



OPEN ACCESS

# A closer look at 'Cheap White' cigarettes

Hana Ross,<sup>1</sup> Nicole Vellios,<sup>1</sup> Katherine Clegg Smith,<sup>2</sup> Jacqueline Ferguson,<sup>2</sup> Joanna E Cohen<sup>2</sup>

► Additional material is published online only. To view please visit the journal online (<http://dx.doi.org/10.1136/tobaccocontrol-2015-052540>).

<sup>1</sup>School of Economics, University of Cape Town, Cape Town, Western Cape, South Africa

<sup>2</sup>Johns Hopkins Bloomberg School of Public Health, Baltimore, Maryland, USA

## Correspondence to

Nicole Vellios, School of Economics, University of Cape Town, Middle Campus, Room 4.13, Rondebosch, Cape Town 7700, South Africa; [nicolevellios@gmail.com](mailto:nicolevellios@gmail.com)

Received 17 June 2015

Accepted 4 September 2015

Published Online First

28 September 2015

## ABSTRACT

**Background** Given the prominence of Cheap Whites in illicit tobacco discussions, we examined various definitions, market presence, brand proliferation, manufacturers, production locations, trademark ownership, prices and compliance with tax stamp and warning labels.

**Methods** Data from peer-reviewed and grey literature, newspapers, trademark registries, governments/international organisation reports, and the tobacco industry were contrasted with two visual legal requirements (tax stamps and warning labels) and prices from the Tobacco Pack Surveillance System (TPackSS).

**Results** Multiple sources identified 82 Cheap White brands and 53 manufacturers operating at least 82 production facilities. One-third of these manufacturers are in the free zones of Russia, Cyprus and the UAE. Two-thirds of the 37 Cheap White brands in the TPackSS had neither the correct health warning nor the required tax stamp in at least one country where they were purchased. Cheap Whites are on average less expensive than all other brands, but the price gap is often not as large as anecdotally reported. The cheapest Cheap White cigarettes purchased in one of the TPackSS countries irrespective of the presence of legal signs were still more expensive than the least expensive other brands satisfying both legal requirements.

**Conclusions** We confirmed that many Cheap White brands do not comply with the legal requirements in countries where they are sold, but also found that some of these cigarettes appear to be sold legally even outside their country of origin. The presence of untaxed Cheap Whites undermines tobacco tax policies, while the availability of legal cheap cigarettes is a public health concern.

## INTRODUCTION

Cheap Whites, also known as Illicit Whites, have been described as cigarettes manufactured by legitimate business enterprises with a large share of the production being sold without all applicable duties paid, usually outside the jurisdiction where they are produced.

Although the terms 'Illicit Whites' and 'Cheap Whites' are used interchangeably in the literature, we use the term 'Cheap Whites', because we determined that some of these brands are sold legally.

Cheap Whites have emerged in the illicit trade channels over the past decade and several sources indicate their growing importance on illicit markets.<sup>1–3</sup> Until now, the issue of Cheap Whites has been primarily analysed by Transnational Tobacco Companies (TTCs),<sup>4–7</sup> because it is in their interest to draw attention to illicit trade in which other companies are involved. Within this

context, an independent examination of this phenomenon is valuable.

On the illegal market, the advantage of Cheap Whites over counterfeited cigarettes is that they are not subject to legal action regarding trademarks. This lower risk translates into lower costs, which may allow the manufacturers of Cheap Whites to invest in more expensive machinery and higher quality material without risk of confiscation. As a result, the quality of Cheap Whites in terms of 'smoothness', flavour and packaging is usually better than that of counterfeits, and even motivates their counterfeiting.<sup>2</sup> This increases the competitive advantage of Cheap Whites on the market where they directly compete with TTC brands.<sup>2</sup>

The distribution of Cheap Whites closely resembles the distribution of legal cigarettes, because the sale to the first purchaser is usually legal. Some Cheap Whites then make their way to the illicit market via the subsequent purchasers, often using elaborate routings, which makes it difficult to trace the source and the country of origin.<sup>2 8</sup>

We identified only three academic articles that touched briefly on the issue of Cheap Whites. Lo *et al*<sup>9</sup> report the occurrence of Cheap White brands in Taiwan as early as 2007, while Joossens and Raw<sup>3</sup> describe the appearance of Cheap Whites in Europe in 2008 and identify them as an emerging source of illicit cigarettes. Gilmore *et al*<sup>10</sup> reported that TTCs focus heavily on the presence of Cheap Whites on the illicit cigarette market while ignoring the fact that the majority of this market is still dominated by TTC brands.

This study aims to fill the void in the literature by summarising the existing evidence and analysing new data on Cheap Whites to examine how these cigarettes are defined, their market presence, brand proliferation, sources, trademarks, compliance with local tax and warning labels laws, and their prices.

## METHODS

Information on Cheap White brands, their market presence and their production facilities were obtained via a review of the published scientific and grey literature, online news articles, trademark registries, and documents published by various international organisations, governments and the tobacco industry.

The World Customs Organization (WCO) annual reports on illegal trade covering tobacco products were particularly useful, even though only partial 2008–2011 reports and full 2012–2013 reports are publicly available.<sup>2 11–16</sup> The WCO data are primarily based on seizures in Europe. We also consulted publications of the European Commission (EC),<sup>17–19</sup> Office de Lutte Anti-Fraude (OLAF, the European Anti-Fraud Office),<sup>20</sup> Europol,<sup>21</sup>



CrossMark

**To cite:** Ross H, Vellios N, Clegg Smith K, *et al*. *Tob Control* 2016;**25**:527–531.

Interpol,<sup>22</sup> the United Nations,<sup>23</sup> and online sources of Custom Departments and agencies in charge of enforcement in the UK,<sup>24</sup> Germany,<sup>8</sup> Poland<sup>25</sup> and Malaysia.<sup>26</sup> Further, we reviewed resources provided by the International Consortium of Investigative Journalists and information published in news articles<sup>26–28</sup> to cross-verify information from other sources.

Reports commissioned by tobacco companies included the 'Project Star'<sup>5 6 29</sup> and 'Project Sun'<sup>7</sup> reports that analyse illicit cigarette consumption in the European Union (EU), the Asia-11<sup>4</sup> and the Asia-14<sup>30</sup> reports that focus on illicit cigarette consumption in Asia, as well as reports of the UK Tobacco Manufacturers' Association (TMA)<sup>31</sup> and the International Tax and Investment Centre.<sup>32</sup>

For the purpose of this report, we rely on international organisations, governments and the tobacco industry to identify brands as either Cheap Whites or Illicit Whites. Therefore, non-Cheap Whites are brands that have not been identified as Cheap Whites or Illicit Whites in any of the data sources described above. These can also include brands of major tobacco companies (sold either with or without all required taxes paid) and counterfeit products.

