

Cigarette Smuggling: Poland to Sweden

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Table of contents

	Front matter	1
	Table of contents	2
1.	Introduction	3
2.	The Illegal Tobacco Trade	4-8
3.	Poland - the Nexus of Trade	9-19
4.	The Swedish Trade	20-23
5.	Recommendations - EU Level	26-29
6.	Recommendations - Sweden	30-32
7.	Avenues for further Research	33
	Acknowledgements	34
	Appendix	35-41



1. Introduction

Characterisation

Cigarette smuggling is a fast-growing criminal enterprise in the European market. The limited legal repercussions and immense profit margins make the movement of cigarettes an incredibly attractive enterprise. According to Lithuanian Customs reports, efficient smuggling organisations stand to gain approximately 1000% on their initial investment. This return is comparable with the narcotics industry, but with much more lenient legal penalties if convicted for involvement.

As more organisations become involved in this trade, its impacts become more apparent. In Latvia, for example, the size of the cigarette black market has grown by approximately 30% each year. In 2015, 650 million illegal cigarettes were consumed in the country, over a quarter of the entire tobacco market. As a result, the state budget in Latvia loses 50-70 million euro of taxes annually to the black market.

Outline

This report is broken into four sections. The first section will describe the general nature of the illegal tobacco trade within the European Union (EU) and its impacts on government functions. The second section will explore cigarette trends in Poland since Poland is the dominant origin of tobacco products within the EU. The third section will focus on current trends in Sweden and examine its role as a transit country. The final section will provide recommendations for all levels of law enforcement, from local to international, on addressing the issue.

The information provided in this report is drawn from online research, discussions with informants closely involved with cigarette smuggling, interviews with agents from both the Polish Central Bureau of Investigation (CBS) and Polish Ministry of Finance, Swedish Customs and other specialists in the field.



2. The Illegal Tobacco Trade

Trends

Smuggling is not a new practice nor is it the most innovative. However, the unique socioeconomic environment of the EU provides opportunities to make incredible profits. Since there is a consistent market for cheap tobacco products across the EU, there is a stable demand for smugglers' wares. The current legislative shortfalls simply enable smugglers to deliver their supply.

The KPMG Cision report from 2011 identified that the market for untaxed cigarettes in Sweden showed a strong correlation between the presence of organised crime and the amount of illegal cigarettes in a specific region. Owing to the overwhelming scale of

the industry and the cost of investment, this is an understandable outcome. As the market becomes more competitive, less efficient manufacturers will generally disappear in the face of a growing monopoly which has the capability to operate and manoeuvre around the existing weak legislation.

Causes

Geographically speaking, Europe is unique in that it holds a very crowded distribution of states ranging from relatively poor to very affluent. As one travels westwards in the EU, the local Gross Domestic Product (GDP) increases significantly, meaning there is little distance needed to be travelled before common goods increase greatly in comparative value, as seen in Figure 1.

The ideal process for an organisation intending to smuggle cigarettes is to



1 – Average cigarette prices across the EU black market from a Lithuanian Customs Presentation

purchase the cigarettes outside the eastern border of the EU, such as in Belarus, for as little as 15 euro cents per pack. They are then imported through a porous section of the EU border, such as in Latvia, and then onto a country such as Germany which increases the value of that same pack of cigarettes by approximately four to five euros. If that same pack is smuggled to Norway, the UK or Ireland, its value will increase even further to just under ten euros, a total increase of over sixty times the original value before sundry costs are considered.

Legal Issues

Normally, this drastic increase in price is accounted for through local tariffs enforced on licensed vendors who import the cigarettes. Even in the EU, individual states have the capacity to pursue duty and tariffs from importers. However, these fees are largely nominal in nature and exceedingly difficult to impose on illegal products. Thus, smuggling can easily bypass all measures of price correction as goods cross borders. With no fixed border controls between European states, customs officers must have intelligence or reasonable suspicion to investigate vehicle contents.

However, there are also a number of more specific legislative shortfalls that have contributed to the rise of the illegal tobacco trade. In particular, officers from the Polish Ministry of Finance note the World Health Organisation's Framework Convention on Tobacco Control. Until an amendment in 2012, the convention only contained one article dedicated to combating the illegal industry. Both officers recognised the enduring effects of this shortcoming. Essentially, both the illegal and legal industries have been merged into one uniform entity. Naturally as a result, the perception of the legal industry has been negative.

As the Polish Police commented, the 'free market' means there will always be demand for tobacco products. The only effective measure that can be taken in this case is thus to limit the supply of illegal products not subject to taxes and regulation. No matter what future regulation is enforced on the legal industry, the illegal industry will remain largely unaffected by it. Tackling the size of this unregulated segment is thus a priority and all resources should be used in countering it. Despite the size of the threat they face, law enforcement authorities have made few formal agreements to cooperate in combatting the trade. Instead, they predominantly rely on personal contacts and direct departmental correspondence.

Perhaps some of the most effective joint efforts include working with tobacco producers, such as Phillip Morris (an American global tobacco company), in order to combat the il-

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legal industry. Up to July 2016 (when the Phillip Morris agreement expired), the EU had agreements with each of the four major global producers of tobacco products. It must be noted that two of these agreements are settlements to past lawsuits (Phillip Morris, settled 2004 and Japan Tobacco, settled 2007) in which the EU asserted the producers' compliance in the function of the illegal trade. These agreements provide a formal framework in which law enforcement authorities could cooperate with the manufacturers directly. However, officials from the Polish Ministry of Finance revealed that this provision has never fully been realised as there is an overwhelmingly negative perception of the industry, including its legal side. This has deterred open cooperation by any government agencies lest they are seen to be 'supporting' the industry.

The agreements themselves are also intended as a deterrent to the major manufacturers from being involved in the illegal market. The primary function to achieve this is a legally binding payment of 100% of the evaded taxes in case a seizure is made of genuine (not counterfeit) products in quantities exceeding 50,000 pieces. Fines levied as a result of these agreements totalled just over 70 million euro between 2004 and 2012. Although this figure seems imposing, it is estimated to be only around 0.08% of the estimated tax losses resulting from the trade during these years. Thus, although the agreements formalising cooperation with major players in the legal market are a positive step, they need to be addressed in order to be more effective.



Figure 2 – Viceroy brand cigarettes hidden in soccer balls for smuggling into Poland

Raw Tobacco

Raw tobacco is a growing issue in the EU. The Polish Ministry of Finance commented that, despite the magnitude of its trade, it has been largely ignored in recent years. Currently, only four countries in the EU have regulations and limitations on the import of raw tobacco products, with Poland the first to enforce such legislation in 2012. Other states maintain a generally unregulated market for the product with countries such as Germany and Lithuania executing very limited policing of the trade.

Raw tobacco is the key ingredient for illegal local production of cigarettes within EU borders. Organised operations can take advantage of this loophole to legally import tobacco products into eastern countries in the EU with limited regulation. There, they illegally produce cigarettes with

other locally purchased materials and send them westwards. As they are produced in the EU, the cigarettes are not subject to extensive customs control. Transportation from the location of production thus carries little risk.

Impacts

The illegal trade of tobacco products is a multibillion dollar industry which directly feeds off government revenue. A 2016 KPMG report estimated that the EU as a whole loses 11.3 billion euro in tax revenue each year as a result of this criminal activity. Poland bears the brunt of this, with an annual shortfall of two billion euro. As the quantities of tobacco products sold on the black market grow, this figure will continue to increase. Polish Customs, essentially the EU's frontline against illegal smuggling, have recorded



Figure 3 - Raw tobacco leaves

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a trend of drastic increase of the amount of tobacco products seized each year. This rise is indicative of an overall increase in the overall amount of goods being moved.

