

Summary report on the
**Second intercountry
meeting on restricting
digital marketing of
tobacco and nicotine
products in the Eastern
Mediterranean Region**

Virtual meeting
28–30 July 2025



**World Health
Organization**

Eastern Mediterranean Region

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1. Introduction

In an era marked by exposure to digital marketing, the promotion of unhealthy products, including tobacco and nicotine products, poses a growing threat. As online engagement grows, driven by mobile device use and the shift towards social media platforms dominated by personalized and targeted advertising, digital marketing is intensifying, risking an increase in demand.

However, the response of governments and public health institutions to this threat is lagging. Efforts are complicated by rapid changes in digital and programmatic marketing strategies and the evolving digital ecosystem. Targeted tools and support are therefore needed to facilitate the restriction of digital marketing of tobacco and nicotine products. The obligation to restrict digital marketing is grounded in the WHO Framework Convention on Tobacco Control (WHO FCTC), specifically Article 13, which obliges Parties to implement a comprehensive ban on all forms of direct and indirect advertising, promotion and sponsorship of tobacco products.

The second intercountry meeting on restricting digital marketing of tobacco and nicotine products in the WHO Eastern Mediterranean Region was held virtually on 28–30 July 2025. Participants included regional and international experts, country representatives, nongovernmental organizations and regulatory authorities.

The objectives of the meeting were to:

- assess the impact of digital marketing, exchange national and global experiences;
- support multisectoral collaboration; and
- agree on a practical road map for implementing WHO FCTC obligations.

The meeting aimed to build on the momentum of the first intercountry meeting, held in July 2024, which brought together selected pilot countries from the Region to initiate efforts in regulating the digital marketing of tobacco and nicotine products. The first meeting laid a strong foundation by enhancing technical knowledge, fostering collaboration and supporting the development of national action plans aligned with WHO FCTC commitments. Building on these achievements, the second meeting convened a second cohort of countries to receive similar training and guidance. Additionally, selected countries from the first round shared progress and lessons learned in advancing their national action plans, providing valuable insights to inform Region-specific implementation of this increasingly important policy area.

2. Summary of discussions

Opening session

Dr Hanan Balkhy, WHO Regional Director for the Eastern Mediterranean, opened the meeting by welcoming participants and highlighting the growing threat of digital marketing of tobacco and nicotine products in the Region. Although many countries have enacted bans on tobacco advertising, promotion and sponsorship (TAPS), Dr Balkhy noted that major gaps persist online, where companies use social media, influencers and targeted content to reach young people. With one in seven boys aged 13–15 using tobacco, she urged stronger regulation, youth-focused education and improved multisectoral coordination to protect the Region's young population.

Dr Asmus Hammerich, Director, Noncommunicable Diseases and Mental Health and Acting Director, Healthier Populations, WHO Regional Office for the Eastern Mediterranean, noted that the second intercountry meeting builds on the momentum of the first by engaging a new cohort of countries while reviewing the progress made to date.

He emphasized the importance of strengthening technical understanding and sharing best practices.

Digital marketing of tobacco and nicotine products

Dr Elisabet Ruiz Cairó, Legal Consultant, WHO headquarters, introduced digital marketing within the framework of Article 13 of the WHO FCTC. She explained that practices such as influencer promotion, search advertising, pop-up advertisements and interactive online content significantly expand the reach of tobacco promotion. She highlighted the complexity of digital marketing ecosystems, involving manufacturers, retailers, platforms and influencers.

Dr Benn McGrady, Head of Unit, Public Health Law and Policies, WHO headquarters, presented a case-study on JUUL's digital marketing tactics. He described the company's "Vaporized" campaign, which used youth-oriented imagery and influencers and ultimately led to litigation resulting in more than US\$ 1.1 billion in settlements. He noted that similar tactics continue globally and pointed to new marketing environments such as the metaverse, non-fungible tokens, advergames and content-driven campaigns that sustain youth appeal.

Ms Caroline Renzulli, Director of Internal Communications, Campaign for Tobacco-Free Kids, presented findings on how major tobacco companies conduct marketing on social media platforms. She reported widespread advertising in more than 60 countries with billions of views, mainly on Instagram, and noted that a significant share of the audience is aged under 25. She described the industry's "surround sound" approach through influencers, collaborations and lifestyle content, and emphasized the need for stronger regulation and platform accountability.