Information on the manufacturer, prices and compliance with local tax stamp and warning labels for 14 low income and middle income countries across five of the six WHO regions was obtained from the Tobacco Pack Surveillance System (TPackSS), a database developed by the Institute for Global Tobacco Control at the Johns Hopkins Bloomberg School of Public Health. TPackSS data were generated through a 2013 systematic purchase of cigarette packs and consist of images of cigarette packs, and data on price, place of purchase, manufacturer, presence of tax stamp and health warnings, among others.<sup>33</sup> The purpose of the data collection was not to study Cheap Whites, but as it includes all brands available for purchase via a broad sample of vendors in three diverse cities in each country (and 5 cities in China), it captured some of them. Two features of a pack determined whether it was licit or illicit: the presence of the correct health warning and the correct tax stamp identified a legal pack, whereas the absence of either of these features identified an illegal pack. In TPackSS countries that either did not use tax stamps (China, the Philippines and Mexico) or did not apply them on all packs at the time of data collection (Egypt), the legal/illegal status was determined based entirely on the health warning.

The price per pack was normalised to 20 sticks per pack and the local currency was converted to US\$ using XE.com using the conversion rate on the date of purchase. In order to account for the non-normal distribution of cigarette prices, we employed geometric means to compare prices across cigarette types (eg, legal, illegal, Cheap Whites, non-Cheap Whites) within a specific country.

The main source of information on the brand ownership of TPackSS packs was the online trademark registries managed by the European Trade Mark and Design Network and by the World Intellectual Property Organization.<sup>34 35</sup> If the brand owner was not identified using these sources, we conducted a general Google search using information from TPackSS such as the brand name, the country of origin and the name of the manufacturer available on most packs. We cross-verified information obtained via a Google search using at least two different sources of information. In cases of multiple brand ownership, we recorded all brand owners associated with the particular brand.

Given the bias of TTCs in evaluating the Cheap Whites phenomenon, we analysed the data from the non-industry and the

industry sources separately. We refer to the original source of the information independent of who disseminated it.

## RESULTS

We found the term 'Cheap/Illicit Whites' first being used in the WCO 2009 report,<sup>13</sup> while two later sources reported that the term was created by the tobacco industry.<sup>3 21</sup> Since 2009, many government institutions, international organisations and TTCs have come up with their own definitions of the phenomenon. Online supplementary appendix 1 provides an overview of these definitions and how they evolved over time. Online supplementary appendix 2 describes the occurrence of Cheap White brands on the market and their growing presence in the illicit cigarette supply.

Available data sources identified 82 Cheap White brands with more than one-third (31 brands) confirmed by multiple sources and 51 brands reported only by TTCs (see online supplementary appendix 3).

We found the names and locations of 53 Cheap White manufacturers who operate at least 82 production facilities (see online supplementary appendix 3). We identified the geographical location of manufacturing facilities for an additional nine brands, but we did not find their manufacturers' names. A manufacturer can have multiple production facilities in multiple countries. For example, Baltic Tobacco, who produces Jin Ling, has 19 factories located in Russia alone, in addition to factories in Ukraine and Moldova. Some of these factories may be acting as a franchise, but the Jin Ling brand is also licensed to other manufacturers.

Among the production facilities with a known manufacturer, 12 (15%) were located in the EU, and 32 (39%) were located in Europe but outside the EU. Three manufacturers were located in the UAE, but this is likely to be an underestimation given that the names of manufacturers for another seven brands that are also manufactured in the UAE are unknown.

One-third (n=27) of the Cheap White production facilities were in free zones of Russia, Cyprus and the UAE. Free zones, a class of special economic zone designated by the trade and commerce administrations of various countries, are known to facilitate the production and distribution of Cheap Whites as they are subject to weak regulations.<sup>22</sup> This finding is consistent with the information provided by the UK's TMA,<sup>31</sup> Her Majesty's Revenue and Customs (HMRC)<sup>24</sup> and the EC.<sup>18</sup>

We found 81 different trademark owners located in 36 countries (see online supplementary appendix 3). China is home to 11 trademark owners. The UK and the UAE host seven and six trade mark owners, respectively. The brand owner and the manufacturer are not necessarily the same entity, and a brand can have both multiple manufacturers and multiple trademark owners. The trademark ownership of Cheap White brands is very complex with multiple owners dividing the global market into geographical segments, registering different features of a brand (name, pack design, etc), and sometimes even retrospectively changing trademark registry (eg, Jin Ling trade mark).<sup>36</sup> A brand can have different features registered with different companies. For example, 'Yes' brand has as many as four different pack designs, all registered with different companies. TTCs also own some of the trademarks, in many instances using names of less-known companies they own—for example, the trademark of Premier in Peru is owned by Tabacalera Nacional S.A.A, which belongs to BAT; it is also owned by LLC Petro in Russia (owned by JTI) and by Abal Hermanos. S.A. in Uruguay (owned by PMI). Generally, TTCs' brand registration is geographically more comprehensive compared with Cheap Whites.

TPackSS contains information on 37 Cheap White brands. Among them, 25 brands (67.5%) had neither the correct health warning nor the required tax stamp at least in one country of purchase and 15 brands (40.5%) had neither the correct health warning nor the required tax stamp in any of the countries of purchase. There were 13 Cheap White brands (35%) that complied with both tax stamp and health warning requirements in all TPackSS countries. In 4 of the 14 countries (Russia, Brazil, Indonesia and Mexico), all Cheap White brands had the proper health warning and tax stamp. The major source countries of Cheap Whites, Russia and Ukraine, have the majority of Cheap White brands available legally on their domestic markets: only 4 of the 45 packs of Cheap White brands purchased in the Ukraine were illicit (none of the 47 packs in Russia). On the other hand, the majority of Cheap White packs purchased in Bangladesh (86%), Pakistan (94%), Thailand (72%), the Philippines (80%), and Viet Nam (93%) were not compliant.

A specific Cheap White brand is generally sold in a country either legally or illegally, with the exception of three brands—Esse, YunYan and Vigor. TPackSS found that Esse were sold both legally and illegally in China (legally in Beijing; illegally in Shanghai and Guangzhou), in Thailand (legally in Chiang Mai; illegally in Bangkok), in the Philippines (legally in Cebu City; illegally in Cebu City and Manila) and in Turkey (legally in Istanbul and Konya; illegally in Diyarbakir). Twenty packs of YunYan were sold legally in Beijing, Shanghai, Kuming and Chengdu while one pack was sold illegally in Guangzhou. One of the six packs of Vigor sold in Turkey was illegal. Illegal Vigor and Esse were significantly cheaper than their legal counterparts in Turkey and the Philippines, while there was no price difference between the legal and illegal Esse and YunYan in China and Thailand. In total, 86% of the 132 illegal Cheap Whites packs in the TPackSS database were not purchased from large retailers such as superstores, supermarkets and grocery stores.

Multiple sources state that Cheap Whites are generally sold at half the price of domestic duty paid cigarettes.<sup>2 37</sup> For example, illegal Cheap Whites in the UK were sold for £2.50 in 2014, compared with an average price of £5.50–£6.50 for legal cigarettes.<sup>28 31</sup> However, there are also reports that illegal Cheap White brands from Belarus such as Fest, Minsk and Nz were sold for as little as €0.2 in some EU markets.<sup>38</sup>

The TPackSS database allowed us to compare average prices of Cheap Whites and non-Cheap Whites in 14 countries according to their legal status. Of a possible 28 pairs, the comparison generated nine statistically significant results ( $p < 0.05$ ). Among both legal and illegal cigarettes, Cheap Whites were cheaper compared with other brands in the same legal/illegal category with the exception of India where legal Cheap Whites were on average more expensive than legal non-Cheap White brands. Excluding India and considering only the remaining eight statistically significant results, Cheap White brands were on average 29% less expensive.