Furthermore, beyond the health concerns commonly associated with tobacco products, illegally produced cigarettes and tobacco have been reported to contain a variety of harmful contaminants. The most complete analysis was published by the American FDA in 2011. It reported that counterfeit cigarettes have "been found to contain rat droppings, camel dung, sawdust and tobacco beetles" and even "sand and ... bits of plastic." The integrity of the raw tobacco used in the production of these cigarettes has also been questioned. Tests conducted by the Center for Public Integrity on raw tobacco leaf used in production of Jin Ling cigarettes by Baltic Tobacco Factory, Kaliningrad found "[heavy] metals such as cadmium, pesticides, arsenic, rat poison and human faeces."

Perhaps the most shocking aspect of the trade is the destination of the proceeds. As organised crime groups generally exercise a monopoly on imports and sales within Europe, proceeds from these sales often go to fund further criminality. In Ireland, for example, reports on the cigarette black market often link it with the activities of the Real IRA (report from state.gov). These claims, however, are very difficult to tie to the organisations themselves as it is the individuals involved who are persecuted and they rarely associate themselves to a terrorist organisation. This is even despite the fact that there are strong statistical links between illegal cigarette sales and other criminal activity in particular regions.

Poland - the Nexus of 3. Trade

Poland's role

Poland has long been acknowledged as a key transit point for tobacco products being smuggled westwards from the Baltic states and former Soviet republics. The eastern border between Białystok and Ukraine has seen countless small-scale smuggling operations, often run by individuals. However, recent trends indicate a rise in more organised multinational organisations committing large-scale smuggling offences. According to KPMG, in 2015 alone, Polish authorities seized 600 million cigarettes within its borders.

The changing methods smugglers use to import both cigarettes and raw tobacco into Poland reflect the past successes of Poland's customs and law enforcement in combatting them. Shipping container seizures (costing smugglers around 125,000 euro per

container seized) have fallen from five in 2014, to one in 2015 and none as of August 2016. Simultaneously, smaller scale (and less costly in case of seizure) methods have seen increased use. For example, lorries carrying 10,000 to 15,000 blocks of cigarettes are in common use between Poland and the Baltic countries. In July 2016, two were seized by mobile customs units on the Polish border with Lithuania. Small aircraft and drones carrying cigarettes have also seen use. One such example was the seizure of a light plane carrying over 20 million cigarettes from Lithuania which crashed in the Polish hinterland (Information provided by the Polish Ministry of Finance). A similar incident occurred in August 2016 where three men of Polish citizenship were arrested after landing a small ex-Soviet plane filled with counterfeit cigarettes in the disused airport of Knislinge in Northern Skåne.

Other methods have been witnessed across the eastern border of Europe. An article in the Economist from 2012



Figure 4 - Tunnel under Ukraine-Slovakia border. Published in 'Tunnel vision', The Economist, 24/6/2012

reported the discovery of a 700m long tunnel under the Ukraine-Slovakia border, shown in Figure 4. Officials responsible for the discovery estimated that approximately 50 million euro in duty and excise tax had been avoided over the course of the tunnel's working life. Such huge profits from such simple methods belies the magnitude of the issue facing law enforcement in the EU. Although this method has not been identified in Poland as of yet, it demonstrates the wide range of methods available to smugglers.

The rise in domestic production comes in response to customs and border control success. Indeed, it has become the Ministry of Finance's primary concern in tackling the illegal tobacco market. At the time of writing (early August), 20 illegal production facilities have been raided. Compared to 2015's total of 18 (yielding 1300 tonnes of raw tobacco – the equivalent of 1.6 billion cigarettes), this sharp rise indicates the rising prominence of a new smuggling strategy (information provided by the Polish Ministry of Finance). Produced within EU borders and so not subject to intense customs scrutiny, these cigarettes are intended for export westwards and pose a unique challenge to law enforcement.

Impact in Poland

According to the Polish Central Bureau of Investigation (CBS), approximately 20% of the tobacco products consumed in Poland are illegal - either produced locally and not subject to excise tax or smuggled without paying tariffs. The total loss of tax revenue is estimated to be around two billion euro, split equally between illegal imports and illegal production. Organised crime groups are wielding an increasing monopoly. The kingpins of the trade are often white collar criminals and generally of Polish or Ukrainian ethnicity. The proceeds from the industry, according to the CBS, are generally laundered through legal businesses involved in transport, development and real estate or sent offshore to tax havens.

A number of reports suggest that illegal cigarettes are directly correlated with the presence of organised crime groups. More alarming is the finding that the vast majority of the population have become desensitised to the issue. An officer of the Ministry of Finance recounted his personal experience as a border guard on the Poland-Lithuanian border. A Russian-speaking man attempted to coerce the officer with a meeting in a restaurant for an unknown purpose. When told that the officer would not do business with a 'bandit', the man responded "I'm not a bandit, I'm a businessman." Such a statement is



indicative of a change in perception of the illegal industry. Despite the substantial damage done to the state, characters within organised crime figures understand their roles as simply 'businessmen', offering a product at a price that the consumer wants to pay.

Key issues in Poland

Minimising the presence of illegal tobacco products on the Polish market and in transit is a multifaceted process. It has evolved beyond simple border checkpoints to include multiple agencies and all levels of government. From interviews with the CBS and Finance Ministry, three issues stood out as the primary concerns for Polish law enforcement. These are:

- Countering illegal domestic production,
- Policing Belarussian-sourced cigarettes and
- Managing the porous EU border.

Local Production – the Importance of Raw Tobacco

Raw tobacco is currently the primary target of Polish law enforcement. As the major material required for the domestic production of cigarettes, it accounts for approximately half of all Polish cigarette exports (including those in transit), both legal and illegal. As only four EU member states (Poland, Slovakia, The Czech Republic and Latvia) have legal limitations or controls on the import or use of raw tobacco, it is generally easy to transport into the EU from sources such as Bulgaria, China and, to a lesser extent, some South American states.

Although the European Commission and the European Anti-Fraud Office (OLAF) only recently began to acknowledge the role of raw tobacco in the illegal tobacco market, Poland enacted legislation in June 2013 to control its presence on the Polish market. Within the next couple of years, the number of licenses to legally import

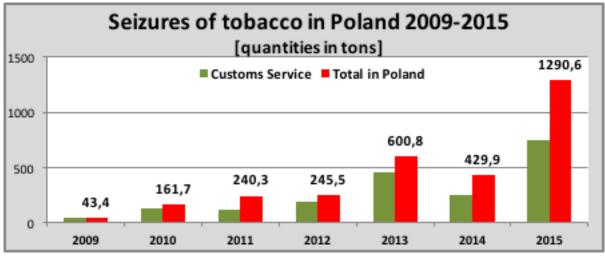


Figure 5 – Seizures of raw tobacco in Poland by year

and process raw tobacco products within Poland fell from 220 to 14, the current number (information provided by the Polish Ministry of Finance). This decline reflects Polish law enforcement's drive to centralise all elements of the legal tobacco industry into a more manageable core figure.

Furthermore, production facilities within Poland are difficult to police. As the possession of equipment to produce cigarettes is not in itself illegal, law enforcement must prove the presence of tobacco at the facilities or catch the facility during the production process. Polish Ministry of Finance officials offered accounts of

their own experiences raiding known production facilities only to find them vacuum-cleaned of all traces of tobacco and, thus, essentially not breaking the law. Indeed, the only other means (beyond the presence of tobacco) by which a facility could break the law is through copyright infringement if counterfeit cigarettes are being produced.