Ms Sheryl Wright, Technical Officer (Legal), WHO FCTC Secretariat, provided an overview of Article 13 and explained that its scope extends to novel nicotine products. She highlighted national examples of applying Article 13 to emerging products and stressed that the provision remains a strong tool for addressing evolving digital marketing strategies. She also provided examples of: bans on disposable e-cigarettes and nicotine pouches (Belgium); comprehensive bans (Brazil); Internet advertising bans (Chile); plain packaging for all nicotine products (Finland); flavour bans (Kingdom of the Netherlands); prohibition of online advertising (Panama); and age verification and retailer registration systems (United Kingdom of Great Britain and Northern Ireland).

The session concluded with a shared recognition of the scale and sophistication of digital marketing and the persistent regulatory and enforcement gaps. The presentations strengthened technical understanding and provided a foundation for identifying practical solutions in subsequent sessions.

Regional efforts to address TAPS

Dr Fatimah El-Awa, Regional Adviser, Tobacco Free Initiative (TFI), WHO Regional Office for the Eastern Mediterranean, opened the second session by highlighting the Region's strong compliance with TAPS bans, while noting persistent enforcement gaps – especially regarding digital marketing and emerging products. She presented examples of point-of-sale bans alongside continuing advertising through entertainment media, and raised the question of whether restrictions should focus particularly on youth or be applied universally.

Dr Iman El-Barani, Lead, Noncommunicable Diseases, Public Health Programs and Policies Department, Gulf Center for Disease Prevention

and Control (Gulf CDC), presented tobacco control efforts at the Gulf Cooperation Council (GCC) level. She noted that tobacco kills around 24 000 people annually in the region and costs US\$ 34.5 billion. All GCC countries have implemented advertising bans, including restrictions on digital marketing, although Kuwait's legislation remains partial. Additionally, enforcement remains difficult due to cross-border content, influencer marketing and uneven implementation. Youth protection remains a primary concern. She highlighted Gulf CDC initiatives such as regional surveys, updated monitoring systems, a new data observatory, and ongoing work on plain packaging and extending excise taxes to e-cigarettes and novel products.

Country presentations on national experiences with TAPS bans

Egypt has a comprehensive legal framework banning TAPS under Laws No. 52, 85 and 154, which extend to all media, including digital platforms. Decrees No. 79 and 365 of 2021 classify heated tobacco and e-cigarettes as tobacco products, ensuring full coverage under tobacco control laws. Penalties for violations include fines, imprisonment, seizure of materials and publication of the offense. While Egypt, a Party to the WHO FCTC since 2005, prohibits sponsorship and indirect promotion, enforcement remains weak for brand placement in films and digital marketing, requiring stronger monitoring of new products and online platforms.

Iraq ratified the WHO FCTC in 2008 and adopted its Tobacco Control Act in 2012, declaring 2 April a national No Tobacco Day. The law enforces Article 13 by banning TAPS, imposing penalties on media outlets, publishers and advertising agencies, and confiscating foreign publications containing tobacco advertisements. It also requires TV scenes showing smoking for profit to carry a 30-second health warning or obscure the image. Enforcement measures include the removal of outdoor advertisements and monitoring by the Supreme Committee for

Combating Smoking. Good practices include multisectoral collaboration, youth awareness campaigns and integration into digital health initiatives. However, challenges remain with cross-border and digital content, weak legislation for online marketing, limited technical capacity and persistent industry influence. Iraq has requested WHO support in developing digital regulatory frameworks, building enforcement capacity and promoting digital media literacy.

