



Regional Company Performance Middle East & Africa

May 2022

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1. Introduction

The Tobacco Transformation Index (“Index”), launched in September 2020, ranks the 15 largest tobacco companies across 36 countries, with company scoring calculated at the consolidated level.

Specifically, the Index assesses tobacco companies’ activities concerning:

1. Phasing out high-risk tobacco products¹;
2. Developing and responsibly offering reduced-risk² alternatives to support current users to move away from high-risk products;
3. Preventing access and marketing of such alternatives to all non-smokers and non-users of high-risk products, especially youth, and;
4. Ensuring consistency of tobacco harm reduction activities across all markets of operation, within regulatory guidelines.

To accompany this consolidated perspective, **the need was identified during stakeholder engagement sessions to better assess company performance at the country level.**

Stakeholder engagement sessions were held before and [after the publication of the first Index](#) in 2020, and again in the [summer of 2021](#). Stakeholders consulted were primarily from one of two groups: the investment community and researchers. Country-level regulation was a recurring theme. Stakeholders highlighted that local regulation, especially in terms of reduced-risk product (RRP – see Appendix for definitions) legality of sale and taxation, has a significant impact on tobacco company activity. A number of stakeholders noted that companies should be assessed by the Index for the actions and outcomes under their control, rather than the result of external factors, while taking the country-level nicotine and tobacco regulatory context into account.

Stakeholders also noted that companies should be evaluated in terms of their activity in low-middle income countries (LMICs) versus high-income countries (HICs). Some tobacco companies are making progress towards tobacco harm reduction in HICs, where they stand to profit to a greater degree. However, they appear hesitant toward harm-reduction activities in LMICs, where the health urgency is often the greatest, but the potential financial gains are not. Others stressed that companies should be assessed on their progress towards making RRP available at an affordable price point to consumers in LMICs and to economically disadvantaged consumers in HICs.

Therefore, it was determined that additional analysis at the country level could spotlight specific actions by individual companies in certain markets. This report series was designed to address this stakeholder feedback.

¹ See [Product Scope](#) section within the Appendix (Page 25) for definition of “high-risk” products for the purposes of this report.

² See [Product Scope](#) section within the Appendix (Page 25) for definition of “reduced-risk” products for the purposes of this report.

Companies should be assessed with the country-level context taken into consideration.

Scope

This report is the second in a series of four reports which will assess the 15 tobacco companies in the Index at a country level. The analysis will be published across a series of four reports for ease of reading. The 36 countries assessed as part of the Index account for approximately 85% of the current global population of adult smokers. The first report was focused on 13 countries in the Asia Pacific region. This second report focuses on the Middle East and Africa region, and covers the six countries in the Tobacco Transformation Index from that region:

1. Egypt
2. Ethiopia
3. Kenya
4. Nigeria
5. Saudi Arabia
6. South Africa

The remaining 17 countries, which form part of the global Index, will be assessed in one of the two subsequent regional reports (the Americas and Europe).

Report structure & objectives

The first section of this report **describes the nicotine and tobacco regulatory context of each country**. The Index recognizes that the regulatory context varies significantly from country to country and that this variation affects individual companies' strategies, performance, and ultimate pathways to industry transformation.

This report does not generally consider non-regulatory factors as part of the country context assessment (except for a country's disposable income per capita). The Index is evolving, and it is envisioned that non-regulatory factors will play a greater role in future analysis and reports. In terms of trade, this and all reports in the series address products legally marketed and sold, and officially offered by companies. Products in de-facto circulation, including illicit products, are not addressed in this report series.

The second section of this report **assesses company performance** through the lens of the country-level nicotine and tobacco regulatory context. In doing so, this report builds further on the consolidated or global Index by covering the nuances of company performance at a country level.

The purpose of this report is to provide observations of company activity at a country level, within that country's nicotine and tobacco regulatory context. The report does not provide

recommendations to companies but focuses rather on observations. A separate report may be developed after this series, offering recommendations as to how companies can go further in individual countries to advance the harm reduction agenda.

2. Summary

Underdeveloped or uncertain regulatory environments correlate with low company reduced-risk product presence

Across the six Middle Eastern and African markets under review, a range of reduced-risk products are legal in most countries. The key exception to this pattern is Ethiopia, where only Swedish-style snus and NRT products are allowed. In the other five countries, while several products are legal, there are notable restrictions. In Egypt, for example, cartridges and e-liquids were banned until December 2021, when the Egyptian Ministry of Health and Population agreed to lift the ban³. Up until that point, cartridges and e-liquids were widely available through the informal market in the country. Heated tobacco products were made legal in Egypt earlier in 2021⁴, resulting in product launches for both BAT (Glo) and PMI (IQOS).

In Kenya, regulatory uncertainty led to British American Tobacco (BAT) launching, and then subsequently withdrawing, its tobacco-free nicotine pouch brand Lyft from the market, following a regulatory dispute in late 2020. At the time of writing, BAT has stated that it is engaging with the authorities in Kenya to support a re-entry of the category.⁵ In other countries, there is a lack of legislation regarding reduced-risk products. In South Africa, for example, e-vapor products are not covered by the Tobacco Products Control Act, and as such, there are no restrictions on marketing. The National Government of South Africa is currently proposing the Control of Tobacco Products and Electronic Nicotine Delivery Systems Bill, which would regulate vapor products in the same way as cigarettes. It is not yet clear, however, whether the bill will be enacted, effectively creating regulatory uncertainty.

Lack of reduced-risk products in low-income countries

The two countries in which companies under review offer reduced-risk products (Saudi Arabia and South Africa) have relatively high levels of disposable income, in comparison to the other countries in the region. Saudi Arabia has the highest level of disposable income, and South Africa has the third highest (marginally behind Egypt, where legal restrictions, until recently, represented the most significant barrier to offering reduced-risk products). In contrast, companies do not currently offer any reduced-risk products in Kenya or Nigeria, two countries where average disposable income levels are relatively low (globally and versus the other countries under review in the region).

International companies maintain high-risk presence

The leading international cigarette manufacturers have maintained their presence of high-risk products within the Middle East and Africa region. While some have lost cigarette share in specific markets, for example as a result of the temporary ban on all tobacco and vaping

³Almal news. Heated Tobacco in Egypt. October 27, 2021. Accessed May 5, 2022.