A presentation from the Polish Customs Service (figure 6) reported a particularly interesting seizure from a raid in Sosnowiec on January 28, 2016. 1587kg of cut tobacco was seized, along with 2,400,000 cigarettes and a large quantity of packaging









Figure 6 – Sosnowiec raid Images from Polish Customs

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board printed with the 'Marhaba' brand. Legally registered in Macedonia, the Marhaba label bears an uncanny resemblance to Marlboro Reds. Previously unseen in Poland, its use indicates a high level of sophistication amongst illegal producers.

With the recent influx of Arabic-speaking migrants, there has been a surge in demand for cheap cigarettes. This has been further confirmed by informants in the Swedish smuggling community. With soaring demand, smugglers have surged to supply their wares as competitively as possible. The below use of the Marhaba label is indicative of the adaptability and acumen of the criminal organisations involved. In less than a year after the migrant influx, the group involved was able to produce labels purposed to identify with their target market and maximise sales. Close-up

images of this branding is shown in Figure 7.

The malleability of organisations to optimise their business practices cannot be underestimated. Evolving methods require constant updates in legislation to ensure that law enforcement can effectively operate against the illegal industry. A particular example was the recent production of 70cm cigars to manipulate excise tax laws on tobacco products. The huge cigars would cost the equivalent tax of a normal-sized cigar in tax and contain five times as much tobacco. The cigar would then be broken down after import and its tobacco used for the production of cigarettes, which themselves are taxed at around twice the rate of cigars. Overall, the semi-legal process would yield a profit margin of approximately ten times production cost.



Figure 7 – Marhaba brand labelling and examples from the Sosnowiec raid

Legislation was quickly updated to account for this loophole. Rather than 280 zloty (65 euro) per 1000 pieces of tobacco product, as was formerly the case, products are now taxed by their weight, 280 zloty per 10kg of tobacco in the products. To put this in perspective, under the former legislation, cigars five times normal size were still considered 'cigars' and organisations were able to pay 280 zloty per 50kg of tobacco.

Limiting the import of raw tobacco to the EU is a step which could yield great results continent-wide, as has been the case more locally in Poland. Organisations currently rely on the weak laws in a number of EU states to gain access to the single market before transporting the tobacco to areas suitable for production. OLAF closes an average of approximately 30 illegal factories per year, such as that shown in Figure 6. However, the activities of the CBS in Poland demonstrate that proactive policies and investigations run domestically are much more effective in policing the illegal industry. In 2015 alone, their results were almost twice those of OLAF, with 59 illegal tobacco handling facilities raided in Poland.

Belarus – an Export-Driven Market

The two major cigarette factories in Belarus, Neman and Tabak-Invest, have a 2016 quota for domestic production of 26.7 billion cigarettes. This quote is pinned by the Belarussian government to reported levels of domestic consumption (information sourced from Interview with cigarette smuggling industry expert - 09.06.16). This reported figure is often disputed with some suggesting it may in be as low as 15 billion. In any case, both factories are free to produce unlimited quantities of cigarettes beyond the 26.7 billion quota, provided they are for export.

Although the destination of this export, according to Neman Factory's 'Commercial Proposal' (found in Appendix 1) is nominally former USSR territories, all Polish law enforcement officers interviewed agreed that this is not the case. A <u>2014 KPMG report</u> revealed that the major destinations of these exports is in fact Poland (3.15 billion cigarettes), Latvia (0.51 billion) and Lithuania (0.87 billion) – all EU states. Fittingly, in 2014 over half of all cigarettes seized by Polish Customs were manufactured in Belarus, as shown in Figure 8.

Cigarettes purchased in Belarus can be bought in bulk at around 15 euro cents a pack. Once they cross the Polish border, this value increases around 1500%. The Belarussian gov-

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ernment is aware of this reality, yet does little to prevent the smuggling of cigarettes out of its borders. Indeed, cigarettes purchased above quota are bought with a legal obligation to take them out of Belarus. The two factories' total production value accounts for approximately 2% of the total Belarussian GDP, around \$1.5 billion per year. Consequently, limiting cigarette production is not possible without a heavy toll on the Belarussian economy. Indeed, the Belarussian government is the major stakeholder in both factories, owning 100% of the Neman enterprise and 50% of Tabak-Invest. This may explain the legal endorsement of the factories' recent sixfold increase in production quantities and commensurate increase in turnover (information sourced from Interview with cigarette smuggling industry expert - 09.06.16).

The involvement, or at least complicity of the Belarussian government in the illegal trade of cigarettes is cause for concern beyond the shear excess of cheap cigarettes less than 15km away from the Polish (and EU) border. Essentially, addressing smuggling at its source becomes a diplomatic as well as a legal issue. The only means to proceed in this matter is to address the questionable production quotas and limit excess, in cooperation with the Belarussian government. Until such an accord can be reached, each year, billions of cigarettes carrying a legal obligation to be exported will be produced within a short drive from Polish borders (information sourced from Interview with cigarette smuggling industry expert - 09.06.16).

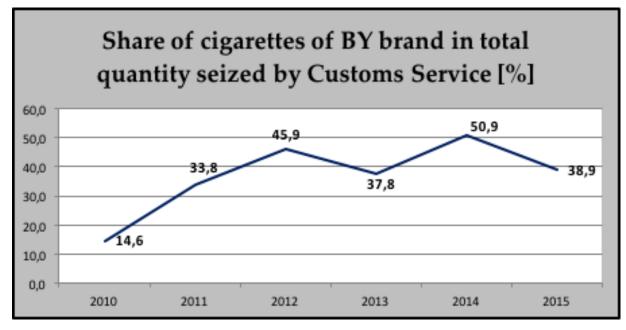


Figure 8 – Proportion of Belarussian-produced cigarettes in total Polish seizures

The Porous EU Border

Poland's law enforcement is regarded by OLAF as the most successful in the EU at addressing smuggling. Its success, however, is undermined by the failings of its neighbours. The bulk of the large-scale import of cigarettes no longer comes over the Polish borders with Belarus and Ukraine but through the Lithuanian border. Bypassing Poland's external border minimises the risk of seizures from an established border checkpoint. Instead, smugglers can cross into the EU single market through less effective borders in the Baltic states and then proceed to

Latvia revealed the extent to which its borders were compromised. It disclosed that customs officers are aware of approximately 80% of all cases of smuggling, yet only act on 5-10% of those cases (information taken from

Poland (information provided by the

A 2015 report on smuggling trends in

Polish Ministry of Finance).

2015 ISDP report). It is not stated whether this is due to pure laziness or, more pessimistically, corruption. However, the report details the cases of four key figures in Latvian law enforcement who have been involved in corruption. These figures' posi-









Figure 9 – A lorry of cigarettes disguised in instant coffee cans seized at the Polish border

tions include the Chief Prosecutor of Financial and Economic Crimes, the Deputy Chief of the Economic Crime Office and officials from the Ministry of Finance.

The fact that a sovereign border governing access to the EU market is susceptible to such influence is itself reason for alarm. However, when the issue is projected by the open borders of the EU single market, it undermines the efficacy of every state's customs and border services. For Poland, this has meant an influx of extra-EU sourced contraband from the Baltic states to the north. Around 1000 trucks cross Poland's northern border each day giving little opportunity for intensive security procedures. Criminal enterprises have an outstanding opportunity to transport goods from outside the EU into Poland itself

drawing very little risk. Indeed, of the estimated 30,000 trucks crossing the border last month (July), only two seizures were made (information provided by the Polish Ministry of Finance).