Jordan ratified the WHO FCTC in 2005 and has since developed strong legislation to align with Article 13. The Public Health Law No. 47 (2008, amended 2017) bans all forms of TAPS across print, broadcast, online and social media, while Regulation No. 73 (2013) controls product display. Further measures include the 2019 ban on advertising e-cigarettes and nicotine liquids, and 2021 rules restricting waterpipes and smoking in public places. Enforcement involves the Ministry of Health and partner agencies through a digital reporting portal, keyword monitoring and cooperation with Internet service providers to remove violations. Penalties include fines of 1000–3000 Jordanian dinars or 3–6 months imprisonment. Despite progress, challenges remain with industry use of fake accounts and influencers, prompting calls for artificial intelligence (AI)-based monitoring and updated laws. Overall, Jordan’s framework is highly consistent with Article 13, although continued adaptation is required to address digital marketing

In Lebanon, Law No. 174 (2011) aligns with WHO FCTC Article 13 and bans most forms of tobacco advertising, including for TV, radio, print, outdoor billboards, Internet, free distribution and sponsorships (including corporate social responsibility activities). It also mandates 40% health warnings on packaging and prohibits misleading descriptors such as “light” or “low tar.” Despite this comprehensive framework, major gaps remain, including visible retail displays at points of sale, promotional discounts and sponsorship publicity. Enforcement is weak,

particularly in rural areas with small retailers, and cross-border advertising is not explicitly addressed. Young people remain highly exposed, as indirect marketing and social media influence are not covered under the current law. Moving forward, key actions include adopting international best practices on banning displays and discounts, strengthening enforcement mechanisms, enhancing youth protection initiatives, and collaborating with WHO and regional partners. Government commitment, investment in enforcement and urgent law amendments to explicitly regulate digital marketing and social media platforms will be required.

The Syrian Arab Republic banned tobacco advertising as early as 1996 through Legislative Decree No. 13, prohibiting all forms of promotion in print, audio, visual or other media, with penalties, including fines and imprisonment. Legislative Decree No. 62 of 2009 expanded the ban to include tobacco-related tools and their use in public places. The Syrian Arab Republic acceded to the WHO FCTC in 2004, committing to Article 13 implementation. Despite these laws, digital platforms such as Facebook, Instagram, TikTok and YouTube are heavily exploited by tobacco companies, especially through indirect advertising, influencer marketing and targeted youth campaigns. Challenges to enforcement include fake accounts, cross-border campaigns and weak accountability mechanisms. Current priorities include updating legislation to explicitly cover digital marketing, collaborating with social media platforms, conducting awareness-raising campaigns, and holding influencers and companies accountable.

In Yemen, the main legal framework for tobacco control is Law No. 26 of 2005 (Concerning Combating Smoking and Treatment of its Damages), which prohibits TAPS across visual, audio, print and cultural platforms (Article 7). It also bans the use of tobacco logos on other products (Article 8) and the import or manufacture of smoking

imitations (Article 9). Article 21 imposes penalties including fines and closure of institutions that violate the law. However, the legislation predates digital marketing and does not cover emerging nicotine products, leading to gaps in enforcement against online promotion and disguised marketing. Key challenges include limited oversight capacity, weak awareness of digital tactics and the rapid growth of new products. Yemen emphasized the need to update the law to address digital marketing, strengthen monitoring systems, expand awareness campaigns, and foster regional and international cooperation.

Interactive exercise and discussion

An interactive exercise was conducted in which delegations identified their key gaps in TAPS legislation or enforcement and proposed immediate actions. Egypt identified the absence of explicit restrictions on influencer-marketing. Jordan highlighted weak enforcement mechanisms and the need for stronger penalties and digital monitoring tools. Several countries noted that although they have comprehensive TAPS bans in place, few contain provisions specific to digital platforms.

Participants also discussed examples of enforcement, including Saudi Arabia's coordinated censorship model, and raised concerns about inconsistent moderation by social media companies. WHO encouraged collective engagement with digital platforms. The session concluded with agreement on the need for explicit digital provisions, strengthened enforcement, improved multisectoral coordination and active engagement of civil society and youth.

Regulation of digital marketing of tobacco and nicotine products

Dr Benn McGrady presented on laws relevant to digital marketing. He emphasized the importance of comprehensive, media-neutral national tobacco control laws that cover all nicotine products and require

coordination among government authorities, including e-commerce and telecommunications regulators. He highlighted examples from Saudi Arabia and the United Arab Emirates.