<https://almalnews.com/%D8%A7%D9%84%D8%B4%D8%B1%D9%82%D9%8A%D8%A9-%D9%84%D9%84%D8%AF%D8%AE%D8%A7%D9%86-%D8%AA%D9%81%D8%A7%D8%B6%D9%84-%D8%A8%D9%8A%D9%86-%D8%B9%D8%B1%D8%B6%D9%8A%D9%86-%D8%B5%D9%8A%D9%86%D9%89>

⁴Veto Gate. Tobacco legislation in Egypt. March 8, 2021. Accessed May 5, 2022. <https://www.vetogate.com/4298625>

⁵Business Daily Africa. BAT Lobbies to Resume Nicotine Pouch Sales. April 19, 2022. Accessed May 5, 2022.

<https://www.businessdailyafrica.com/bd/corporate/companies/bat-lobbies-to-resume-nicotine-pouch-sales-3786400>

products in South Africa between March and August 2020, or as a result of competitive activity, none have lost cigarette share across all operating markets. Product launches, promotions, increases in product offer and acquisitions have all taken place in the cigarette category in the countries under review over the last five years.

3. Nicotine & Tobacco Regulatory Context

Purpose

When assessing a nicotine and/or tobacco company's contribution toward accelerated industry transformation, it is necessary to consider the regulatory country-level context in which that company is operating. Certain factors, as highlighted below, play a role in a company's ability to offer reduced-risk products to help transition smokers from combustible to non-combustible forms of nicotine consumption, as part of the long-term goal of ending smoking completely.

Criteria

The following set of metrics has been incorporated into the country context analysis:

1. Nicotine and Tobacco Regulatory Context

The Index recognizes that the context in which companies operate varies significantly from country to country and that this variation affects individual companies' strategies, performance and ultimate pathways to industry transformation. While this variation should not limit the industry in pursuing tobacco harm reduction strategies, it should be considered when conducting a wider analysis of the context in which companies operate.

- a. **Reduced-Risk Product Legality of Commercialization:** The legal status of reduced-risk products is a crucial factor to consider. Ultimately, tobacco companies cannot offer reduced-risk products in countries where the sale of those products is banned or heavily restricted. This analysis therefore takes into account the legal status of reduced-risk products when assessing company performance at a country and regional level.
- b. **Reduced-Risk Product Taxation:** The overall tax burden applicable to reduced-risk products in a country is another key factor to consider. This analysis considers the overall tax burden of reduced-risk products in a country, and how this compares with the tax burden for high-risk products.
- c. **Ability to Market Reduced-Risk Products:** In certain instances, despite the legality of reduced-risk product of commercialization, tobacco companies are unable to market, or are severely limited in the extent to which they can market, reduced-risk products, making it challenging to transition smokers to reduced-risk products as a means of harm reduction.

2. **Disposable Income Per Capita:** Economics is another factor for consumers to consider in transitioning to reduced-risk alternatives if they are unable to quit consumption of high-risk products. Disposable income per capita impacts the ability of smokers in a country to afford reduced-risk products. This analysis considers the average disposable income levels in a country as part of the overall country-level context.

Approach

Each of the 36 countries included in the global Tobacco Transformation Index was ranked based on each of the below metrics.

1. Nicotine and Tobacco Regulatory Context

- a. **Reduced-Risk Product Legality of Commercialization:** The number of reduced-risk products which can be legally sold, out of the six categories defined as part of the Tobacco Transformation Index (cartridges, e-liquids, heated tobacco, non-tobacco nicotine pouches, NRT products, Swedish-style snus).
- b. **Reduced-Risk Product Taxation:** The highest-taxed reduced-risk product in the market (total tax burden, as a percentage of the average retail selling price).
- c. **Ability to Market Reduced-Risk Products:** The number of channels in which legal reduced-risk products are allowed to be marketed per country. (Advertising in press and other printed media, advertising on radio, audiovisual commercials, retail product display, advertising in stores).

2. Disposable Income Per Capita: Average disposable income levels.

The ability to legally sell reduced-risk products influences companies' actions at the country level.

Country Context & Company Activity⁶ Summary

With the above analytical framework in mind, it is important to look closely at the specific nicotine and tobacco regulatory context of each of the six countries⁷ in the Middle East and Africa region, and how tobacco and nicotine companies have responded.

Figure 1: Country Context – Key Nicotine and Tobacco Regulation, and Disposable Income

Middle East & Africa: Country Context (Key Nicotine and Tobacco Regulation)

		RRP Legality of Commercialization (out of 6)	RRP Taxation (average overall tax burden)	Ability to Market RRP (out of 30)	Disposable Income Per Capita (USD, 2020)
Ethiopia		2	-	2	617.6
Egypt		4*	17%	4	3275.1
Kenya		5	23%	20	1518.5
Saudi Arabia		5	51%	17	9157.6
Nigeria		6	27%	14	1514.6
South Africa		6	19%	20	3060.2

High Barrier	Medium Barrier	Low Barrier
		

Source: Tobacco Transformation Index 2021 Country Fact Sheet, data to end 2020

*Egypt legalized the remaining two reduced-risk product categories, e-liquids and cartridges, in December 2021

Approach: See Appendix – Country Context Approach, for more details

Note: Countries are ordered by lowest to highest number of legal reduced-risk products

⁶ This analysis focuses on official company presence in each country at the time of writing. Brands in de facto, and/or illicit, circulation in a country are not included, as the analysis is focused on official company activity.

⁷ Countries are ordered alphabetically in this summary

Egypt

Country Context

Until December 2021, e-liquids and cartridges were banned in Egypt, when the Ministry of Health and Population agreed to lift the ban, and Eastern Co was allowed to obtain a license to manufacture electronic cigarettes⁸. As of the time of writing, United Tobacco Company (Philip Morris Egypt) also submitted an application for a license to produce tobacco products in Egypt⁹. The other four reduced-risk product categories are legal, although in 2020 market sizes were negligible. Retail display for the legal reduced-risk product categories is permitted, but all other marketing is banned. Disposable income levels are relatively high in Egypt compared to other countries under review in the region.

Company Activity

None of the companies under review have a significant presence in reduced-risk products in Egypt, although IQOS (PMI) and Glo (BAT) heated tobacco products were recently launched in 2021 in the market. BAT, Eastern, Imperial, JTI, PMI and Swisher all sell high-risk products in Egypt.