A similar issue is the direct St Petersburg to Kaliningrad channel, the T1 route, which allows for free movement of goods between the Russian heartland and its Baltic satellite region. The Polish Ministry of Finance officials noted that there is an unstated agreement between the Russian and Lithuanian governments which allows goods to flow freely between the two Russian territories. This allows goods to enter the EU freely, provided their stated destination is Kaliningrad. However, the Polish officials noted that it is common practice for these goods, having entered the

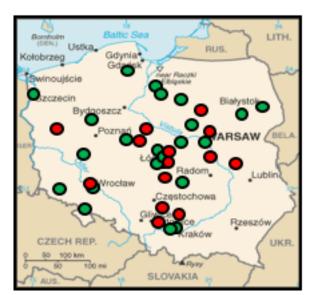




Figure 10 – Distribution of illegal tobacco product factory closures in Poland 2015 (on left) and between 1/1 - 1/4, 2016 (on right). Red dots indicate illegal cigarette factories raided and green dots cut-filler production facilities

EU single market territory unchecked, to 'disappear'. The goods lost are most likely transported westwards, using Poland as a transit country.

Addressing the Issues

In recent years, Poland has shown demonstrable success in dealing with smuggling. The CBS in particular has been extremely effective in addressing smuggling and counterfeiting within Poland's borders. Indeed, at the time of writing, the CBS has been responsible for 14 of the 20 illegal factories closed (information provided by the Polish Ministry of Finance). A distribution of these factories as of 1st

April, 2016 is presented in Figure 10. These success can largely be attributed to cooperation with partner agencies in neighbouring countries such as Lithuania.

Although there is formal cooperation between countries under the auspices of Europol and OLAF, the officers interviewed suggested that the most effective contact was at a departmental level. For example, intelligence sourced directly from a Latvian agency was partly responsible for the closure of one of the factories mentioned above. However, the officers interviewed reported that cooperation with Latvian agencies was not as effective as with Lithuanian agencies.

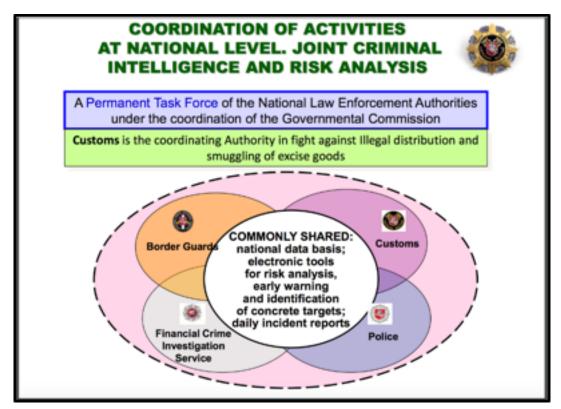


Figure 11 - Cooperative framework under 'Via Baltica', incorporating four branches of Lithuanian law enforcement

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Indeed, they suggested that their successes with Lithuanian cooperation has resulted in a noticeable trend of organisations moving their operations to Latvia as a means of minimising operational risk.

The framework for cooperation under 'Via Baltica' – a Lithuanian law enforcement initiative - is shown in Figure 11, showing a formally established shared intelligence capability across four law enforcement services for ease of contact with foreign agencies, a model for other states to aid cooperation. The pooled intelligence capability falls under the authority of the Customs Service yet allows for easy information-sharing with external agencies.

Polish Customs officers utilise similar connections to maintain the integrity of the borders to great effect. They work particularly closely with CBS officers to systematically unravel entire smuggling networks. The results of this cooperation are clear – 70% of all cigarettes seized in Poland annually are by Customs officers. Ministry of Finance officials, under whom Customs operate, commented that customs can, however, only be effective as long as they are supported by effective legislation which evolves to address changing methods. In the last two years, for example, excise tax laws have been changed three times to address changing methods and close legal loopholes (such as oversized cigars).



The Swedish Trade 4.

Connecting Poland and Sweden

A number of methods are used to move cigarettes and, to a lesser extent, tobacco products from Poland to Sweden. Around a half of this intake will remain in Sweden for domestic sale, while the other half will transit through Sweden to Norway, where it will either be sold or shipped further to British and Irish markets. A Swedish customs officer maintained that around 25 vehicles with illegal goods enter Sweden every day. On average, around 50-20,000 cigarettes, 800 litres of beer and a 100 litres of spirits can be smuggled on one van (information sourced from Swedish Customs -28.04.16).

Informants and specialists have described the basic modus operandi of trafficking cigarettes from Poland to Sweden. The cigarettes are generally purchased on the Polish black market from domestic producers, although legal purchases are also involved. They are loaded into cars customised for trafficking, with multiple secret compartments and caches. One informant revealed that drivers are often Polish nationals who are offered 6000 kronor per trip as well as receiving compensation for petrol and food during the trip. Given the limited legal repercussions if they are caught,

the offer proves very enticing for many (interview with cigarette smuggling industry expert - 09.06.16).

Alternatively, delivery vans have been used which bear the logos of well-known delivery companies, such as DHL and Schenker as they raise little suspicion at customs checkpoints. Such vans are generally acquired on the second hand market from the delivery companies themselves on the condition that the logos are removed prior to use – but never are. The storage space of vans allows for large quantities of cigarettes to be shipped. Blocks of cigarettes are generally concealed by common consumer goods, such as candy or toys, bought cheaply on the Polish market and then also sold in Sweden (interview with protected informant - 14.05.16).

One particular case involved a smuggler who concealed blocks of cigarettes at the bottom of Ariel washing powder boxes, covering them with a layer of powder in the box themselves and then boxes full of powder above the compromised boxes. His commercial acumen also led him to fill the Ariel boxes, considered a higher-end brand, with cheaper, lower-quality Polish washing powder. On arriving in Sweden, he would sell both the cigarettes and the washing powder. This process, repeated almost daily, yielded such immense profit that he was eventually able to fully fund the equipment for an illegal tobacco processing factory in Northern Poland.

However, his success quickly dissipated as workers at the factory stole the machines in his absence, leaving him largely broke (interview with protected informant - 14.05.16).

Polish CBS officers revealed that they have pending investigations into two major organised crime groups involved in smuggling cigarettes into Sweden. Although both cases are currently classified, the agents revealed that both groups are largely comprised of Polish nationals. However, they were unable to provide further details, such as whether the participants in the smuggling were residents of Poland or Sweden or what the main method of transportation used was.

The smuggling network across Sweden and Norway is highly organized and there are permanent contacts receiving shipments from western Norway to northern Sweden. The same smuggled cigarettes in northern Sweden costs more than in Skåne or Stockholm. Some will travel south to collect the smuggled goods themselves or pay a little extra to have it delivered. In Stockholm there are a lot of cigarettes which come from Latvia and Lithuania with the ferry so there are many Russian cigarettes circulating in Stockholm whereas in Skåne and up to Norway smuggled cigarettes are predominantly Polish.

A Swedish customs officer informed us that it is in fact Polish cigarettes

that sell better in Sweden. Those cigarettes that are smuggled from Russia often have the health warning text written in Russian and the country of origin isn't known. They do not show much popularity on the market. The Polish cigarettes are much preferred as they are next to the same quality as Swedish ones (information sourced from Swedish Customs - 28.04.16).