Dr Elisabet Ruiz Cairó highlighted the need for laws that explicitly cover digital platforms, influencers and cross-border content, and which apply to all advertisements viewed within a country. She stressed regulating influencer disclosures, limiting product categories, addressing user-engagement techniques and banning online retail to prevent digital promotion. Dr Cairó also addressed enforcement challenges in digital environments, highlighting the complexity of targeted advertising, short-form content and high volumes of online material. She called for AI-supported monitoring, stronger transparency requirements for platforms and laws that extend liability to influencers, retailers and digital platforms, accompanied by timely and diverse sanctions. She stressed the importance of coordinated action to address cross-border advertising.

Dr Nandita Murukutla, Vice President for Behavioral Insights and Evaluation, Vital Strategies, presented on the role of civil society in monitoring digital marketing. She introduced Canary, an AI-based early warning tool designed to detect harmful marketing of tobacco, alcohol and sugary drinks in real time. Canary is in use or being piloted in several countries and has expanded to alcohol monitoring. She emphasized that while regulations exist, online enforcement remains weak, and combining AI-based detection with civil society advocacy is critical.

Country presentations on national experiences in developing responses to digital marketing

Oman reported long-standing advertising bans but acknowledged limited capacity in monitoring digital content due to technical and human resource constraints. The need for stronger interagency collaboration and increased resources was highlighted.

Pakistan noted that while its legislation covers most traditional forms of advertising, digital marketing is not explicitly addressed. Enforcement has included content removals and fines; however, challenges persist due to limited surveillance capacity and the rapid growth of electronic nicotine delivery systems (ENDS) and heated tobacco products. A road map was proposed, including conducting digital audits, updating legislation, using AI monitoring tools and strengthening regional collaboration.

Qatar highlighted its strong regulatory framework, including bans on the sale and import of ENDS and heated tobacco products, as well as cooperation with cybercrime authorities. Digital marketing is not explicitly covered under current laws, and legislative updates are planned to address this gap.

Saudi Arabia described its use of national censorship authorities to block illegal online advertising, integrating digital enforcement into its broader tobacco control strategy.

The United Arab Emirates presented its robust bans and enforcement system but noted continuing challenges with cross-border digital marketing and the need for regional alignment when engaging global platforms.

Discussion

The discussion addressed several themes. Participants expressed interest in demonstrations of AI-supported monitoring systems and the need for tools tailored to national capacities. It was noted that AI technologies complement, rather than replace, inspectors. Concerns were raised about enforcement focusing on smaller actors while manufacturers continue to avoid penalties. It was stressed that Article 13 of the WHO FCTC requires accountability across the entire

supply chain. Participants also highlighted the challenge of foreign influencers targeting domestic youth and emphasized the need for regional cooperation to exert pressure on digital platforms. WHO and civil society representatives underscored the need for public awareness campaigns targeting small businesses and influencers.

Closing session

The meeting concluded with an interactive exercise and final reflections. Countries identified gaps in their legislation and enforcement and proposed immediate actions using WHO's sample questionnaire and action plan template (see Annexes 1 and 2).

Dr Fatimah El-Awa, Regional Adviser, TFI, WHO Regional Office for the Eastern Mediterranean, closed the meeting by thanking Member States and partners for their engagement. She emphasized that digital marketing is the newest and most urgent frontier of tobacco industry interference, and called for collective action and practical use of the tools shared to ensure measurable progress.

3. Recommendations

To Member States

1. Using the forms and action plan template provided, develop a national action plan and implement country-level activities to restrict the digital marketing of tobacco and nicotine products.
2. Provide regular updates on the development and implementation of the action plan.
3. Coordinate across relevant sectors to establish a multisectoral approach to action on digital marketing.

To WHO

4. Follow-up on planned activities through organized meetings.
5. Continue providing technical support to countries to plan and implement national activities, as needed.

To the WHO FCTC Secretariat

6. Coordinate with Parties to address digital marketing and its threat to tobacco control and provide technical guidance through sessions of the Conference of the Parties.