Ethiopia

Country Context

Swedish-style snus and NRT products are legal in Ethiopia, while other reduced-risk categories are banned. Retail product display and advertising in store are unrestricted for NRT products, but all other marketing activity for NRT products and Swedish-style snus is banned. Market sizes in the country for these categories in 2020 were negligible. Disposable income levels are the lowest of the countries under review.

Company Activity

None of the companies under review sell reduced-risk products in Ethiopia. BAT, JTI and PMI sell high-risk products in the country.

Kenya

Country Context

Five reduced-risk product categories are legal in Kenya, while non-tobacco nicotine pouches are illegal. Marketing of Swedish-style snus is restricted, but for all other legal reduced-risk categories, marketing is unrestricted. Kenya has among the lowest levels of disposable income in the region. Taxation was first introduced for e-vapor products in 2017 and was increased in 2019. Taxation rates for e-vapor products are comparable with those of high-risk products in Kenya (33.8% total tax burden).

Company Activity

None of the companies under review sells reduced-risk products in Kenya. The government banned non-tobacco nicotine pouches in October 2020, which led to BAT withdrawing its Lyft brand. BAT and PMI sell high-risk products in the country.

⁸Masrawy news. Production licenses. December 07, 2021. Accessed May 9, 2022

https://www.masrawy.com/news/news_economy/details/2021/12/7/2137054/%D8%B1%D8%AE%D8%B5%D8%A9-%D8%A5%D9%86%D8%AA%D8%A7%D8%AC-%D8%A7%D9%84%D8%B3%D8%AC%D8%A7%D8%A6%D8%B1-%D9%83%D9%8A%D9%81-%D9%8A%D8%B1%D9%89-%D9%85%D8%B5%D9%86%D8%B9%D9%88%D9%86-%D9%83%D8%B1%D8%A7%D8%B3%D8%A9-%D8%A7%D9%84%D8%B4%D8%B1%D9%88%D8%B7-%D8%A7%D9%84%D8%AC%D8%AF%D9%8A%D8%AF%D8%A9-#Details-RelatedArticle

⁹ Eastern Co SAE. Decisions of the Board of Directors' Meeting. April 14, 2022. Accessed May 9, 2022.

https://www.egx.com.eg/downloads/Bulletins/276739_3.pdf

Nigeria

Country Context

All six reduced-risk product categories are legal in Nigeria. The marketing of e-liquids and cartridges is unrestricted. Marketing for other reduced-risk product categories is restricted, but not completely banned. Nigeria has among the lowest levels of disposable income in the region.

Company Activity

None of the companies under review sells reduced-risk products in Nigeria. BAT, Imperial, JTI, KT&G, PMI and Swisher sell high-risk products in Nigeria.

Saudi Arabia

Country Context

Swedish-style snus is illegal in Saudi Arabia, while the other five reduced-risk product categories are permitted. Marketing restrictions apply to NRT products and non-tobacco nicotine pouches, while the marketing of other reduced-risk product categories is unrestricted. Relatively high taxation levels, comparable to those of high-risk products (63% total tax burden) represent a barrier to reduced-risk-products, but this is mitigated to a certain degree by the highest level of disposable income in the region.

Company Activity

BAT and PMI sell both reduced-risk and high-risk products in Saudi Arabia. Imperial, JTI and Swisher sell high-risk products in the country but have no reduced-risk presence.

South Africa

Country Context

All six reduced-risk product categories are legal in South Africa. Swedish-style snus and heated tobacco are subject to certain marketing restrictions, while marketing of the other categories is unrestricted. Tax rates are relatively low on reduced-risk products (compared to high-risk product taxation in the market), while disposable incomes are relatively high for the region. From March to August 2020, in a measure aimed at tackling the spread of COVID-19, South African authorities placed a [temporary ban](#) on all tobacco and vaping products, which led to stockpiling, as well as an increase in the sale of illicit tobacco products.

Company Activity

BAT and PMI sell both reduced-risk and high-risk products in South Africa. Imperial, JTI and Swisher sell high-risk products in the country but have no reduced-risk presence. JTI sells high-risk products and, through the e-cigarette brand E-Lites (manufactured by Zandera Ltd, which JTI acquired in 2014) also has a minor presence in reduced-risk products.

4. Company Performance at Country Level

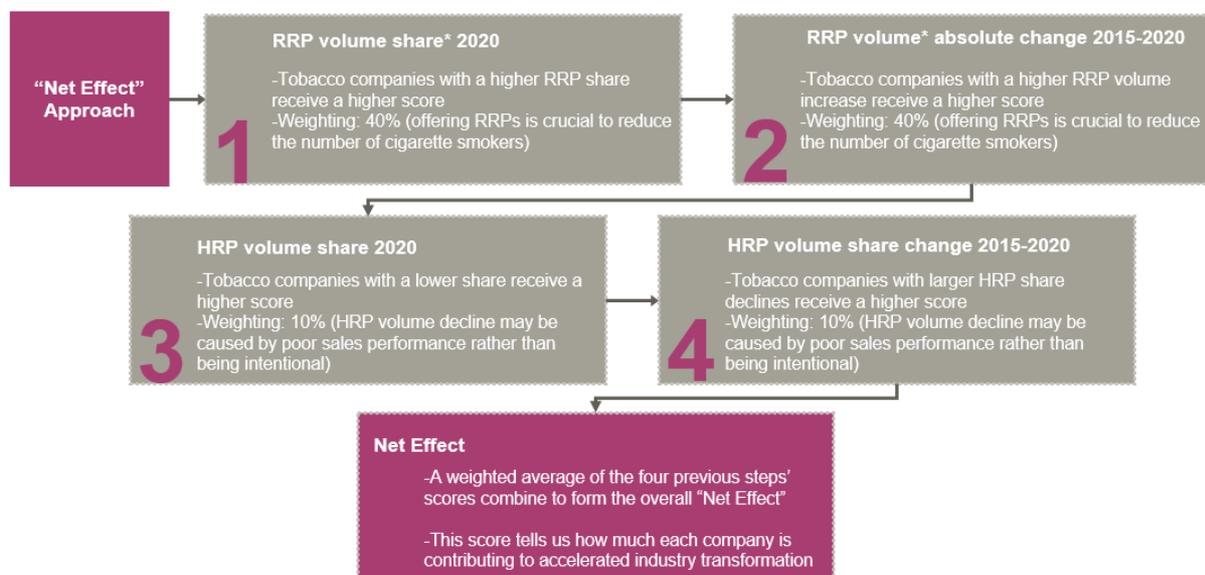
Purpose

An analysis of company performance at the country level relative to peers gives an indication of a company’s proactive harm-reduction strategies, as it enables a comparison within the same operating environment. This analysis strategy mitigates to a certain degree (although does not fully eliminate) the impact of circumstance and historic geographic footprints, compared to analysis aggregated at a global level. The analysis allows us to understand what types of RRP (if any) companies are offering, in markets where those products can be sold legally.