Domestic Sale

Once the cigarettes are in Sweden, they enter a network of distributors. Informants reveal these distributors either sell the cigarettes directly to 'regulars' from their own homes or to small family-owned shops. The owners of the small shops have sought to expand the market for their smuggled wares, selling both cigarettes and alcohol to minors under the age of 18. Informants have commented that the shops use the attraction of cheap cigarettes as a catalyst to also offer alcohol to underage consumers.

When looking at the individuals behind the statistics of the illegal tobacco trade, we find that a large target market is young people. Either those not above the legal age to purchase cigarettes and alcohol, or those willing to take the risk for the cheaper product. One informant reported that there is no moral standard when it comes to selling their smuggled goods, it is purely about shifting the products as soon as possible.

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Smugglers have also taken their business to refugee camps. Such communities, where rule of law is seldom enforced, are an extremely valuable market for cheap cigarettes. Their high demand has led to the rise of a number of distribution networks, comprising of Swedish residents from a number of ethnicities, including Kurds, Albanians and Arabs. (interview with protected informant -22.06.16).

Indeed, the refugee crisis and its associated rise in border security have not halted the smuggling trade at all, but instead have provided a new market for it. One source reports that, during the height of the crisis in 2015, when increased border patrols focused their searches on minivan-type vehicles popular amongst people-smugglers, cigarette smugglers used larger trucks to transport their goods without raising suspicion.

The source also highlighted the importance of Polish construction companies in smuggling practices. Workers for these companies often bring products purchased on the Polish black market to Sweden for

further sale. However, the dominant concern is these companies' practice of importing 'building supplies' from Poland, among which are hidden large caches of illegal cigarettes. This practice cannot be ignored. In March 2015, Polish Customs intercepted a concrete bridge segment coming from Belarus for use in construction. In its core was hidden a shipment of cigarettes with a street value of \$500,000 (information provided by the Polish Ministry of Finance).

The <u>Cision report</u> reveals that a number of local Police units in Sweden have had incredible success at combating the presence and trade of illegal cigarettes within their jurisdiction. Gävle Police, for example, undertook a two-year operation (from 2012 to 2014) in cooperation with Gävle Municipality and the Tax and Customs Administration to disrupt illegal trade in the area. Over the course of the project, a method of targeted inspections and raids were carried out against suspected offenders. Having been reported as the city with the highest concentration of illegal cigarettes in Sweden in 2012 with 38%, in 2014 Gävle scored only a 17% concentration with the same methodology.

"The smugglers themselves do not have any issues in selling to young people. If it's sold on in a shop they will wait till the young people come in and ask after cigarettes or alcohol. They can also simply get their regular customers to ring and collect the cigarettes from their private homes. If you have contact with one underage person, you can be certain you have another twenty who can be potential customers." (Interview with cigarette smuggling industry expert - 09.06.16)

Magnitude of the Issue

According to the 2016 Cision report, 12.8% of all cigarettes smoked in Sweden are untaxed. The breakdown of the 12.8% figure was as follows: around 3.9% were imported legally as a duty-free product legal for personal consumption and 8.9% of the cigarettes consumed were from the illegal trade which either stem from foreign branded cigarettes, illegally imported tax free cigarettes, counterfeit brands and illicit whites (brands manufactured legitimately in one country, but smuggled and sold in another without duties being paid).

An interview with the Customs Office in Gothenburg revealed that foreign-sourced cigarettes were generally produced in Poland or, less commonly, China. Cigarettes originating from Poland have become much more common on the Swedish market over the last three or four years as they are considered of a higher quality compared with other illegal brands. However, law enforcement has not been effective in countering this rise, with the most recent large cigarette seizure coming from Poland in 2014, in which 15 million Atu brand cigarettes were seized (information sourced from Swedish Customs – 28.04.16).

Most of the counterfeit duty free cigarettes are manufactured outside the EU. Evidence suggest they come mainly from Russia, the Ukraine and countries in the Middle East and are smuggled on transport ships in large containers. These cigarette packets often have either English or Swedish text on them to make them seem more legitimate. The brands that are mostly counterfeited are Marlboro and LM

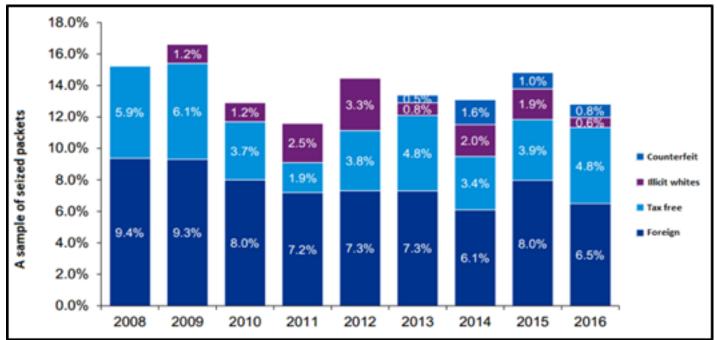


Figure 12 – Breakdown of untaxed Swedish cigarettes, 2008-2016, Cision 2016



(information sourced from Swedish Customs -28.04.16).

Onwards from Sweden

Despite the relatively high levels of illegal consumption within the country, a large portion of the cigarettes smuggled into Sweden are simply in transit. A law enforcement officer specialised in the tobacco industry revealed that a number of routes exist that take cigarettes directly from Poland, through Sweden, to Norway. Once there they are either sold at almost twice the price they would be in Sweden or shipped further to the British and Irish markets.

Svinesund, Örje and Kongsvinger are the road that the Polish smugglers take from Sweden to Norway. In Värmland alone there are twenty routes to cross the border. The Norwegian Police have set up cameras on certain roads but the smugglers take other routes or sometimes cross through the border through forests. They have also used security cameras to record license plates. However, the smugglers continually adapt and have now begun to change their license plates regularly (information sourced from Swedish Customs -28.04.16).

One route leads from the Poland-Sweden ferry at Gothenburg through Ljungskile to the Norwegian border

and eventually to Oslo. Teams of six or seven drivers transport smuggled goods (generally cigarettes and alcohol) along this route approximately once a week, with another team operating each subsequent day.

The convoys are highly organised and use a variety of methods to minimise their risk of capture. In Ljungskile, they disguise the cars with false Norwegian registration plates. Each convoy is led by a 'scout' car, which is empty of all contraband and thus not at risk of seizure. The scout drives ahead to check border areas for law enforcement officers. The smugglers can also use decoy cars - poorly conditioned cars that purposefully look suspicious and are thus stopped at the border control. Of course these cars are completely empty and whilst the check is in progress the other vehicles loaded with contraband go on unchecked.

As soon as a customs check is discovered in Sweden, word will spread amongst the smugglers. So the next day there will only be a couple of cars stopped and by the third day none at all. The convoys often use remote border crossings to the north as they are generally unmanned by Norwegian or Swedish law enforcement officers (information sourced from Swedish Customs – 28.04.16).

After dropping off their goods in Oslo, the cars return to Sweden, where they change their registration plates back to their Polish originals. They then return to Poland via the same ferry route by which they arrived in Sweden (interview with cigarette smuggling industry expert - 09.06.16).



5. Recommendations – EU Level

Cooperation with Corporations

Both the CBS and Polish Finance Ministry commented on the effectiveness of cooperation with major legal tobacco producers, such as British American Tobacco and Phillip Morris International. Indeed, these major corporations have a shared goal with law enforcement in maintaining the integrity of the industry, as shown in Appendix 2. As law enforcement branches involved have little familiarity with the intricacies of the industry, cooperation with specialists from these corporations is incredibly beneficial. Officers from the Ministry of Finance in particular commented that experts from these corporations and their professional insight into the industry have been indispensable in the past (information provided by the Polish Ministry of Finance). Their expertise has allowed estimations of the scale of the trade, the efficiency of criminals' enterprise and the mapping of their network.

