Yes/No

C. Participation in meetings organized under the auspices of the Protocol to Eliminate Illicit Trade in Tobacco Products and contributions to other tobacco control related events

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

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

D. Work encouraging Parties to the WHO Framework Convention on Tobacco Control (WHO FCTC) to become Parties to the Protocol

D1. Have you supported any Party or Parties to the WHO FCTC to become Parties to the Protocol? Yes/No

D2. If yes, please indicate which one(s):

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

E1. Has your organization conducted any work/activity in relation to the following provisions of the Protocol?

E2. Part II: General obligations

E2(a) Article 4 (General obligations): Yes/No

E2(b) Article 5 (Protection of personal data): Yes/No

E2(c) If you responded YES to either of the above, please provide details:

E3. Part III: Supply chain control

E3(a) Article 6 (Licence, equivalent approval or control system): Yes/No

E3(b) Article 7 (Due diligence): Yes/No

E3(c) Article 8 (Tracking and tracing): Yes/No

E3(d) Article 9 (Record keeping): Yes/No

E3(e) Article 10 (Security and preventive measures): Yes/No

E3(f) Article 11 (Sale by Internet, telecommunication, or any other evolving technology): Yes/No

E3(g) Article 12 (Free zones and international transit): Yes/No

E3(h) Article 13 (Duty free sales): Yes/No

E3(i) If you responded YES to any of the above, please provide details:

E4. Part IV: Offences

E4(a) Article 14 (Unlawful conduct including criminal offences): Yes/No

E4(b) Article 15 (Liability of legal persons): Yes/No

E4(c) Article 16 (Prosecution and sanctions): Yes/No

E4(d) Article 17 (Seizure payments): Yes/No

E4(e) Article 18 (Disposal or destruction): Yes/No

E4(f) Article 19 (Special investigative techniques): Yes/No

E4(g) If you responded YES to any of the above, please provide details:

E5. Part V: International cooperation

E5(a) Article 20 (General information sharing): Yes/No

E5(b) Article 21 (Enforcement information sharing): Yes/No

E5(c) Article 22 (Information sharing: confidentiality and protection of information): Yes/No

E5(d) Article 23 (Assistance and cooperation: training, technical assistance and cooperation in scientific, technical and technological matters): Yes/No

E5(e) Article 24 (Assistance and cooperation: investigation and prosecution of offences): Yes/No

E5(f) Article 27 (Law enforcement cooperation): Yes/No

E5(g) Article 28 (Mutual administrative assistance): Yes/No

E5(h) Article 29 (Mutual legal assistance): Yes/No

E5(i) Article 30 (Extradition) and Article 31 (Measures to ensure extradition): Yes/No

E5(j) If you responded YES to any of the above, please provide details:

E6. Part VI: Reporting

E6(a) Article 32 (Reporting and exchange of information): Yes/No

E6(b) If you responded YES to the above, please provide details:

E7. Part VII: Institutional arrangements and financial resources

E7(a) Article 36 (Financial resources): Yes/No

E7(b) If you responded YES to the above, please provide details:

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

F1. Please provide any other relevant information, including support to countries that does not fit under the questions above.

G. Attachments

G1. Please attach any file relevant to any of the activities reported above. (File name; file size limited to 10 MB).

H. Declarations

H1. Please indicate whether your organization would like to retain its status as observer to the Meeting of Parties (MOP) to the Protocol to Eliminate Illicit Trade in Tobacco Products: Yes/No

H2. Please confirm that your organization does not receive, has not received and will not receive in the future, either directly or indirectly, any financial or other contributions or assistance from the tobacco industry or its affiliates, or any other commercial entity with a vested interest.

H2(a) Yes, I can confirm/No, I cannot confirm.

H2(b) If you responded NO, please provide details:

H3. Please confirm that neither your members nor your partners are affiliated directly or indirectly with the tobacco industry or its affiliates or those furthering the interests of the tobacco industry, or any other commercial entity with a vested interest.

H3(a) Yes, I can confirm/No, I cannot confirm.

H3(b) If you responded NO, please provide details:

H4. Please confirm that the activity of your organization is in conformity with Article 5.3 of the WHO FCTC, the 15th and 16th preambular paragraphs of the Protocol and Article 4.2 of the Protocol.

H4(a) Yes, I can confirm/No, I cannot confirm.

H4(b) If you responded NO, please provide details:

H5. Through my electronic signature, I confirm that the above information is accurate and complete, to the best of our knowledge and abilities:

(Signature of the Head of the organization.)

Annex 2

Draft decision:

Review of accreditation of nongovernmental organizations with the status of observer to the Meeting of the Parties

The Meeting of the Parties (MOP),

Recalling the 17th and 18th preambular paragraphs and Article 5.3 of the WHO Framework Convention on Tobacco Control, as well as the 15th and 16th preambular paragraphs and Article 4.2 of the Protocol to Eliminate Illicit Trade in Tobacco Products;

Having considered document FCTC/MOP/4/14,

1. DECIDES, in accordance with Rule 31.2 of its Rules of Procedure, to maintain the observer status of the following 11 nongovernmental organizations (NGOs):

- African Tobacco Control Alliance
- Campaign for Tobacco-Free Kids
- Corporate Accountability
- European Network for Smoking and Tobacco Prevention
- Global Alliance for Tobacco Control
- InterAmerican Heart Foundation
- Smoke Free Partnership
- International Union Against Tuberculosis and Lung Disease
- Tobacco Control Research Group
- Tobacco Free Portfolios
- Union for International Cancer Control

2. ADOPTS the process to facilitate the review of accreditation of NGOs with observer status to the MOP as described in paragraphs 22 and 23 of document FCTC/MOP/4/14 and the standard reporting questionnaire for use by NGOs for future reviews of accreditation contained in Annex 2 of document FCTC/MOP/4/14.

XXX plenary meeting, XX November 2025