The comparison of legal and illegal Cheap Whites prices produced mixed results: in three of the five countries where the results were statistically significant, the illegal Cheap Whites were more expensive than their legal counterparts.

Surprisingly, the average prices of legal non-Cheap White brands were lower than the average prices of illegal Cheap Whites in five of the seven countries where the results were statistically significant. With the exception of Turkey, the cheapest Cheap White cigarettes purchased in any TPackSS country irrespective of their legal status were still more expensive than the least expensive legal non-Cheap White brand.

## DISCUSSION

We found that Cheap White brands and TTC brands have many similarities. They are sold legally and illegally and their production facilities are located in multiple countries with the manufacturer and the trademark owner sometimes being different legal entities. On average, the prices of Cheap Whites were lower compared with other brands, but the price differences were not as large as reported anecdotally from Western Europe. In 13 of the 14 TPackSS countries, the least expensive legal brand was cheaper than the least expensive Cheap White brand.

The trademark registration of Cheap White brands is less comprehensive compared with TTC brands as it is geographically limited.

Both enforcement agencies and TTCs report an upward trend in the market presence of illegal Cheap Whites. In order to penetrate new markets, cigarettes are sold without payment of all applicable taxes. This approach was employed by TTCs when they used illicit routes to secure their access to new markets in Asia, Africa and the former Soviet Union countries.<sup>3</sup> The manufacturers of Cheap Whites seem to apply the same strategy. This would seem to explain why TTCs try to draw attention to Cheap Whites—they oppose them not because they are illegal, but because they represent competition. In addition, TTCs seem to use the presence of illegal Cheap Whites to divert attention from their own contribution to the illegal cigarette market.<sup>10 39 40</sup>

Despite the attention paid to Cheap Whites by the TTCs and the media, the majority of illicit cigarettes consumed in Europe, for example, still consist of TTC brands.<sup>10 41</sup> This means that illicit cigarette trade is not likely to disappear by eliminating Cheap Whites but rather by focusing on illicit trade of all tobacco products. The WHO Protocol to Eliminate Illicit Trade in Tobacco Products requires Parties to the Protocol to take measures to effectively control the supply chain of tobacco products.<sup>42</sup> Ratification of, or accession to, the Protocol by the majority of countries, and especially by countries where Cheap Whites are manufactured, would be a step in the right direction. By the time this happens, however, some Cheap White brands might already be well established in some markets and able to compete with other TTC brands even if taxes on them are fully paid.

## Limitations

Our study has several limitations. First, the majority of data on Cheap White brands are from Europe, because the seizures there are better documented compared with other regions. Second, our results with respect to legal or illegal status of a particular brand and its market price are based only on data from 14 TPackSS countries and none of these countries are located in the EU. This limits our ability to assess the legal status of Cheap Whites in the EU, where the majority of them are seized. Nevertheless, we found that even outside the EU, two-thirds of Cheap White brands were sold illegally, primarily in the countries where Cheap Whites are not produced. Third, our definition of legal and illicit products is rather broad, given that we could not verify compliance with other legal requirements such as tar, nicotine and carbon monoxide emissions, for example. Fourth, our online searches were limited to sources in English and Russian. Even though we have reached out to our colleagues in Latin America to cross-verify our results, we most likely missed data published in other languages.

## CONCLUSIONS

On the basis of our findings, we challenge the notion of Cheap Whites being only illegal products that deprive governments of

tax revenue. However, many Cheap Whites appear to evade some taxes, thus undermining tobacco tax policy. Moreover, the availability of fully taxed cheap cigarettes is a public health concern given their high affordability.

### What this paper adds

- ▶ The market presence of Cheap White cigarettes is increasing.
- ▶ Tobacco companies are pointing to Cheap Whites as the main source of illicit cigarettes.
- ▶ The Cheap White phenomenon has remained unexplored in the academic literature.
- ▶ We present an up-to-date list of Cheap White brands, and identify most of their manufacturers and trademark owners.
- ▶ Contrary to the general notion that all Cheap Whites are illegal, we identified markets where some Cheap White brands are sold legally.
- ▶ Cheap Whites should not distract policymakers from addressing illicit trade in all tobacco products as is proposed by the WHO Protocol to Eliminate Illicit Trade in Tobacco Products.

**Acknowledgements** The authors would like to thank Alejandro Ramos and Dardo Curti for their assistance in providing information on Cheap Whites in Latin America.

**Contributors** HR conceived of the study and wrote the initial draft. NV conducted the literature review, collected data and contributed to the writing of the manuscript. KCS was involved in the TPACKSS data collection and reviewed the article. JF conducted the data analysis of the TPACKSS data. JEC was involved in the TPACKSS data collection and reviewed, revised and approved the final draft.

**Funding** This work was partially supported by funding from the Bloomberg Initiative to Reduce Tobacco Use to the Institute for Global Tobacco Control at the Johns Hopkins Bloomberg School of Public Health. Funding was also provided by the Bill & Melinda Gates Foundation, through the African Capacity Building Foundation, to the Economics of Tobacco Control Project at the University of Cape Town.

**Competing interests** None declared.

**Provenance and peer review** Not commissioned; externally peer reviewed.

**Open Access** This is an Open Access article distributed in accordance with the terms of the Creative Commons Attribution (CC BY 4.0) license, which permits others to distribute, remix, adapt and build upon this work, for commercial use, provided the original work is properly cited. See: <http://creativecommons.org/licenses/by/4.0/>