In July 2016, the cooperation agreement between European law enforcement bodies and Phillip Morris expired. No moves, however, were made to renew or expand it. Rather, the growing animosity towards the industry on a governmental level has meant that law enforcement agencies are often left to their own means, without the specialist support they would otherwise have from cooperation. Although the corporations themselves have teams responsible for combating illegal production and protecting their brand against illegal competition (lower quality products being sold with their label), this is not, in itself, an end. It is imperative to expand and deepen cooperation between these teams and experts from the major corporations and law enforcement operatives working against the illegal trade.

Furthermore, acknowledgement of the ends to which legal tobacco manufacturers are going to combat the illegal industry must be recognised on a governmental level. Governments distancing themselves from major producers is counterintuitive. The demand for illegal tobacco products exists regardless and it should be the focus of all law enforcement agencies to make sure this demand is met with legal, taxable and controllable products rather than black market contraband. Cooperating with corporations with identical interests is thus an absolute necessity (information provided by the Polish Ministry of Finance).

Since Poland joined the EU and, by extension, the Schengen agreement, smuggling has increased. Indeed, in the last five years it has escalated dramatically. Many regions in Northern

Poland have high rates of unemployment so the option to take well paid illegitimate work can prove very appealing. It is not hard to find willing drivers. According to investigations by the Polish customs there is a town in the Drawsko Pomorskie region of Northern Poland where almost all inhabitants are somehow connected to the illegal trade to Sweden and Norway, right up to the mayor (information sourced from Swedish Customs -28.04.16).

One way to approach the problem of smuggling could be to tackle the heart of the issue and try to stimulate the legitimate job market in the areas most renowned for illegal operations. This could be instigated through a transnational agreement between Sweden, Norway and Poland or a corporation at EU level. With the loss of taxes on goods and the finances being spent on trying to prevent the illegal trade, the investments needed to improve employment in Northern Poland could make a lot of economic sense. By no means would this be a silver bullet, but, considering that many of those involved in smuggling operations are doing so for lack of other options, it seems necessary to provide suitable alternatives for them.

Raw tobacco legislation

Poland has long pushed for the recognition of raw tobacco as a prominent part in the black market for cigarettes. It is only recently that both OLAF and the European Commission have accepted the causal link between the two entities. This change in attitude is a positive start. However, simply reacting to the presence of the materials is unproductive. All states need to take a proactive approach through legislative measures to enforce a consistent policy across the EU single market.

While EU states, particularly those on the eastern border, exercise limited control of raw tobacco imports, there will be a steady influx of raw tobacco. One ton of raw product is enough to produce 1.2 million cigarettes. To aggressively control the import of cigarettes on the border while raw tobacco goes through largely unchecked is self-defeating. Poland's example has demonstrated the utility of government-sanctioned licensing practices in this regard to centralise imports to a number of core manufacturers. Under this model, legal corporations can maintain production while other imports of otherwise illegal product can be controlled and minimised.

Awareness of Port Traffic

Although Poland has drastically reduced illegal smuggling through shipping containers, the CBS commented that ports remain viable methods for smugglers to import large quantities of contraband through a largely unpoliced method. Shipping containers can hold up to 10 million cigarettes each. Thus, just one container of cigarettes reaching the British market, for example, could yield profits of just under 3 million euro.

Despite the quantity of incoming port traffic, it is advisable that customs officers at ports maintain an effective method of policing. This method should incorporate cooperation with the international monitoring centre for shipping in Rotterdam, dialogue with international port services and intelligence sharing with law enforcement agencies. The primary focus of this method should be to identify suspicious containers before they arrive at the port in question and thus triage those containers which require further investigation through x-ray screening or similar technique (information provided by the Polish Ministry of Finance).

Closer Control of Borders

Every interview conducted in the research of this paper mentioned, at some point, the ineffectiveness of the EU border. Owing to the European single market, every state has a stake in the effective operation of the EU's external border. However, its current operation indicates that many states are either oblivious of its shortcomings or indifferent to them. In the case of the illegal tobacco trade, almost every state stands to lose. Thus, cooperation between both agencies and states is essential.

The Latvian border was identified by the Polish Ministry of Finance as the most problematic for smuggling goods into the EU. According to a Polish official, a mid-ranking offi-



Figure 13 – A seizure of Jin Ling cigarettes by Polish Customs

cer stationed on the Latvian border is paid approximately 600 euro per month. There have been numerous reports of Latvian officers supplementing this income through taking bribes. One account reports that an unidentified Latvian officer charges 50 euro per 'box' (an unidentified amount, assumedly 25 cartons) of cigarettes smuggled across the border. The officer in question was, at the time of the source's publication, still an active customs officer (information sourced from protected informant – 22.06.16).

Incentivising the officers on these borders to be as effective as possible is the first step in dealing with the issue. With the support of stricter legislation against imports of both cigarettes and raw tobacco, customs officers have the capacity to stop the majority of the trade. As mentioned earlier, there are current 'buy-back' agreements between the EU and the four major tobacco manufacturers. These entail a sizeable rebate to the EU for each package of cigarettes produced by the manufacturers seized as contraband. Allotting a proportion of this income to the officers responsible for the seizures seems an option states could explore. For example, the officers who consistently uncover smuggling operations should receive a salary that reflects the impact of their work.



Recommendations -6. Sweden

Macro Level

Sweden should prioritise addressing the illegal cigarette industry either at its borders or before it even reaches them. However, Sweden currently has far too few customs officers to effectively tackle the growing influx. The Gothenburg Customs Office commented that the current number of officers is too small to even manage the border as expected. Additional officers and resources allocated to known smuggling points, such as the Poland-Sweden ferry routes, are essential. Indeed, the capacity of Sweden's law enforcement now pales in comparison to the gravity of the issue they face.

Recent cuts in overseas-based personnel, assumedly to cut spending, are counterintuitive. Since the recall of Swedish liaison officers from Poland in 2012, cooperation with Polish authorities has been hardly existent, perhaps contributing to the paucity of seizures coming from Poland. The CBS officers interviewed, despite actively working on a case involving smuggling to Sweden, revealed that they do not have contact with any Swedish agencies. The tax losses from the large quantity of cigarettes currently entering Sweden far outweighs the cost of maintaining a direct point

of contact with the Polish authorities.

The Polish Ministry of Finance commented that it is difficult to cooperate with Swedish authorities as there is no single agency with overriding responsibility for cigarette smuggling. Maintaining a direct point of contact in Warsaw is an effective means of combating this confusion and prioritizing intelligence flows. An officer from the Polish Ministry of Finance recalled an episode when he had to call a personal friend in the Swedish Customs in the middle of the night to report an illegal shipment of raw tobacco arriving in Gothenburg. Such confusions can be hugely costly to the Swedish state and demonstrate a necessity for formal cooperation with Poland.

Personal Scale

Reports with informants within the smuggling community have offered insights on how to combat it on an individual level. These measures are predominantly deterrent in nature, addressing the perceived lack of legal repercussions and monetary gains. Ideally, these will limit the number of couriers willing to be involved in smuggling the cigarettes into Sweden, directly combating organisations' supply.

Reports with informants within the smuggling community have offered insights on how to combat it on an

individual level. These measures are predominantly deterrent in nature, addressing the perceived lack of legal repercussions and monetary gains. Ideally, these will limit the number of couriers willing to be involved in smuggling the cigarettes into Sweden, directly combating organisations' supply.

