



Position of the international representative bodies of the aviation sector on Article 13 of the WHO Protocol to Eliminate Illicit Trade in Tobacco Products

Article 13:

No later than five years following the entry into force of this Protocol, the Meeting of the Parties shall ensure at its next session that evidence-based research is conducted to ascertain the extent of illicit trade in tobacco products related to duty free sales of such products.

Our position is as follows;

1. The evidence-based research requested in Article 13 should only be carried out when the Protocol has been fully implemented and adequate time given for changes to industry and enforcement practices worldwide. Until then it will be impossible to ascertain if any further policy actions are required. Furthermore all signatory countries must be aligned on the methodology and scope of the study.
2. This study must be carried out in a fair and objective manner with full industry participation. The aviation, maritime, and duty free retail industry has a long exemplary history of working closely with customs and enforcement bodies worldwide to ensure security of the industry's supply chain, which actively contributes to the elimination of illicit trade.
3. All the signatory bodies and our members fully support the objective of the Protocol. Our retailers suffer significant economic damage as a result of illicit trade in tobacco.
4. It should not be assumed that illicit trade is linked with duty free sales, and legitimate, law abiding retailers and transport operators should not be penalised.