### REFERENCES

- 1 House of Commons Home Affairs Committee. Tobacco Smuggling. First Report of Session 2014–15. 2014. <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmhaff/200/200.pdf> (accessed 31 Mar 2015).
- 2 World Customs Organization. Illicit Trade Report 2013 (2014). <http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Illicit%20Trade%20Report%202012/WCO%20REPORT%202013%20-%20BR.ashx> (accessed 31 Mar 2015).
- 3 Joossens L, Raw M. From cigarette smuggling to illicit tobacco trade. *Tob Control* 2012;21:230–4.
- 4 International Tax and Investment Center and Oxford Economics. Asia-11 Illicit Tobacco Indicator 2012, September 2013. [http://www.pmi.com/eng/tobacco\\_regulation/illicit\\_trade/Documents/Asia\\_11\\_Illicit\\_Tobacco\\_Indicator\\_2012.pdf](http://www.pmi.com/eng/tobacco_regulation/illicit_trade/Documents/Asia_11_Illicit_Tobacco_Indicator_2012.pdf) (accessed 31 Mar 2015).
- 5 KPMG. Project Star 2010 Results, 11 August 2011. [http://www.pmi.com/eng/tobacco\\_regulation/illicit\\_trade/documents/Project\\_Star\\_2010\\_Results.pdf](http://www.pmi.com/eng/tobacco_regulation/illicit_trade/documents/Project_Star_2010_Results.pdf) (accessed 31 Mar 2015).
- 6 KPMG. Project Star 2012 Results, 16 April 2013. [http://www.pmi.com/eng/media\\_center/media\\_kit/Documents/Project\\_Star\\_2012\\_Final\\_Report.pdf](http://www.pmi.com/eng/media_center/media_kit/Documents/Project_Star_2012_Final_Report.pdf) (accessed 31 Mar 2015).
- 7 KPMG. Project SUN. A study of the illicit cigarette market in the European Union. 2013 Results, 2014. <http://www.kpmg.co.uk/email/06Jun14/OM014549A/PageTurner/index.html> (accessed 31 Mar 2015).
- 8 The German Customs Investigation Bureau. Cheap white cigarettes / Uncommon brands. A challenge for law enforcement. <http://www.iticnet.org/file/document/watch/3645> (accessed 31 Mar 2015).
- 9 Lo C, Lin T, Yan P, et al. Combatting against tobacco smuggling: Taiwan's experience. *Asian J WTO & Int'l Health L & Pol'y* 2009;4:249–92.
- 10 Gilmore AB, Rowell A, Gallus S, et al. Towards a greater understanding of the illicit tobacco trade in Europe: a review of the PMI funded 'Project Star' report. *Tob Control* 2014;23:e51–61.
- 11 World Customs Organization. Customs and Tobacco Report 2007 (2008).
- 12 World Customs Organization. Customs and Tobacco Report 2009 (2010). <http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Tobacco%20Smuggling/Reports/TOBACCO%202008%20EN%20web.ashx> (accessed 31 Mar 2015).
- 13 World Customs Organization. Customs and Tobacco Report 2010 (2011). <http://www.wcoomd.org/en/media/newsroom/2010/june/~media/83967DFEB9F74D388924A4C61F279DC4.ashx>
- 14 World Customs Organization. Customs and Tobacco Report 2011 (2012). [http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Tobacco%20Smuggling/Reports/WCO\\_Customs\\_Tobacco\\_2010\\_public\\_en.ashx](http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Tobacco%20Smuggling/Reports/WCO_Customs_Tobacco_2010_public_en.ashx) (accessed 31 Mar 2015).
- 15 World Customs Organization. Customs and Tobacco Report 2012 (2013). [http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Tobacco%20Smuggling/Reports/WCO\\_Customs\\_Tobacco\\_2010\\_public\\_en.ashx](http://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Tobacco%20Smuggling/Reports/WCO_Customs_Tobacco_2010_public_en.ashx) (accessed 31 Mar 2015).
- 16 World Customs Organization. Illicit Trade Report 2014 (2015). [http://www.wcoomd.org/en/media/newsroom/2014/june/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Illicit%20Trade%20Report%202012/ILLCIT%202013%20-%20EN\\_LR2.ashx](http://www.wcoomd.org/en/media/newsroom/2014/june/~media/WCO/Public/Global/PDF/Topics/Enforcement%20and%20Compliance/Activities%20and%20Programmes/Illicit%20Trade%20Report%202012/ILLCIT%202013%20-%20EN_LR2.ashx) (accessed 31 Mar 2015).
- 17 European Commission. Action plan to fight against smuggling of cigarettes and alcohol along the EU Eastern Border. Commission staff working document accompanying the communication on the Commission anti-fraud strategy, 24 June 2011. <http://aei.pitt.edu/id/eprint/45825>
- 18 European Commission. *Stepping up the fight against cigarette smuggling and other forms of illicit trade in tobacco products—a comprehensive EU Strategy*. Brussels: 2013. [http://ec.europa.eu/anti\\_fraud/documents/2013-cigarette-communication/communication\\_en.pdf](http://ec.europa.eu/anti_fraud/documents/2013-cigarette-communication/communication_en.pdf) (accessed 31 Mar 2015).
- 19 European Parliament. Answer given by Mr Semeta on behalf of the Commission. OJ C 279 E, 23/09/2011 ed, 2011. <http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2010-011191&language=EN> (accessed 31 Mar 2015).
- 20 European Anti-Fraud Office. Cigarette Smuggling: European Commission. [http://ec.europa.eu/anti\\_fraud/investigations/eu-revenue/cigarette\\_smuggling\\_en.htm](http://ec.europa.eu/anti_fraud/investigations/eu-revenue/cigarette_smuggling_en.htm) (accessed 31 Mar 2015).
- 21 Europol. EU Organized Crime Threat Assessment, 2011. [https://www.europol.europa.eu/sites/default/files/publications/octa\\_2011\\_1.pdf](https://www.europol.europa.eu/sites/default/files/publications/octa_2011_1.pdf) (accessed 31 Mar 2015).
- 22 Interpol. Countering Illicit Trade in Tobacco Products: a Guide for Policy-Makers, 2014. <http://www.interpol.int/Crime-areas/Trafficking-in-illicit-goods-and-counterfeiting/Legal-assistance/Legal-publications> (accessed 31 Mar 2015).
- 23 United Nations Office on Drugs and Crime. Transnational Trafficking and the Rule of Law in West Africa: a Threat Assessment. 2009. [http://www.unodc.org/documents/data-and-analysis/Studies/West\\_Africa\\_Report\\_2009.pdf](http://www.unodc.org/documents/data-and-analysis/Studies/West_Africa_Report_2009.pdf) (accessed 31 Mar 2015).
- 24 HM Revenue & Customs. Tackling Tobacco Smuggling—building on our success. A renewed strategy for HM Revenue & Customs and the UK Border Agency. 2011. <https://www.gov.uk/government/publications/tackling-tobacco-smuggling-building-on-our-success> (accessed 31 Mar 2015).
- 25 Department of Customs MoF, Poland. Seizure data for 2011–2012. 2013.
- 26 The Star Online. Federal Territory Customs Department to 'light up' 45 million illegal cigarettes. March 14, 2013. <http://www.thestar.com.my/News/Nation/2013/03/14/Federal-Territory-Customs-Department-to-light-up-45-million-illegal-cigarettes/> (accessed 31 Mar 2015).
- 27 Smyth J. Security: smoking out the smugglers. September 1, 2013. <http://www.ft.com/intl/cms/s/0/5d7b8b00-0fe3-11e3-a258-00144feabdc0.html#axzz3Jc17Od8e> (accessed 31 Mar 2015).
- 28 Britton P. Illegal cigarettes seized on the streets of Manchester in undercover probe: Manchester Evening News 19 August 2014. <http://www.manchestereveningnews.co.uk/news/greater-manchester-news/illegal-cigarettes-seized-streets-manchester-7634709> (accessed 31 Mar 2015).
- 29 KPMG. Project Star 2011 Results, 19 June 2012. [http://www.pmi.com/eng/tobacco\\_regulation/illicit\\_trade/documents/Project%20Star%202011%20results.pdf](http://www.pmi.com/eng/tobacco_regulation/illicit_trade/documents/Project%20Star%202011%20results.pdf) (accessed 31 Mar 2015).
- 30 International Tax and Investment Center and Oxford Economics. Asia-14 Illicit Tobacco Indicator 2013, September 2014. [http://www.pmi.com/eng/tobacco\\_regulation/illicit\\_trade/Documents/Asia-14%20Illicit%20Tobacco%20Indicator%202013.pdf](http://www.pmi.com/eng/tobacco_regulation/illicit_trade/Documents/Asia-14%20Illicit%20Tobacco%20Indicator%202013.pdf)