Firstly, tougher laws against those caught smuggling are a necessity. Many participants see smuggling simply as a short-term vocation which generates a sizeable income. Without this work they would be unemployed so for them the risk is definitely worth the pay off. Usually the threat of being caught or receiving any real punishment is low and at most they're risking three to five months in a Swedish prison. Given the high standards of prisons in Sweden, this does not always act as a suitable deterrent.

As such, their interest is solely financial. Enforcing harsher penalties for involvement, including much greater fines is a simple method of addressing this. Furthermore, a number of participants use their own vehicles in the smuggling process. Enforcing mandatory seizure of any vehicle involved in smuggling is a necessary countermeasure. As a number of these vehicles are customised (at considerable cost) to more effectively smuggle larger quantities of cigarettes. Returning vehicles involved in seizures is allowing the continuation of the process.

Secondly, one informant particularly noted the influence of dog units as a deterrent measure. Indeed, Polish authorities mandate at least one sniffer dog unit per border control shift because of their effectiveness. Both the Ministry of Finance and the CBS noted the results of such measures. Enforcing such measures at Swedish border control points seems a prescient option, particularly in areas which require efficient checks to be effective. This point has even been raised by the Swedish Customs officials as an advantageous and cost effective method to tackle cigarette smuggling.

An example of such locations are the Poland-Sweden ferry ports. Every source consulted in the writing of this report commented on the regularity of their use in smuggling, with the Gothenburg Customs Office estimating that approximately 20-25 cars smuggle cigarettes per ferry per trip. However, border control for vehicles coming off a ferry remains extremely ineffective. Anecdotal reports suggest that around four vehicles are properly inspected before the wave of traffic coming off the ferry forces customs officers to let vehicles through without proper inspection. Using dogs to inspect these vehicles is a quick and effective alternative to the current situation.

Authorities should also be able to confiscate the cars used in smuggling runs. Sometimes the same car

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can make fifty trips in a short space of time. Norwegian Customs have the authority to take the cars directly from the perpetrators, whereas in Sweden the car needs to be returned to them directly. Many of the cars used for smuggling can be in extremely poor condition, with no seatbelts and worn parts. However, the custom officers cannot seize them as they are registered to a Swedish owner. It is often the case that the car is registered in Sweden to an owner who may have up to 25-35 vehicles registered in his or her name.

Giving Swedish custom officers the authority to seize vehicles that are not fit for the road would hamper the effectiveness of smuggling operations. In Norway, authorities have a policy to reprimand cars that look to be in very poor condition but this was only after a deadly accident where one such car crashed causing the death of another innocent driver. Furthermore, there needs to be an opportunity to take legal action against Swedish citizens registered with so many cars involved in smuggling. In this case, fines and even imprisonment could act as a suitable deterrent.

Despite the fact that great success has been seen in many areas, further controls need to be enforced on outlets selling contraband. It was noted that token prison sentences of a few weeks are in no way a deterrent, but, as one informant commented, a time for those charged to catch up with old friends

(information sourced from protected informant – 22.06.16). As the type of people involved in the trade have no qualms with having been in prison, the law is not an effective deterrent to their actions. This might be addressed by a loss of license for the premises involved in knowingly selling illegal goods.

Finally, the issue which has potentially the most impact on improving resources for countering smuggling is the negative effect this trade is having on young people. With the legal age to purchase cigarettes in Sweden at 18 and alcohol at 21, the smugglers have cornered a market in which they can take full advantage. One may argue that this is no longer simply a question of lost taxes and underhand business but a far greater atrocity which is putting young people's health at risk. Policy makers should be careful not to simply look at the statistics and implement counter measures on a cost basis solution but realise that behind these figures, young people make up a substantial portion of the customers in this trade. If the Swedish Ministry of Public Health (Folkhälsoenheten) backed up a campaign with the customs office to raise awareness of the harm this was doing to Swedish youth culture, then we could quickly see this become a priority issue.

Avenues for Future 7. Research

Current literature in the area is not extensive. Most reports detail the current state of the illegal trade in various countries. Few investigate sources of the cigarettes and the environment in which they operate. Fewer still offer insights into how such a market might be combatted. However, over the entire research of this report, not one report explored the outcomes of the trade. That is, analysis often concluded that income from the trade went to 'further criminal activities'. However, a number of sources suggested this generalisation might conceal a more sinister reality.

Exploring the results and outcomes of the trade is necessary to understand the industry as a whole. Sweeping generalisations that buying illegal cigarettes is funding groups such as Al Qaeda and ISIS may be effective marketing against consumption by the population, but they do not offer law enforcement or other government agencies an insight into the magnitude of the issue they are facing. Providing this insight is the next logical step in fully coming to terms with what such a trade really means for the countries it affects.



Figure 14 – Viceroy brand cigarettes discovered by Polish Customs concealed in a lorry

Acknowledgements

We would like to thank the following for their invaluable help in researching and writing this report:

- Swedish Customs, Gothenburg
- Swedish Police
- Swedish Bureau of Economic Crimes
- Swedish Tax Authority
- Polish National Police (CBS)
- Polish Ministry of Finance
- A Major Swedish Security Firm

- (which asked to remain anonymous)
- International Specialists (who also asked to remain anonymous)
- A number of informants within the illegal industry itself

Special thanks also to Oskar Gustafson, intern at the ISDP, for his contribution to the report.

All photos are courtesy of Polish Law Enforcement.

Cover designed by Harryarts -

Freepik.com



Figure 15 – Cigarettes seized by Polish Customs with Cyrillic labels



Appendix 1 – Neman Factory, Grodno 'Commercial Proposal'



АДКРЫТАЕ АКЦЫЯНЕРНАЕ ТАВАРЫСТВА

JOINT-STOCK COMPANY "GRODNO TOBACCO FACTORY "NEMAN"

"ГРОДЗЕНСКАЯ ТЫТУНЁВАЯ ФАБРЫКА "НЁМАН". **ТААТ "ГРОДЗЕНСКАЯ ТЫТУНЕВАЯ ФАБРЫКА "НЕМАН").**

(JSC "GRODNO TOBACCO FACTORY "NEMAN"). Ordzhonik dzheistr., 18, 230771, Gradno вул. Арджанікідэр, 18, 230771, п.Продна Рэспубліка Беларусь

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03.11.2014 № 01-12/27-9252

TO WHOM IT MAY CONCERN

COMMERCIAL PROPOSAL

Dear Sir/Madam.

JSC "Grodno Tobacco Factory "Neman" has more than 150 year experience in production and sales of top quality cigarettes. At present time, the factory employs more than 1,000 people with considerable experience in the tobacco industry, including leaders of the best domestic managers.

JSC "Grodno tobacco factory" Neman "provides a full cycle of production of tobacco products, which includes the preparation of a production batch of tobacco processing and processing of leaf tobacco, as well as direct production of cigarettes (Commodity code 240229000).

JSC "Grodno tobacco factory" Neman "produces both own world famous brands for international tobacco companies:

- «British American Tobacco»:
- «Japan Tobacco International»;
- as well as for the company «Tobacco International Enterprises Limited».

Modern equipment of the German companies «HAUNI» and «FOCKE» allows producing 10,000 cigarettes per minute and pack up to 550 packs. At this speed ensures 100% quality control of each unit of product released.

The machinery allows to produce different cigarettes formats including King Size, Compact King Size (Nano), Super slims.