Note that this report does not generally consider non-regulatory factors as part of the country context assessment (except for of a country’s disposable income per capita).

To achieve a direct comparison across companies, a “Net Effect” score is calculated from a set of criteria (see below), which measures a company’s impact on harm reduction.

Criteria and Scoring Approach – Net Effect



RRP = Reduced-risk product / HRP = High-risk product. See appendix for category definitions.

Source of data used: Tobacco Transformation Index / Euromonitor Passport May 2021, data to end 2020

*RRP/HRP Volume: Per Stick Equivalent conversion and Risk Spectrum weighting applied to sales figures taken from Euromonitor Passport. See appendix for further details.

See Appendix for further detail on approach to scoring

Company Performance Summary

British American Tobacco (BAT)¹⁰ had a significant reduced-risk presence in three of the Middle Eastern and African countries under review in 2020, although its presence declined to two when non-tobacco nicotine pouches became illegal in Kenya in October 2020. The two countries in which BAT sells reduced-risk products are Saudi Arabia and South Africa, principally through cartridges, although the company also launched heated tobacco products in South Africa. In 2021, BAT launched its Glo heated tobacco product in Egypt. In high-risk products, BAT has a presence in all six countries under review, but in 2020 only increased its market share of cigarettes in one market – Kenya.

Eastern CO SAE (Eastern) sells high-risk products in Egypt, where it is the leading manufacturer of cigarettes and other high-risk tobacco products. Eastern does not currently sell reduced-risk products, although has indicated that it is considering options to bring heated tobacco to the market by mid-2022¹¹.

Imperial Brands (Imperial) in 2020 did not sell reduced-risk products in the countries under review, but sold high-risk products in Egypt, Nigeria, Saudi Arabia and South Africa. Of the countries under review in the region, Saudi Arabia is the company's largest market, where it registered a 20.5% volume share in cigarettes in 2020. Egypt is the only other market in which Imperial sells cigarettes, while it sells fine cut tobacco in South Africa and cigars in Nigeria.

JTI in 2020 sold high-risk products in Ethiopia, Nigeria, Saudi Arabia and South Africa. With the exception of South Africa, JTI increased its volume share of cigarettes in each of these markets in 2020. JTI offers reduced-risk products in South Africa through e-cigarette brand E-Lites, whose manufacturer, Zandera Ltd, was acquired by JTI in 2014.

KT&G sells high-risk products (cigarettes) in one country under review in the region, Nigeria.

PMI, at the end of 2020, had a presence in reduced-risk products through heated tobacco in two of the Middle Eastern and African countries under review: Saudi Arabia and South Africa. More recently, in 2021, PMI launched its IQOS heated tobacco product in Egypt as well. PMI is present in high-risk products in all six countries under review. Its share of cigarettes sales increased in Saudi Arabia and Egypt in 2020, while it declined or stagnated in the other countries under review.

Swisher International is not present in reduced-risk products in any of the Middle Eastern and African countries under review. It sells high-risk products in four countries (Egypt, Nigeria, Saudi Arabia and South Africa) through cigars, cigarillos and pipe tobacco.

¹⁰ Companies are ordered alphabetically in this summary

¹¹Almal news. Heated Tobacco in Egypt. October 27, 2021. Accessed May 5, 2022.

<https://almalnews.com/%D8%A7%D9%84%D8%B4%D8%B1%D9%82%D9%8A%D8%A9-%D9%84%D9%84%D8%AF%D8%AE%D8%A7%D9%86-%D8%AA%D9%81%D8%A7%D8%B6%D9%84-%D8%A8%D9%8A%D9%86-%D8%B9%D8%B1%D8%B6%D9%8A%D9%86-%D8%B5%D9%8A%D9%86%D9%89>

A full assessment of each company's activities in the region can be found on the following pages.

Company Assessment¹²: British American Tobacco Plc (BAT)

Middle East & Africa Harm Reduction Summary: British American Tobacco (BAT)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 South Africa	Yes	Yes	#1 (of 5)	6
 Saudi Arabia	Yes	Yes	#2 (of 4)	5
 Ethiopia	Yes	No	-	2
 Egypt	Yes	Recently launched	-	4
 Kenya	Yes	No	-	5
 Nigeria	Yes	No	-	6

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Recent Product Launches: BAT's Glo heated tobacco product was launched in Egypt in 2021. Sales are not yet significant enough to be considered in the Net Effect score.

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

BAT offers reduced-risk products in two markets and recently launched in a third market

As of the end of 2020, BAT sold reduced-risk products in two of the markets under review – Saudi Arabia and South Africa. BAT also had a minor presence in Kenya through its Lyft brand in the non-tobacco nicotine pouches category, but it had to suspend sales after the government banned the category in October 2020. In addition, in 2021, BAT launched its Glo heated tobacco product in Egypt.

In South Africa, BAT ranked first in terms of harm reduction efforts, primarily through its presence in e-liquids, where in 2020 it recorded a 78.1% value share. This position was established through the 2019 acquisition of local company Twisp (Pty) Ltd and its brand of vaping products. In 2020, BAT also established a minor presence in heated tobacco through its Neo brand (consumables designed to be used in conjunction with its Glo device), which recorded a 0.4% volume share in that year.

BAT ranked second in harm reduction in Saudi Arabia, following the launch in August 2020 of Vuse, where it is the first mover in the cartridges category.

BAT sells high-risk products in all markets

BAT is the market leader in cigarettes in both South Africa and Saudi Arabia but saw its market share fall in both countries in 2020. In South Africa, BAT's volume share in cigarettes was

¹² Companies assessed in alphabetical order

62.0%, having fallen from 66.5% in 2019. The impact of COVID-19, and the subsequent ban (from March to August 2020) on all tobacco and vaping products, led to increased demand for cheaper local brands, as well as illicit tobacco products. BAT's share in Saudi Arabia fell from 47.2% in 2019 to 44.2% in 2020, where demand for cheaper products strengthened. In response, BAT introduced Pall Mall Classic Red (8mg) and Pall Mall Classic Blue (6mg) in Saudi Arabia, which were positioned at the lowest price point in cigarettes (SAR16 per pack of 20 sticks). BAT still lost share to competitors which discounted products.