- 31 Tobacco Manufacturers' Association. Illicit Whites. <http://www.the-tma.org.uk/policy-legislation/tobacco-smuggling-crossborder-shopping/illlicit-whites/> (accessed 31 Mar 2015).
- 32 International Tax and Investment Center. The Illicit Trade in Tobacco Products and How to Tackle it, 2013. <http://iticnet.org/resources/global-studies/year/2013>
- 33 Clegg Smith K, Washington C, Brown J, *et al*. The Tobacco Pack Surveillance System (TPackSS): a protocol for assessing health warning compliance, design features and appeals of tobacco packs sold in low-and middle-income countries. *J Med Internet Res Public Health Surveill* 2015;1:e8.
- 34 European Trade Mark and Design Network. <https://www.tmdn.org/> (accessed 2 Apr 2015).
- 35 World Intellectual Property Organization. Global Brand Database. <http://www.wipo.int/branddb/en/>
- 36 Organised Crime and Corruption Reporting Project. Made To Be Smuggled. Russian Contraband Cigarettes 'Flooding' EU. [https://reportingproject.net/underground/index.php?option=com\\_content&view=article&id=1&Itemid=8](https://reportingproject.net/underground/index.php?option=com_content&view=article&id=1&Itemid=8) (accessed 31 Mar 2015).
- 37 British American Tobacco. Anti-illicit trade: scale and opportunities. BAT presentation by Neil Withington. [http://www.bat.com/group/sites/UK\\_\\_8GLKJF.nsf/vwPagesWebLive/8F6C4B5D17C9E9F3C125788800568BD4/\\$FILE/05\\_Neil%20Withington%20-%20Anti%20Illicit%20Trade%20-%20Scale%20and%20Opportunities.pdf?openelement](http://www.bat.com/group/sites/UK__8GLKJF.nsf/vwPagesWebLive/8F6C4B5D17C9E9F3C125788800568BD4/$FILE/05_Neil%20Withington%20-%20Anti%20Illicit%20Trade%20-%20Scale%20and%20Opportunities.pdf?openelement) (accessed 31 Mar 2015).
- 38 Bartłomiejczyk L. Illicit Trade of Tobacco at EU Eastern Border. Presentation at Cigarette Smuggling Workshop, 22 January 2014. [http://www.europarl.europa.eu/meetdocs/2009\\_2014/documents/cont/dv/dossier\\_cigarette\\_smuggling\\_/dossier\\_cigarette\\_smuggling\\_en.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/cont/dv/dossier_cigarette_smuggling_/dossier_cigarette_smuggling_en.pdf) (accessed 2 Apr 2015).
- 39 Committee on Budgetary Control. Working Document on the Agreements with the tobacco industry and fight with the illicit tobacco trade European Parliament: European Parliament, 2.4.2013. [http://www.europarl.europa.eu/meetdocs/2014\\_2019/documents/cont/dv/tobacco\\_agreements\\_/tobacco\\_agreements\\_en.pdf](http://www.europarl.europa.eu/meetdocs/2014_2019/documents/cont/dv/tobacco_agreements_/tobacco_agreements_en.pdf) (accessed 31 Mar 2015).
- 40 The Wall Street Journal. U.K. fines British American Tobacco for oversupplying cigarettes in Belgium, November 2014. <http://online.wsj.com/articles/u-k-fines-british-american-tobacco-for-oversupplying-cigarettes-in-belgium-1415873470?tesla=y&mg=reno64-wsj&url=http://online.wsj.com/article/SB11151172388113754324204580272830158648228.html> (accessed 31 Mar 2015).
- 41 World Health Organization. Combating the illicit trade in tobacco products from a European perspective. Regional Studies Series. Paper R/3, 2014. [http://www.who.int/fctc/publications/Regional\\_studies\\_paper\\_3\\_illicit\\_trade.pdf](http://www.who.int/fctc/publications/Regional_studies_paper_3_illicit_trade.pdf) (accessed 31 Mar 2015).
- 42 World Health Organization. Framework Convention on Tobacco Control. Protocol to Eliminate Illicit Trade in Tobacco Products, 2013. [http://apps.who.int/iris/bitstream/10665/80873/1/9789241505246\\_eng.pdf?ua=1](http://apps.who.int/iris/bitstream/10665/80873/1/9789241505246_eng.pdf?ua=1)

## **Appendix 1:**

### **Definitions of Cheap Whites from non-industry sources**

(Text underlined to help the analysis)

Even though the term "Cheap Whites" appeared in the 2009 WCO report,<sup>13</sup> it was first defined in 2011 by the European Commission (EC) and Europol. The EC defined "Illicit White" as "brands manufactured legitimately in one market, either taxed for local consumption or untaxed for export, and sold knowingly to traders who transport them to another country where the products are sold illegally without domestic duty paid."<sup>19</sup> Europol's definition was strikingly different: they defined "Cheap Whites" as "the tobacco industry's term for cigarettes produced entirely independently of the traditional tobacco manufacturers. According to Europol, "Cheap Whites" are cheap cigarette brands, often of reasonable and consistent quality, that provide a good alternative to counterfeits, whose quality can vary significantly."<sup>21</sup>

Given that the 2011 EC definition implies that TTCs brands in illicit trade channels are Cheap Whites, an update was made in the 2013 EC document, which narrowed the definition and brought it closer to Europol's definition making clear that "Cheap Whites" are "other brands", i.e. "...cigarettes produced entirely independently of the traditional tobacco manufacturers".<sup>18</sup> This was rather surprising given that one of the most commonly seized Cheap White brands in Europe (Classic) was manufactured by one of the TTCs (Imperial Tobacco).<sup>6 33</sup>

A definition similar to the first EC definition has been adopted by another EU institution – Office de Lutte Anti-Fraude (OLAF): "Cheap Whites are cigarettes manufactured legitimately in one country where they may have a domestic market or may not have a market

at all in the EU, but are smuggled into or sold illegally in another country/market, where they do not have the license to be sold legally.”<sup>13</sup>

The World Customs Organization defines Cheap Whites as cigarettes with “legal production in the source country and the usually legal sale to the first purchaser” while “the overall cigarette consumption at national level does not correspond to the volume of production.”<sup>2</sup> A large number of ‘Cheap Whites’ cigarettes are not legally available in the destination countries and generally do not comply with regulatory standards”. WCO also defines a sub-category of Cheap Whites - product doubles - that feature graphics and colors that are very similar to well-known brands, but have different, often similar names.<sup>2</sup>

The definitions disseminated by OLAF and the original 2011 EC definition imply that Cheap Whites can be legitimate in countries where they are produced, but not in other markets, while the WCO definition opens the possibility that some Cheap Whites are sold legally in the destination country.