Annex 1. Sample questionnaire**Overview of the legal framework for digital marketing**

1. Is digital marketing regulated in your country?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, please explain:	
	Applicable laws	Competent authorities
	Sector-specific laws:	
	Advertising laws,	
	Data protection laws:	
	Digital markets laws:	
	Audiovisual/broadcasting laws:	
	Other laws:	
2. What do these laws regulate?	Product-specific restrictions:	
	Prohibited or restricted marketing practices:	
	Disclosure obligations:	
	Regulation of targeted marketing and profiling techniques:	
	Data protection for marketing purposes:	
	Protection of vulnerable groups:	
	Other:	
3. Are there any coordination mechanisms across laws?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, please explain:	

4. Are there any tools available in your legislation to easily update rules on digital marketing?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, please explain:
5. How does your country monitor digital marketing practices?	Individual inspectors (please provide number of inspectors and responsible authority):
	Artificial intelligence (AI):
	Disclosure obligations:
	Other:
6. Who may be held liable for violations of (digital) marketing rules, and what sanctions may be imposed in case of violation?	Please explain:
7. Can measures be enforced even when the addressee is not in the jurisdiction?	<input type="checkbox"/> No <input type="checkbox"/> Yes
	Does your country have enforcement cooperation mechanisms with other countries?
	Does your legislation have a broad jurisdictional reach, allowing enforcement provisions abroad?
	In practice, how is cross-border enforcement undertaken?

Annex 2. Sample action plan template

National level plan of action for controlling/ending digital marketing of tobacco and nicotine products

Area	Activities	Timeline	Key partners
Research and monitoring	Establish systems to continuously monitor social media, websites and other digital platforms for tobacco and nicotine marketing activities.	6–12 months, then ongoing	Ministry of health Ministry of information
	Integrate digital marketing questions into ongoing surveys.	1–6 months ongoing	Academic institutions Ministry of education
	Document good practices.		Legal experts/law department Nongovernmental organizations
Governance/ multisectoral	Include in the multisectoral mechanism in the country all national level partners who can contribute to the ban and monitoring of digital marketing, including the ministry of information, civil society, etc.	3–6 months, then ongoing	Ministry of health Ministry of information Civil society Ministry of information and technology Inter-country collaboration

National level plan of action for controlling/ending digital marketing of tobacco and nicotine products

Area	Activities	Timeline	Key partners
Legislative/policy options	Develop guidelines on digital marketing regulation if there is a full/comprehensive ban on TAPS in the country.	1–2 years	Ministry of health
	In case of no full/comprehensive ban on TAPS in the country, identify a legal modality to bridge existing gaps.	2–4 months	Parliament
	Suggestions include:		Legislators
	1. Articulate a regulatory pathway for new and emerging nicotine and tobacco products.	4–6 months	Policy-makers
	2. Issue an appropriate legal instrument to ban or restrict all forms of digital marketing for tobacco and nicotine products.	1–2 years	Legal experts
	3. Send official letters to all digital platforms to remove existing tobacco and nicotine advertisements.	6–12 months	
	4. How to tackle advertisements for jurisdictions that have no regulation for new and emerging nicotine and tobacco products.		
	5. Incorporate guidelines/regulations for influencers, content creators and celebrities to ban all tobacco and nicotine advertising and disclose any commercial content they may publish.		
Advocacy and awareness	Collaborate with relevant national authorities, influencers and public figures to promote anti-tobacco messages and advocate for a tobacco-free lifestyle.	6–12 months, then ongoing	Ministry of health
	Develop an awareness package that can be used by all sectors and key partners tailored to the country.	6–12 months, then ongoing	Ministry of information
			Advocacy groups

National level plan of action for controlling/ending digital marketing of tobacco and nicotine products

Area	Activities	Timeline	Key partners
	Run national/regional level social media campaigns to raise awareness about digital marketing tactics, how it increases tobacco advertising and promotion, and its damaging impact on the next generation.	1–2 years, then ongoing	Nongovernmental organizations Journalists
	Raise awareness about the impacts of tobacco marketing to promote anti-tobacco messages.		Influencers/celebrities/influential figures
	Integrate digital literacy and anti-tobacco education into school curricula.		Social media platforms Educational institutions
Enforcement	If legislation has been adapted and monitoring has been conducted, relevant authorities need to enforce the law and impose available sanctions.	Ongoing	
General observations			



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