BAT has a presence in high-risk products in the other four countries under review in the region. In Ethiopia, however, BAT's sales are minimal, with Rothmans being imported and distributed by National Tobacco Enterprise Ethiopia SC (owned by JTI). In Kenya and Nigeria, BAT is the market leader in cigarettes, and ranks third in Egypt.

Kenya was the one of six markets where BAT increased its share in cigarettes in 2020, reaching 81.7%. Its sales grew as demand increased for economy products, such as its Rooster and Sportsman brands.

In Nigeria, BAT's cigarette market share fell marginally, from 77.8% in 2019 to 77.6% in 2020, as demand for cheaper brands grew. There were, however, pockets of growth for premium brands, particularly in flavors, and BAT launched a number of innovations, such as Benson & Hedges Switch and the 2019 release of Rothmans Indigo.

BAT has a relatively small volume share of cigarettes in Egypt, and its share has been in slow decline, having been 5.7% in 2016 and falling to 5.1% in 2020.

Company Assessment: Eastern CO SAE (Eastern)

Middle East & Africa Harm Reduction Summary: Eastern Co (SAE)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Egypt	Yes	No	-	4

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

Eastern leads high-risk sales in Egypt

Eastern, which is 51% owned by the Egyptian government, is only present in Egypt. It dominates high-risk product sales in the country and does not currently sell reduced-risk products. In 2020, Eastern held a 79.4% volume share of cigarettes, having consistently increased its sales and market share since 2017, and having started expanding production in 2020. Eastern has indicated that it will focus future efforts on expanding into flavored cigarettes, following the success of its flavored molasses products.

Eastern is also the market leader in cigars and cigarillos, with a volume share of 76.2%. Actual volume sales of cigars and cigarillos are very small in Egypt, however, and have generally been in decline since 2016.

Until December 2021, e-vapor products were illegal in Egypt; at which point the Egyptian Ministry of Health and Population confirmed the lifting of the ban on these reduced-risk products. E-liquids and cartridges can now be imported and sold legally, must conform to Egyptian product standards, and are subject to VAT. Heated tobacco was also recently made legal in Egypt, and Eastern has indicated it is considering plans to launch a heated tobacco product by mid-2022¹³.

¹³ Almal news. Heated Tobacco in Egypt. October 27, 2021. Accessed May 5, 2022.

<https://almalnews.com/%D8%A7%D9%84%D8%B4%D8%B1%D9%82%D9%8A%D8%A9-%D9%84%D9%84%D8%AF%D8%AE%D8%A7%D9%86-%D8%AA%D9%81%D8%A7%D8%B6%D9%84-%D8%A8%D9%8A%D9%86-%D8%B9%D8%B1%D8%B6%D9%8A%D9%86-%D8%B5%D9%8A%D9%86%D9%89>

Company Assessment: Imperial Brands Plc (Imperial)

Middle East & Africa Harm Reduction Summary: Imperial Brands Plc (Imperial)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Egypt	Yes	No	-	4
 Nigeria	Yes	No	-	6
 Saudi Arabia	Yes	No	-	5
 South Africa	Yes	No	-	6

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

Imperial's presence in the region is limited to high-risk products

Imperial does not have a presence in reduced-risk products in the Middle Eastern and African countries under review, while it sells high-risk products in Egypt, Nigeria, Saudi Arabia and South Africa.

Saudi Arabia is Imperial's largest high-risk products market, where it ranked third in cigarettes in 2020, with a volume share of 20.5%; up significantly from 8.8% in 2018. The company's West and Davidoff brands have driven its growth, although Davidoff's sales stagnated in 2020. In order to stimulate sales, the brand offered free gifts with purchase. For example, Davidoff Evolve included a free cigarette case containing a lighter. This gift was available to consumers purchasing four packs. Imperial also sells cigars and cigarillos in Saudi Arabia.

In Egypt, Imperial is the fifth-ranked cigarette player, with a 1.3% volume share in 2020, down from 1.7% in 2016. In 2020, it was the market leader in fine cut tobacco, with a volume share of 54.1%; however, the overall category is very small. In cigars, Imperial is a minor player, with a market share of less than 1%.

Imperial's presence in South Africa is restricted to fine cut tobacco, where it ranked second in 2020, with a 34.4% volume share. The category remains small compared with cigarettes in the market, and shrank in 2020, owing to the government's temporary (March to August 2020) ban on all tobacco and vaping products, in response to COVID-19.

In Nigeria, Imperial is the market leader in cigars, with a 55.6% volume share in 2020, although this equates to sales of just 20,000 cigars.

Company Assessment: Japan Tobacco Inc (JTI)

Middle East & Africa Harm Reduction Summary: Japan Tobacco Inc (JTI)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Egypt	Yes	No	-	4
 Ethiopia	Yes	No	-	2
 Nigeria	Yes	No	-	6
 Saudi Arabia	Yes	No	-	5
 South Africa	Yes	No	-	6

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

JTI primarily sells high-risk products in the region

Other than e-cigarette product E-Lites (whose manufacturer Zandera Ltd was acquired by JTI in 2014, with negligible sales in 2020) JTI does not sell reduced-risk products in the Middle Eastern and African countries under review. JTI sells high-risk products in five of the markets, with Kenya being the exception.

Ethiopia is JTI's largest high-risk products market, where it has a monopoly on cigarette distribution following its 2017 acquisition of a controlling share of National Tobacco Enterprise Ethiopia SC. Following the acquisition, cigarette volume sales increased by 31.1% between 2017 and 2020, driven by existing locally produced brands, but also from JTI importing its international brand Winston. JTI-owned brands account for over 99% of cigarette volume sales in the country, but it also imports and distributes very small volumes of other brands, such as BAT's Rothmans and PMI's Marlboro.

Nigeria is JTI's second biggest market in cigarette volume terms, where it increased its volume share from 14.5% in 2019 to 14.7% in 2020. In Egypt, JTI's cigarette volume sales are similar to those in Nigeria in actual volume terms, but JTI is ranked fourth, with its market share falling in 2020 to 2.4%. JTI is, however, the market leader in pipe tobacco, a significant category in Egypt, where it had a 36.8% volume share in 2020.