On the other hand, the definition adopted by the UK government, and also the only definition available in the academic literature, implies that Cheap Whites have no legitimate market anywhere. The UK’s HMRC defines Cheap Whites as “brands that are legally manufactured by companies, often based in emerging economies, with the intent on exporting illegally to other countries through a smuggling network. The products are then sold illegally without domestic duty being paid”.<sup>1</sup> Gilmore et al. (2014)<sup>10</sup> also define Cheap Whites as non-TTC branded cigarettes that are legally produced but have no legitimate market.

In 2014, Interpol introduced a new feature to the definition when it specifically mentioned trademark registration: “New cigarette brands (generally with registered trade brands) produced legally in one jurisdiction but produced intentionally for smuggling into other

countries where there is no prior legal market for them. Tax possibly paid in production country, but rarely. Products are lawfully exported from the production country and tax will not be paid in the destination country.”<sup>22</sup>

To summarize, various institutions define Cheap Whites differently, which may reflect the varying aspects of illicit trade that they focus on. The government agencies stress tax evasion while the enforcement agencies focus on the legal aspect of the trade. The definitions of Cheap Whites are often confusing and change over time, which could reflect the evolving nature of the industry including the business model under which it operates.

### **Definitions of Cheap Whites by TTCs**

The majority of the industry sources use the term "Illicit Whites" instead of "Cheap Whites", because it better suits the industry rhetoric about the issue. We found the first TTCs definition of Illicit Whites in the 2011 Project Star (PS) report funded by PMI<sup>29</sup> defining them as brands that are mainly produced for the purpose of smuggling. The 2011 PS report categorizes all non-TTCs brands found in the EU without correct marking (e.g. local tax stamps) or Duty Free labelling as Illicit Whites. The subsequent 2012 PS report<sup>6</sup> published in 2013 paid much more attention to the definition of Illicit Whites: “Cigarette brands manufactured outside the EU and/or in Free Trade Zones, and distributed in such a way that a large share of their volume is sold at a very low price and consumed in EU countries, although these brands are in general not registered there and not destined to be sold at legitimate retail in such markets”. The 2012 PS report also defines Domestic Whites as domestic cigarette brands that are priced below the minimum tax rate.<sup>6</sup>

The PS definitions imply that Cheap Whites can have legitimate markets even in countries where they are not manufactured. The geographical location of Cheap White production, low

prices, market registration and distribution via illegal distribution channels were new features of the PS 2012 definition that clearly distinguish Cheap Whites from TTCs brands.

Interestingly, the Asia-11<sup>4</sup> report published in the same year as the 2012 PS report and also funded by PMI defines Illicit Whites a bit differently: “Cigarettes that are usually produced legally in one country/market, primarily for smuggling. While they may also be exported legally from some countries, they are smuggled ..... to point of sale where they have no legal distribution and are sold without payment of tax”. This definition implies legitimacy of Cheap Whites in some countries, but clearly excludes brands produced by TTCs because these are not primarily produced for the purpose of smuggling (even though some are produced for this purpose<sup>10</sup>) and do not have legal distribution. The follow-up report from Asia published in 2014<sup>30</sup> does not discuss the issue of Illicit Whites at all.

The common features of the TTCs definition are: a clear distinction between the Cheap White and the TTCs brands in terms of their legal status/distribution and a focus on low price or no tax payment, which creates “unfair” competition for TTCs since they cannot compete with the low prices of Cheap Whites. The definitions used by Europol, the 2013 EC and the TTCs are fairly similar.

All definitions, independent of the source, highlight that Cheap Whites are manufactured legally, but a lot of them are sold illegally. It seems that the only difference between the Cheap White and TTCs brands is the disproportionate share of the legal and illegal sales, and the competitive pricing/tax advantage of Cheap White brands stressed by the TTCs.

## **Appendix 2:**

### **Market share of illegal Cheap Whites**

One possible way to estimate the share of the illicit cigarette market composed of Cheap White brands is to analyze seizure data. The first seizures of Jin Ling, a prominent Cheap White brand, were reported in Europe in 2005.<sup>11</sup> The following year, Jin Ling became one of the most frequently seized cigarette brands in the EU.<sup>22</sup> By 2007, the UK authority reported a growing share of Cheap White brands among all seized cigarettes.<sup>24</sup> Shortly after Cheap Whites appeared in Europe, their seizures were reported in Asia<sup>3</sup> (in 2008) and Africa<sup>23</sup> (in 2000) where they were also commanding a growing share of the illicit market. The tobacco industry reports that there are at least six factories in Zimbabwe that produce over 20 brands of Cheap Whites, many destined for South Africa.<sup>32</sup>

In 2010, the WCO signaled “A significant and growing threat from cheap white cigarettes”<sup>14</sup> as their presence spread to many European countries.<sup>13</sup> The 2011 WCO report states that “the popularity of “Cheap Whites” cigarettes is increasing at the expense of counterfeit cigarettes”,<sup>15</sup> while Jin Ling became one of the main smuggled brands in Europe.<sup>4</sup> According to the European Commission, Cheap Whites accounted for approximately 20% of seizures in the EU in 2011,<sup>17</sup> but already 26% a year later.<sup>41</sup> WCO reported even faster growth of the number of seizures of the Cheap White brands (52% increase) and rising quantities of Cheap Whites seized (17% increase) during the same period.<sup>2</sup> Most of these cigarettes were seized in Europe, although this might be the product of better enforcement and reporting practices in that region. By 2012–13 the majority of large seizures in the UK were of Cheap Whites.<sup>1</sup> A 2013 report by Irish customs shows 76% of seized cigarettes in 2012 were Cheap Whites, up from 46% in 2011.<sup>27</sup>

Interpol estimates that Paraguay manufactures more than 2600 cheap cigarette brands, where the majority are not sold in the domestic market.<sup>22</sup> Cheap Whites produced in Paraguay have been seized across Latin America.<sup>32</sup>

The TTCs have been stressing the growing presence of Cheap Whites since the early 2010s as a way to turn public attention away from their brands as part of the illicit trade channels.<sup>41</sup> According to the TTCs, the consumption of Cheap White brands increased by 3% just between 2011 and 2012, reaching 16 billion sticks (or 24% of illicit cigarette market) in the EU alone.