Our domestic sales share is 80%. Due the cigarettes quality we expand our export to different countries, such as Ukraine, Moldova, Latvia, Georgia, Russian Federation,



Appendix 1 – Neman Factory, Grodno 'Commercial Proposal' (continued)

-2-

Estonia, Arab Emirates, Iraq and have negotiations with Iran, Venezuela, Jordan, Benin, Nigeria, Togo.

We are interested in establishing contacts with large wholesale operators of tobacco products and ready to consider various forms of cooperation including tobacco products export to the country; brand names cigarettes production for companies as part of cooperation on a contract basis; the creation of a joint venture or opening a representative office in your country.

You will find some more information about our brand names, terms of delivery and price list in the attached files.

Our contact details: Grodno Tobacco Factory "Neman" JSC, 18, Ordzhonikidze str., 230771, Grodno, Republic of Belarus, www.tabak.by Phone/Fax: +375152791644, e-mail: export@tabak.by Contact person: Head of foreign trade department Mr. Andrei Poviadayko

With best regards and with hope for fruitful cooperation,

Alexander Shagun

Deputy Director for Commercial Affairs



Appendix 2 –

Further Statistics from Customs Service Seizures in Poland

All seizures recorded:

Year	Quantity seized	Number of seizures	Average quantity
			per seizure
2013	372 529 295	93 697	3 976
2014	383 937 450	105 040	3 655
2015	428 139 705	112 199	3 816

Seizures in personal cars:

Year	Quantity seized	Number of seizures	Average quantity
			per seizure
2013	146 907 790	69 420	2 116
2014	176 373 235	82 900	2 128
2015	167 987 570	92 293	1 820

Seizures in lorries / trucks:

Year	Quantity seized	Number of seizures	Average quantity
			per seizure
2013	121 718 820	2 517	48 359
2014	61 561 600	2 025	30 401
2015	103 355 950	1 953	52 922

Seizures in busses (regular connections and tourist coaches):

Year	Quantity seized	Number of seizures	Average quantity
			per seizure
2013	22 508 180	5 508	4 086
2014	24 875 190	5 413	4 595
2015	15 331 845	4 505	3 403

Seizures in trains (both: passenger and cargo):

Year	Quantity seized	Number of seizures	Average quantity
			per seizure
2013	24 897 100	1 719	14 483
2014	35 271 530	1 180	29 891
2015	40 106 625	952	42 129

Illegal factories producing cigarettes (including counterfeit), detected in 2015.

There were 9 illegal cigarette factories dismantled in Poland in 2015 – details below:

- Turek (central-western part of Poland), detection on November 9th by the Police
- 1 complete production line (2 machines) a)
- b) goods seized:
- 89.000 cigarettes
- 915 kg of tobacco (fine cut tobacco).
- Konstantynów Łodzki (central part of Poland), detection on October 29th by the 2. Police.
- 1 complete production line a)
- b) goods seized:
- 901.000 cigarettes
- 964.000 kg of tobacco (fine cut tobacco)
- 424,4 kg of tipping paper to cover the filters.
- 3. City of Bydgoszcz (north-central part of Poland), detection on October 26th by the Police.
- a) 1 complete production line
- b) goods seized:
- 600.000 cigarettes (MG brand)
- 3.200 kg of tobacco (fine cut tobacco)
- components (filters, rolling paper, foils, adhesives).
- 4. Slupno (near Warsaw, central part of Poland), detection om October 19th by the Police
- a) 1 complete production line
- b) goods seized:
- 609 kg of tobacco (fine cut tobacco).
- 5. Michalow-Reginow (near city of Radom, central part of Poland), detection on September 22nd by the Police
- 1 complete production line a)
- b) goods seized:
- 1.100 kg of tobacco (fine cut tobacco).



- 6. Motoga (south-eastern part of Poland), detection on September 17th by the Police
- a) 1 complete production line
- b) goods seized:
- 12.200 kg of tobacco (fine cut tobacco)
- components (filters, rolling paper, foils, adhesives, printed materials).
- 7. Myslowice (southern part of Poland), detection on July 27th by the Police
- a) 1 complete production line (4 machines)
- b) goods seized:
- 1.418.000 cigarettes (MG, PRINCE, MARLBORO brand)
- 3.201,5 kg of tobacco (fine cut tobacco)
- components (filters, rolling paper, foils, adhesives, printed materials).
- 8. Sycewo (central-western part of Poland), detection on June 23rd by the Police
- a) 1 complete production line
- b) goods seized:
- 2.002.000 cigarettes
- 720 kg of tobacco (fine cut tobacco)
- 9. Glebokie (central part of Poland), detection on June 23rd by the Police
- a) 1 complete production line
- b) goods seized:
- 1.928.500 cigarettes
- 4.771 kg of tobacco (fine cut tobacco) and 17.090 kg of tobacco leaves
- components (filters, rolling paper, foils, adhesives, printed materials).

In addition, some tobacco-processing facilities were detected and dismantled – details below:

- 1. City of Lodz (central Poland), detection on January 22nd by the Police
- c) 1 complete fine-cut tobacco production line
- d) goods seized:
- 2.011 kg of tobacco (tobacco leaves)
- 2. Koscierzyna (north part of Poland), detection on February 10th by the Police.
- c) 1 complete fine-cut tobacco production line
- d) goods seized:
- 5.500 kg of tobacco leaves and 2.930 kg of fine cut tobacco.

- Ciosny (central Poland), detection on April 23rd by the Police. 3.
- c) 1 complete fine-cut tobacco production line
- d) goods seized:
- 2.575,2 kg of tobacco leaves.
- Radom (central Poland), detection on April 9th by the Police 4.
- c) 1 complete fine-cut tobacco production line
- goods seized: d)
- 615 kg of tobacco leaves.
- 5. Ilawa (north-eastern part of Poland), detection on June 25th by the Police
- 1 complete fine-cut tobacco production line c)
- d) goods seized:
- 50.336 kg of tobacco leaves.
- 6. Zielona Góra (south-western part of Poland), detection on September 24th by the Police
- a) 1 complete fine-cut tobacco production line
- b) goods seized:
- 15.080,5 kg of tobacco leaves and 5.917,5 kg of fine cut tobacco.
- 7. City of Lodz (central Poland), detection on July 27th by the Police
- 1 complete fine-cut tobacco production line a)
- b) goods seized:
- 2.843,8 kg of tobacco leaves.
- 8. City of Bydgoszcz (north-central part of Poland), detection on September 17th by the Police
- 5 tobacco-cutting machines a)
- b) goods seized:
- 7.117 kg of tobacco leaves
- 111.360 pcs. of cigarettes
- empty cigarettes packages (printed marks of MARLBORO, L&M, BRADLEY brands).



- 9. Kolonia Głowa (central part of Poland), detection on October 2nd by the Police
- a) 1 complete fine-cut tobacco production line (5 machines)
- b) goods seized:
- 26.845 kg of tobacco leaves.
- 10. Polkowice (south-western part of Poland), detection on October 19th by the Police
- a) 1 complete fine-cut tobacco production line (4 machines)
- b) goods seized:
- 1.332,8 kg of tobacco leaves.
- 11. Kamieniec Ząbkowicki (south-western part of Poland), detection on April 24th by the Police
- a) 3 tobacco leaves-cutting machines
- b) goods seized:
- 8.146 kg of tobacco leaves.
- 12. Zgierz (central part of Poland), detection on May 25th by the Police
- a) 1 tobacco-cutting machine
- b) goods seized:

736 kg of tobacco leaves and 1.525 kg of fine cut tobacco.