In Saudi Arabia, JTI is the fourth largest cigarette player and increased its volume share from 4.2% in 2019 to 5.1% in 2020. It is also the largest player in pipe tobacco, increasing its market share from 66.5% in 2019 to 66.8% in 2020.

JTI is the second largest cigarette player in South Africa, with a 2020 volume share of 11.6%. In 2020, its volume sales declined as a result of the temporary (March to August 2020) ban on all tobacco and vaping products. However, JTI gained market share as a result of it not increasing its prices once the ban ended, contrary to the actions of several of its competitors.

Company Assessment: KT&G Corp (KT&G)

Middle East & Africa Harm Reduction Summary: KT&G Corp (KT&G)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Nigeria	Yes	No	-	6

*Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).
Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.
Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).*

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company’s actions in a market. Some, but not all, of these factors are assessed in the analysis below.

KT&G’s presence is limited to cigarettes in Nigeria

KT&G is not present in reduced-risk products in the Middle Eastern and African countries under review, but does sell cigarettes in Nigeria, where it is the third-ranked player. The company established a presence in Nigeria in 2014, where its volume share of cigarettes in 2020 reached 4.1%. Its activities in 2020 included the launch of Esse Change, a cigarette brand with different flavor capsules.

Company Assessment: Philip Morris International (PMI)

Middle East & Africa Harm Reduction Summary: Philip Morris International (PMI)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Saudi Arabia	Yes	Yes	#1 (of 4)	5
 South Africa	Yes	Yes	#2 (of 5)	6
 Egypt	Yes	Recently launched	-	4
 Ethiopia	Yes	No	-	2
 Kenya	Yes	No	-	5
 Nigeria	Yes	No	-	6

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Recent Product Launches: PMI's IQOS heated tobacco product was launched in Egypt in 2021. Sales are not yet significant enough to be considered in the Net Effect score.

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

PMI has a reduced-risk presence in two countries in the region and recently launched in a third market

As of the end of 2020, PMI offered reduced-risk products in two of the Middle Eastern and African countries under review: Saudi Arabia and South Africa. More recently, in 2021, PMI launched its IQOS heated tobacco product in Egypt. PMI offers high-risk products in all the countries under review in the region.

In Saudi Arabia, PMI launched its IQOS heated tobacco brand in 2020, and it is currently the only player in the category. In South Africa, PMI has been present in heated tobacco through IQOS since its launch in 2017. Despite a temporary ban on all tobacco and vaping product sales during March to August 2020 in South Africa, in response to COVID-19, IQOS still managed to increase its sales in 2020 compared to 2019. Since its initial launch, when distribution was limited to specialist tobacco stores, IQOS is now available through standalone kiosks in most major shopping centers throughout South Africa.

PMI sells high-risk products in all the countries under review in the region

Egypt is PMI's biggest cigarette market in volume sales terms, where it is ranked second, with a market share of 9.4% in 2020, having consistently risen from 9.0% in 2017.

Saudi Arabia is PMI's second biggest cigarette market in the region, where it recorded a 29.4% volume share in 2020. This, however, has fallen significantly since 2016, when it recorded a market share of 54.6%. Between 2019 and 2020, its market share stabilized, although market

conditions were challenging, with consumers being particularly price conscious. In response, PMI reduced the price of its Parliament range from SAR28 to SAR19 per pack of 20 sticks.

In South Africa in 2020, PMI ranked third in cigarettes with a market share of 9.3%. This rose from 7.5% in 2016, although its share stagnated between 2019 and 2020. PMI is the market leader in pipe tobacco in South Africa, with an 81.6% volume share in 2020. Its share has increased since 2016, as its volume sales decreased as the category declined. In US-style moist snuff (“dip”), PMI is the second largest player, with a volume share of 40% in 2020, while it is ranked third in fine cut tobacco (a minor category in the country compared with cigarettes).

PMI is ranked fourth in cigarettes in Nigeria, with a 1.7% volume share in 2020. In Kenya, PMI is ranked third in cigarettes, but its share declined to 1.7% in volume terms in 2020, from 4.3% in 2016.

In Ethiopia, PMI’s Marlboro cigarette brand is available in retail outlets, but it is imported and distributed by National Tobacco Enterprise Ethiopia SC (owned by JTI) and its volume sales are negligible.

Company Assessment: Swisher International Group Inc (Swisher)

Middle East & Africa Harm Reduction Summary: Swisher International Group Inc (Swisher)

Country	Company HRP Presence	Company RRP Presence	Net Effect Ranking	Legal RRP Categories
 Egypt	Yes	No	-	4
 Nigeria	Yes	No	-	6
 Saudi Arabia	Yes	No	-	5
 South Africa	Yes	No	-	6

Source: Tobacco Transformation Index 2021 Country Fact Sheet, and Euromonitor Passport (published May 2021, data to end 2020).

Net Effect Ranking: Ranking of company at a country level, versus the other 14 companies assessed as part of the analysis. A company will not register a positive Net Effect score if it does not sell RRP in a country where at least two RRP categories are legal. See Appendix – Company Assessment for more details on Net Effect scoring.

Legal RRP Categories: Reflects the number of legal RRP categories in the country (out of a total of 6).

Note: The above table focuses on regulatory factors but does not include non-regulatory factors that may limit a company's actions in a market. Some, but not all, of these factors are assessed in the analysis below.

Swisher's sales are limited to high-risk products in the region

Swisher is not present in reduced-risk products in any of the Middle Eastern and African countries under review. It sells high-risk products in four of the countries, although it is not present in cigarettes, but in the smaller categories of cigars, cigarillos and pipe tobacco.

In Egypt, Swisher is the fourth largest cigar player, with a 2.7% volume share in 2020, which equates to sales of 40,000 cigars.

Swisher is ranked second in cigars in Nigeria, with a 17.2% volume share, although this equates to just over 5,000 cigars per year.

Swisher sells cigars and cigarillos in Saudi Arabia, ranking fourth in each category. It is, however, a minor player, with its volume shares in 2020 being 0.2% in cigars and 1.0% in cigarillos.

South Africa is the company's largest market in the region. Swisher is the category leader in cigarillos, with a 39.0% volume share in 2020, which equates to 1.5 million cigarillos sold. In pipe tobacco it ranks third, with a volume share of 2.1%.

Companies not present in the Middle East and Africa region

Eight of the companies covered by the Tobacco Transformation Index do not have a presence in the Middle East and Africa: Altria Group Inc, China National Tobacco Corp (CNTC), Djarum PT, Gudang Garam Tbk PT, ITC Limited, Swedish Match AB, the Tobacco Authority of Thailand, and the Vietnam National Tobacco Corp.