Based on their ongoing collection of discarded packs on the streets of major European metropolis, the TTCs were able to detect a shift in the supply of Cheap Whites: Cheap White brands occupying the largest share of the illegal cigarette market in Europe until 2011 (Classic, Jin Ling and American Legend) began to lose their market share to new emerging Cheap White brands such as NZ, Fest, Premier, and Minsk, primarily coming from Belarus.<sup>6</sup> This trend has been confirmed by illegal cigarettes seizures by the Customs Departments in Poland<sup>25</sup> and the Baltic States.<sup>41</sup>

**Appendix 3: List of Cheap White cigarettes**

<b>Brand</b>	<b>Manufacturer/s (manufacturing site)</b>	<b>Trademark owner/s (headquarter)</b>
<i>Brands identified as Cheap Whites by multiple sources</i>		
821	Manifattura Italiana Tabacco (Italy)	Manifattura Italiana Tabacco (Italy)
Business Club	European Tobacco (Lebanon)	Vian Ltd (Bulgaria)
Capital	<ul style="list-style-type: none"> <li>• Vietnam National Tobacco Corp. (Vietnam)</li> <li>• Oriental Group (UAE)</li> </ul>	<ul style="list-style-type: none"> <li>• Vietnam National Tobacco Corp. (Vietnam)</li> <li>• Oriental Group/Anthony D'Souza (UAE)</li> <li>• Medi Plus Tec Medizinisch-Technische (Germany)</li> </ul>
Classic	Imperial Tobacco (India, Ukraine, Russia)	Imperial Tobacco (UK)
em@il	Manifattura Italiana Tabacco (Italy)	Manifattura Italiana Tabacco (Italy)
Fu-qi (Good Fortune)	Qu Jing Cigarette Factory (China)	Qu Jing Cigarette Factory (China)
George Karelias and Sons	Karelia Tobacco Company Inc. (Greece)	Karelia Tobacco Company Inc. (Greece)
Gold Classic	Explosal Ltd (Cyprus and possibly other countries)	Explosal Ltd (Cyprus)
Golden Bridge	<ul style="list-style-type: none"> <li>• Xiamen Cigarette Factory (Fujian: China)</li> <li>• Fujian Industrial Co. (Fujian: China)</li> </ul>	<ul style="list-style-type: none"> <li>• China National Tobacco Corporation (China)</li> <li>• China Tobacco Fujian Industrial Co., Ltd. (China)</li> </ul>
Half Time 5	Selangor Cigarette Factory (Malaysia)	Natuzi Trading Pte Ltd (Singapore)
Hatamen	<ul style="list-style-type: none"> <li>• China Tobacco Shandong Industrial Corporation (China)</li> <li>• (UAE)</li> </ul>	China Shandong Industrial Corporation (China)
Jet	Sumatra Tobacco Trade Company (Indonesia)	Sumatra Tobacco Trade Company (Indonesia)
Hero	Sumatra Tobacco Trade Company (Indonesia)	<ul style="list-style-type: none"> <li>• Sumatra Tobacco Trade Company (Indonesia)</li> <li>• Philip Morris (China)</li> </ul>
Jim	(UAE)	Mediterranean Star Llc (UAE)
Jin Ling	<ul style="list-style-type: none"> <li>• Baltic Tobacco (19 locations in Russia, 1 Ukraine, 1 Moldova)</li> <li>• BE Tobacco Company Khamaday (Donetsk: Ukraine)</li> <li>• (Chisinau: Moldova)</li> </ul>	<ul style="list-style-type: none"> <li>• MegaEvrobud Limited Liability Co. (Ukraine)</li> <li>• Bluestar Worldwide Logistic Co. (Philippines)</li> <li>• Baltic Tobacco (Kaliningrad, Russia)</li> <li>• Francisco Javier Sarmiento Santana (Spain)</li> <li>• Ariki Pte Ltd (Singapore)</li> <li>• Ilcenco Vsevolod (Moldova)</li> </ul>
June Slims	• GTC Industries Ltd (India)	-
Luffman	PT Leadon International (Indonesia)	Leadon Tobacco International Pte Ltd (Singapore)

Manchester	Stolichnaya Tobacco Factory (Moscow: Russia)	<ul style="list-style-type: none"> <li>• J.S.S Tobacco Ltd (UK)</li> <li>• Jamal Abdul Nasser Mahmood Al Mahamid (UAE)</li> <li>• Manchester Cigarette Co (UK)</li> </ul>
Master	(UAE)	Dunhill Tobacco Of London Limited (UK)
Mond	• Gulbahar Tobacco International FZE (previously Concord Tobacco International Corp.) (Dubai: UAE)	<ul style="list-style-type: none"> <li>• Mr. Kamal Kareem Ahmad (UAE)</li> <li>• Gulbahar Tobacco International FZE</li> </ul>
Mond International	• Gulbahar Tobacco International FZE (previously Concord Tobacco International Corp.) (Dubai: UAE)	<ul style="list-style-type: none"> <li>• Mr. Kamal Kareem Ahmad (UAE)</li> <li>• Gulbahar Tobacco International FZE</li> </ul>
Mo-shen	-	-
NZ	Grodno Tobacco Factory Neman (Belarus)	<ul style="list-style-type: none"> <li>• Grodno Tobacco Factory Neman</li> <li>• Otkrytoe aktsionerno obshchestvo (Belarus)</li> </ul>
Palace	PMI (Brazil and possibly other countries)	<ul style="list-style-type: none"> <li>• PMI (USA)</li> <li>• ESPL Marketing Pte Ltd (Singapore)</li> <li>• Century Tobacco (UAE)</li> </ul>
Raquel	Explosal Ltd (Cyprus and possibly other countries)	Explosal Ltd (Cyprus )
Regal	-	Imperial Tobacco (UK)
Richman	(UAE)	Stepanchuk Ruslan Dmytrovych (Ukraine)
Shan	-	-
Top Mountain	(UAE)	-
Vigor	European Tobacco (Lebanon)	European Tobacco (Turkey)
Yesmoke	Yesmoke Tobacco Factory (Italy)	Yesmoke Tobacco S.P.A (Italy)
<i>Brands identified as Cheap Whites only by industry</i>		
American Legend	Karelia Tobacco Company Inc. (Greece)	Karelia Tobacco Company Inc. (Greece)
Austin	-	Landewyck Tobacco S.A. (Luxembourg)
Bayron	Baltic Tobacco Factory (Russia)	Baltic Tobacco Factory
Bon	-	-
Bon International	(UAE)	-
Bredal	-	-
Broadway	Montepaz (Uruguay)	<ul style="list-style-type: none"> <li>• Compania Industrial de Tabacos Monte-Paz Uruguay</li> <li>• Dubek Ltd. (Israel)</li> <li>• Philip Morris (Australia, China)</li> <li>• Imperial Tobacco (Canada)</li> </ul>
Business Man	-	-
CK	-	-
Compliment	Baltic Tobacco Factory (Russia)	-
Corsair	King's Tobacco (Bulgaria)	Ednolitchno Drujestvo S Ogranitchena Otgovornost (Bulgaria)