5. Appendix

Country Context Approach

In Figure 1 of this report (page 8), four metrics were used to provide country context:

- **RRP Legality of Commercialization (out of 6)** – This metric represents the number of reduced-risk product categories that can be legally commercialized in a given market.
 - Cartridges
 - E-liquids
 - Heated tobacco
 - Non-tobacco nicotine pouches
 - NRT products (regulated under pharmaceutical legislation)
 - Swedish-Style snus (see page 25 “Product Scope” for full list of product definitions).
- **RRP taxation (average overall tax burden)** – The taxation rates represent the share of taxes as a percentage of the final price of each tobacco product. Taxes include tobacco-specific excise taxes, ad valorem taxes, retail taxes and other taxes, but exclude import tariffs. To calculate this figure, each country’s national tax rates are applied to the median price for each category of products. Median prices are ascertained during store audits, where product availability and pricing information is gathered during visits to various point-of-sale locations in each country, conducted between June and August 2021. For this specific metric, the tax burden of each individual (legal) reduced-risk product was taken and an average created across all reduced-risk products.
- **Ability to market RRP (out of 30)** – This metric represents the number of channels through which reduced-risk products can be legally advertised in the market. The maximum is 30, since there are six total possible reduced-risk product categories, and five channels:
 - Advertising in press and other printed media
 - Advertising on radio
 - Audiovisual commercials (e.g., cinema, YouTube, TV)
 - Retail product display
 - Advertising in stores

- **Disposable income per capita** – The average level of disposable income across the population of a country, in US dollars, in 2020.

Company Assessment Approach

Each company was assessed and given a “Net Effect” score per country, calculated as follows:

- Reduced-risk product volume share 2020 (40% weighting)
- Reduced-risk product volume absolute change 2015-2020 (40% weighting)
- High-risk product volume share 2020 (10% weighting)
- High-risk product volume share change 2015-2020 (10% weighting)

Risk Classification

“Reduced-risk products” is an aggregate category which includes sales of cartridges, e-liquids, heated tobacco, Swedish-style snus, nicotine pouches and NRT products.

“High-risk products” is an aggregate category which includes sales of cigarettes, cigars, cigarillos, fine cut tobacco, pipe tobacco, shisha, moist snuff and chewing tobacco.

Each product’s position on the risk spectrum¹⁴ was taken into account and volume sales adjusted to reflect this. Volume sales were also converted into per-stick equivalents, in order to sum up all categories to create the aggregates.

Normalization

Given the disparate nature of the four data points that are taken into account in the Net Effect score, a normalization process was implemented. Company scores across the four metrics were aggregated according to the respective weighting and normalized on a scale of 0 to 5.

A Net Effect score of 0 means that a company is not making any harm reduction progress in that market, relative to competitors. A Net Effect score of 5 means that a company is making the most progress toward harm reduction in that market, relative to competitors.

Country Context

If a company sells high-risk products in a market but does not sell any reduced-risk products it automatically registers a Net Effect score of 0, as it is regarded as not contributing to harm

¹⁴ Reduced-risk product definition based on [Relative Risk Hierarchy \(RRH\)](#) produced by Rachel Murkett et al, October 2020, based on a systematic review of the scientific literature and analysis of the best available evidence.

reduction efforts. The exception to this is in markets where no reduced-risk products are legal or if the only ones that are legal are NRT products, as in such markets it is not regarded as viable for tobacco companies to sell reduced-risk products. The reason for not taking into account the legality of NRT products is that they are commonly regarded as operating in the pharmaceutical sector, which tobacco companies have limited access to.

Net Effect Calculation: Example

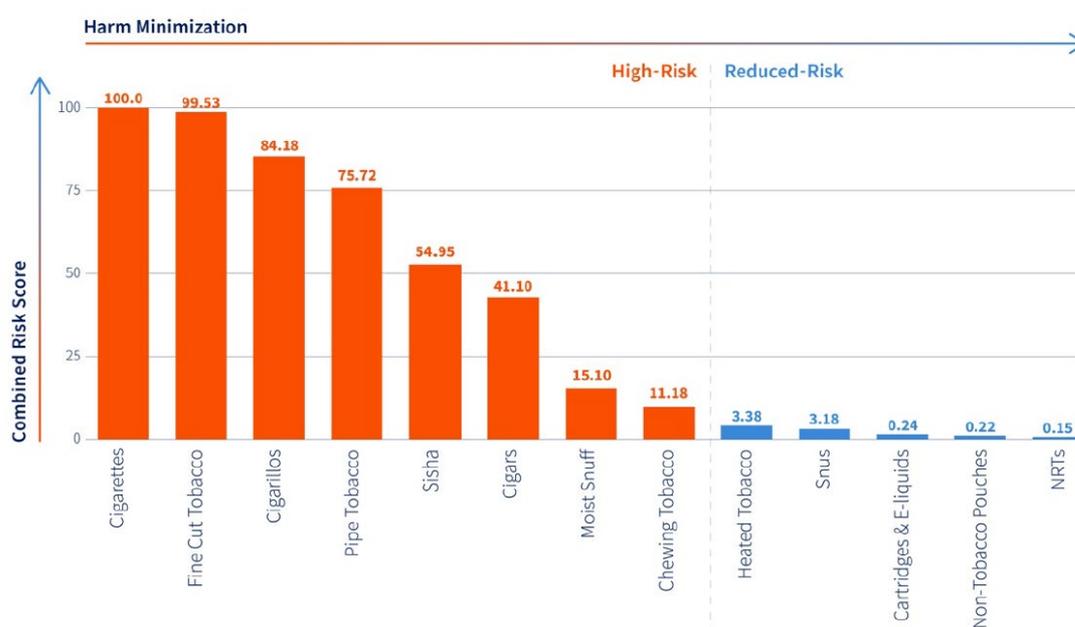
 South Africa		RRP Volume Share 2020 (%)	RRP Volume Absolute Change 2020 vs 2015 (Millions Sticks)	HRP Volume Share 2020 (%)	HRP Volume Share Change 2020 vs 2015 (Percentage Points)	Net Effect (Normalized, 0-5)
British American Tobacco Plc		77.8%	+7,084.58	45.0%	-5.4	4.5
Philip Morris International Inc		0.3%	+23.48	27.4%	+1.4	0.3
Imperial Brands Plc		n.a.	n.a.	0.2%	-1.3	0.0 (No RRP Presence)
Japan Tobacco Inc		n.a.	n.a.	8.4%	+2.9	0.0 (No RRP Presence)
Swisher International Group Inc		n.a.	n.a.	0.5%	0.0	0.0 (No RRP Presence)

Note: Showing companies included in the Index only. Excludes other tobacco companies present in the market which are not included in the Index. "N.A." means company does not offer any products in category. Japan Tobacco has a minor presence in reduced-risk products (e-cigarettes) in South Africa following its acquisition of Zandera Ltd in 2014. Sales are negligible and have been discounted for the purposes of this calculation.

Product Scope

High-risk products – Combustible or other high-risk nicotine products, which include cigarettes, cigars, cigarillos, smoking tobacco, moist snuff, and bidis, as well as traditional smokeless tobacco, such as gutkha.

Reduced-risk products – Nicotine products that are considered to be less harmful than combustible cigarettes and/or other traditional products. Products that are potentially reduced-risk include vapor products (including open and closed vaping systems and their consumables, and heated tobacco), Swedish-style snus, NRT products, and non-tobacco nicotine pouches.



Murkett, R, Rugh, M & Ding, B (2020). *Nicotine Products Relative Risk Assessment: A Systematic Review and Meta-Analysis*.

Product	Type	Definitions	Per Stick Conversion
High-Risk Products			
Chewing Tobacco	Smokeless Tobacco	Chewing tobacco consists primarily of two types of product: Asian-style and US-style, available in those specific geographic areas; and other chewing tobacco available in all other markets.	1g = 0.7 cigarettes
Cigarettes	Combustible Tobacco	The definition of cigarettes for the purposes of the Index is duty-paid, machine-manufactured white-stick products. This product category also includes hand-rolled kretek cigarettes present in Indonesia and other brands of cigarettes that do not use white paper. However, it excludes non-machine-manufactured products such as bidis/beedis (India) and papirosy (Russia), and other smoking products made with tobacco but that either do not resemble	

Product	Type	Definitions	Per Stick Conversion
		cigarettes as recognized in the US or Europe, or those that are not machine-manufactured.	
Cigarillos	Combustible Tobacco	Cigarillos are defined as miniature cigars, with a ring gauge of <29. Ring gauge is usually listed under a brand as Length/Ring and is a number indicating the circumference of the cigar's cross section and is enumerated in sixty-fourths of an inch ($64/64 = 1$ inch). Length does not matter as much in determining cigarillo versus cigars, as some cigarillos can be quite long. However, six inches (15cm) is the maximum length a cigarillo tends to be.	1 unit = 5.4 cigarettes
Cigars	Combustible Tobacco	Cigars are made of tobacco wrapped in leaf as opposed to paper. The product varies considerably in terms of price, quality, and size. Different terms are used to describe the various types of cigar, depending on the country. Cigars generally consist of three sections: the filler, the binder, and the wrapper. Cigars are defined as having ring gauges of 30 or more.	1 unit = 8.1 cigarettes
Fine Cut Tobacco	Combustible Tobacco	Fine cut tobacco is usually sold in plastic or foil pouches, metal tins or plastic tubs. It can also be flavored.	1g = 2.0 cigarettes
Moist Snuff	Smokeless Tobacco	Moist snuff is either loose or pre-portioned in miniature sized "teabag" pouches that are placed on the gum and sucked on. Moist snuff is distinguished from Swedish-style snus by its processing: moist snuff is fermented, compared to Swedish-style snus which is pasteurized (heat-treated).	1g = 1.4 cigarettes
Pipe Tobacco	Combustible Tobacco	Western-style pipe tobacco includes cut tobacco sold in packaged format for smoking in pipes and available in pouches, tins and cans.	1g = 3.2 cigarettes
Shisha	Combustible Tobacco	Middle Eastern-style water pipe tobacco is also known as "shisha", "hookah", or "nakhla". Shisha tobacco is also referred to as molasses tobacco and is moist and sweetly flavored – often with fruit.	1g = 0.3 cigarettes

Product	Type	Definitions	Per Stick Conversion
Reduced-Risk Products			
Cartridges	Vapor Products	This product category consists entirely of the sales of pre-filled pods or capsules for use with a non-cig-a-like closed system device. Currently, these are universally proprietary in nature (pods are usable exclusively with a single specific hardware device).	1ml = 13 cigarettes
E-liquids	Vapor Products	E-liquids include nicotine and non-nicotine bottled e-liquids which are decanted by the consumer into a tank for heating and inhalation. E-liquids can have different nicotine levels and flavors.	1ml = 13 cigarettes
Heated Tobacco	Vapor Products	Heat-not-burn devices include products, generally manufactured by major tobacco companies, which allow the consumer to heat rather than combust a tobacco product. Heated tobacco is the consumable element of heat-not-burn devices, which comes in the form of pods or in specially designated cigarette sticks.	1 unit = 1 cigarette
Non-tobacco Nicotine Pouches	Smokeless Tobacco	Non-tobacco nicotine pouches are manufactured in a similar way to Swedish-style snus using ingredients such as filler, flavors, stabilizers and nicotine but do not contain tobacco.	1 unit = 1 cigarette
NRT Products	NRT Products	Nicotine-based products such as gum, lozenges, patches, and inhalators used to aid smoking cessation. It also includes nicotine-based products sold as capsules, micro-tabs or sprays.	1 unit = 10 cigarettes (patches) 1 unit = 1 cigarette (non patches)
Swedish-style snus	Smokeless Tobacco	Swedish-style snus is either loose or pre-portioned in miniature sized “teabag” pouches that are placed on the gum and sucked on. Swedish-style snus is distinguished from moist snuff by its processing: Swedish-style snus is pasteurized (heat-treated), compared to moist snuff which is fermented.	1g = 1.4 cigarettes

Sources: Euromonitor International Passport’s Tobacco and Consumer Health databases, and the National Cancer Institute’s Dictionary of Cancer Terms.

Acronyms

BAT – British American Tobacco Plc

CNTC – China National Tobacco Corp

HIC – High-Income Country

JTI – Japan Tobacco Inc

KT&G – KT&G Corp

LMIC – Low-Middle Income Country

NRT – Nicotine replacement therapy

PMI – Philip Morris International Inc

RRP – Reduced-Risk Products

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