Derby	<ul style="list-style-type: none"> <li>• British American Tobacco (Bangladesh)</li> <li>• Souza Cruz (Brazil)</li> </ul>	<ul style="list-style-type: none"> <li>• British American Tobacco (Australia, UK)</li> <li>• China Tobacco Anhui Industrial Co., Ltd. (China)</li> <li>• D. Ritchie &amp; Co. (Canada)</li> </ul>
Ducal	Heintz Van Landewyck (Trier: Germany)	<ul style="list-style-type: none"> <li>• Heintz Van Landewyck (Luxembourg)</li> <li>• Bluestar Worldwide Logistic Co. (Philippines)</li> </ul>
EB	<ul style="list-style-type: none"> <li>• Baltic Tobacco Factory (Lvov: Ukraine, Kaliningrad Zone Free: Russia)</li> </ul>	<ul style="list-style-type: none"> <li>• Bugatti International S.A. (Luxembourg);</li> <li>• MegaEvrobud Limited Liability Co. (Ukraine)</li> </ul>
Elixyr	Heintz Van Landewyck (Trier: Germany)	Heintz Van Landewyck (Luxembourg)
Esse	KT&G (Korea)	KT&G Corporation (Korea)
Fest	Grodno Tobacco Factory Neman (Belarus)	Grodno Tobacco Factory Neman (Belarus)
GB	-	Xiamen Tobacco Industrial Co., Ltd. (China)
Goal	-	-
Gold Mount	<ul style="list-style-type: none"> <li>• London Tobacco (overseas) Ltd (UK)</li> <li>• Kaane American International Tobacco (UAE)</li> </ul>	Kaane American International Tobacco Co. Ltd. (UAE)
Golden Seagiiies	-	-
GR	-	-
Hd	European Tobacco (Turkey)	British American Tobacco (UK)
Karelia	Karelia Tobacco Company Inc. (Greece)	Karelia Tobacco Company, Inc. (Greece)
Kiss	BAT Donskoj tabak (Russia)	Innovation Tobacco Company Ltd (UK)
Lifa	Baltic Tobacco Factory (Russia)	-
Magnat	Grodno Tobacco Factory Neman (Belarus)	Grodno Tobacco Factory Neman (Belarus)
Marble	(UAE)	Hongta Tobacco (Group) Co., Ltd. (China)
MG	-	Dubek Ltd (Israel)
Minsk	Grodno Tobacco Factory Neman (Belarus)	Grodno Tobacco Factory Neman (Belarus)
Modeng	-	-
More	<ul style="list-style-type: none"> <li>• JTI (Ukraine, Russia)</li> <li>• PMI (Philippines)</li> </ul>	JTI (Japan)
My Way	-	-
Napoli	Collezione Italiana Tabacchi (Italy)	Collezione Italiana Tabacchi (Italy)
Nelson	<ul style="list-style-type: none"> <li>• Dubek Ltd (Israel)</li> <li>• Israel Cigarette Company Ltd. (Israel)</li> </ul>	<ul style="list-style-type: none"> <li>• The Israel Cigarette Co. Ltd. (Israel)</li> <li>• Dubek Ltd. (Israel)</li> <li>• Senior Service (Overseas) Limited (UK)</li> <li>• Manufacture De Tabacs (Luxembourg)</li> <li>• Lidl Stiftung &amp; Co. Kg (Germany)</li> <li>• Selected Tobacco S.A. (Costa Rica)</li> </ul>

		<ul style="list-style-type: none"> <li>• Melfinco S. A. (Liechtenstein)</li> </ul>
Paladium	<ul style="list-style-type: none"> <li>• Veneto Tabacos (Paraguay)</li> <li>• Espert S.A. Tabacalera Argentina (Argentina)</li> </ul>	<ul style="list-style-type: none"> <li>• Veneto Tabacos (Paraguay)</li> <li>• Fab. de Cigarros Paulista Gracioli (Brazil)</li> </ul>
Penang	-	Hanchen Tobacco (Europe) B.V. (Netherlands)
Portman	Melfinco (Greece)	Melfinco S.A. (Liechtenstein)
Premier	<ul style="list-style-type: none"> <li>• Grodno Tobacco Factory Neman (Belarus)</li> <li>• Protabaco S.A. (Colombia)</li> <li>• Abal Hnos. S.A. (Uruguay)</li> <li>• Tabacalera Nacional S.A. (Panama)</li> <li>• LLC Petro (Russia)</li> </ul>	<ul style="list-style-type: none"> <li>• Grodno Tobacco Factory Neman (Belarus)</li> <li>• British American Tobacco Australia Limited (Australia)</li> <li>• Van Nelle Canada Limited (Canada)</li> <li>• Japan Tobacco Inc. (Japan)</li> <li>• Renwick Of Canada Inc.- Renwick Du Canada Inc. (Canada)</li> <li>• Protabaco S.A. (Colombia)</li> <li>• Abal Hnos. S.A. (Uruguay)</li> <li>• Tabacalera Nacional S.A. (Panama)</li> <li>• LLC Petro (Russia)</li> </ul>
President	<ul style="list-style-type: none"> <li>• PMI (Ukraine)</li> <li>• European Tobacco (Lebanon)</li> <li>• International Cigarette Industries (Pvt.) Ltd. (Pakistan)</li> </ul>	<ul style="list-style-type: none"> <li>• PMI (USA)</li> <li>• European Tobacco (Turkey)</li> <li>• Ohserase Holdings, LLC (U.S.)</li> <li>• Imperial Tobacco (UK)</li> <li>• International Cigarette Industries (Pvt.) Ltd. (Pakistan)</li> </ul>
Queen	Grodno Tobacco Factory Neman (Belarus)	<ul style="list-style-type: none"> <li>• Fantasia Distribution, Inc. (Canada)</li> <li>• Grodno Tobacco Factory Neman (Belarus)</li> </ul>
RGD (Red Golden Dragon)	<ul style="list-style-type: none"> <li>• Hubei Industrial Co. Ltd. (China)</li> <li>• Wuhan Cigarette Factory (China)</li> <li>• PMI (Poland, Czech Republic, Hungary)</li> </ul>	<ul style="list-style-type: none"> <li>• China Tobacco Hubei Industrial Co., Ltd. (China)</li> <li>• Wuhan Tobacco Group (China)</li> </ul>
Rodeo	<ul style="list-style-type: none"> <li>• Tabesa (Paraguay)</li> <li>• (Mexico)</li> <li>• Coimexpor Argentina S.A (Argentina)</li> </ul>	<ul style="list-style-type: none"> <li>• Natuzi Trading Pte Ltd (Singapore)</li> <li>• Coimexpor Argentina S.A (Argentina)</li> </ul>
Ronhill	Tobacco Factory Rovinj (Croatia)	Tobacco Factory Rovinj (Croatia)
Super Sunday	-	-
Toro	-	-
VIP	Grodno Tobacco Factory Neman (Belarus)	<ul style="list-style-type: none"> <li>• International Masis Tabak (Armenia)</li> <li>• European Tobacco (Turkey)</li> <li>• Cyf Enterprise Limited (Singapore)</li> <li>• Grodno Tobacco Factory Neman (Belarus)</li> </ul>
VP international	-	-
Walton	-	Ray Tobacco Inc. Llc. (USA)

Yes	<ul style="list-style-type: none"> <li>• Mastermind (South Africa)</li> <li>• ITABA (Brazil)</li> <li>• La Soberana (Paraguay)</li> <li>• Taiwan Tobacco &amp; Wine Board (Taiwan)</li> </ul>	<ul style="list-style-type: none"> <li>• Potomac Tobacco Company Ltd. (Belgium, British Virgin Islands)</li> <li>• ITABA (Brazil)</li> <li>• Taiwan Tobacco &amp; Wine Board (Brazil)</li> </ul>
Yun Yan	Hongyunhohge Tobacco Co., Ltd (China)	<ul style="list-style-type: none"> <li>• Hongyunhohge Tobacco Co. (China)</li> <li>• P.T. Permona (Indonesia)</li> </ul>